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Larry Greene  
AIR POLLUTION CONTROL OFFICER

15 Feb 2006

FEB 17 2006

SACRAMENTO LOCAL AGENCY  
FORMATION COMMISSION

Mr. Peter Brundage  
Sacramento LAFCo  
1112 I Street, Ste 100  
Sacramento CA 95814

**RE: DRAFT EIR FOR THE AMENDMENT OF THE SPHERE OF INFLUENCE  
FOR THE SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD) AND  
ANNEXATION**

Dear Mr. Brundage:

Thank you for sending the above referenced project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review and comment. Staff comments are as follows:

- 1) p. IV-27. The summary of quantitative thresholds of significance indicates that SMAQMD has not adopted a threshold for PM10. This should be revised to indicate that SMAQMD has adopted a PM10 threshold equal to the California Ambient Air Quality Standards (CAAQS), currently 50  $\mu\text{g}/\text{m}^3$  (24-hour average).
- 2) p. IV-32. The DEIR concludes that an increase in diesel particulate emissions resulting from a small increase in vehicle miles traveled by diesel powered trucks would be a significant impact. However, given that the incremental increase in VMT is very small, we conclude that it is unlikely to result in emissions of diesel particulates that would be considered significant. For example, the recently published California Air Resources Board (CARB) "Air Quality and Land Use Handbook" recommends restrictions on siting sensitive receptors within 500 feet of a freeway or other roadway with over 100,000 vehicles per day. This project contributes substantially less than 100,000 vehicles per day, therefore we do not expect a significant impact from diesel particulate emissions.
- 3) p. IV-35. The DEIR states that no best management practice (BMP) or mitigation measure has been identified to reduce the potential impact from diesel particulate emissions. However, the document contains a BMP that restricts idling from diesel powered vehicles. SMAQMD staff strongly supports the idling restriction BMP, and suggests that it may reduce any significant or less than significant impact from diesel particulate emissions.

- 4) p. IV-35. Although SMAQMD has adopted separate construction and operational thresholds, the determination of construction significance is based on the combination of operational and construction emissions. This approach, while conservative, may overestimate the specific construction related impact.

Thank you for the opportunity to comment on the DEIR. If you have any questions, please contact me at 916.874.4886.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Christensen", with a long horizontal flourish extending to the right.

Peter Christensen  
Strategic Planning Division

c: Mike Deis, SMUD  
Ron Maertz, SMAQMD  
Paul Hensleigh, YSAQMD