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February 18, 2015

Ms. Katherine Hess
City of Davis
Community Development Department
23 Russell Blvd.
Davis, CA 95616

Dear Ms. Hess:

The Yolo-Solano Air Quality Management District (District) has received the Notice of Preparation (NOP) for the Nishi Gateway Project (Project). The Project would develop a mixed-use community providing roadway connections to the City of Davis and the UC Davis campus. The project will also rezone West Olive Drive to allow for redevelopment of parcels within West Olive Drive. We have reviewed the document and offer the following comments:

Construction Emissions:

The environmental document prepared for the project should address emissions of criteria pollutants during construction of the project. These emissions would most likely be calculated using the CalEEMod emissions modeling software. Emissions should be compared to the applicable thresholds of significance as found in the District's "Handbook for Assessing and Mitigating Air Quality Impacts" (Handbook). Other guidance on the quantification of construction emissions can also be found in the Handbook. The analysis should specifically address what dust-suppression measures will be implemented during construction in order to keep fugitive dust from impacting nearby receptors.

Operational Emissions:

According to the NOP, the Project land uses as preliminarily proposed include:

- 650 residential units
- 325,000 square feet of office and research and development space
- 20,000 square feet of accessory retail and related commercial uses

The environmental document prepared for the project should estimate long-term operational emissions from the project uses as included in the project description at the time of analysis. As with construction emission quantification, the CalEEMod emissions modeling software can be used for this purpose, and emissions should be compared to the appropriate thresholds of significance as found in the District's Handbook. Vehicle emissions should be based on the vehicle trip information found in the traffic study prepared for the project. Additional guidance on quantifying operational emissions can be found in the District's Handbook.

Site Design:

The environmental analysis should examine whether the project's site design incorporates available features that could contribute to vehicle trip reduction and/or the use of alternative fueled vehicles. Specifically, the analysis should discuss the following:

- Availability of infrastructure to support electric vehicle charging
- Bicycle infrastructure
- Circulation between the project and other surrounding land uses
- Whether the project provides for non-motorized connectedness to other surrounding uses

Exposure to Toxic Air Contaminants:

Due to the proximity of the project site to Interstate 80, the environmental analysis should address potential impacts from diesel particulate matter on sensitive receptors created by the proposed project. Diesel particulate has been identified as a toxic air contaminant (TAC) and is produced by heavy-duty vehicles as they travel along roadways. The Air Resources Board (ARB) document titled "Air Quality and Land Use Handbook: A Community Health Perspective" provides guidance that addresses appropriate distances between receptors and sources of TAC. The document recommends avoiding new sensitive receptors (such as residents) within 500 feet of freeways with traffic volumes of 100,000 vehicles per day. The segment of Interstate 80 adjacent to the project site experiences average daily traffic volumes well above 100,000 vehicles per day. Many of these vehicles are heavy-duty diesel trucks. The District defers to the guidance in the ARB document, but also acknowledges that factors such as new vehicle technology, reduction of truck emissions due to recent regulation, and predominant wind patterns can affect overall exposure of receptors to diesel TAC from vehicles traveling along the interstate. If the lead agency's conclusions are that exposure of new receptors to diesel TAC would be lower than that suggested in the ARB guidance, the lead agency should provide a quantitative analysis to demonstrate this. This would likely require the preparation of a health risk assessment using a dispersion model and employing appropriate methodology. In order to completely assess TAC exposure to residents, the contribution of any other significant ongoing sources of TAC (such as locomotive emissions) should be included in the analysis as well.

Climate Change and Greenhouse Gases:

Recent changes to CEQA require any CEQA analysis to address a project's impacts on global climate change. The lead agency should provide a discussion of the project's potential to produce greenhouse gas emissions (GHG) and whether these emissions would be in conflict with the GHG-reduction goals set by the State. If emissions are quantified, the lead agency should contact the District to determine the most appropriate threshold of significance for the project.

The District appreciates the opportunity to comment on the NOP for this project. If you have any questions about the comments included in this letter, please feel free to contact me at 530-757-3668 or email me at mjones@ysaqmd.org.

Sincerely,

Matthew R Jones

Matthew Jones
Planning Manager, YSAQMD