

TRUCK TERMINAL YARD PROJECT (DR20-035) Appendix A Response to Comments

Letter 1: Comment Letter from Residents of Santa Ana Avenue and Dry Creek Road 4/5/21

Response 1: Response to Residents of Santa Ana Avenue and Dry Creek Road 4/5/21 Comment Letter

Letter 2: Comment Letter from Douglas Alvis and Angela Watson 4/12/21

Response 2: Response to Douglas Alvis and Angela Watson 4/12/21 Comment Letter

Letter 3: Comment Letter from Douglas Alvis and Angela Watson 4/15/21

Response 3: Response to Douglas Alvis and Angela Watson 4/15/21 Comment Letter

Letter 4: Comment Letter from Terri Duarte, Sacramento Metropolitan Air Quality Management District (SMAQMD)

Response 4: Response to Terrie Duarte, SMAQMD Comment Letter

To City Community Development Department, Officer, Ron Bee,
Hello, Good Day!

We are residents of Santa Ana Avenue/Dry Creek Road, and we oppose anyone who attempts to set up a "Trucking Terminal Yard Project (DR 20-035)" next door to us.
We have lived here for decades, and we just want to keep this land quiet.

The reasons for the letter of protest are as follows:

1. A big trailer Large trucks will come in and out from here day and night, which will inevitably produce **uncontrollable loud noise, which is equivalent to changing our quality of life.** We can't bear such a huge noise. Please don't let us sleep well at night.
2. **The traffic problem will be tested.** The two roads, Aanta Ana Avenue/Dry Creek Road, were originally small roads. The arrival of large trucks will inevitably lead to traffic jams, which will cause inconvenience to nearby residents.
3. Large trucks enter and exit unlimited times, day and night, and small roads will be forced to break. **Repairing and maintaining roads will definitely be the pain of our citizens.**

If such an environment is destroyed, more and more troubles will surely breed.
Hope that City's Officer can become our life environmental protectionist.

The co-signers are residents living on Santa Ana Avenue/Dry Creek Road,

- 1209 Santa Ana Ave, Sacramento, CA 95838. Signature
- 1233 Santa Ana Ave, Sacramento, CA 95838. Signature
- 1227 Santa Ana Ave, Sacramento, CA 95838. Signature
- 1209 Santa Ana Ave, Sacramento, CA 95838. Signature
- Santa Ana Ave, Sacramento, CA 95838. Signature
- Santa Ana Ave, Sacramento, CA 95838. Signature
- 5000 Dry Creek Road, Sacramento, CA 95838. Signature
- 4941 Dry Creek Road, Sacramento, CA 95838. Signature
- Dry Creek Road, Sacramento, CA 95838. Signature
- Dry Creek Road, Sacramento, CA 95838. Signature
- Dry Creek Road, Sacramento, CA 95838. Signature
- Dry Creek Road, Sacramento, CA 95838. Signature

Jung Huang 3-25-2021
Angela G. White
Jennifer D. Nelson 3/29/2021
Zulu 3/29/21
- [Signature] 3-25-21
Kathy S. Jensen 3-29-21

Dear Officer, Ron Bee,
Hello, Good Day!

April 04, 2021

The city government is reviewing the application of the company "Trucking Terminal Yard Project (DR20-035)".

Please take a look at our response from your organization:

The main reason is that the two roads of Santa Ana Avenue/Dry Creek Road, which were originally the village, cannot withstand the noise and traffic problems of large trucks.

The company in this application is a large-scale corporate transportation company. We believe they have enough financial resources to move to other major roads to set up large truck terminals. We oppose the intention of this company.

All our residents are neighbors of this land. We have had the tranquility of this land for decades. We cannot tolerate their deliberate changes to this safe environment.

Thank you for watching our suggestions and helping our neighbors to make a just claim to the review committee!

Thank you once again!

