

January 22, 2009

**SENT VIA E-MAIL**

Ms. Jennifer Hageman  
Development Services Department  
City of Sacramento  
300 Richards Boulevard, 3rd Floor  
Sacramento, CA 95811

**Subject: Natomas Crossing P04-264  
SMAQMD # SAC200400124**

Dear Ms. Hageman:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (SMAQMD) with the opportunity to review this project. This letter is in response to the Notice of Scoping Meeting for 1-22-09, and is our input on the scope of the revised environmental document for this project. This letter is based on information obtained from the most recent documents we have received for this project: a Project Notification routed 12-29-08, with request for responses 1-9-09; and the Notice of Scoping Meeting, received 1-20-09.

According to the Project Notification, the revised project includes the following entitlements: Environmental Determination - Environmental Impact Report; General Plan Amendments; NNCP Amendments to Regional Commercial and Employment Center; Schematic Plan Amendment; PUD Guidelines Amendment; Rezones to Shopping Center and Employment Center; and Tentative Subdivision Map. According to the Project Notification and the Notice of Scoping Meeting, the revised land use designations would enable three primary uses for the project site: office use on 10 acres; retail use on 72 acres; and a hospital on 35 acres. Site plans for these uses were not included in the documents, and are necessary in order to make educated comments on this project. Please provide us with site plans for these uses. Staff comments on the revised project, based on the information available, are as follows.

### **Operational Impacts**

The project's effects on the jobs/housing balance of the North Natomas area are crucial part of its operational impacts on air quality. To adequately assess the project's potential operational impacts on air quality, the Air Quality section of the environmental document must address this issue.

According to the Victoria Transport Policy Institute's TDM Encyclopedia, "**Jobs/Housing Balance** refers to the ratio of residents and jobs in an area. Research indicates that a jobs/housing balance of about 1.0 tends to reduce average commute distance and per capita

*vehicle travel (Weitz, 2003; Kuzmyak and Pratt, 2003)... Crane and Chatman (2003) find that a five percent increase in the amount of employment in a metropolitan area's outlying counties will lead to a 1.5 percent reduction in the average commute distance, with significant differences by industry."* The Air Quality section of the environmental document should discuss the ratio of residents to jobs in the area, and should compare the existing and proposed jobs/housing balance.

### **Air Quality Mitigation**

As you know, the District has adopted CEQA thresholds of significance for use in preparing and reviewing environmental documents. Separate thresholds were established for the construction phase and operational phase of projects. Those thresholds are available at [www.airquality.org](http://www.airquality.org).

Because of the size of this project, we believe it will generate short term (construction) and perhaps long-term (operations) air quality impacts which may be in excess of the established District threshold for construction. An air quality analysis should be done on the project in order to determine if those impacts are significant. Relative to the construction impacts, if those impacts are significant, the SMAQMD standard construction mitigation measures should be used. Those measures include both on-site strategies and the possibility of a mitigation fee. They can be found on our website.

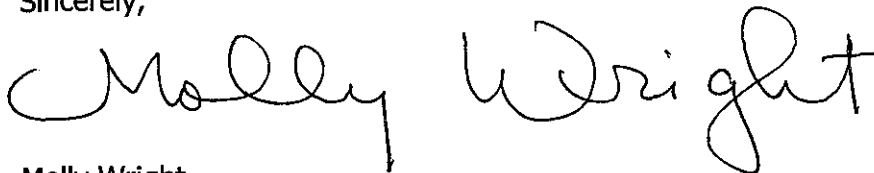
If the project is significant for operational impacts, we recommend the creation and implementation of an Air Quality Mitigation Plan (AQMP) which would seek to reduce emissions by 15%. We recommend that the plan be endorsed by us and included in the DEIR.

### **Climate Change Analysis**

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](http://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](http://www.opr.ca.gov)). These documents recommend methods of addressing impacts by (1) quantifying projected greenhouse gas emissions; (2) addressing the significance of the project's impact on climate change and (3) identifying project alternatives or mitigation measures, if the project is significant. The environmental document should (1) clearly describe and quantify the greenhouse gas emissions projected to be generated from the project, (2) discuss whether or not the emissions are significant, and (3) include specific alternatives and mitigation measures to reduce those emissions.

Finally, all projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD Rules which may apply to this project. We look forward to receiving the environmental document for this project, including the air quality analyses. If you have questions about these comments, please contact me at 916-874-4886 or [mwright@airquality.org](mailto:mwright@airquality.org).

Sincerely,

A handwritten signature in black ink that reads "Molly Wright". The signature is written in a cursive, flowing style.

Molly Wright  
Air Quality Planner/Analyst

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Cc: Larry Robinson, Program Coordinator, SMAQMD

## **SMAQMD Rules & Regulations Statement**

*The following statement is recommended as standard condition of approval or construction document language for **all** construction 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](http://www.airquality.org) or by calling 916.874.4800. Specific rules that may relate to construction activities 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.

**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 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.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.