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From-Sac Local Agency Formation Commission
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SACRAMENTO METROPOLITAN


AIR QUALITY
MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

FILE COPY

October 3, 2005

Mr. Peter Brundage
Executive Officer
Sacramento Local Agency Formation Commission
1112 I St, Suite 100
Sacramento, Ca 95814

**SUBJECT: Notice of Preparation for the Amendment of the Sphere of Influence for the Sacramento Municipal Utility District and Annexation by SMUD of the Cities of West Sacramento, Davis, and Woodland, and Portions of Unincorporated Areas of Yolo County
SMAQMD # SAC2005828**

Dear Mr. Brundage:

Thank you for providing the project listed above to the Sacramento Metropolitan Air Quality Management District (District). Staff comments follow.

As you know, the District has adopted CEQA thresholds of significance for use in preparing and reviewing environmental documents. Separate thresholds were established for the construction phase and operational phase of projects. Those thresholds are available at www.airquality.org.


In July 2004, the District published new guidance on air quality assessment entitled "Guide to Air Quality Assessment in Sacramento County." That guidance replaces our 1994 "Air Quality Thresholds of Significance" document and can be found on our website www.airquality.org under Plans & Rules/ CEQA & mitigation. Table 4.2 (pg. 4-3) in that new document gives a framework to judge whether air quality impacts of projects of various sizes may exceed District thresholds of significance. Under the new guidance which uses the latest analysis tools, construction related air quality impacts trigger the thresholds of significance with smaller projects than before.

This project may generate short term (construction) air quality impacts which may be in excess of the established threshold. An air quality analysis should be done on the project in conjunction with the environmental document in order to determine if those impacts are significant. Relative to the construction impacts, if those impacts are significant, the SMAQMD standard construction mitigation measures should be required as well as other feasible mitigation. Those measures can be found on our website, www.airquality.org.

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. Please see the attached document describing SMAQMD Rules which may apply to this project.

If you have questions, please contact me at 874-4885 or jborkenhagen@airquality.org

Sincerely,



Jeane Borkenhagen
Associate Air Quality Planner/Analyst
cc: Ron Maertz SMAQMD

SMAQMD Rules & Regulations Statement

The following statement is recommended as standard condition of approval or construction document language for all construction 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 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.

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 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.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.