Sincerely yours,

We are residents living in Santa Ana Avenue/Dry Creek Road,

Truck Terminal Yard Project (DR20-035)

Response to Comments

Response to Comments for Comment Letter #1

Residents of Santa Ana Avenue and Dry Creek Road 4/5/21		
Comment Number/Location	Comment/Recommendation Summary	Response to Comment
#1, Page 1	The project will result in uncontrollable loud noise.	Noise related impacts as a result of the project are evaluated in Section III.9, Noise, of the IS/MND. Mitigation Measures NOI-01: Restriction on Refrigeration Units and Diesel Idling, and NOI-02: Project Construction Activities would reduce impacts from potential sources of noise related to the project to less than significant levels.
#2, Page 1	The addition of trucks to Santa Ana Avenue and Dry Creek Road will cause traffic jams.	Traffic related to the project is analyzed in Section III.12, Transportation and Circulation, of the IS/MND. The proposed project would generate a maximum of 20 vehicle trips per day, 10 of which would be heavy trucks and 10 of which would be automobiles or light trucks used for worker commutes. These trips would account for less than 3 percent of existing traffic on Dry Creek Road and Santa Ana Avenue and would not create a significant amount of additional traffic.
#3, Page 1	The additional truck traffic will cause the roads to fall into disrepair.	Traffic related to the project is analyzed in Section III.12 of the IS/MND. The proposed project would generate a maximum of 20 vehicle trips per day, 10 of which would be heavy trucks and 10 of which would be automobiles or light trucks used for worker commutes. These trips would account for less than 3 percent of existing traffic on Dry Creek Road and Santa Ana Avenue and would not create a significant amount of additional traffic.

From: [Douglas Alvis](#)
To: [Ron Bess](#)
Subject: Trucking Terminal Yard Project (DR20-035)
Date: Monday, April 12, 2021 7:40:20 AM

As the residents of 1233 Santa Ana Ave., we are against the Truck Yard, due to the street being way too narrow, and the lack of off street parking, for the employees of the Truck Yard. For the short time they did operate there, our mailbox was hit by trucks. Our fence was tapped by trucks. Between the Chop Shop at 1241 Santa Ana and the Truck Yard, my car was hit, in my driveway as someone decided our driveway was a good turn around place, due to the very narrow street. The constant blocking of our driveway by the Truck Yard and the Chop Shop. The rudeness and lack of care by the businesses, (Truck Yard and Chop Shop).

If the City of Sacramento is willing to widen the street, install underground stormwater runoff, fix the stormwater collection area between 1233 and 1241 Santa Ana Ave, move the entrance of the Truck Yard, so it does not impact neighbors driveways, then we would not be so opposed to the project. As it stands now, I can barely get my RV or trailer out of my driveway. When people park across from our driveway, it is damn near impossible to get in and out with anything bigger than our car. Very little consideration is given by the businesses and the City of Sacramento to the residents on Santa Ana Ave. Please note: When Raley Blvd is flooded, Santa Ana Ave becomes the main thoroughfare, and traffic becomes five to ten times greater than usual. Widening the street, and improving the on street parking, by adding underground stormwater runoff, would be a great help to the community. I really do not want sidewalks, but as the Raley Business Park expands, this will be inevitable. At this time, road base over underground drainage would be sufficient.

Thank You
Angela Q. Watson
Douglas G. Alvis
1-(916)-960-9779

Truck Terminal Yard Project (DR20-035)

Response to Comments

Response to Comments for Comment Letter #2

Douglas Alvis and Angela Watson 4/12/21		
Comment Number/Location	Comment/Recommendation Summary	Response to Comment
#1, Page 1	Oppose the project due to the narrow street and lack of off-street parking for the employees of the truck yard.	Employee vehicles would be parked in the truck yard and would not require street parking. This comment does not raise any issue with the CEQA analysis presented in the Initial Study.
#2, Page 1	Concerns about stormwater runoff between 1233 and 1241 Santa Ana Avenue.	Stormwater runoff related to the proposed project is evaluated in Section III.8, Hydrology and Water Quality,. The commenter's concerns about existing stormwater runoff on Santa Ana Avenue are beyond the scope of this project.

From: [Douglas Alvis](#)
To: [Ron Bess](#)
Subject: Re: Trucking Terminal Yard Project (DR20-035)
Date: Thursday, April 15, 2021 1:37:55 PM

Since I last e-mailed you, two more mailboxes have been hit on Santa Ana Ave, and our driveway, blocked several more times, by big rigs and the damn Eastern European Legal chop shop. We are noticing more pedestrian traffic. I have seen pedestrians, have to bail for the dirt, to avoid the big trucks, and when a truck and car meet, on the road. Once again, street extremely too narrow, and few, improvements, of street over the last 30 years. We also learned that the property of the proposed Truck Yard, was once considered a Giant Garter Snake Habitat by either the EPA or another Environmental entity. I would appreciate, a phone call, and hopefully a visit by you, to discuss these issues and come with solutions, so business can move forward.

