

November 4, 2008

SENT VIA E-MAIL

Scott Johnson, Associate Planner
City of Sacramento, Development Services Department
Environmental Planning Services
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**Subject: Station 65 Project / Draft Environmental Impact Report (P08-068)
SMAQMD# 200801284**

Dear Mr. Johnson:

Thank you for providing the Draft Environmental Impact Report (DEIR) for the Station 65 project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) to review. SMAQMD commends the project's high-density, mixed-use urban infill. This type of development, Transit Oriented Development (TOD), generates significantly less vehicle miles traveled (VMT), and associated air pollutants, than more conventional, motor vehicle oriented development.

Two scenarios have been submitted for review, Scenario A and Scenario B. SMAQMD received the Scenario B circulation after initial Notice of Preparation for the DEIR. SMAQMD supports Scenario B because as the denser of the two projects, it takes best advantage of the project's urban infill location in reducing VMT.

Operational Impacts

Some minor alterations to the project's design could help the project take even better advantage of its urban infill location, mix of uses and high density. These alterations would help take best advantage of the project's urban infill location in reducing VMT and overall operational impacts. These alterations are as follows:

1. Pedestrian Access & Safety

- The northwest corner of the project site, Folsom and 65th, could be extended outwards to include a pedestrian bulb-out. This would eliminate the need for the currently proposed disconnected pedestrian island and would also slow vehicular traffic in that vicinity, for safer pedestrian conditions.
- Building frontages should provide frequent pedestrian access points or building entrances. This would better facilitate pedestrian access to proposed uses and facilitate street activity as a crime prevention measure.

- Provide signalized pedestrian crossings at every street crossing at all intersections adjacent the project site.
- Two major driveways access the site from Q Street and from 67th Street, respectively. To minimize these driveways' impacts on pedestrian travel along those streets, the portion of the driveway crossing the sidewalk could be treated to slow speeds in proximity to the sidewalk and would discourage stopping in the pedestrian right-of-way. An example of such a treatment would be with raised, stamped concrete.
- The portion of Q Street fronting the site could provide street treatments identifying it as a pedestrian priority area. Examples of this may include raised stamped concrete, left turn prohibitions, landscaping and other traffic calming treatments. These treatments strengthen the project's connection to the 65th Street light rail station.

This portion of Q Street has the potential to pose a major pedestrian barrier between the proposed project and the 65th Street light rail station. It has two intersections in proximity to the site's primary driveway, as well as being adjacent to a major transit terminal. This potential barrier between the site and the light rail station jeopardizes the project's effectiveness as a TOD. The recommended treatments would help mitigate this situation.

- The site's 67th street frontage could be activated with transit oriented retail to facilitate street activity. Additionally, the sidewalk there should be widened to allow room for pedestrian amenities and landscaping. These measures would provide safer, more comfortable conditions for both pedestrians and transit users in that area. Transit-oriented retail does not necessarily require deep storefronts, and could be provided along that frontage of the parking garage, without substantially compromising the parking area.

2. Transit & Bicycle Amenities

- The project should include all-weather waiting areas for adjacent transit services.
- Circulations plans for the project should be coordinated with all transit providers that utilize the area as a terminal, not limited to Sacramento Regional Transit (RT). Additionally, the DEIR circulation analysis should include all transit providers, not limited to RT, in its assessment of existing conditions and projections of project impacts.
- The project should provide greater detail on its bicycle parking accommodations, including both short term bicycle parking and long term bicycle parking (bicycle lockers). Short term bicycle parking especially should be located adjacent to major building entries.

URBEMIS Inputs

Please provide greater explanation for site-specific URBEMIS inputs, specifically transportation-related inputs. They are evidently generally derived from the transportation and circulation analysis, but to determine this requires a careful review of the traffic and circulation analysis. For greater transparency, please include a discussion of how the site-specific inputs were determined. As much as possible, the air quality analysis should be an independent analysis, without relying on review of other analyses.

As fireplaces and wood-burning stoves were not included in the URBEMIS run for the residential units, there should be a condition of approval prohibiting their installation.

Also, there is a typographical error in table 4.5-7. Amend Scenario A 2010 ROG levels from 9.95 to 19.95.

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). 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). 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. Following is a discussion of how the DEIR could address impacts using these methods.

1. Quantifying Projected Emissions

The table provided on page 4.5-4 of the DEIR is an excellent way to summarize projected greenhouse gas emissions. The table references tools that are noted in the CAPCOA guide, including URBEMIS and the Climate Change Action Registry. Not all of the emissions factors derived from the Climate Change Action Registry are clear. For greater transparency, please reference which version of the Climate Change Action Registry General Reporting Protocol was used, and include a website to the protocol for public reference. Further, the tonnage listed for CH₄ and N₂O is not consistent, despite having a similar emissions factor. This may confuse members of the general public. Please include a brief discussion of the table as part of the text of the climate change analysis.

2. Determining Significance

No adopted threshold of significance currently exists for project greenhouse gas emissions. However, the CAPCOA guide discusses multiple potential thresholds and the Air Resources Board (ARB) is in the process of developing and adopting a recommended approach to determining thresholds significance. A brief discussion of the potential significance of the project's projected greenhouse gas emissions, relative to potential thresholds of significance, would be a useful for public information purposes. Moreover, applying potential thresholds to project would be a useful exercise in preparation for the impending ARB threshold recommendation.

3. Mitigation

Due to its size, the project may not likely generate significant greenhouse gas emissions, and would therefore not require mitigation. If any emissions reduction measures for the project are discussed, however, they should be specific and easily monitored. Much recent litigation on the adequacy of climate change analyses in CEQA review has centered on mitigation that is not specific or easily monitored. Table 4.5-5 on page 4.5-8 contains some reductions strategies that

are not specific enough to be easily monitored. For example, the strategy "where feasible the project would implement the use of photo voltaic arrays," makes no specific commitment to incorporate this technology into the project.

Toxic Air Contaminants

The proposed project is within 350 feet of a highway ramp, and within 750 feet of Highway 50. SMAQMD has developed the Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways (Protocol) for assessing and disclosing potential cancer risk for sensitive receptor projects, including residential projects, located near major roadways. Although the project lies just far enough from the freeway to preclude analysis under the Protocol, the discussion of Toxic Air Contaminants on page 4.5-18 of the DEIR should briefly discuss the Protocol and state that it does not apply to this project. The Protocol can be found at <http://www.airquality.org/ceqa/index.shtml#SensitiveLU>. The newly revised Protocol is be posted to the website as of the week of 10-27-2008.

If you have any questions regarding these comments, please contact Paul Philley at 916-874-4882 or pphilley@airquality.org or Molly Wright at 916-874-4886 or mwright@airquality.org.

Sincerely,



Paul Philley
Air Quality Planner/Analyst

Cc: Larry Robinson, Program Coordinator, SMAQMD