



May 1, 2019

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Erik Nolthenius, Planning Manager
City of Brentwood
Community Development Department
150 City Park Way
Brentwood, CA 94513

RE: Vineyards at Deer Creek – Notice of Preparation

ALAMEDA COUNTY

John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
Mark Ross

MARIN COUNTY

Katie Rice
(Chair)

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Gordon Mar
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY

David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY

Margaret Abe-Koga
Cindy Chavez
(Secretary)
Liz Kniss
Rod G. Sinks
(Vice Chair)

SOLANO COUNTY

James Spering
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Erik Nolthenius,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the proposed Vineyards at Deer Creek Project (Project). We understand that the Project would annex approximately 815 acres of undeveloped land into the City of Brentwood. The Project would develop up to 2,400 residential units and approximately 19 acres of land for commercial and civic uses. The anticipated density of this new development is three dwelling units per acre.

The DEIR should evaluate whether the proposed Project is likely to cause regional or local air quality impacts in the San Francisco Bay Area Air Basin, as well as cause potential impacts to the global climate. Low-density development often leads to car-dependent residents, resulting in high single-occupancy vehicle trips. The Project's design contains limited in-neighborhood availability of goods and services to satisfy daily needs and is likely to motivate frequent trips into and out of the neighborhood. An urban design with only two points of ingress and egress is likely to increase vehicle miles traveled (VMT) for local residents. The anticipated overall result is likely to be a sprawling neighborhood with high criteria pollutants and greenhouse gas emissions.

Air District staff recommends that the Project incorporate the following design characteristics to reduce air quality and GHG emissions:

- **Facilitation of Multi-Modal Transportation:** Design the neighborhood and its roadways to encourage walking, biking, and transit to satisfy daily needs.
- **Mixed-Use Design:** Increase density and expand commercial land uses to enable all daily goods and services to be made available locally.
- **Efficient Ingress and Egress:** Remove community gates and redesign the roadway network to allow more flexible and efficient movement through the neighborhood, particularly to support alternative modes of transportation.

Connect with the
Bay Area Air District:



Air District staff also recommend that the Project take the following approach in evaluating and mitigating its carbon footprint:

- **The Air District recommends that a significance determination be based on an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's CEQA Guidelines are based on the State's 2020 greenhouse gas targets, which are now superseded by the 2030 targets for greenhouse gases established in SB 32.
- **The Project should ensure on-site power generation and electricity storage for residential and commercial space.** The Air District recommends the Project be designed so that non-fossil fuel power generation and battery storage be integrated into the design, and a community microgrid is used to assure energy infrastructure resilience and efficiency.

Furthermore, Air District staff recommends that the DEIR include the following information:

- **The DEIR should quantify the Project's potential construction and operational impacts to local and regional air quality.** The Air District's CEQA Guidelines provide guidance on how to evaluate a project's or plan's construction, operational, and cumulative air quality and GHG impacts. You may download a copy of the CEQA Guidelines from the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the project's construction and operation.** Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on nearby sensitive receptors.
- **If any aspects of the Project may require a permit from the Air District, then the Air District may be a responsible agency for California Environmental Quality Act (CEQA) purposes.** Please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Josephine Fong, Environmental Planner, at (415) 749-8637, or jfong@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Karen Mitchoff
BAAQMD Director Mark Ross