Thank You
Doug Alvis 1(-916)-960-9779
Angela Watson
1233 Santa Ana Ave
Sacramento, Ca. 95838

On Mon, Apr 12, 2021 at 7:40 AM Douglas Alvis <dalvisgt@gmail.com> wrote:

As the residents of 1233 Santa Ana Ave., we are against the Truck Yard, due to the street being way too narrow, and the lack of off street parking, for the employees of the Truck Yard. For the short time they did operate there, our mailbox was hit by trucks. Our fence was tapped by trucks. Between the Chop Shop at 1241 Santa Ana and the Truck Yard, my car was hit, in my driveway as someone decided our driveway was a good turn around place, due to the very narrow street. The constant blocking of our driveway by the Truck Yard and the Chop Shop. The rudeness and lack of care by the businesses, (Truck Yard and Chop Shop).

If the City of Sacramento is willing to widen the street, install underground stormwater runoff, fix the stormwater collection area between 1233 and 1241 Santa Ana Ave, move the entrance of the Truck Yard, so it does not impact neighbors driveways, then we would not be so opposed to the project. As it stands now, I can barely get my RV or trailer out of my driveway. When people park across from our driveway, it is damn near impossible to get in and out with anything bigger than our car. Very little consideration is given by the businesses and the City of Sacramento to the residents on Santa Ana Ave. Please note: When Raley Blvd is flooded, Santa Ana Ave becomes the main thoroughfare, and traffic becomes five to ten times greater than usual. Widening the street, and improving the on street parking, by adding underground stormwater runoff, would be a great help to the community. I really do not want sidewalks, but as the Raley Business Park expands, this will be inevitable. At this time, road base over underground drainage would be sufficient.

Thank You
Angela Q. Watson
Douglas G. Alvis
1-(916)-960-9779

Truck Terminal Yard Project (DR20-035)

Response to Comments

Response to Comments for Comment Letter #3

Douglas Alvis and Angela Watson 4/15/21		
Comment Number/Location	Comment/Recommendation Summary	Response to Comment
#1, Page 1	Concerns about existing traffic and parking on Santa Ana Avenue.	Employee vehicles would be parked in the truck yard and would not require street parking. Traffic related to the project is analyzed in Section III.12 of the IS/MND. The proposed project would generate a maximum of 20 vehicle trips per day, 10 of which would be heavy trucks and 10 of which would be automobiles or light trucks used for worker commutes. These trips would account for less than 3 percent of existing traffic on Dry Creek Road and Santa Ana Avenue and would not create a significant amount of additional traffic. The commenter's concerns about existing traffic and parking on Santa Ana Avenue are beyond the scope of this project.
#2, Page 1	The property was once considered giant garter snake habitat by either the EPA or another environmental entity.	Potential impacts related to endangered or threatened species and species of special concern are evaluated in Section III.3, Biological Resources, of the IS/MND. Three special status wildlife species have the potential to occur or be affected by the proposed project: burrowing owl, Swainson's hawk, and white-tailed kite. Giant garter snake was not identified as having the potential to occur on the project site. Section III.3 includes mitigation measures to reduce any potential impacts on biological resources to less than significant levels.



April 15, 2021

SENT VIA E-MAIL ONLY

Scott Johnson
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Subject: Trucking Terminal Yard Project (DR20-035) (SAC202102657)

Dear Scott Johnson:

Thank you for providing the Draft Mitigated Negative Declaration (MND) for the Trucking Terminal Yard Project to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The proposed project, located on an approximately a 3.6-acre vacant site bounded by Santa Ana Avenue and Dry Creek Road, would create a truck terminal to be used for overnight parking and storage of trucks with sleeper cabs and 53-foot trailers. Vehicles would typically be parked overnight and on weekends, with trucks entering the project site in the evening and exiting the site in the morning. Sac Metro Air District staff comments to benefit air quality follow.

