

August 31, 2005

Joyce Horizumi
Environmental Coordinator
Department of Environmental Review and Assessment
827 7th Street, Room 220
Sacramento, CA 95814

RE: Florin- Vineyard Gap Community Plan NOP; 04-GPB-CPB-0096

Dear Ms. Horizumi:

Thank you for the opportunity to comment on the above referenced project. Staff comments are as follows:

1. Per previous correspondence sent to both the proponent and the jurisdiction, it is important to reiterate the need for preparation of an Air Quality (AQ-15) Mitigation Plan for this community plan and all projects contained therein. Preparation of this plan at this time is important in order that it be part of the EIR. This plan is necessary to reduce the air quality impacts of the projects by 15% or more per the Sacramento County General Plan Policy AQ-15. Sacramento Metropolitan Air Quality Management District (District) staff is available to provide any needed assistance to the proponent(s) in this effort.
2. A project of this size will likely generate short term (construction) air quality impacts which exceed adopted CEQA thresholds. However, an air quality analysis should be done to verify the significance of all impacts. We recommend using the most current version of URBEMIS 2002, version 8.7, available at www.urbemis.com. If it is determined that construction impacts are significant, we recommend our standard construction mitigation be applied to the project. Assuming worst case, per CEQA, construction of these projects should be assumed to occur simultaneously and analyzed accordingly. If mitigation to below the threshold is not achieved through standard mitigation, any remaining emissions over the threshold can be offset through an off site mitigation fee based upon \$13,600/ton. Please note that the mitigation fee may either be paid in its entirety in advance of the first construction activity, or may be distributed equally among each dwelling unit and commercial project. The distributed mitigation fee option allows for proportional payment at the time individual projects are constructed. A recommended methodology for distributing mitigation fees is available upon request.
3. Given that the subdivisions and other uses encompassed by this EIR are to a great extent being built in existing neighborhoods, it is important to ensure excellent connectivity between developments, particularly for bicycles and

pedestrians to area parks and commercial uses. With that in mind consideration should be given to altering designs, where possible, to re-align or eliminate cul-de-sacs for better connectivity.

4. Construction projects are subject to all applicable District rules that may be in affect at the time of construction. An attachment outlining some of those rules is provided for your information. For further details on all District rules please check the District website at www.airquality.org or call the Compliance Assistance Hotline at (916)874-4884.

Please contact me with any questions regarding these comments at (916) 874-4883 or at cmcghee@airquality.org.

Sincerely,

Charlene McGhee
Associate Air Quality Analyst

Attachment

c: Roy Brewer, Florin-Vineyard Property Owners Group