

September 25, 2008

SENT VIA EMAIL

Ms. Beth Tincher
Downtown Development Group
City of Sacramento
915 I Street, 3rd Floor
Sacramento, CA, 95814

**SUBJECT: Draft Environmental Impact Report for the Docks Area Specific Plan
SMAQMD # SAC200500794**

Dear Ms. Tincher,

Thank you for providing the Draft Environmental Impact Report for the Docks Area Specific Plan (DEIR) to the Sacramento Metropolitan Air Quality Management District (District). Staff comments follow.

The District recognizes that this high-density, mixed-use project close to downtown Sacramento will likely be beneficial to regional air quality. We would like to be invited to participate in any outreach efforts conducted for public agencies or interested parties.

Construction-related impacts

According to the document, the project's construction-related emissions were modeled using an URBEMIS computer run. This analysis showed the construction emissions exceed the District's threshold for significance (85 lbs NOX/day) and that those emissions would be mitigated to below the District's threshold by application of the District's on-site construction mitigation. Compliance with District rules and implementation of the mitigation measures described in the document should reduce the project's short-term construction-related emissions to a level below the District's threshold of 85 pounds of NOx per day.

Operational-related impacts

Impact 5.2.3, described on page 218 of the DEIR, discusses the emissions associated with project operations, which are in excess of the District's threshold. The proposed mitigation for this impact is the implementation of an Air Quality Mitigation Plan (AQMP), which will reduce the operational emissions associated with the project by 15 percent or more. The description of the mitigation notes that the Traffic analysis for the project, which was used to model the operational emissions, already takes into account the trip reduction benefits associated with bicycle, pedestrian, and transit facilities. The document notes that the consideration of these facilities in the traffic analysis precludes the use of similar measures in the project's AQMP, as this would result in duplicative accounting of the per-capita trip reduction associated with the measures. The District recommends the following mitigation strategies be strongly considered for inclusion within the AQMP.

- **Car Sharing:** The City of Sacramento could be the next prime market for car sharing programs similar to those in some metropolitan cities (i.e. Washington DC). Programs like this need some programmatic elements such as special preferential parking facilities and funding to administer the program. To ensure that specific projects within the plan area include facilities to support this program, the District recommends that the project proponents consider the inclusion of car

sharing facilities as a component of the projects AQMP. The District would review this mitigation strategy as a "99 measure," which is the designation used for innovative strategies within the *SMAQMD Guidance for Land Use Emission Reductions*.

- **Transportation Demand Management funding:** The District recommends that the project implement a funding mechanism built into the specific plan which would provide funding for transportation demand management (TDM) services. TDM services consist of transportation information and alternative transportation services (like guaranteed ride home, vanpools, carpools, bike incentives, etc). They're typically provided by a Transportation Management Association (TMA) to employers and sometimes others in a specific geographical area. An example of a development-wide TMA is the Warner Center in Woodland Hills, California. As economies of scale are identified, working with the existing Sacramento TMA would also be an effective strategy to provide TMA services to the project. The Director of that TMA is Marilyn Bryant and she can be reached at 441-7074.

Toxic Air Contaminants

Following are comments on the Toxic Air Contaminant Impact 5.2-5 and Mitigations in the DEIR air quality section (pages 5.2-45 through 5.2-50):

1. We applaud the inclusion of toxic air contaminant mitigation measures, namely, mitigation measures 5.2-5a tree plantings and 5.2-5b electrostatic filters.
2. In the section about Dr. Thomas A. Cahill's tree study, it should be made clear that while the laboratory study findings show a 65 to 85 percent reduction in particulate matter levels, such reductions cannot be assumed for real-life situations. More research is needed to identify actual reductions.
3. We strongly suggest that the document stop short of stating that the implementation of mitigation measures reduces the toxic risk to a less-than-significant level, especially since no significance threshold has been established for this project.
4. Throughout Table 5.2-17, the upwind concentrations appear to be transposed with the downwind concentrations. In general, upwind concentrations will be less than downwind concentrations. The table shows that upwind concentrations are greater than downwind concentrations.

Site Specific Health Risk Assessment

Following are comments on the site specific Health Risk Assessment found in the DEIR Appendices (starting on page 240):

1. Figure 2, Locations of Modeled Receptors: Please clearly indicate in the figure where the closest proposed receptor would fall.
2. Table 2, Summary of Maximum Modeled Cancer Risks due to Interstate 5 and Highway 50: These values do not appear to be consistent with Table 5.2-17 of main DEIR document.
3. Overall it is a good HRA.

The District's recommendation is that the AQMP for this project be drafted and endorsed by the District prior to the certification of the FEIR. An AQMP which is created and endorsed prior to a project's approval

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has far more success at reducing emissions than an AQMP that is created after project approval. In addition, the District's preferred timing allows interested parties as well as the deciding body (i.e. City Council) to get a clear picture of the air quality mitigation measures which have been committed to by the proponent.

The District encourages the project proponent to consult with District staff as the AQMP for this project is developed. If you have questions, please contact Molly Wright at 874-4886 or mwright@airquality.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry Robinson".

Larry Robinson
Program Coordinator

cc: Tim Taylor, Division Manager, SMAQMD