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November 29, 2011

Erik Nolthenius, Principal Planner
City of Brentwood
Community Development Department
150 City Park Way
Brentwood, CA 94513

Subject: Draft Environmental Impact Report for the Brentwood Boulevard Specific Plan

Dear Mr. Nolthenius,

Bay Area Air Quality Management District (District) staff reviewed the Draft Environmental Impact Report (DEIR) for the City of Brentwood's (City) Brentwood Boulevard Specific Plan (Plan). We understand that the Plan area covers roughly 310 acres and will serve as the guiding policy document for future development in the City's downtown. The City anticipates this area to accommodate 1,992 new residential units, support 3,500 jobs, and allow for the development of approximately 1.4 million square feet of retail, commercial, office, and industrial space.

The District has the following specific comments on the DEIR.

Air Quality Impact Analysis

District staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with construction and operational emissions. The San Francisco Bay Area is currently in nonattainment for state and federal ozone standards and fine particulate matter (PM2.5) standards, and for state PM10 standards. The emissions associated with the Plan should be mitigated to the maximum extent feasible to ensure the Plan does not adversely affect the region's ability to attain health-based ambient air quality standards.

4.5.1 Short-term Construction-Related Air Quality Impacts

The DEIR states that construction activities would exceed BAAQMD 2010 CEQA thresholds for criteria pollutants and exacerbate existing air quality conditions. In response, Mitigation 4.5.1 is proposed which lists 22 mitigation measures that future projects shall incorporate. District staff supports these measures and recommends the City add further measures that reduce construction exhaust emissions. This includes:

- Require electrification of motors, pumps, and other power tools whenever feasible

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- Prohibit diesel generators where access to the electrical grid is available
 - Require the use of biodiesel or other alternative fuels in diesel generators, construction equipment, and/or off-road vehicles
 - Establish minimum construction waste reduction and recycling standards
 - Require the use of diesel particulate filters on equipment where Tier 3 engines are not available

District staff also encourages the City to develop a standard construction mitigation plan as part of the FEIR's Mitigation Monitoring and Reporting Program. This would serve to help developers establish compliance with air quality mitigation requirements.

4.5-3 Long-term Operational Air Quality Impacts

Emissions from long-term operational activities associated with the implementation of the Plan exceed the District's significance thresholds for criteria pollutants. To address this impact, the DEIR contains a host of measures aimed at reducing commercial vehicular trips and several measures to reduce area source emissions from residential development. Staff supports these measures and recommends the City apply transportation-related measures to residential development as applicable. For example, the City can require landlords and property owners to separate parking costs from property costs, allowing tenants who wish to purchase parking to do so at an additional cost. Additionally, providing transit subsidies can apply to residential as well as commercial/retail projects. District staff has also identified other feasible mitigation measures that should be made conditions of approval for subsequent development within the Plan area to ensure that all impacts are mitigated to the maximum extent feasible. (See recommended mitigation measures below.)

Toxic Air Contaminants Analysis

District staff understands the DEIR contains an analysis of toxic air contaminants (TACs) which relies on a guidance document prepared by the California Air Resources Board (CARB), "*Air Quality and Land Use Handbook: A Community Health Perspective*" (2005). The handbook provides information to local governments on common sources of air pollution and gives general guidance to consider when siting sensitive receptors. This information was used to identify potential setbacks for new development.

The District's CEQA Air Quality Guidelines may be a useful resource to supplement the CARB handbook. The District's Guidelines provide detailed guidance specific to the Bay Area on evaluating and minimizing air quality impacts of land use development. In addition, the District offers site specific information which allows for more precise analyses. District staff recommends the City use the tools on the District's website to evaluate the potential cancer risk and hazard impacts to existing and future sensitive populations within the Plan area boundary. These are available for download at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>. This analysis should include highways, major roadways, permitted stationary sources, and active rail lines in or near the Plan area boundary.

