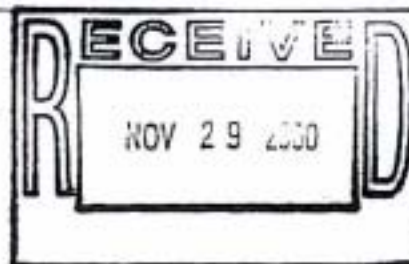


November 28, 2000

Ms. Colleen McDuffee
 Citrus Heights Planning Department
 6237 Fountain Square Drive
 Citrus Heights, CA 95621



SUBJECT: STOCK RANCH DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Dear Ms. McDuffee:

Thank you for referring this DEIR to the staff of the Sacramento Metropolitan Air Quality Management District (District) for review and comment. This is a large project for the City of Citrus Heights, with the potential to generate significant air quality impacts.

5-1

Sacramento County and the surrounding region have been designated by the Federal Environmental Protection Agency (EPA) as a "severe" non-attainment area for ozone. This classification is due to recurrent exceedances of the health based air quality standards of the Federal Clean Air Act.

5-2

The 1994 State Implementation Plan (SIP) requires that the area under the jurisdiction of the District achieve "attainment" by 2005. In order to reach attainment by the prescribed date, the SIP states that emissions must be reduced from "indirect sources" by one ton of reactive organic gases (ROG) per day, and one ton of oxides of nitrogen (NO_x) per day. These pollutants are precursors to the formation of ozone.

5-3

In estimating the amount of emissions reductions to be included in our SIP commitment, the District used the adopted General Plans of local agencies within its jurisdiction to estimate future population and employment. In 1994 the project area was under the jurisdiction of Sacramento County, and the County General Plan was used to estimate future population and employment. To the extent that proposed general plan amendments exceed the intensity of use for development as indicated on the previous general plan, the City of Citrus Heights should require mitigation measures, as necessary, to reduce the impact of this project.

5-4

District staff is supportive of all the emission reduction measures included in this Draft EIR, and recommend that they be required as mitigation measures for project development. However because of the scale of this project and the SIP commitment issue referred to above, we are of the opinion that additional emission reduction measures are necessary. For areas under the jurisdiction of Sacramento County, where growth factors were included in the SIP, a 15 percent emissions reduction is required for significant projects. We therefore recommend that emissions reductions in excess of 15 percent be required for the Stock Ranch project. Enclosed are several

5-5

emission reduction measures, and the point scores ascribed to each, that District staff have developed in concert with staff from the Sacramento County Planning Department and Department of Environmental Review and Assessment. ↑

The Stock Ranch DEIR lists the significant impacts of construction-related emissions. However, the mitigation measures outlined in the document – MM 4.6.1c, while important, are somewhat dated and lack the level of effectiveness that the District staff now considers reasonable and feasible. District staff therefore recommends the following additional construction equipment emission mitigation measures as conditions of project approval. We recommend that a contractor be allowed to provide on-road and off-road emissions mitigation by choosing one measure from Category 1, and one measure from Category 2.

Category 1: Reducing NOx Emissions from Off-Road Diesel Powered Equipment:

1. The prime contractor shall submit, to the City of Citrus Heights, a comprehensive inventory of all the heavy-duty off-road equipment (50 or greater horsepower) that will be used an aggregate of 40 or more hours for the construction project. At a minimum, 20% of the heavy-duty off-road equipment included in the inventory shall be powered by CARB certified off-road engines, as follows:
- 175hp -750 hp 1996 and newer engines
 - 100hp -174 hp 1997 and newer engines
 - 50hp – 99 hp 1998 and newer engines
- Said off-road equipment may be owned and operated by the prime contractor and/or any subcontractor.

or

2. The prime contractor shall provide a plan, for approval by the City of Citrus Heights in consultation with SMAQMD, demonstrating that the heavy-duty off-road vehicles to be used in the construction project, and operated by either the prime contractor or any subcontractor, will provide a fleet-averaged NOx emission reduction of 10% compared to an unregulated/uncontrolled fleet. (Includes the use of emulsified fuel in noncertified engines, and other methods not requiring the use of post 1996 – 1998 engines.)

