



March 16, 2021

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Gina Paolini, Principal Planner
Morgan Hill Development Services
City of Morgan Hill
17575 Peak Ave
Morgan Hill, CA 95037

RE: Crosswinds Mission View Drive Residential Project – Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Paolini,

Bay Area Air Quality Management District (District) staff has reviewed the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for Crosswinds Mission View Drive Residential Project (Project). The Project would include development of 269 new residential units, comprised of 56 single-family, 64 duets, and 149 condominium units. There would be a total of 40 below-market-rate (BMR) units. Each unit would include a two-car garage on the ground floor. The Project site would be located near Highway 101 on the west side along Mission View Drive between Half Road and Cochrane Road.

Air District staff recommends the DEIR include the following information and analyses:

- **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operations.** Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TACs and PM_{2.5} emissions on sensitive receptors within and near the Project area.
- **The GHG impact analysis should include 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 current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets which are now superseded by the 2030 GHG targets established in SB 32. The DEIR should demonstrate how the Project will be consistent with the Scoping Plan.

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- **The DEIR should evaluate all feasible mitigation measures, both onsite and offsite, for air quality and GHG impacts.** The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>) and signed by Steve Tate, former Mayor for City of Morgan Hill;
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity;
 - Installing all-electric appliances to eliminate the use of natural gas, a high global warming potential greenhouse gas that also produces oxides of nitrogen and other pollutants when combusted;
 - Requiring construction vehicles to operate with the highest tier engines commercially available;
 - Providing funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others;
 - Providing funding for expanding and improving bicycle and pedestrian infrastructure (e.g., protected bike lanes to the nearest Caltrain station) and projects that improve pedestrian access to transit, employment, and major activity centers; and
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of post-consumer food materials for uses such as composting.

 - **The DEIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The DEIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

 - **The DEIR should evaluate the Project's consistency with the City of Morgan Hill Climate Action Plan.** The DEIR should analyze the Project's consistency with the City of Morgan Hill's most recently adopted Climate Action Plan and ensure all measures in the Climate Action plan that are applicable to the Project are incorporated into the Project's design.

 - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.

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- **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the DEIR.

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 Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Chair Cindy Chavez
BAAQMD Director Margaret Abe-Koga
BAAQMD Director Rich Constantine
BAAQMD Director Rob Rennie