

November 2, 2007

Mr. Scott Johnson  
Environmental Planning Services  
City of Sacramento  
2101 Arena Blvd, Suite 200  
Sacramento, CA 95834

**RE: DEIR for COMMERCE STATION, P06-018  
SAC200500780C**

Dear Mr. Johnson:

Thank you for providing the project listed above to the Sacramento Metropolitan Air Quality Management District (District). Thank you, too, for allowing one extra day for review. Staff comments follow.

**Site design**

Commerce Station, a proposed mixed-use project in North Natomas, is bounded by East Commerce Way on the east side and Interstate-5 on the west. According to DEIR Figure 4.2-1<sup>1</sup>, there is at least one and perhaps two Regional Transit Light Rail stations planned for the span of East Commerce Way adjacent to the project, one at Club Center Drive and the other at North Park Drive. We recommend that the Commerce Station land uses adjacent to the Light Rail station(s) contain uses and a configuration that support transit. Buildings, rather than parking, should be located nearest to the future light rail stations. Sufficient density is essential; building entrances should be positioned to face the transit stations; and parking should be minimized.

From the site plans included with the DEIR, it's difficult to discern what is planned for these two areas adjacent to future transit stops although it appears to be office, support retail and parking. We understand that these areas may undergo future planning efforts and Planning Director design review. We highly recommend that RT and the District be consulted as those land uses undergo further planning. The District encourages the proponent and the City to maximize the potential to support transit with the project's design. The ability of RT to actually build the Downtown-Natomas-Airport line will depend in large part on the creation of transit-oriented developments along the line.

In addition, the current design does not support convenient internal connectivity in a north-south direction. In order to support bicycle and pedestrian trips, it's essential that more internal connections be established.

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<sup>1</sup> DEIR Commerce Station, pg. 4.2-2

## Construction schedule and air quality construction-related mitigation

The DEIR states that this 180.5 acre project which consists of 3,267,068 sq ft will be phased over 13 years<sup>2</sup>. Segment 1 and 2 of Phase 1 of the project will consist of the construction of four office/retail/residential buildings (168,785 sq ft) which will take over 3 years. In the following 10 years, the rest of Phase 1 and all of Phase 2 are to be constructed. The assumptions used in the analysis of construction-related impacts include the 13 year construction schedule supplied by the proponent and an attempt to use the District's recommended construction fleet mix. Unfortunately, less equipment was used in the modeling than is recommended.<sup>3</sup>

The results of the analysis indicate the project exceeds the District's construction-related threshold of significance (85 lbs/day NO<sub>x</sub>) in 2010-2015. DEIR Table 4.4-5 lists the estimated ROG and NO<sub>x</sub> for the construction of the entire project. Those exceedences are projected to be so slight that they can be mitigated down to the District's threshold with the application of on-site mitigation which involves the use of cleaner construction equipment. Because of the modeling, the document finds that "short term construction-generated emissions of ozone-precursor pollutants would be considered **potentially significant**."<sup>4</sup>

The District has two issues with the document's construction-related analysis and significance determination. First, the equipment fleet is underestimated and secondly, the analysis relies on a lengthy, custom construction schedule for which there are no guarantees. SMAQMD planners have rerun the project's URBEMIS models, using the same schedule, but correcting the fleet mix and find the project exceeds the District's thresholds in a way that cannot be mitigated with on-site mitigation alone. The attached table shows District generated results. The document's URBEMIS models should be rerun and an off-site construction mitigation fee should be required. The amount of the fee should be included in the FEIR. Text, tables and the off-site fee calculation spreadsheet referencing URBEMIS results should be revised accordingly. Finally, the significance determination should be revisited.

The second concern has to do with the custom 13 year schedule which is considerably longer than the URBEMIS default schedule. Ordinarily, using an URBEMIS default schedule, a project of this size would exceed the threshold of significance during grading and building construction by a considerable margin. However, construction impacts are highly sensitive to the construction timeline. In this case, the 13 year, phased timeline serves to spread the impacts over a longer duration, which minimizes daily emissions. Although a longer-than-usual construction timeline can help to mitigate emissions, if market conditions result in a desire to construct the project in a more typical shorter timeline, the project could result in significant impacts that are not disclosed in the DEIR. To protect against this possibility, the District recommends an additional mitigation measure and a condition of approval to take into account that emissions were

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<sup>2</sup> DEIR Commerce Station, pg. 4.4-16

<sup>3</sup> "FAQ" to SMAQMD Guide to Air Quality Assessment, July 2004, District website. Table 3.1 states 3 "other" pieces of equipment are recommended for every 10 acres "actively graded." The DEIR URBEMIS models used 2 pieces of equipment for every 10 acres "actively graded."