Technical Corrections

Missing Figures - On page ii, the Table of Contents includes a List of Figures consisting of a vicinity map, land use and zoning, and site plan. Sac Metro Air District staff were unable to locate these figures in the body of the report. **We recommend that the figures be included in the final report.**

Correct Attributes of Information in Table 1 - On page 17, Table 1 lists sources and health effects of criteria air pollutants. Under the column "Human Health Effects," numerous non-human-health effects, such as "Precursor to ozone and acid rain," are listed. **This column might be better titled "Human Health and Environmental Effects," or a third column titled "Environmental Effects" could be added.**

Correct Information on Attainment of Air Quality Standards - On page 18, Table 2 lists the status of attainment of compliance with state and national air quality standards. In the fourth row, "Fine Particulate Matter (PM_{2.5}), State of California Attainment Status" is listed as "Attainment." **We recommend that this be changed to the correct status, which is "Non-Attainment."**¹

¹ <http://www.airquality.org/Air-Quality-Health/Air-Quality-Pollutants-and-Standards>

Trip Generation Assumptions

The Project Description on page 8 indicates that the project would include parking stalls for up to 36 trucks. However, usage of the project would be limited to 20 max trucks and cars per day (Air Quality section, page 24). On page 72, the Transportation and Circulation section reiterates this usage limit: "The proposed project would add a maximum of 20 vehicles per day, up to 10 heavy trucks and up to 10 autos for worker commutes to and from the project site." Trucks utilizing the project would remain onsite only overnight or for a weekend, as described on the document's cover page: "Vehicles would typically be parked overnight and on weekends, with trucks entering the project site in the evening and exiting the site in the morning." The air quality emissions analysis also modeled 10 truck trips and 10 car trips per day. On page 23, under Question B, the document states that the emissions modeling analysis "...assumes that each truck trip would be accompanied by a car or light truck trip representing truck drivers commuting to and from the project site..." This assumed limit of truck parking to one night implies that drivers will use the site as an overnight station and will drive from there to where they stay for the night. However, it is not clear why the facility would need 36 truck parking stalls if only 10 trucks per day will be using the facility. **Based on the capacity of the project to park 36 trucks, the Sac Metro Air District recommends that the estimate of usage of 10 trucks per day be reconsidered.**

Potential for Exposure of Sensitive Receptors to Toxic Air Contaminants

Proximity of Residential Uses to the Site – The project site is near several residences. As noted in the Air Quality section on page 19, "The closest existing sensitive receptor to the project site is a single-family residence adjacent the project site southern boundary. Additional sensitive receptors in the project vicinity include two single-family residences across Dry Creek Road to the west, and four single-family residences across Santa Ana Avenue to the north." This proximity of the residences creates a risk of resident exposure to diesel exhaust, a toxic air contaminant. There is no known safe level of exposure to diesel particulates and other toxic air contaminants present in truck exhaust.

The diesel exhaust emitted during entry and exit could be augmented by two common practices: idling of the diesel engines and operation of the Truck Refrigeration Units (TRUs) while parked. The MND, in the Project Description section on page 7, includes a statement, "Any trucks with refrigeration capabilities would not be running refrigeration units overnight." However, in the Answers to Checklist Questions Section, Question G, page 24, conflicting information is presented: "Truck trailers with diesel-powered TRUs (Truck Refrigeration Units) could be parked at the project overnight and on weekends with TRUs running." **We recommend that this discrepancy be rectified.**

The environmental document addresses the issue of TRUs running overnight by including a mitigation measure that prohibits TRUs from being operated while they are parked. This measure appears on page 70, in the Noise section:

Measure NOI-01: Restriction on Refrigeration Units. The City shall note in project approvals and on project use permits a restriction to prohibit the operation of internal combustion engine powered TRUs while trucks or trailers are parked within the project site.

