

October 17, 2008

SENT VIA E-MAIL

Donald J. Lockhart  
Assistant Executive Officer  
Sacramento Local Agency Formation Commission  
1112 I Street, Suite 100  
Sacramento, CA 95814

**Subject: Early Consultation Request for the Proposed Sphere of Influence Amendments – Camino Norte (SMAQMD #SAC200801295)**

Dear Mr. Lockhart:

Thank you for the opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to comment on the proposed sphere of influence amendments to the Camino Norte area. Staff comments are as follows.

The proposed project is not inconsistent with land use plans applying to the area. The project does not conflict with SMAQMD's State Implementation Plan (SIP), because it does not conflict with the Blueprint Preferred Scenario, the baseline assumption of the SIP. Because it is not a development project, it does not include development that conflicts with applicable land use plans. However, because it provides for urban services in an area that does not currently have them, it prepares the area for inevitable urbanization.

Any environmental document for the proposed project must fully address the air quality impacts of urbanization on the subject properties. The intent of the California Environmental Quality Act (CEQA) is to identify all of a project's significant effects on the environment. The urbanization of the subject properties, 403 acres of land, would be a significant effect on the environment. Any environmental document for the project must fully address this urbanization to adequately support the intent of CEQA. Following are recommended areas of study for an environmental document, which would help inform SMAQMD for future comments and actions related to the proposed project.

#### **Operational and Construction-Related Impacts**

Urbanization of an area of this size will likely generate operational and construction-related air quality impacts that exceed adopted thresholds of significance for CEQA review. As specifics of development for this area become available, they should be subject to an air quality analysis to determine potential operational and construction-related impacts. To determine operational and construction-related impacts, we recommend using the most current version of URBEMIS available at the time of the analysis (see [www.urbemis.com](http://www.urbemis.com).) If projects are found to be operationally significant, we recommend that project proponents work with Air District staff to develop an Air Quality Mitigation Plan (AQMP) to be included in the environmental document. If construction-related impacts are determined significant, we recommend that our standard construction mitigation measures be applied.

**Greenhouse Gas and Climate Change Impacts**

We recommend that any environmental document for the project and subsequent related development 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, both the California Air Pollution Control Officers Association (CAPCOA) and the California Governor's Office of Planning and Research (OPR) have issued resource guides to addressing project greenhouse gas emissions through CEQA review.

The CAPCOA guide, *CAPCOA CEQA & Climate Change*, is available at [www.CAPCOA.org](http://www.CAPCOA.org). The OPR guide, *CEQA & Climate Change: Addressing Climate Change through CEQA Review*, is available at [opr.ca.gov](http://opr.ca.gov). These documents provide guidance on the analysis and mitigation of greenhouse gas emissions for commercial and other projects through CEQA review. We recommend that any environmental document for the project and subsequent related development follow this guidance.

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of implementation. Information regarding SMAQMD rules can be obtained at [www.airquality.org](http://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](mailto:mwright@airquality.org).

Sincerely,



Molly Wright  
Associate Air Quality Planner / Analyst

C: Larry Robinson, Program Coordinator, SMAQMD