<sup>4</sup> DEIR Commerce Station, pg 4.4-18

underestimated and to provide a reasonable degree of certainty that actual construction impacts do not exceed those identified in the EIR:

**4.4-1(d)**

*The applicant will mitigate the unmitigated construction-generated emissions of NOx that exceed the SMAQMD threshold ( currently 85 lbs/day) through payment of an off-site mitigation fee. The fee will be based upon the then applicable current SMAQMD fee (currently \$14,300/ton NOx reduced) as well as the then current administrative fee (currently 5% of mitigation fee). That fee will be paid prior to issuance of a grading or improvement permit, whichever comes first. That fee will be **\$ XYZ**.<sup>5</sup>*

*The applicant shall construct the Commerce Station project consistent with the time line presented in the DEIR. The following construction intensity limits will apply. From the issuance of the first grading permit until three years later, construction will be limited to no more than 168,785 sq ft of mixed-use office uses. From the beginning of the 4<sup>th</sup> year of construction until 5 years later, building will be limited to the following: 124 condos, 18,000 sq ft restaurants, 7,000 sq ft fast food restaurants, 1,354,200 sq ft office and 1,611,000 sq ft of office. From the ninth year of construction until another 5 years later, building will be limited to the following: 1,354,200 sq ft office and 1,611,000 sq ft of office. The applicant will notify the SMAQMD if at any time the construction phasing exceeds the schedule above. The project applicant shall estimate construction activities and corresponding emissions for the new schedule. The applicant will mitigate any construction-generated emissions of NOx that exceed SMAQMD threshold ( currently 85 lbs/day) through on-site mitigation or payment of mitigation fees. The fees will be based upon the then applicable current SMAQMD fee (currently \$14,300/ton NOx reduced) as well as the then current administrative fee (currently 5% of mitigation fee). That fee will be paid prior to issuance of a grading or improvement permit, whichever comes first.*

DEIR mitigation measures 4.4-1(d) to 4.4-1(e) which concern PM<sub>10</sub> mitigation should be renumbered to read 4.4-1(e) and 4.4-1(f) in order to accommodate the new NOx measure above.

The District also recommends a project **condition of approval** be required which limits construction to the schedule presented in the DEIR.

*The applicant shall construct the Commerce Station project consistent with the time line presented in the DEIR. The following construction intensity limits will apply. From the issuance of the first grading permit until three years later, construction will be limited to no more than 168,785 sq ft of mixed-use office uses. From the beginning of the 4<sup>th</sup> year of construction until 5 years later, building will be limited to the following: 124 condos, 18,000 sq ft restaurants, 7,000 sq ft fast food restaurants, 1,354,200 sq ft office and 1,611,000 sq ft of*

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<sup>5</sup> See "Construction Emissions Mitigation Fee Calculation," Appendix E, Commerce Station DEIR. Fee to be recalculated using corrected URBEMIS results.

*office. From the ninth year of construction until another 5 years later, building will be limited to the following: 1,354,200 sq ft office and 1,611,000 sq ft of office. The applicant will notify the SMAQMD if at any time the construction phasing exceeds the schedule above.*

#### **Air Quality Mitigation Plan for significant air quality emissions**

The project is significant for operational emissions at project build out. Using the 13 year timetable, the analyst found that operational emissions were not significant in the early phase, but became significant by later years. The mitigation measure for this impact reads:

##### **4.4-2**

*Prior to issuance of grading permits, the project applicant will coordinate with the SMAQMD and the City of Sacramento to develop a project Air Quality Mitigation Plan (AQMP). In accordance with SMAQMD recommendations, the AQMP shall achieve a minimum overall reduction of 15 percent in the project's anticipated operational emissions. SMAQMD-recommended measures and corresponding emissions-reduction benefits are identified in SMAQMD's Guidance for Land Use Emissions Reductions, which has been included in Appendix B of DEIR Appendix D, Air Quality Impact Assessment. The AQMP shall be reviewed and endorsed by SMAQMD staff prior to project implementation. Available measures to be included in the AQMP include, but are not limited to, the following....<sup>6</sup>*

