

December 23, 2013

Ms. Amy Dutschke, Regional Director  
Bureau of Indian Affairs, Pacific Region  
2800 Cottage Way  
Sacramento, CA 95825

**NOI Comments, Wilton Rancheria Project (SAC201301478)**

Dear Ms. Dutschke:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is providing comments in response to the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Wilton Rancheria Project listed in the Federal Register on December 4, 2013. One of the purposes of the SMAQMD is to represent the citizens of Sacramento in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality<sup>1</sup>. Since Sacramento County does not attain the Federal or State air quality standards for ozone, and an overwhelming percentage of emissions of nitrogen oxide and volatile organic compounds (ozone precursors) come from mobile sources, the SMAQMD reviews land use decisions of public agencies as an opportunity to obtain emissions reductions from mobile sources to improve air quality.

SMAQMD staff recommends the draft EIS for the Wilton Rancheria Project include the following topics.

1. Analyze and disclose the amount of construction and operational related emissions from the project including: nitrogen oxides (NO<sub>x</sub>), reactive organic gases (ROG), exhaust and fugitive dust particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), greenhouse gas emissions (GHG), toxic air contaminants (TAC) and odors. Activities covered should be comprehensive and include on-road, off-road, portable and stationary equipment related to the project.
2. Determine if emissions will cause significant impacts to air quality by comparing the emissions levels to local significance thresholds, state and federal air quality standards, and transportation and general conformity regulations if applicable.
3. Describe all feasible mitigation measures that will be implemented to avoid and/or minimize significant impacts for each pollutant.
4. Discuss the project's consistency with local planning documents such as the County of Sacramento General Plan, the City of Galt General Plan, the Sacramento Area Council of Government's Metropolitan Transportation Plan, and the SMAQMD's attainment plans for ozone and particulate matter.
5. Include all analyses assumptions, calculations and modeling runs in the document (or its appendices).

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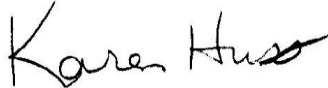
<sup>1</sup> California Health and Safety Code §40961

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The SMAQMD provides its *Guide to Air Quality Assessment in Sacramento County* that may be helpful to the Bureau in adequately addressing air quality in the draft EIS. The Guide can be downloaded from the [www.airquality.org](http://www.airquality.org) website, by clicking on *CEQA Tools*.

Please contact me at 916-874-4881 or [khuss@airquality.org](mailto:khuss@airquality.org) if you have any questions regarding these comments. I look forward to receiving a copy of the draft EIS on the Wilton Rancheria Project when it is released.

Sincerely,

A handwritten signature in black ink that reads "Karen Huss". The signature is written in a cursive style with a horizontal line underlining the name.

Karen Huss  
Associate Air Quality Planner/Analyst  
Land Use and Mobile Sources Division

Cc: Larry Robinson, SMAQMD  
Chris Erias, City of Galt Community Development Department, Planning Division  
Lauren Hocker, County of Sacramento Community Department, Planning and Environmental Review Division