

August 2, 2010

Mr. John Bassett
Director of Engineering
SAFCA
1007 Seventh Street, 7th Floor
Sacramento, CA 95814

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

American River Watershed Common Features Project, Natomas Levee Improvement Program (NLIP), Phase 4b Landside Improvements Project DEIS/DEIR (SAC200701184f)

Dear Mr. Bassett and Ms. Holland:

Thank you for providing the NLIP Phase 4b Landside Improvements Project DEIS/DEIR to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff comments follow.

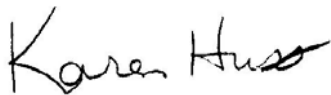
1. Please provide the analysis justifying the statement that a dust control plan has been developed that will "effectively reduce mass PM10 emissions below the concentration based threshold" (page 4.11-6, paragraph 2). Has modeling been performed to show concentrations below the 5% substantial contribution in non-attainment areas?
2. Why was the level of 400 tons/year of PM10 selected as a trigger to include the use of advanced dust suppression materials (page 4.11-14, last bullet)?
3. Would the application of advanced dust suppression materials reduce PM10 emissions from 400 to 100 tons/year (page 4.11-14, last bullet)?
4. The SMAQMD prefers that an estimated mitigation fee be disclosed in the DEIS/DEIR based on the emissions estimates and mitigation measures provided in the document (page 4.11-15, 4th bullet).
5. Because there is concern in the construction industry regarding the safe operation of off-road equipment with a diesel particulate filter (DPF) that blocks driver visibility, the SMAQMD suggests an alternative mitigation be available to the 15% DPF installation for off-road equipment. SMAQMD has determined that an additional 20% reduction in project-wide fleet average particulate emissions would be beneficial, which brings the total particulate emission reduction to 65% compared to the state fleet average (page 4.11-16, last bullet).
6. SMAQMD suggests adding the word "not" in the 3rd to last sentence of the first paragraph on page 4.11-23, regarding exposing sensitive receptors to substantial concentrations of Toxic Air Contaminants.

7. Overall, the climate change and greenhouse gas discussion and analysis were done well (section 5.1.5.12).
8. The listing of potential greenhouse gas mitigation measures on page 5-22 should be referenced in Table ES-2, Summary of Impacts and Mitigation Measures, and/or another obvious place in the DEIS/EIR that future contractors will reference for project construction requirements.

All projects are subject to SMAQMD rules in effect at the time of construction. Attached is 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.

Please contact me at 916-874-4881 or 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 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.