Air Quality Mitigation Plans are most effective as mitigation when they can influence project design to become more pedestrian, bicycle and transit friendly. Because those effective measures deal with design issues, the earlier the proponent works with the District, the better. We prefer to see a draft Air Quality Mitigation Plan included in the DEIR so that reviewers can get a sense of the mitigation being offered for the significant operational emissions. The District suggests the following changes to the mitigation measure above to expedite this process:

##### **4.4-2**

*Prior to the issuance of the project's first grading permit, the project applicant will receive written endorsement from the SMAQMD for an Air Quality Mitigation Plan (AQMP). In accordance with SMAQMD recommendations, the AQMP shall achieve a minimum overall reduction of 15 percent in the project's anticipated operational NOx and ROG emissions. SMAQMD-recommended measures and corresponding emissions-reduction benefits are identified in SMAQMD's Guidance for Land Use Emissions Reductions, which has been included in Appendix B of DEIR Appendix D, Air Quality Impact Assessment. Under no circumstances will a grading permit be issued without the SMAQMD written endorsement of the AQMP. Available measures to be included in the AQMP include, but are not limited to, the following....<sup>7</sup>*

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<sup>6</sup> DEIR Commerce Station, pg 4.4-24

<sup>7</sup> DEIR Commerce Station, pg 4.4-24

## **Greenhouse Gas Emissions & Climate Change**

The DEIR discusses Greenhouse Gas (GHG) Emissions & Climate Change in a 3 page section<sup>8</sup> in the Air Quality Chapter. The section basically states that the nature of global warming “*makes it impossible to identify...the incremental effect...of other current projects* [on global warming, aka Greenhouse Gas emissions].” It also states “*the City is unable to determine the effectiveness of potential mitigation measures*” and so none are specified. The discussion goes on to list several City-wide programs that the City believes address the issue of global warming and the section ends by mentioning that project characteristics like mixed-use design and locating residential uses near transit would reduce green house gases. This discussion is inadequate. In addition, the statement about residential uses near transit appears to be in error as the project site map does not show any residential uses near the proposed light rail station.

The subject of project-specific greenhouse gas emissions and appropriate mitigation has evolved since the publication of the Commerce Station DEIR. On September 6, 2007, the District sent recommended guidance (attached) on how to address global warming in CEQA documents to all municipalities within the County of Sacramento, including the City. Among other things, the guidance encourages lead agencies to analyze project-specific GHG impacts and to adopt mitigation measures. That guidance also includes a six page list of possible mitigation measures as compiled by the California Attorney General’s office.

We recommend that this section of the DEIR be revised to contain an analysis of project-level greenhouse gas emissions as well as a commitment to mitigation which can reduce the project’s contribution to those emissions. As the SMAQMD guidance states, “avoiding feasible mitigation today will require other projects to implement more difficult and costly mitigation in the future as GHG levels increase in the atmosphere.”<sup>9</sup>

## **Mobile Source Toxic Air Contaminants**

The project is located adjacent to Interstate 5 which is a source of toxic air contaminants. The DEIR analyzed this impact to the proposed nearby (389 ft.) residential uses through the use of the District’s Recommended Protocol and found that the “*increase in inhalation cancer risks at the nearest proposed onsite residential land use would be approximately 168 [additional cancer cases] in a million or less.*”<sup>10</sup> At this level, the District does not currently recommend further analysis of the impact such as the completion of a project-specific Health Risk Assessment.

We agree with the analysis of toxic air contaminants in the DEIR. However, there still will be some impacts to the residences from toxic air contaminants and the District suggests the proponent consider design features that can help to reduce exposure to toxic air contaminants. For example, the residences could be situated as far from the freeway as possible, windows facing the freeway could be stationary, and finely-needled trees could be planted between the residential area and the freeway.

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<sup>8</sup> DEIR Commerce Station, pg 4.4-8 to 4.4-11

<sup>9</sup> “Addressing Climate Change in CEQA Documents,” SMAQMD, Sept 6, 2007, pg. 2

<sup>10</sup> DEIR, Commerce Station, Appendix E, Air Quality Impact Assessment for Sacramento Commerce Station, Ambient Consulting, pg. 12

If you have questions, please contact me at 874-4885 or [jborkenhagen@airquality.org](mailto:jborkenhagen@airquality.org).