and

Category 2: Reducing NOx Emissions from On-Road Diesel Powered Equipment:

1. The prime contractor shall submit, to the City of Citrus Heights a comprehensive inventory of all heavy-duty on-road equipment (50 or greater horsepower) that will be used an aggregate of 40 or more hours for the construction project. At a minimum, CARB-certified low-emission engines shall power 20% of the heavy-duty on-road equipment included on the inventory. Said on-road equipment may be owned and operated by the prime contractor and/or any subcontractor; ↓

or

2. The prime contractor shall provide a plan, for approval by City of Citrus Heights in consultation with SMAQMD, demonstrating that the on-road vehicles to be used in the construction project, and operated by the prime contractor or any subcontractor, will provide a fleet-averaged NOx emission reduction of 10%. (Includes the use of alternative fuels and/or other CARB certified low-emission technologies.)

and

Category 3: Enforcement Plan

An enforcement plan shall be established to weekly evaluate project-related engine emission opacities, modeled after the California Air Resources Board Heavy-Duty Diesel Smoke Enforcement Program. An environmental coordinator certified to perform Visible Emissions Evaluations would routinely "read" off-road equipment exhaust opacity, using opacity standards identified in the California Health and Safety Standards. Engines with readily visible emissions [i.e. a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the U.S. Bureau of Mines, or b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in section a.] shall be repaired immediately. The certified environmental coordinator may be a County inspector, a representative of the prime contractor, or an independent contractor. The Environmental Coordinator shall keep a log of all readings. The SMAQMD and/or ARB may conduct periodic site inspections to determine compliance.

A contractor can meet the emission mitigation requirement by choosing one measure from Category 1, and one measure from Category 2 listed above. Category 3, the Enforcement Plan, is required for both off-road and on-road equipment.

Should you have any questions regarding these comments, please call me at (916) 874-4885.

Sincerely,



Phil Stafford
Associate Air Quality Planner

cc: Ron Maertz, SMAQMD

#	Description	Development Type R=Res C=Comm M=Mixed	Point Value	Comments
Bicycle/Pedestrian/Transit				
1	Non-residential projects provide bicycle lockers and/or racks	C	0.5	
2	Provide an additional 20 percent of required Class I and Class II bicycle parking facilities	C	0.5	
3	Non-residential projects provide personal showers and lockers	C	0.5	
4	Bicycle storage (Class I) at apartment complexes or condos without garages	R	0.5	
5	Entire project is located within 1/2 mile of an existing Class I or Class II bike lane and provides a comparable bikeway connection to that existing facility	R, C, M	1.0	All facilities must be in place before 20% of the occupancy permits are granted or before 2005, whichever occurs first.
6	The project provides for pedestrian facilities and improvements such as overpasses and wider sidewalks	R, C, M	1.0	All facilities must be in place before 20% of the occupancy permits are granted or before 2005, whichever occurs first.
7	Bus service provides headways of 15 minutes or less for stops within 1/4 mile; project provides essential bus stop improvements (i.e., shelters, route information, benches, and lighting).	C	1.0	Maximum combined credit for measure #7 and #64 is 2.0
8	Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees or residents	R, C, M	0.5	
9	High density residential, mixed, or retail/commercial uses within 1/4 mile of existing transit, linking with activity centers and other planned infrastructure	R, C, M	2.0 for light rail, 1.0 for bus only	Planned infrastructure must be in General Plan or Community Plan. Office uses considered under "Commercial Building Design" category. Maximum credit is 2.0 (light rail and bus points cannot be combined). Planned transit must be in MTP or RT Masterplan; planned infrastructure must be in General Plan or Community Plan. Office uses considered under "Commercial Building Design" category. Maximum credit is 1.0 (light rail and bus points cannot be combined). Cannot get points for both this measure and measure #9.
10	High density residential, mixed, or retail/commercial uses within 1/4 mile of planned transit, linking with activity centers and other planned infrastructure	R, C, M	1.0 for light rail, 0.5 for bus only	

