

March 18, 2009

Mr. John Bassett  
Director of Engineering  
Sacramento Area Flood Control Agency (SAFCA)  
1007 Seventh Street, 7<sup>th</sup> Floor  
Sacramento, CA 95814

Ms. Elizabeth Holland  
Planning Division  
USACE, Sacramento District  
1325 J Street  
Sacramento, CA 95814

**Natomas Levee Improvement Program (NLIP), Phase 3 Landside  
Improvements Project DEIS/DEIR, SAC200701184c**

Dear Mr. Bassett and Ms. Holland:

Thank you for providing the NLIP Phase 3 Landside Improvements Project DEIS/DEIR to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff comments follow.

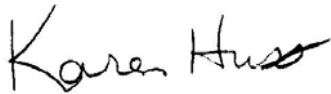
1. Page 4.13-9, last paragraph, indicates "SAFCA will submit a construction emissions dust control plan(s) to SMAQMD...and shall receive approval of the plan(s)." Generally, the SMAQMD does not review and approve dust control plans unless the construction is located in an area of known naturally occurring asbestos. The SMAQMD supports the development and implementation of the plan to ensure the project complies with SMAQMD rules and reduces particulate emissions.
2. Page 4.13-10, fourth bullet, discusses an off-site mitigation fee. Recognizing the estimate in the document is just that, the SMAQMD supports the approach to recalculate the emissions and mitigation fee prior to groundbreaking activities for each project phase.
3. Page 4.13-11, last bullet, indicates idling time shall be limited to 10 minutes. State law for most sectors of diesel-fueled equipment allows only 5 minutes of idling.
4. Page 4.13-12, first bullet, indicates diesel-fueled construction equipment operating on the site for more than 40 hours shall be equipped with diesel particulate filters (DPFs) that meet ARB level 3 verification. The SMAQMD doesn't believe that it is currently feasible for all construction equipment to be equipped with level 3 DFPs. There are less than 10 verified devices currently listed on ARB's webpage, but not all of these devices will work on all pieces of construction equipment. The SMAQMD recommends that this measure be replaced with either a certain number (i.e., 2-5) or percentage of pieces of equipment be retrofitted, or go in a different direction and require only construction equipment with tier 2 or higher certified engines be used on the project, unless the tier 0 or tier 1 engine is retrofitted with ARB certified level 3 diesel particulate filters.

5. Page 4.13-13, there are two references to Table 4.13-3. One reference indicates the emissions in the table are from the Levee Raise-in-Place Alternative and the other reference indicates the emissions in the table are from the Proposed Action. Please clarify which reference is correct and if necessary provide a separate emissions table for the other reference.

All projects are subject to SMAQMD rules in effect at the time of construction. I have attached a list of rules that may apply to this project. For more information on SMAQMD rules call 916-874-4800 or visit [www.AirQuality.org](http://www.AirQuality.org).

Please contact me at 916-874-4881 or [khuss@airquality.org](mailto:khuss@airquality.org) if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Karen Huss". The signature is written in a cursive, slightly slanted style.

Karen Huss  
Associate Air Quality Planner/Analyst

Attachment

Cc: Larry Robinson, Sacramento Metropolitan Air Quality Management District  
Sondra Andersson, Feather River Air Quality Management District

## **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](http://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.