



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

August 28, 2015

Brad Beck, AICP, Senior Transportation Planner
Contra Costa Transportation Authority
2999 Oak Road, Suite 100
Walnut Creek, CA 94597

Dear Mr. Beck,

Bay Area Air Quality Management District (District) staff has reviewed the Notice of Preparation (NOP) of a Recirculated Draft Program Subsequent Environmental Impact Report (RDPSEIR) for the 2014 Update to the Contra Costa Countywide Comprehensive Transportation Plan (CTP). We understand that the 2014 CTP updates the visions, goals, and strategies of the Contra Costa Transportation Authority (CCTA), and includes transportation projects and programs for implementation throughout the entirety of Contra Costa County as well as the Tri-Valley sub-region of Alameda County.

Previous Comment

District staff has commented on the proposed project on May 28, 2014 and recommends that the RDPSEIR address all applicable comments made in the previous comment letter, which is available at: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-comment-letters>.

Additional Comments

District staff submits the following additional comments regarding the recommended air quality and greenhouse gas (GHG) analysis to be provided in the RDPSEIR:

- Staff recommends the RDPSEIR contain a comparison of the existing baseline GHG emissions, reflecting existing conditions, with projected future emissions under the CTP, including documentation to support the calculations.
- Staff recommends that the RDPSEIR demonstrate the 2014 CTP's consistency with the GHG reduction targets set forth in the Plan Bay Area sustainable communities strategy, which meet the California Air Resources Board's (CARB's) Bay Area regional target of 7 percent per capita reduction in transportation emissions from the 2005 baseline by 2020, and 15 percent per capita reduction from the 2005 baseline by 2035.
- Staff recommends the RDPSEIR mitigate any identified potentially significant air quality and GHG impacts to the maximum extent feasible. The Air District's *CEQA Air Quality Guidelines* contain numerous mitigation measures for lead agencies to consider. These guidelines are available on the District's website at:

http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/baaqmd-ceqa-guidelines_final_may-2012.pdf?la=en.

The District's website contains a number of tools and methodologies to assist lead agencies in analyzing environmental impacts. Available documents include guidance on quantifying plan level greenhouse gas emissions, risk and hazard screening for toxic air contaminants, and emissions modeling guidance. View and download available tools and methodologies here: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.

We encourage lead agencies to contact District staff with questions during the preparation of the air quality and greenhouse gas emissions analyses. If you have any questions regarding these comments, please contact Josh Pollak, Environmental Planner at 415-749-8435 or jpollak@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Board Member John Gioia
BAAQMD Board Member David Hudson
BAAQMD Board Member Karen Mitchoff
BAAQMD Board Member Mark Ross