

March 26, 2007

Dr. Jake A Plante
Planning and Environmental Division
Federal Aviation Administration
800 Independence Avenue
APP-400, SW., Room 616, Office of Airports
Washington, DC 20591

Re: Federal Presumed to Conform Actions under General Conformity

Dear Dr. Plante:

We appreciate the opportunity to comment on FAA's Federal Presumed to Conform Actions under General Conformity notice as published in the Federal Register on February 12, 2007. The Sacramento Metropolitan Air Quality Management District is included in the Sacramento nonattainment area, which is currently designated "serious" for the federal 8-hour ozone standard. Our staff comments on the proposed action pertain to: 1) Aircraft Gate Areas on Airside, and 2) How to Apply Presumed to Conform Actions

Aircraft Gate Areas on Airside

We support FAA's recommendation to include this project category to the list of exemptions. Although this area did not describe which type of projects used in the analyses, it is important to identify if the analysis included upgrades such as airside gate electrification as part of this category. Projects incorporating gate electrification, and shown to be *de minimus*, could be a catalyst for airport agencies and airlines to pursue upgrades in this area. Not only will there be improvement in passenger queuing and waiting times, there will undoubtedly be substantial long-term emission reductions benefits as well.

How to Apply Presumed To Conform Actions

The air district commends the FAA's effort and diligence in conducting thorough evaluations and detailed analyses of those project categories that are consistently *de minimus*. As mentioned in the notice, references a separate analysis of each project category in the presumed to conform list showing the resulting emissions from any presumed to conform action are below the "applicable" *de minimus* threshold. However, to provide further clarification and better understanding of the project analyses performed, references to the results of the analyses should be provided. In that significant air quality problems persist in California and meeting air quality standards will require controls on federal sources as well as state and local controls, we urge inclusion of requirements for minimum level of controls to be presumed to conform in areas with nonattainment classifications of serious or higher. Similar conditions should be considered to minimize greenhouse gas emissions.

Thank you for your consideration of our comments. If there are any questions regarding our comments, please contact me at (916) 874-4802 or Brigette Tollstrup (Program Coordination Division Manager) at (916) 874-4832.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene". The signature is fluid and cursive, with a large initial "L" and "G".

Larry Greene
Executive Director