#	Description	Development Type R=Res C=Comm M=Mixed	Point Value	Comments
Parking				
11	Employee and/or customer paid parking system (no validations)	C	3.0	Must be coordinated with TMA.
12	Provide minimum amount of parking required	C, M	0.5	
13	Provide parking reduction: Office 25%, Medical office 8%, Commercial 5%, Industrial 10%, Additional 10-20% if located along transit station (special review of parking is required)	C, M	2.5	
14	Provide-grass paving or reflective surface for unshaded parking lot areas, driveways, or fire lanes that reduce standard paving by 10% or more	R, C, M	0.5	
15	Increase parking lot shading by-20% over code	R, C, M	1.0	Details of facilities' provision must be coordinated with City or County of Sacramento and SMAQMD.
16	Provide electric vehicle charging facilities	R, C, M	1.0	
17	Provide preferential parking for carpool/vanpools	C	0.5	
18	Covered carpool/vanpool spaces near the entrance to the building(s)	C	0.5	
19	Loading and unloading facilities for transit and carpool/vanpool users	C	0.5	
20	Project is located within one mile of a park and ride lot operated by a transportation agency	R	0.5	
21	Provide a parking lot design that-includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances	C	0.5	

#	Description	Development Type			Point Value	Comments
		R=Res	C=Comm	M=Mixed		
Commercial Building Design						
22	Office FAR is 0.75 or greater within 1/4 mile of a planned transit stop	C, M			1.5 for light rail, 0.8 for bus only	Planned transit must be in MTP or RT Masterplan. Cannot get points for both this measure and the below measure.
23	Office FAR is 0.75 or greater within 1/4 mile of an existing transit stop	C, M			2.5 for light rail, 1.5 for bus only	
24	Setback distance is minimized between development and existing transit, bicycle, or pedestrian corridor	C, M			1.0	
25	Setback distance is minimized between development and planned transit, bicycle, or pedestrian corridor	C, M			0.5	Planned transit, bicycle or pedestrian corridor must be in MTP, RT Masterplan, General Plan, or Community Plan. Cannot get points for both this measure and the above measure.
Residential Development						
26	Average residential density 7 d.u. per acre or greater	R			1.5, 3.0, 4.5	1.5 points for 7-14 du/acre, 3.0 points for 15-29 du/acre, 4.5 points for 30+ du/acre
27	Multiple and direct street routing (grid style)	R, C, M			2.5	Full credit for internal connectivity factor (CF) >= 0.70, and average 1/4 mile or less between external connections. [CF= # of intersections / (# of cul-de-sacs + intersections)]
28	Granny Flats - Have ancillary "granny units" (requires Special Development Permit but no Accessory Structure Use Permit)	R			1.0	

#	Description	Development Type R-Res C-Comm M-Mixed	Point Value	Comments
Mixed Use				
29	Development of projects predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site. A "single site" may include contiguous properties.	M	3.0	Cannot get points for both this measure and any "Convenience Services" measures. Also mutually exclusive with #30.
30	Mixed use - Have at least 3 of the following on site and/or within 1/4 mile: Residential Development, Retail Development, Personal Services, Open Space, Office	R, C, M	1.0	Cannot get points for both this measure and any "Convenience Services" measures. Also mutually exclusive with #29.
31	Neighborhood serving as focal point with parks, school and civic uses within 1/4 mile	R, M	0.5	
32	Separate, safe, and convenient bicycle and pedestrian paths connecting residential, commercial, and office uses	R, C, M	2.0	
33	The project provides a development pattern that eliminates physical barriers such as walls, berms, landscaping, and slopes between residential and non-residential uses that impede-bicycle or pedestrian circulation	C, M	1.0	
Convenience Services				
34	Day care facilities are provided on site	R, C, M	1.0	
35	Restaurant or cafeteria on site or within 1/4 mile of site	R, C, M	0.2	
36	Bank or ATM on site or within 1/4 mile of site	R, C, M	0.2	
37	Dry cleaners on site or within 1/4 mile of site	R, C, M	0.2	
38	Post office on site or within 1/4 mile of site	R, C, M	0.2	
39	Entertainment (movie/video) on site or within 1/4 mile of site	R, C, M	0.2	
40	Recreation facility/fitness center on site or within 1/4 mile of site	R, C, M	0.2	

