

May 21, 2009

SENT VIA E-MAIL

Mr. Keith Durkin
Assistant General Manager
San Juan Water District
9935 Auburn-Folsom Road
Sacramento, CA 95746

**Subject: Notice of Intent to adopt a Mitigated Negative Declaration for the Raw Water Pipeline Bypass Project
SMAQMD # 200901333**

Dear Mr. Durkin:

Thank you for providing the Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the Raw Water Pipeline Bypass Project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review. SMAQMD comments follow.

The MND Air Quality section indicates that the project's air quality impacts are less than significant according to SMAQMD thresholds. The air quality analysis was based on modeling data using an emission factor developed by the Midwest Research Institute for construction projects, and emissions factors generated from the EMFAC and OFFROAD models. Please provide us with an electronic copy of this modeling, so that we can verify its assumptions and accuracy.

We recommend that the MND include a discussion of climate change. Construction activities proposed for this project may result in significant greenhouse gas emissions. While there are currently no adopted thresholds of significance for project-related greenhouse gasses, multiple authoritative resource guides exist for addressing greenhouse gas emissions for projects subject to CEQA. The California Air Pollution Control Officers Association (CAPCOA) publication *CAPCOA CEQA & Climate Change* provides guidance on addressing project impacts on climate change through CEQA (www.capcoa.org). Additionally, the Governor's Office of Planning and Research (OPR) has issued a technical advisory on this subject, entitled *CEQA and Climate Change: Addressing Climate Change through CEQA Review* (www.opr.ca.gov).


If you have any questions regarding these comments, please contact Molly Wright at 916-874-4886 or mwright@airquality.org. This project is also subject to any and all SMAQMD rules in effect at the time of construction. The attached sheet entitled *SMAQMD Rules & Regulations Statement* enumerates some of those rules for your convenience. Additional information about

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those and all other rules that may be applicable can be found at www.airquality.org or by calling Compliance Assistance at (916) 874-4884

Sincerely,



Molly Wright
Air Quality Planner/Analyst

Cc: Larry Robinson, Program Coordinator, SMAQMD

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.