While this mitigation measure can help to reduce both noise-related and air-quality-related environmental impacts, it appears to apply only to diesel-powered TRUs and may not apply to TRUs that are diesel-and-electric-powered, or electric. To manage the potential for TRUs that are electric or diesel-and-electric to be left operating overnight, the Sac Metro Air District recommends the project applicant install electrical plug-ins (“shore power”). Note that the Sac Metro Air District is now offering incentive funding to support clean-air vehicles, and **funds may be available to cover up to 50% of the cost of installation of electrical connections for TRUs**. Applications are accepted through May 28, 2021. For more information, go to <http://www.airquality.org/Residents/Incentive-Programs/Carl-Moyer-Program>, or contact Patrick Robinson at probinson@airquality.org or 916-874-6276. The California Air Resources Board is now developing regulations to mandate TRU electrification in the future, and may also have incentive funding for both vehicles and electric charging infrastructure, through its [Carl Moyer Program](#) and [the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project](#).

It is unclear how Mitigation Measure NOI-01 will be enforced. To enhance compliance with the measure, **the Sac Metro Air District recommends an additional mitigation measure requiring the project to post clear, conspicuous enforcement and complaint signs facing all neighboring residences and visible to truck drivers**. The notices will inform neighbors of the prohibition against operating TRUs while trucks are parked and will provide the telephone number at the City of Sacramento to call with complaints. Idling of trucks for more than five minutes is prohibited by State law, and **the notices should also include information on the California Air Resources Board (CARB) regulation limiting diesel truck idling to five minutes**, and the CARB Vehicle Complaint Hotline at 1-800-363-7664, or <https://air.arb.ca.gov/Forms/VehicleComplaint/CommercialIdling>. The notices should be in plain, everyday, conversational language, such as, “Trucks running overnight? Call xxx-xxx-xxxx.”

Vegetation Barrier - Even with the restrictions on running TRUs overnight and on idling diesel engines no more than five minutes, vehicle particulate matter emissions will present an exposure risk to nearby residents. The Sac Metro Air District commends the project for the project site plan (not included in the environmental document) that indicates a planter area that encircles the project with a width of 10 feet on the south, 28.4 feet on the east, 25 feet on the north, and 25 feet on the west. The project landscape plan indicates that the planting area is comprised of a mix of trees and shrubs. These trees and shrubs form a vegetation barrier between the truck parking and the residences that will help to disperse, absorb and filter the exhaust pollutants emitted by the trucks. However, Sac Metro Air District staff note that there are gaps in the planting area and that some of the trees and shrubs are deciduous. Deciduous trees and shrubs lose their ability to absorb and filter pollutants when their leaves drop in winter. **Sac Metro Air District staff recommend that the planting design in the landscape plan be consistent with the Sac Metro Air District’s [Landscaping Guidance to Improve Air Quality Near Roadways](#)**. This guide offers a list of trees and shrubs that are ideal in vegetation barriers and are well-suited to the Sacramento region. Another resource for identifying trees that will do well in the region’s climate future, searchable by specific characteristics, is provided by the Sacramento Tree Foundation on its [Shady Eighty list](#). **The Sac Metro Air District recommends the inclusion of more trees and shrubs in the landscape plan** so that the porosity of the barrier, that is, the degree to which air can pass through, is minimal. This can be achieved by selecting **trees and shrubs with dense foliage and by planting them as close together as possible, with no gaps**.

Construction Emissions

Sac Metro Air District staff note that no report of construction emissions modeling is present in the environmental document. **We recommend that an analysis of construction emissions be completed.** Please consult with the Sac Metro Air District's [CEQA Guide, Chapter 3](#) for assistance. Construction of a project that does not exceed the Sac Metro Air District screening level, meets all the screening requirements in Section 3.3.1 (i.e., cannot include any of the parameters listed in Section 3.3.1), and implements the Sac Metro Air District's Basic Construction Emission Control Practices (also known as Best Management Practices [BMPs]) will be considered to have a less-than-significant impact on air quality.

The Sac Metro Air District has adopted [construction emissions thresholds](#) of zero, or if all feasible Best Available Control Practices and Best Management Practices are applied, then the thresholds are 80lbs/day and 82 lbs/day for PM₁₀ and PM_{2.5}, respectively. This project is likely to be less-than-significant for construction emissions, but all projects are subject to Sac Metro Air District rules in effect at the time of construction and any construction project, regardless of the size, is required to implement the Sac Metro Air District's Basic Construction Emission Control Practices. The Basic Construction Emission Control Practices and the Rules & Regulations Statement are attached for your reference. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800.