Sincerely,



Jeane Borkenhagen

Associate Air Quality Planner Analyst

CC: Larry Robinson                      SMAQMD  
Don Smith                                Regional Transit  
Greg Thatch                              Law Offices of Greg Thatch

Enc: SMAQMD, Addressing Climate Change in CEQA Documents, September 6, 2007  
SMAQMD table of URBEMIS results for Commerce Station using SMAQMD default construction equipment and a custom 13 year schedule.

September 6, 2007

Subject: **Addressing Climate Change in CEQA Documents**

To whom it may concern:

Global warming is one of the most significant environmental issues facing the business and environmental community today. We now have sufficient knowledge of both the role of greenhouse gases (GHG) and the availability of mitigation measures to properly analyze the potential global warming impacts of projects under the California Environmental Quality Act (CEQA). The purpose of this letter is to provide interim recommendations for local agencies to use in analyzing and mitigating global warming impacts pending development of guidelines by the Office of Planning and Research as directed by SB 97.

The major anthropogenic (man-made) GHGs are carbon dioxide, methane, and nitrous oxide, and the primary sources of these emissions are vehicles (including trains and planes), energy plants, and industrial and agricultural activities. Consequently, GHG emissions may be increased through the approval of a wide variety of projects, including residential, commercial, and mixed-use developments, transportation system expansions, and other construction and development activities. Applying energy efficient building components, design, and siting practices to these projects can reduce these impacts. Since current emissions are already significantly effecting global warming, it is critical that these new projects, and others like them, be analyzed to determine whether they will worsen the warming process and whether there are mitigation measures available to reduce any impacts identified.

To date, local decision-making agencies, the District, the state, and the federal government have not developed specific GHG thresholds of significance for use in preparing environmental analyses under the California Environmental Quality Act (CEQA). The absence of thresholds, however, does not negate the CEQA mandate to analyze all potentially significant impacts, including emissions of greenhouse gases.

Agencies have the discretion to determine, based on a variety of factors, whether a particular impact is significant.<sup>1</sup> To insure consistency and fairness, the CEQA Guidelines encourage agencies to adopt significance thresholds.<sup>2</sup> Neither the Act nor the Guidelines, however, require the adoption of thresholds as a prerequisite to analyzing impacts. To the contrary, significance criteria are commonly developed by the experts that prepare the CEQA analysis, based on their assessment of the technical evidence.<sup>3</sup> In fact, CEQA may require additional analysis even if a project meets an adopted standard, if other evidence indicates the project may nonetheless have a significant impact.<sup>4</sup>

<sup>1</sup> *National Parks & Conservation v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1356-1357 (agency may apply different thresholds depending on the nature of the area affected).

<sup>2</sup> 14 CCR 15064.7

<sup>3</sup> 1 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act (Cont. Ed. Bar 2006) § 31.2, p. 621, citing *Napa Citizens for Honest Govt. v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 362 (significance standard for traffic developed by EIR drafters).


<sup>4</sup> *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380-1382 (project that meet FCC noise standards could still have a significant effect if it caused a substantial increase in the ambient noise levels for adjoining areas); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App. 4th 1099, 1109-1111 (project meeting hydrology significance thresholds could still have a potentially significant impact because thresholds did not address all hydrology and water impacts of the project); *Mejia v. City of Los Angeles*

Consequently, despite the lack of a GHG threshold, the District recommends that CEQA environmental documents include a discussion of anticipated GHG emissions during both the construction and operation phases of the project. This recommendation is consistent with comments made by the previous and current California Attorney Generals on Land Use projects undergoing CEQA review. Models are already available to estimate GHG emissions from projects, and the District staff can help agencies select and refine models to accommodate their specific projects.

Analysis of the impacts is not simply a technical exercise. If the analysis demonstrates that a project may have a significant impact, there are many practical climate change mitigation measures available to reduce or eliminate the project impacts. And avoiding feasible mitigation today will require other projects to implement more difficult and costly mitigation in the future as GHG levels increase in the atmosphere. Moreover, many projects include elements that mitigate GHG emissions (energy measures, solar roofs, mixed use housing, etc) and the benefits of these measures should be noted.

