



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

CHIEF EXECUTIVE OFFICE

2008 JUL -9 A 11: 48

July 2, 2008

Keith Boggs
Stanislaus County Economic Development
1010 10th St
Modesto, CA 95354

Project: West Park Specific Plan Project – Notice of Preparation

District Reference No: 20080395

Dear Mr. Church:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the West Park Specific Plan Project located on the Crow's Landing Air Facility in Stanislaus County.

The proposed project would include a general plan amendment, zoning, and related land use entitlements. The District offers the following comments:

District Comments

- 1) The District recommends that any preliminary and final environmental review of the project's potential impact on air quality include the following:
 - 1a) A description of the regulatory environment and existing air quality conditions impacting the area. Information on the District's attainment status can be found on the District's web page: <http://valleyair.org/aqinfo/attainment.htm>
 - 1b) A description of the project, including a discussion of existing and post-project emissions. The discussion should include emissions from short-term activities such as construction, and emissions from long-term activities, such as operational, and area wide emission sources.

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Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
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Southern Region
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- 1c) A discussion of the potential health impact of Toxic Air Contaminants (TACs), if any, to near-by receptors.
- 1d) A discussion of whether the project would result in a cumulatively considerable net increase of any criteria pollutant or precursor for which the San Joaquin Valley Air Basin is in non-attainment.
- 1e) A discussion of whether the project would create nuisance odors.
- 1f) A discussion of the methodology, model assumptions, inputs and results used in characterizing the project's impact on air quality.
- 1g) A discussion of all existing District regulations that apply to the project.
- 1h) A discussion of all feasible measures that will reduce air quality impacts.
- 2) At this time there are no established significance thresholds for greenhouse gas emissions, however, it is suggested that the EIR include a discussion of greenhouse gas emissions generated by the project and the effect they will have, if any, on global climate change.
- 3) Emissions from permitted (stationary sources) and non-permitted (mobile sources) sources should be analyzed separately. The project should be considered to have a significant adverse impact on air quality if emissions from either source exceed the following amounts: 10 tons per year of oxides of nitrogen (NO_x), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM₁₀).
- 4) If the project is located near residential/sensitive receptors, the proposed project should be evaluated to determine the health impact of Toxic Air Contaminants (TACs) to the near-by receptors. If the analysis indicates that TACs are a concern, the District recommends that a Health Risk Assessment (HRA) be performed. If a HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach. Please contact Mr. Leland Villalvazo, Supervising Air Quality Specialist, at hramodeler@valleyair.org. Additional information on Toxic Air Contaminants (TACs) can be found on the District's Air Quality Modeling page; http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm
- 5) If an HRA is performed, all input and out put files necessary to validate the analysis should be submitted to the District in electronic format.

- 6) The proposed project may require District permits. Prior to construction, the project proponent should submit to the District an application for an Authority to Construct (ATC). For further information or assistance, the project proponent may contact the District's Small Business Assistance Office at (209) 557-6446.

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call Maya H. Garcia at (559) 230-5934 and provide the reference number at the top of this letter.

Sincerely,

David Warner
Director of Permit Services



 Arnaud Marjollet
Permit Services Manager

DW: mhg

cc: File