According to the District's highway screening tool, the cancer risk from TACs attributed to traffic along the eastern side of Brentwood Boulevard is approximately 15.74 in a million. To address this potentially significant impact, staff recommends the City require mitigation measures, for example requiring that new development with sensitive receptors be located on the building's second floor (or higher) or ensure building setbacks of at least 50 feet from the nearest edge of Brentwood Boulevard. Alternatively, buildings with sensitive receptors located in the impacted area can have their HVAC systems fitted with high-efficiency particulate air filters (HEPA filters). Upon doing so, this would reduce the impact below the District's risk and hazards thresholds. The City can also consider phasing future development in a manner which first places sensitive receptors furthest from the roadway, allowing for state vehicle emission regulations to take full effect before development occurs closer to the roadway.

District staff has also identified other sources of TACs not included in the analysis. This includes four gas stations, four emergency back-up generators, and an active rail line to the South/Southwest of the Plan area boundary. Staff has reviewed these TAC sources and recommends new development within the Plan area that have sensitive receptors be located at least 100 feet from these gas stations. Of the four emergency back-up generators, only one would have a potentially significant impact. To address this impact, District staff recommends the following: do not locate sensitive receptors within 150 feet of the generator; or install a diesel particulate filter on the generator; or install HEPA filters on all buildings in impacted areas that house sensitive receptors.

In addition, Union Pacific Rail operates a rail line approximately 750 feet from the South/Southwest of the Plan area. District staff has reviewed emissions data from the rail line and has determined that at the Plan's boundary, risk and hazard impacts are below the District's risk and hazard thresholds.

Greenhouse Gas (GHG) Emissions Analysis

District staff understands GHG emissions from existing and new development were estimated to be 51,739 MTCO₂e/yr at the Plan's full buildout. The GHG analysis, however, subtracts the existing emissions from the Plan's projected emissions and concludes an increase in emissions of approximately 28,993 MTCO₂e/year. This was then divided by the Plan's future buildout service population of 9,661 which included existing and projected new residents and employees. The DEIR compared the resulting 3.0 MTCO₂e/SP/yr to the District's 6.6 MTCO₂e/SP/year threshold.

This analysis is not consistent with the District's methodology to estimate the Plan's GHG emissions and the use of the 6.6 threshold is not appropriate for a specific plan. As stated on page 2-7 of the District's 2010 CEQA Guidelines, the 6.6 MTCO₂e/SP/yr threshold's only applicable to general plans. District staff recommends using the Plan's buildout emissions of 51,739 MTCO₂e/yr, divide those emissions by the Plan's buildout service population, and then compare to the District's 4.6 MTCO₂e/SP/yr threshold. Based on this analysis, the Plan's GHG emissions would be considered potentially significant and the City should mitigate this impact. District staff recommends the City incorporate the mitigation measures listed below, and additional measures if necessary, to reduce GHG emissions below the District's 4.6 threshold.

Recommended Mitigation Measures

District staff recommends the City consider all feasible mitigation measures to lessen the severity of the Plan's identified significant impacts to operational criteria pollutants and GHG emissions. If any of these measures recommended below are considered infeasible, the FEIR should provide substantial evidence to justify that conclusion. This includes:

Transportation Measures

- Require employers to provide transit subsidies for retail/commercial employees
- Require employers to offer parking cash-out options to employees
- Install electric vehicle charging stations
- Dedicate downtown parking for carpooling and electric vehicles
- Unbundle parking costs from residential leases and rental units

Energy Mitigation Measures

- Require all new commercial and residential buildings, and significant remodels, to exceed current Title 24 standards by a minimum of 15%
- Require on-site renewable energy systems, such as wind turbines, solar photovoltaic or solar hot water heating systems
- Implement waste recycling and composting programs for all types of development, and
- Require the use of recycled grey water for landscaping

District staff also recommends utilizing the District's CEQA Air Quality Guidelines as well as the CAPCOA report "*Quantifying Greenhouse Gas Mitigation Measures*" for additional information on mitigation measures and quantification methodologies. Both documents are publicly available and can be downloaded from the District's website under CEQA Guidelines, Tool's and Methodology.

If you have any questions, please contact Ian Peterson, Environmental Planner, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Vice Chair John Gioia
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