The District is available to help agencies in their analysis of GHG emissions. In addition, to aid local jurisdictions in identifying feasible mitigation, the District has attached a list of feasible mitigation measures drawn from comments made by the California Attorney General that will reduce GHG emissions by reducing the stationary and travel related energy use associated with the new development.<sup>5</sup> A copy of this list is attached to this letter. We have also attached a summary of recent agency and court decisions related to this topic. If you have any question regarding CEQA and climate change, please do not hesitate to contact Larry Robinson at <lrobinson@airquality.org>.

Sincerely,



Larry Greene  
Air Pollution Control Officer

Enclosures

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(2005 130 Cal.App.4th 322, 342 (agencies can not apply standards or thresholds "in a way that forecloses the consideration of any other substantial evidence showing that there may be a significant effect)).

<sup>5</sup> California Attorney General. "Comments on Draft Environmental Impact Report for Coyote Valley Specific Plan." Letter to the City of San Jose. 19 Jun. 2007.

**Summary of current actions by other agencies and the courts related to Global Warming and Climate Change.**

The issue of climate change has gained a great deal of attention recently. Some of the pertinent developments include:

\* On September 27, 2006, the State of California adopted AB32, the Global Warming Solutions Act of 2006, which requires the State to reduce its carbon emissions by approximately 25% by the year 2020.

\* California Attorney General Bill Lockyer raised the issue of climate change in his comment letter (3/20/06) on the Orange County Transportation Authority's 2006 Long-Range Transportation Plan Draft Program EIR. This precedent-setting letter pointed out that GHG emissions, and their related global warming impacts, are one of the most important environmental impacts associated with vehicle emissions.

\* In April 2007, Attorney General Edmund G. Brown sued San Bernardino County for failing to account for the impacts of climate change in the county's recently adopted General Plan. On August 21, 2007, this lawsuit was settled with the adoption of an amendment to San Bernardino County General Plan. This amendment includes a Greenhouse Gas Emissions Reduction Plan that requires the county to establish current and future Green House gas emission baselines and set a target for the reduction of emissions attributable to the county's discretionary land use decisions and its own internal government operations.

\* On April 2, 2007 in the case of *Massachusetts v. EPA*, the Supreme Court ruled that the state of Massachusetts and its co-plaintiff's (which included the state of California) had legal standing to sue the Environmental Protection Agency (EPA) for its failure to regulate the emission of GHG by new automobiles. In this same decision, the court rejected the EPA's claim that it lacked authority to regulate CO<sub>2</sub> under the Clean Air Act.

## Mitigation Measures and Global Warming Resources

### **(1) Global Warming Mitigation Measures**

The following are some examples of the types mitigation that local agencies may consider under the California Environmental Quality Act (CEQA) to offset or reduce global warming impacts. The list, which is by no means exhaustive or obligatory, includes measures and policies that could be undertaken directly by the local agency, incorporated into the agency's own "Climate Action Plan," or funded by "fair share" mitigation fees; measures that could be incorporated as a condition of approval of an individual project; and measures that may be outside the jurisdiction of the local agency to impose or require but still appropriate for consideration in an agency's environmental document.

While the lead agency must determine which particular mitigation measures, or suite of measures, is appropriate and feasible for a particular project, proponents of individual private projects are encouraged to take an active role in developing and presenting to lead agencies new and innovative ways to address the impacts of global warming.

#### **Transportation**

- Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where signals are installed, require the use of Light Emitting Diode (LED) traffic lights.<sup>1</sup>
- Set specific limits on idling time for commercial vehicles, including delivery and construction vehicles.
- Require construction vehicles to use retrofit emission control devices, such as diesel oxidation catalysts and diesel particulate filters verified by the California Air Resources Board (CARB).<sup>2</sup>
- Promote ride sharing programs *e.g.*, by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.
- Create car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.<sup>3</sup>
- Require clean alternative fuels and electric vehicles.
- Develop the necessary infrastructure to encourage the use of alternative fuel vehicles (*e.g.*, electric vehicle charging facilities and conveniently located alternative fueling stations).<sup>4</sup>
- Increase the cost of driving and parking private vehicles by imposing tolls, parking fees, and residential parking permit limits.

