



June 13, 2008

Ms. Elise Gumm
Development Services Department, Planning Division
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA, 95811

**SUBJECT: Request to establish Docks Area Specific Plan and Docks PUD
SMAQMD # SAC200500794C**

Dear Ms. Gumm,

Thank you for providing the project listed above to the Sacramento Metropolitan Air Quality Management District (District). I am the point person for this project. Staff comments follow.

We are excited to see this proposed project coming to the City of Sacramento. As a high-density, mixed-use project close to downtown Sacramento, it will very likely be beneficial to regional air quality. Hopefully, too, it will be catalytic in the revitalization efforts for downtown Sacramento. We look forward to learning more details about the specific design alternatives and the project's connectivity as those details evolve. We would like to be invited to participate in any outreach efforts conducted for public agencies or interested parties.

Toxic Air Contaminants from mobile sources on highways

The subject project is immediately north of the elevated Interstate 80/Highway 50 /Pioneer Bridge and it is immediately west of the elevated Interstate 5. Both of these highways are very heavily traveled. Because of its orientation relative to the highways, the project is generally downwind of emissions generated by traffic on the two major highways. In addition, the project is considered a "sensitive receptor." Sensitive receptors are facilities or uses that house or attract children, the elderly, people with illness or others who are especially sensitive to the effects of air pollutants. In this case, this project's residential uses qualify it as a sensitive receptor.

In 2005, the California Air Resources Board (CARB) adopted the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance to local planners and decision-makers about land use compatibility issues. The Handbook suggests that, at a minimum, the siting of residential uses should not occur within 500 feet of a freeway. Traffic-related studies referenced in the Handbook reflect that the additional health risk attributable to the proximity effect was strongest within 1,000 feet. In 2007, the District's Board of Directors endorsed the District's own Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways which was created to provide guidance for developers and planners in the Sacramento area. That document will be updated shortly.

The District Protocol document, however, would not give appropriate guidance for this situation in which there are multiple elevated highways. **Contrary to the District response to the NOP for the project (10/23/2007), we do not recommend reliance on the District Protocol for analysis of the TAC impact for this project. Rather, we suggest dispersion modeling be used in the TAC analysis to more accurately predict the health risk to the project.** In addition, we urge the City to consider the TAC impacts to this project very early in the design process so that TAC mitigation can be incorporated into the siting, design and orientation of buildings.

Other recommendations

Maximize project connectivity

Given the fact the project is practically land-locked by the two major highways and the river, it will be especially important to maximize any opportunity for connectivity to the surrounding area from the project. Opportunities to increase pedestrian and bicycle access to the project should be very carefully examined. Hopefully, the few vehicle access streets will be designed as "complete" streets and will not be so wide as to discourage other forms of travel.

Bicycle facilities

In order to better support bicycling, residential and office buildings could be designed to incorporate large, comfortable bicycle storage rooms at the ground level. An example of such a storage facility can be found in the CALEPA building. That storage room holds over 150 bicycles. Cyclists also have the use of showers and lockers. The high-rise residential buildings of the Docks project as well as the office buildings could all have such facilities which would greatly encourage people to ride bicycles.

Car Sharing

The City of Sacramento could be the next prime market for car sharing programs similar to those in some metropolitan cities (ie Washington DC). Programs like this need some programmatic elements such as special preferential parking facilities and funding to administer the program. The Docks Specific Plan could incorporate a vision and mechanisms which would facilitate a car sharing program which could greatly reduce the amount of vehicles needed by residents or office workers. We would be happy to share information about car sharing programs with the developer.

Transportation Demand Management funding

We believe it would be essential to have a funding mechanism built into the PUD or specific plan which would provide transportation demand management (TDM) services. TDM services consist of transportation information and alternative transportation services (like guaranteed ride home, vanpools, carpools, bike incentives, etc). They're typically provided by a Transportation Management Association (TMA) to employers and sometimes others in a specific geographical area. An example of a development-wide TMA is the Warner Center in Woodland Hills, California. As economies of scale are identified, working with the existing Sacramento TMA would also be available. The Director of that TMA is Marilyn Bryant and she can be reached at 441-7074.

We would be very happy to engage in discussions or brainstorming with the developer or proponent regarding alternative transportation or TDM at this site. If you have questions, please contact me at 874-4885 or jborkenhagen@airquality.org

Sincerely,



Jeane Borkenhagen
Associate Air Quality Planner Analyst

cc:	Larry Robinson	SMAQMD
	Beth Tinch	Economic Development Department
	Scott Johnson	City of Sacramento
	Marilyn Bryant	Sacramento TMA