#	Description	Development Type R=Res C=Comm M=Mixed	Point Value	Comments
Building Component Measures				
41	Install lowest emitting commercially available fireplace	R	1.0	
42	Install lowest emitting commercially available furnace	R, C, M	0.5	
43	Install ozone destruction catalyst on air conditioning systems, in consultation with SMAQMD	R, C, M	2.5	
44	Install-Energy Star labeled roof materials	C	0.5	
45	Provide fiber optic wiring and connections	R, C, M	0.5	
46	Provide-T1 wiring and connections	R, C, M	0.5	
47	Install roof photovoltaic energy systems	R	0.5	2.5 if offered as a standard feature on all homes
48	Comply with SMUD Advantage (Tier II) energy standards	R	0.5	
49	Comply with SMUD Advantage Plus (Tier III) or EPA/DOE Energy Star Home energy standards	R	1.0	Cannot get points for both this measure and the above measure.
50	Orient 75 or more percent of homes and/or buildings to face either north or south (within 30 degrees of N/S), and include shading masterplan	R	0.5	Moved from Commercial Building Design and Residential Development sections.

#	Description	Development Type			Point Value	Comments
		R=Res	C=Comm	M=Mixed		
TDM and Misc. Measures						
	Include permanent TMA membership and funding requirement. Funding to be provided by Community Facilities District or County Service Area or other non-revocable funding mechanism.					
51	Carpool Matching Assistance	R, C, M			2.5	
52	Provide financial incentives to carpools for vehicle tune-up or maintenance	C			0.2	Must be coordinated with TMA.
53	Provide Flextime for non-SOV commuters	R, C, M			0.2	Must be coordinated with TMA.
54	Provide Guaranteed Ride Home	C			0.2	Must be coordinated with TMA.
55	Implement compressed work week schedules	C			0.2	Must be coordinated with TMA.
56	Provide on-site Transportation Coordinator	R, C, M			0.2	Must be coordinated with TMA.
57	Contract only with commercial landscapers who operate with equipment that complies with the most recent California Air Resources Board certification standards, or standards adopted no more than three years prior to date of use.	C			2.0	
58	Make physical development consistent with requirements for neighborhood electric vehicles	R			1.5	
59	Install videoconferencing system	C, M			0.5	
60	Promote-teleworking and implement an employee-telework policy	C, M			1.0	
61	Provide free-access telework terminals in multi-family projects	R			1.0	At least one terminal per 100 apartments
62	Implement Clean Air Business Practices such as using low-emission delivery vehicles, contract with alternative-fuel waste hauling companies, etc., in consultation with-SMAQMD	C			1.0	
63	Provide electric shuttle to transit stops	R, C, M			2.0	Maximum combined credit for measure #7 and #64 is 2.0
64	Provide a complimentary cordless electric lawnmower to each residential buyer	R			2.0	
65	Provide an opportunity to receive either a complimentary bicycle or electric bicycle retrofit kit to each residential buyer	R			0.5	
66	Transit pass subsidy and/or commute alternative allowance	C			1.5	Point value based on 100% subsidy.
67						

Recommended SMAQMD Guidance for AQ-15/NNCP Implementation

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#	Description	Development Type R=Res C=Comm M=Mixed	Point Value	Comments
	Innovative Strategies			
99	Other proposed strategies, in consultation with City or County of Sacramento and SMAQMD	R, C, M	tbd	