Non-CEQA Comments

Increasingly in California, heavy-duty trucks will be powered by electrical propulsion in lieu of gasoline combustion engines. [California Executive Order N-79-20](#) directs the state to require that, by 2035, all new cars and passenger trucks sold in California will be zero-emission vehicles. The California Air Resources Board is currently developing regulations that will result in all trucks being zero-emission. Consistent with the state air quality and climate goals and future regulations, **the Sac Metro Air District recommends ensuring that the project includes electrical conduit in each parking space to provide for future EV truck parking.** Conduit is the greater part of the cost of installation of EV charging stations, and before pavement is laid is the least expensive time to install conduit. Also, if conduit is installed after the facility is constructed, it may require the removal of the trees and shrubs on the perimeter of the project.

Thank you for your consideration of these comments. If you have any questions, please contact me at 916-874-4816 or teriduarte@airquality.org.

Sincerely,



Teri Duarte, MPH
Planner/Analyst

Enclosures

Cc: Paul Phillee, AICP, Sac Metro Air District

Enclosure
Sac Metro Air District BASIC CONSTRUCTION EMISSION CONTROL PRACTICES
(BEST MANAGEMENT PRACTICES)

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. The practices also serve as best management practices (BMPs), allowing the use of the non-zero particulate matter significance thresholds.

Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).

Enclosure
Sac Metro Air District Rules & Regulations Statement (revised 10/2020)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District):*

All projects are subject to Sac Metro Air District rules 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 or building design 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 Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a Sac Metro Air District permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

Rule 402: Nuisance. The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

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 453: Cutback and Emulsified Asphalt Paving Materials. This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify the Sac Metro Air District of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other Regulations (California Code of Regulations (CCR))

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify the Sac Metro Air District of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.

Truck Terminal Yard Project (DR20-035)

Response to Comments

Response to Comments for Comment Letter #4

Teri Duarte, SMAQMD		
Comment Number/Location	Comment/Recommendation Summary	Response to Comment
#1, Page 1	Missing vicinity map, land use and zoning, and site plan figures.	These maps are included in both the version of the IS/MND that the Air District reviewed and in the Final IS/MND. No change to the document is required.
#2, Page 1	Page 17, Table 1 lists sources and health effects of certain criteria air pollutants. Suggest re-titling the column titled "Human Health Effects" to "Human Health and Environmental Effects" due to the fact that effects not related to human health are listed in this column.	The Column Title has been revised to "Human Health and Environmental Effects."
#3, Page 1	Page 18, Table 2 incorrectly lists "Fine Particulate Matter" as being in attainment.	The attainment designation for the PM _{2.5} State standard (CAAQS PM _{2.5} annual arithmetic mean - 12 µg/m ³) for Sacramento County is "Attainment," which is shown on the CARB State Attainment Designation Maps (https://www.arb.ca.gov/desig/adm/2019/state_pm25.pdf?ga=2.141154676.735155161.1621019186-329572025.1576257494) and on the SMAQMD website (http://airquality.org/air-quality-health/air-quality-pollutants-and-standards). The correct attainment status (Attainment) is shown in Table 2. No revision to the IS/MND is required.
#4, Page 2	Trip Generation Assumptions. The IS/MND list indicated that the project would include parking stalls for up to 36 trucks. The AQ and Transportation sections assume a maximum of 10 trucks and 10 autos per day. It is not clear why the facility	The analysis in the IS/MND assumes a maximum of 10 truck trips and 10 automobile/light truck trips per day. The applicant's company owns a total of 10 trucks, and since this site would only be used by the trucks owned by the applicant's company there would be no more than 10 trucks entering or leaving the site per day. Personal vehicles (automobiles or light trucks) belonging to the