- Develop transportation policies that give funding preference to public transit.<sup>5</sup>
- Design a regional transportation center where public transportation of various modes intersects.
- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations.
- Assess transportation impact fees on new development in order to facilitate and increase public transit service.<sup>6</sup>
- Provide shuttle service to public transit.
- Offer public transit incentives.
- Incorporate bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments.
- Create bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking.<sup>7</sup>
- Require commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.
- Provide public education and publicity about public transportation services.<sup>8</sup>

#### **Energy Efficiency and Renewable Energy**

- Require energy efficient design for buildings.<sup>9</sup> This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.
- Adopt a "Green Building Program" to promote green building standards.<sup>10</sup>
- Fund and schedule energy efficiency "tune-ups" of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)
- Provide individualized energy management services for large energy users.
- Require the use of energy efficient appliances and office equipment.<sup>11</sup>
- Fund incentives and technical assistance for lighting efficiency.<sup>12</sup>
- Require that projects use efficient lighting. (Fluorescent lighting uses approximately 75% less energy than incandescent lighting to deliver the same amount of light.)
- Require measures that reduce the amount of water sent to the sewer system. (Reduction in water volume sent to the sewer system means less water has to be treated and pumped to the end user, thereby saving energy.)<sup>13</sup>
- Incorporate on-site renewable energy production (through, *e.g.*, participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.<sup>14</sup>

- Streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.
- Fund incentives to encourage the use of energy efficient equipment and vehicles.<sup>15</sup>
- Provide public education and publicity about energy efficiency programs and incentives.

### **Land Use Measures**

- Encourage mixed-use and high-density development to reduce vehicle trips, promote alternatives to vehicle travel and promote efficient delivery of services and goods. (A city or county could promote “smart” development by reducing developer fees or granting property tax credits for qualifying projects.<sup>16</sup>)
- Discourage “leapfrog” development. Enact ordinances and programs to limit sprawl.<sup>17</sup>
- Incorporate public transit into project design.<sup>18</sup>
- Require measures that take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Preserve and create open space and parks. Preserve existing trees and require the planting of replacement trees for those removed in construction.
- Impose measures to address the “urban heat island” effect by, *e.g.*, requiring light-colored and reflective roofing materials and paint; light-colored roads and parking lots; shade trees in parking lots; and shade trees on the south and west sides of new or renovated buildings.<sup>19</sup>
- Facilitate “brownfield” development. (Brownfields are more likely to be located near existing public transportation and jobs.)
- Require pedestrian-only streets and plazas within developments, and destinations that may be reached conveniently by public transportation, walking, or bicycling.<sup>20</sup>

### **Solid Waste Measures**

- Require projects to reuse and recycle construction and demolition waste.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses.
- Increase areas served by recycling programs
- Extend the types of recycling services offered (*e.g.*, to include food and green waste recycling).
- Establish methane recovery in local landfills and wastewater treatment plants to generate electricity.<sup>21</sup>
- Provide public education and publicity about recycling services.

## (2) General Resources

The following web sites and organizations provide general information about mitigating global warming impacts at the local level. These sites represent only a small fraction of the available resources. Local agencies are encouraged to conduct their own research in order to obtain the most current and relevant materials.

- The U.S. Conference of Mayors' Climate Action Handbook contains valuable information for the many local agencies that are joining the fight against global warming. The Handbook is available at the City of Seattle's Climate Action Plan website: <http://www.cityofseattle.net/climate/docs/ClimateActionHandbook.pdf>.
- Local Governments for Sustainability, a program of International Cities for Local Environmental Initiatives (ICLEI), has initiated a campaign called Cities for Climate Protection (CCP). The membership program is designed to empower local governments worldwide to take action on climate change. Many California cities have joined ICLEI. More information is available at the organization's website: <http://www.iclei.org/>.

## (3) Notes

1. For a discussion of the use of LED traffic lights, see the City of Berkeley's Resource Conservation and Global Warming Abatement Plan at <http://www.baaqmd.gov/pln/GlobalWarming/BerkeleyClimateActionPlan.pdf>.
2. See [www.arb.ca.gov/diesel/verdev/verdev.htm](http://www.arb.ca.gov/diesel/verdev/verdev.htm) and [www.epa.gov/ispd/pdf/emission\\_0307.pdf](http://www.epa.gov/ispd/pdf/emission_0307.pdf).
3. There are a number of car sharing programs operating in California, including City CarShare <http://www.citycarshare.org/>, Zip Car <http://www.zipcar.com/> and Flexcar <http://www.flexcar.com/>.
4. See the City of Santa Monica's Green Building Program at <http://www.greenbuildings.santa-monica.org/transportation/parkingcharging.html>.
5. San Francisco's "Transit First" Policy is listed in its Climate Action Plan, available at <http://www.sfenvironment.com/aboutus/energy/cap.htm>.
6. San Francisco assesses a Downtown Transportation Impact Fee on new office construction and commercial office space renovation within a designated district. The fee is discussed in the City's Climate Action plan. See Note 5.
7. See Marin County's Safe Routes to Schools program at <http://www.saferoutestoschools.org/>.

