

From: [Elena Nuno](#)
To: [Dan Barber](#)
Subject: GAMAQI Update
Date: Wednesday, May 02, 2012 10:11:20 AM

Dear Dan,

I would like to offer the following comments regarding the GAMAQI Update:

It would be helpful if the District could provide more information showing that a VERA is not over mitigating a project's impacts, why is compliance with Rule 9510 not sufficient, if that rule was adopted to mitigate growth and development. There is also a question that while Rule 9510 has undergone a CEQA level analysis and withstood several nexus challenges, the VERA has not undergone such a public environmental review process consistent with CEQA to determine whether payment of the fee will result in full mitigation.

It would also be helpful to have additional detail on how the Air District prepares VERA contracts for construction and operational emissions that exceed the regional thresholds. Some air districts, like San Luis Obispo, provide information such as how excess emissions are estimated over the life of the project (25 years for commercial and 50 years for residential) and the cost of the reductions (based on Carl Moyer guidelines). This would provide the agencies and applicants with information to determine if a VERA is economically feasible.

Finally, as others at the GAMAQI meeting expressed, I would also like to express my concern with the threshold proposed for conducting an ambient air quality analysis. It would be helpful if the District prepared some Localized Significance Thresholds based on background concentrations of criteria pollutants to indicate when an ambient air quality analysis is necessary. Perhaps the District can create some screening models similar to the health risk assessment model that can indicate when ambient air quality analysis will be triggered. I do not believe that the trigger should rely on an exceedance of a regional threshold.

Thank you for the opportunity to comment.

Best Regards,

Elena Nuño

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From: [Terry Farmer](#)
To: [Dan Barber](#)
Subject: GAMAQI update
Date: Monday, May 14, 2012 3:56:53 PM

Dear Dr. Barber,

I realize that I am late with my comments, but I hope you will consider them, as I am a CEQA practitioner and have much interest in the GAMAQI update.

In reviewing the draft update, there appeared to be little written about the evaluation of infrastructure projects such as streets, canals and levees. Much of the focus appears to be on more conventional development projects such as residential subdivisions, retail centers and industrial plants. However, infrastructure projects are of a type that the use of models such as URBEMIS and CalEEMod is problematical in an impact analysis. In my experience, I have used the Road Construction Model, which is recommended by SMAQMD and specifically addresses road projects. However, while better than other models, the RCM is not precisely applicable with projects such as levees and canals.

I would like to see GAMAQI address the issue of the evaluation of infrastructure projects; specifically, I would like it to recommend a model for the quantification of emissions from such projects. The recommended model is important especially in evaluating impacts of construction emissions, which in many cases is the main source of emissions from infrastructure projects.

Thank you very much for your consideration of my comments.

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