	<p>would need 36 truck parking stalls if only 10 trucks per day will be using the facility. Based on the capacity of the project to park 36 trucks, the Sac Metro Air District recommends that the estimate of usage of 10 trucks per day be reconsidered.</p>	<p>drivers of the 10 trucks would also be parked on site, resulting in a maximum of 10 automobiles/light trucks entering or exiting the site each day.</p>
<p>#5, Page 2</p>	<p>Potential for Exposure of Sensitive Receptors to Toxic air Contaminants. Sensitive receptors are located in the area, and there is a risk of resident exposure to diesel exhaust, a toxic air contaminant. The analysis on Page 24 Question G states “Truck trailers with diesel-powered TRUs [Truck Refrigeration Units] could be parked at the project overnight and on weekends with TRUs running.”, conflicting with the Project Description which states that “Truck trailers with diesel-powered TRUs could be parked at the project overnight and on weekends with TRUs running.” The Air District recommends that the discrepancy be rectified.</p>	<p>The analysis for Question G in Section III.2 has been revised acknowledge that there is a potential for truck trailers with diesel-powered TRUs to be parked on the site with TRUs running, and to identify the use of diesel-powered TRUs or truck idling in excess of the State 5-minute statutory limit as potentially significant. Implementation of Mitigation Measure NOI-01 would prohibit diesel engines from being used to power TRUs while trucks or trailer are parked on the project site and would require signs to alert drivers to the restriction on TRU operation and remind them of the State 5-minute idling restriction. The proposed mitigation would reduce impacts to a level of less than significant.</p>
<p>#6, Page 3 and 4</p>	<p>Mitigation measure NOI-01 may not apply to diesel-electric or electric powered TRUs. The Air District recommends that project install electrical plug-ins (“shore power”) for TRUs.</p>	<p>The wording of Mitigation Measure NOI-01 has been revised to remove any ambiguity restriction on the use of TRUs while parked on the project site. Based upon the project description and information provided by the applicant, truck trailers parked at the project site overnight and on weekends would not contain TRUs. The type of truck trailers being used that will occupy the site are for dry good hauling and do not contain the refrigeration units. The commenter’s recommendation that the project install electrical plug-ins (“shore power”) is noted and will be passed on to the project applicant. However, with implementation of Mitigation Measure NOI-01,</p>

		there are no significant impacts which would require such an installation as mitigation.
#7, Page 3	It is unclear how Mitigation Measure NOI-01 will be enforced. The District recommends additional mitigation to require publicly visible signage reminding drivers and the public of the TRU restriction and the California 5-minute truck idling regulation.	Requirements for posting publicly visible signs at the project entrance(s) has been added to Mitigation Measure NOI-01. The signs shall clearly state the restrictions on the operation of TRUs using diesel internal combustion engines and provide City and CARB phone number for the public to report violations. The City, as lead agency, will be responsible for enforcing the requirements of Mitigation Measure NOI-01, as revised in this document, through the Mitigation Monitoring and Reporting program (MMRP) adopted for the project.
#8, Page 3	Vegetation Barrier. The Air District recommends changing the landscaping plan to reduce gap, replace deciduous trees and shrubs with evergreen trees and shrubs, and increase the density of vegetation to help disperse, absorb and filter the exhaust pollutants emitted by the trucks	With the implementation of restrictions on running TRUs overnight and on idling diesel engines no more than five minutes, vehicle particulate matter emissions will fall within the acceptable exposure risk to DPM recommended by SMAQMD of 10 in 1 million. No changes to the IS/MND are required. The Air District's recommendations regarding landscaping will be passed on to the applicant.
#8, Page 4	Notes no report of construction emissions modeling, recommends an analysis of construction emissions be completed.	Construction emissions of NO _x were evaluated in Section III.2 Air Quality, Question A of the IS/MND using the screening criteria listed in the SMAQMD CEQA Guidelines, Section 3.3.1. in Question A. Construction emissions of PM ₁₀ and PM _{2.5} were evaluated in Section III.2 Air Quality, Question D of the IS/MND using the screening criteria listed in the SMAQMD CEQA Guidelines, Section 3.4.1 in Question D. The project meets all screening criteria, no modeling of construction emissions is required. The document has been revised to list all screening criteria.
#9, Page 4	Notes that the SMAQMD has adopted construction emissions thresholds of zero unless all feasible Best Available Control Practices and Best Management Practices are applied.	The Basic Construction Emission Control Practices are discussed in Section III.2 Air Quality, Question D of the IS/MND. The analysis in Question D has been revised to include the list of Basic Construction Emission Control Practices.
#10, Below	Recommends ensuring that the project includes electrical conduit in each parking space	As noted by the commenter, this is not a CEQA requirement, but is a good idea to prepare for the future implementation of electric trucks.

	to provide for future EV truck parking.	The Districts recommendations will be passed on to the applicant.
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