8. The U.S. Conference of Mayors' Climate Action Handbook, cited above, lists education and outreach as key components to taking action against global warming.
9. Leadership in Energy and Environmental Design (LEED) administers a Green Building Ratings program that provides benchmarks for the design, construction, and operation of high-performance green buildings. More information about the LEED ratings system is available at <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19>.
10. The City of Santa Monica has instituted a Green Building Program. See <http://www.greenbuildings.santa-monica.org/>.
11. Energy Star is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy that certifies energy efficient products and provides guidelines for energy efficient practices for homes and businesses. More information about Energy Star certified products is available at <http://www.energystar.gov/>.
12. As described in its Climate Action Plan, the City of San Francisco uses a combination of incentives and technical assistance to reduce lighting energy use in small businesses such as grocery stores, small retail outlets, and restaurants. The program offers free energy audits and coordinated lighting retrofit installation. In addition, the City offers residents the opportunity to turn in their incandescent lamps for coupons to buy fluorescent units. See Note 5.
13. The City of Berkeley's Resource Conservation and Global Warming Abatement Plan includes information about strategies for promoting the use of low flush toilets and shower heads. See Note 1.
14. At the direction of Governor Schwarzenegger, the California Public Utilities Commission (CPUC) approved the California Solar Initiative on January 12, 2006. The initiative creates a \$3.3 billion, ten-year program to install solar panels on one million roofs in the State. See <http://www.gosolarcalifornia.ca.gov/nshp/index.html>.
15. In March 2007, the League of California Cities (LOCC) Climate Change Working Group drafted proposed Climate Change Policies and Guiding Principles for the League. The draft principles (March 30, 2007) can be found on the LOCC website at [http://www.cacities.org/resource\\_files/25656.EQ%20high3-07%20REVISED.pdf](http://www.cacities.org/resource_files/25656.EQ%20high3-07%20REVISED.pdf)
16. The City of Berkeley has endorsed this strategy in its Resource Conservation and Global Warming Abatement Plan. See Note 1.
17. Samples of local legislation to reduce sprawl are set forth in the U.S. Conference of Mayors' Climate Action Handbook, cited above.

18. The U.S. Conference of Mayors cites Sacramento's Transit Village Redevelopment as a model of transit-oriented development. More information about this project is available at <http://www.cityofsacramento.org/planning/projects/65th-street-village/>.
19. See Lawrence Berkeley National Laboratory's "Cool Roofing Materials Database" prepared by the Laboratory's Heat Island Project at <http://eetd.lbl.gov/coolroof/> and U.S. EPA's Heat Island site at [www.epa.gov/heatisland/](http://www.epa.gov/heatisland/).
20. Palo Alto's Green Ribbon Task Force Report on Climate Protection recommends pedestrian streets under its proposed actions. See <http://www.city.palo-alto.ca.us/greenribbon/index.html>.
21. San Diego's Metropolitan Wastewater Department installed eight "digesters" at one of its wastewater treatment plants. Digesters use heat and bacteria to break down the organic solids removed from the wastewater to create methane. See <http://www.sandiego.gov/mwwd/facilities/ptloma.shtml>.

Commerce Station  
SMAQMD

Year/ phase	Const dates	DEIR URBEMIS NOx results	SMAQMD URBEMIS NOx results
2007 Special Permit	9/2007= 4 mos	13.64	13.64
2008	12 mos	9.59	14.26
2009	12 mos	9.08	13.51
2010	8 mos (~ 9/15)	12.81	17.00
2010 Phase 2	9/2010= 4 mos	93.37	93.37
2011	12	93.37	95.19
2012	12	64.11	95.19
2013	12	64.11	95.19
2014	12	64.11	95.19
2015	8/2015 =8. mos	93.65	124.73 *
2015 Phase 3	9/2015= 4 mos	81.15	81.15
2016	12	81.15	82.19
2017	12	55.17	82.19
2018	12	55.17	82.19
2019	12	55.17	82.19
2020	8/2020=4 mos	80.87	107.89*

\* still exceeds District's threshold even after on-site mitigation