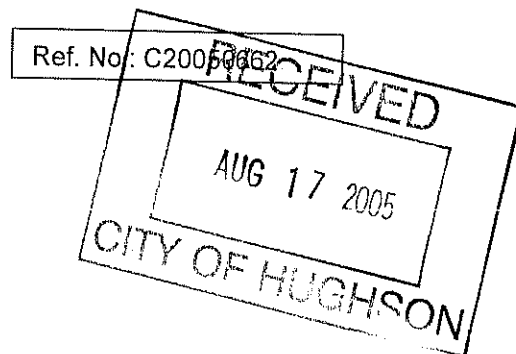




San Joaquin Valley Air Pollution Control District

August 16, 2005

Mr. Barry C. Siebe
Director of Planning and Building
City of Hughson
7018 Pine Street
Hughson, CA 95326



Re: City of Hughson General Plan Draft Environmental Impact Report

Dear Mr. Siebe,

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) forwarded by the City of Hughson for the City of Hughson General Plan (Project). The DEIR appropriately addresses the project's potential impact on Air Quality. Development as a result of this project will be subject to District rules, regulations and permitting requirements. The District previously commented March 29, 2005, Reference No. N20050171, and it appears that our comments were thoroughly addressed.

3-1

We noticed an error regarding the District's air quality classifications on Table 4.3-1. The SJV Air Basin is currently *serious* non-attainment for 8-hour ozone (the previous extreme non-attainment for 1-hour ozone has been revoked by the US EPA effective June 15, 2005 as specified in Federal Register Vo. 69 No. 84 Friday April 30, 2004 Rules and Regulations) and *severe* nonattainment for the State ozone standard. This information could be significant, for example, when providing the District's air quality classifications for federal programs such as Community Development Block Grant and Federal Transit Administration funding.

3-2

Also, we believe Policy COS-7.8 regarding fireplaces could be strengthened. See Air District Rule 4901 (Wood Burning Fireplaces and Wood Burning Heaters) regarding limitations of wood burning devices in new residential development at <http://www.valleyair.org/rules/1ruleslist.htm>. The City of Hughson may also consider restricting new fireplaces in residential development to only natural gas-fueled devices similar to an ordinance adopted by the City of Fresno.

3-3

As noted in the DEIR, despite describing all mitigation efforts to reduce air quality impacts, the document correctly specifies that such efforts may not reduce impacts to levels of insignificance. We agree that all mitigations included in the DEIR should be implemented to the extent specified to reduce air quality impacts.

3-4

As the General Plan is the blueprint for future growth in Hughson, it correctly provides a broad, generalized approach to the city's development. However, as individual projects are developed, there are many mitigations which can be implemented and there are a variety of approaches to implement mitigations. In addition to the mitigation measures specified in the General Plan regarding air quality, the City of Hughson may also refer future development applicants to the

3-5

District directly. The District has entered into Air Quality Mitigation Agreements (Mitigation Agreement) with several developers. These agreements require the District and the applicant to quantify operational emissions, and identify on-site mitigation to reduce the proposed project's net impact on air quality. The developer commits to providing funding on a per ton of emissions basis to the District to purchase emission reductions through its grant and incentive programs to fully mitigate the net emissions. The District commits to reduce the net emissions and to manage and monitor the emission reduction projects over time. The District asks that developers interested in a Mitigation Agreement to meet with District staff to discuss the specifics of the project and the contract. District staff is available to meet with project proponents to discuss Mitigation Agreements for specific projects. Examples of Air Quality Mitigation Agreements have been included. For more information, or questions concerning this topic, please call Mr. Dave Mitchell, Planning Manager at (559) 230-5800.

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If you have any questions or require further information, please call me at (559) 230-5820 and provide the reference number at the top of this letter.

Sincerely,



Hector R. Guerra
Senior Air Quality Planner

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