

July 17, 2015

Maywan Krach, Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
SENT VIA: mkrach@placer.ca.gov

SUBJECT: Village at Squaw Valley Specific Plan (PSPA2011-0385), Draft Environmental Impact Report

Dear Ms. Krach,

Thank you for submitting the Village at Squaw Valley Specific Plan (Project) and associated Draft Environmental Impact Report (DEIR) to the Placer County Air Pollution Control District (District) for comment. Our comments are provided as follows.

Construction Impacts

1. The DEIR concludes that air quality impacts related to construction are significant and unavoidable. Page 10-20 of the DEIR lists the proposed mitigation measures associated with construction impacts. In addition to these measures, the District recommends adding within the mitigation measure the submittal of a Dust Control Plan as follows:

Prior to approval of Grading or Improvement Plans, (whichever occurs first), for each phase/individual tentative map associated with the project, the applicant shall submit a Construction Emission / Dust Control Plan to the Placer County Air Pollution Control District. The applicant shall not break ground prior to receiving District approval, of the Construction Emission / Dust Control Plan, and delivering that approval to the local jurisdiction issuing the permit.

Cumulative Impacts

1. On Page 18-31, the DEIR concludes that the Project's cumulative impacts will be reduced to a less-than-significant level with the implementation of Mitigation Measure (MM) 10-2:

Prior to recordation of each Small Lot Final Map, the project applicant shall prepare, to the satisfaction of Placer County Planning Services Division and PCAPCD, a chart or table with supporting analysis, which demonstrates that construction and operation of the proposed phase, combined with emissions from all past approved phases, will not result in ROG or NOx emissions in excess of 82 lbs/day.

As stated within the District's comment letter for the NOP (2012), the District applies 10 lbs per day standard as the recommended threshold for mitigating the project's cumulative impacts resulting from its ROG and NOx emissions. The District does not recommend tiering from MM10-2 for determining the level of mitigation for the Project, as this measure does not mitigate project-level emissions associated with the full buildout of the Project.

Furthermore, the DEIR states that the Project is located in an Ozone nonattainment area for the State Standard, and in order to improve air quality and attain the health-based standards, reductions in emissions are necessary within nonattainment areas. The District recommends the County consider all developed mitigation programs and plans, such as the triennial plan and Health and Safety code, when determining the level at which a project shall mitigate its cumulative impacts. The District does not recommend relying on the State Implementation Plan (SIP), as the SIP has been prepared for meeting the federal/national standards only, not to address the State Standards which are more restrictive, nor the State's Health and Safety Code requirements which have established the use 10 lbs/day as the threshold for determining when additional mitigation is needed. The District's recommended Cumulative Thresholds of 10 lbs/day for criteria pollutant emissions (ROG and NOx) are not established for the purposes of significance determination, rather it stipulates a level at which projects should mitigate its "cumulative" emissions, which is consistent with the methodology used by the State's Health and Safety Code. The District therefore recommends the County incorporate additional mitigation necessary to reduce the Project's cumulative emissions in excess of 10 lbs/day.

In order to calculate the fee, the District utilizes the cost-effectiveness factor updated by the latest CARB Carl Moyer Program Guideline. Cost-effectiveness is a measure of the dollars provided for each ton of covered emission reductions; CARB may adjust it to reflect emission reduction market conditions. The current rate for the District's off-site mitigation fee calculation is \$18,030 per ton of ozone precursor emissions (ROG or NOx), effective July 1, 2015.

According to the DEIR, Table 10-5 on pages 10-15 and 10-16, the total operational emissions at full buildout, for one ozone season, are estimated at 182 lbs/day for ROG and 82.7 lbs/day for NOx, an exceedance of 22 tons per year of ROG and NOx. Based on the current Carl Moyer Fee Guidelines, the offset mitigation fee is calculated at \$398,205. The District recommends the implementation of the mitigation measure to occur prior to final map issuance for each phase of the Project.

Thank you for allowing the District this opportunity to review the DEIR. Please do not hesitate to contact me at 530.745.2333 or agreen@placer.ca.gov if there are any questions regarding this communication.

Sincerely,



Angel Green
Associate Planner
Planning & Monitoring Section

cc: Yu-Shuo Chang, Planning & Monitoring Section Supervisor
Tom Thompson, Planning Consultant