

## Rincon del Rio project redistribution

Sam Longmire [sam@myairdistrict.com]

**Sent:** Friday, July 02, 2010 4:50 PM

**To:** Jessica Hankins

**Attachments:** Land Use Guidelines.doc (76 KB)

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Dear Ms. Hankins:

The NSAQMD has reviewed the redistributed Early Consultation/Project Description for the proposed Rincon del Rio project (increased from 312 to 363 residential units, counting the 5 proposed group homes as single units, to house a maximum population of 415 residents) located at 10358 Rincon Way (APNs 57-130-13 & 57-240-17, -18, & -19). Attached is the NSAQMD's Land Use Guidelines document, which is recommended for use in preparing the air quality portion of the CEQA document for the project. The Land Use Guidelines recommend using URBEMIS for emissions estimations from construction and long-term use. Another land use emissions model is currently under development by the South Coast air district and is expected to be out by October, 2010. If it is out when the calculations are performed and it is determined to yield emissions reasonably similar to those derived from URBEMIS, it may be acceptable to use that model instead. Overlapping phases and previously completed components should be added together for comparison to the criteria pollutant thresholds, in order to derive a reasonable maximum daily emissions scenario. The analysis should also take into account employee trips, maintenance activities, specific occupancy of the proposed group homes and delivery/maintenance vehicles. Deviations and innovations applied to the emissions estimations should be clearly described and the rationale behind them stated. If the analysis indicates significant air quality impacts from NOx (an ozone precursor) emissions, which is sometimes the case with large construction projects that require considerable grading, a suggested mitigation measure is to use only construction equipment with Tier 2 or cleaner engines, at least during the months of May through October when ozone concentrations are typically highest. Establishing public transit and/or a van service can be considered as a mitigation.

The NSAQMD recommends that residential woodburning appliances and residential open burning of waste vegetation be prohibited within the project because of the potential for smoke to impact sensitive receptors. However, land management burning in the open space, on the eastern hill (across the drainage from the residential area), may be permitted with an Air Pollution Permit.

Any diesel generators greater than 50 hp will require a permit from the NSAQMD, and any spray booth or other source of air contaminants may require a permit from the NSAQMD. The applicant is encouraged to contact the NSAQMD with any questions about permitting.

The NSAQMD has not established thresholds of significance for greenhouse gas emissions, but due to guidance from the Attorney General's office and legal precedents a reasonable effort should be made to quantify such emissions during construction and long-term use, and GHG mitigation measures should be employed as feasible. A list of potential mitigations from the Attorney General's office is available at [http://ag.ca.gov/globalwarming/pdf/GW\\_mitigation\\_measures.pdf](http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf), Many of these measures also mitigate criteria pollutant emissions.

Note that the project is not in an area mapped as having ultramafic rock or serpentine, so the Asbestos ATCM for Construction... will not apply unless such is discovered on site, in which case the NSAQMD must be notified no later than the following business day and the the ATCM will apply.

The air pollution discussion in the EIR should pay special attention to ozone and ozone precursors -- particularly the typical ozone transport pattern in which ozone and precursors are transported from the Sacramento and Bay areas to Nevada County on days when Nevada County experiences high ozone concentrations. In this context, the document should make the connection that the project is upwind of the most densely populated portion of the Western Nevada County federal ozone non-attainment area on typical high-ozone days. The federal Clean Air Act's requirements for Reasonable Further Progress, as they apply to the Western Nevada County Non-attainment area, should also be discussed.

Thank you for the opportunity to comment on this project. Please contact me with any questions.

Sincerely,

Samuel F. Longmire

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