

October 15, 2008

SENT VIA E-MAIL

Traci Michel, CEQA Project Manager for the California Prison Receivership
URS / Bovis Lend Lease Joint Venture
2400 Del Paso Road, Suite 255
Sacramento, CA 95834

Subject: Notice of Preparation for a Draft Environmental Impact Report (EIR) for the California Health Care Facility, Folsom (SMAQMD #200801293)

Dear Ms. Michel:

Thank you for the opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review and comment on the California Health Care Facility, Folsom. Staff comments are as follows.

Construction-Related Impacts

A project of this size will likely generate construction-related air quality impacts that exceed adopted thresholds of significance for CEQA review. An air quality analysis should be done on the project to verify the significance of its construction-related air quality impacts. We recommend using the most current version of URBEMIS 2007, version 9.2.4, available at www.urbemis.com. If its impacts are found to be significant, we recommend that our standard construction mitigation measures be applied to the project. These measures include both on-site strategies and a possible off-site mitigation fee. They can be found on our website, www.airquality.org.

Operational Impacts

A project of this size will also likely generate operational air quality impacts that exceed adopted thresholds of significance for CEQA review. If the project is found to be operationally significant, we recommend that the project proponent work with SMAQMD staff to develop an Air Quality Mitigation Plan (AQMP) for this project to be included in the draft EIR. Early consideration of operational mitigation will allow mitigation, related to design elements in particular, to be developed before design plans are finalized. Optimally, we recommend that SMAQMD endorsement of the AQMP be required before circulation of the draft EIR. At a minimum, we recommend that SMAQMD endorsement of the AQMP be required no later than issuance of grading permits.

According to the Notice of Preparation, the proposed facility would employ approximately 1,600 new staff. Moreover, the proposed facility would not be located in proximity to established transit and other alternative modes infrastructure. Because of these factors, the proposed project has the potential to generate significant motor vehicle commute traffic, emissions and associated air quality impacts. Suggested mitigations for these impacts include Transportation Demand Management (TDM) provisions including alternative work schedules, bicycle facilities, ridesharing incentives, commuter shuttles, telecommuting and membership in a Transportation Management Association (TMA).

Also, according to the Notice of Preparation, the proposed project would include energy design standards to meet Leadership in Energy and Environmental Design (LEED) Silver. This rating would help substantially reduce the project's operational air quality impacts.

Greenhouse Gas and Climate Change Impacts

We recommend that the draft EIR include a discussion of climate change. The California Global Warming Solutions Act of 2006 requires the State to reduce its carbon emissions by approximately 25% by the year 2020. Currently there are no adopted thresholds of significance for project-related greenhouse gasses. However, the California Air Pollution Control Officers Association (CAPCOA) has issued a resource guide to addressing greenhouse gas emissions from projects subject to CEQA. This guide, *CAPCOA CEQA & Climate Change*, available at www.CAPCOA.org, provides guidance on the analysis and mitigation of greenhouse gas emissions for commercial and other projects. We recommend that the draft EIR follow this guidance.

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD rules which may apply to this project. Information regarding SMAQMD rules can be obtained at www.airquality.org or by calling the Compliance Assistance Hotline at 916-874-4883.

If you have any questions on this matter, please contact me at 916-874-4886 or mwright@airquality.org.

Sincerely,

Molly Wright
Associate Air Quality Planner / Analyst

C: Larry Robinson, Program Coordinator, SMAQMD

Enclosure

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

Rule 417: Wood Burning Appliances. Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.