

October 28, 2008

Shelly Amrhein  
City of Sacramento  
Development Services Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**RE: Delta Shores Draft Environmental Impact Report (DEIR); P06-197  
SMAQMD#: 200600974**

Thank you for the opportunity for the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review and comment on the Delta Shores DEIR. Staff comments are as follows:

**Greenhouse Gas (GHG) Emissions**

1. A significance determination is an important step in the evaluation of GHG emissions. Other projects in the Sacramento County area, both larger and smaller than Delta Shores, have made GHG significance findings and have also chosen to apply mitigation measures to help reduce GHG emissions. However, notwithstanding a significance finding, the SMAQMD would like to see a format for both the *Greenhouse Gas Emissions Reduction Measures/Design Strategies* found in Table 5.10-7 and the list of *Attorney General Recommendations for Addressing Global Warming* found in Appendix K that better ensures a commitment to implementation and enforceability. The recommendation of the SMAQMD is to include these GHG reduction measures in the form of mitigation and included in a Mitigation, Monitoring and Reporting Program.
2. The SMAQMD recommends providing a more complete explanation for any measure in Appendix K the *Attorney General Recommendations for Addressing Global Warming* that is not being implemented on the Delta Shores project.

**Construction PM Mitigation**

1. Section 5.3-2, Mitigation incorrectly refers to "... the District's requirement to grade no more than 15 acres per day...". The 15 acres is not a required limitation, but is a screening criterion to determine what level of mitigation from Table B.1 in the *Guide to Air Quality Assessment (Guide)* to apply to a project. The Guide also states that "*if a project is larger than the screening values, or if the project cannot undertake the mitigation measures that would be required, the project proponent should model the project using a PM modeling program.*" The SMAQMD does not recommend limiting a project of this size to 15 acres

actively graded because monitoring and enforcement of such a measure is problematic. At this time the SMAQMD recommends following the protocol in the Guide for PM mitigation.

### **Off Site Construction Mitigation Fee**


1. Off site construction fee calculations sheets are not shown in Appendix E as indicated in the notes on Table 5.3-6.
2. Table 5.3-5 correctly lists the NOx construction emissions calculated through the use of URBEMIS 9.2.4; however, the figures for the 2010 construction year were not carried forward correctly to Table 5.3-6 for calculation of the off site mitigation fee. The \$89,667 indicated for 2010 in Table 5.3-6 does not account for the overlap in the mass grading (159 lbs/day) and building (160 lbs/day) phases clearly shown in the URBEMIS results in Time Slice 6/1/2010 – 12/31/2010 (154 days). The revised calculation for the 2010 is \$224,688 and when added to the remaining construction years will result in a mitigation fee of \$1,009,233. With the addition of the 5% administrative fee along with all corrections as noted above, the total off site construction mitigation fee owed the SMAQMD is \$1,059,695 or \$1454 per acre, given the current value of \$16,000 per ton of NOx.

### **Toxic Air Contaminants Mitigation**

1. The project proponents are proposing to build a number of residential units within 500 feet of the freeway which have been shown to be at relatively low risk levels by both the evaluation following the SMAQMD *Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways* (Protocol) and the subsequent Health Risk Assessment. However, given the proximity to the freeway, the SMAQMD would like to recommend strong consideration be given to the planting of trees between the freeway and the receptors as an added barrier. As cited in the Protocol, recent studies indicate that all forms of vegetation are effective with redwood and deodar cedar trees being most effective.

Any questions regarding these comments can be directed to Charlene McGhee of my staff at [cmcghee@airquality.org](mailto:cmcghee@airquality.org) or 916.874.4883.

Sincerely,



Larry Robinson  
Sacramento Metropolitan AQMD