



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

May 16, 2022

Mr. John Funderburg, Assistant Director of Planning
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565

RE: City of Pittsburg Envision Pittsburg 2040 General Plan Update Draft Environmental Impact Report - Notice of Preparation

Dear Mr. Funderburg,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the City of Pittsburg (City) Envision Pittsburg 2040 General Plan Update Draft Environmental Impact Report (DEIR). As we understand, the City intends to prepare a programmatic DEIR to update the land use map and policy document consisting of goals, policies, and implementation measures in the General Plan (Plan) that will guide future development activities and City actions. The City is located in eastern Contra Costa County and is bordered by Suisun Bay to the north and Solano County to the north, the City of Antioch and unincorporated Contra Costa County to the east, the City of Concord to the west, and unincorporated Contra Costa County to the south. No specific development projects are proposed as part of the General Plan Update. Upon adoption, the 2040 Plan will replace the City's existing 2020 Plan, which was adopted in 2001 with subsequent updates to various elements. The City will implement the Plan by requiring development, infrastructure improvements, and other projects to be consistent with its policies and by implementing the actions included in the Plan, including subsequent project-level environmental review, as required under CEQA.

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

- As identified by the Air District's CARE Program and Assembly Bill (AB) 617 Community Health Protection Program, the Pittsburg community census tracts that are in the top 30 percent of pollution burden statewide, as identified in CalEnviroScreen 4.0, are currently cumulatively impacted with very high risk due to toxic releases, ground water threats, and other sources of pollution, as well as a highly vulnerable population. Increases in air pollution exposure in areas that are already overburdened would be of concern; therefore, the City should fully evaluate potential significant impacts and implement all feasible measures to minimize air quality impacts to the greatest extent possible.
- The DEIR should provide a detailed analysis of the Plan's potential effects on local and regional air quality. The DEIR should include a discussion of the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. The Air District's CEQA Guidelines, which provide guidance on how to evaluate a Plan's construction, operational, and

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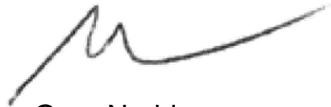
cumulative air quality impacts can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.

- The DEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP) and should discuss 2017 CAP measures relevant to the Plan. 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 greenhouse gas (GHG) impact analysis should include an evaluation of the Plan's consistency with the State's 2030 and 2045 climate targets. The Air District's current plan-level thresholds of significance for climate impacts, adopted April 20, 2022 by the Board of Directors, are based on the State's climate targets of reducing GHG emissions 40 percent below 1990 levels by 2030 and achieving carbon neutrality by 2045 (see Justification Report here: <https://www.baaqmd.gov/ceqa-guidelines>). The Air District recommends that cities and counties evaluate their plans based on whether they would be consistent with these long-term climate goals. To be consistent with the 2030 goal, plans should document specific strategies and implementation measures and quantify the associated GHG emission reductions to reduce the community's GHG emissions to 40 percent below the 1990 emission levels by 2030, without the use of offsets. Plans should also demonstrate that they will achieve as ambitious emission reductions as technologically and financially feasible by 2045 through a preponderance of enforceable, mandatory measures, minimizing the remaining (residual) amount of emissions needed to close the gap to carbon neutrality. Plans should include a strong implementation and monitoring strategy that shows how the remaining emissions gap will diminish over time, that commits to re-evaluation and adjustments as additional technologies become feasible and new statewide policies and programs emerge to close the gap to carbon neutrality as much as possible. The Air District strongly recommends that GHG reduction targets be achieved from GHG emission reductions and sequestration occurring within the community to the greatest extent feasible. For additional guidance on developing robust local plans that are consistent with State CEQA guidance, please contact Alesia Hsiao, Senior Environmental Planner, (415) 745-8419, ahsiao@baaqmd.gov.
- The Program DEIR should evaluate all feasible measures to minimize air pollutant emissions and exposure and should prioritize onsite measures within the Plan area, followed by offsite measures. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Requiring construction vehicles to operate with the highest tier engines commercially available,
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free by '33 initiative (<http://dieselfree33.baaqmd.gov/>),
 - Implementing parking strategies to discourage vehicle travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and related strategies,
 - 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,

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- Providing comprehensive, safe, and convenient bicycle and pedestrian facilities throughout the city, linking residential areas and activity centers, and connecting to regional networks where appropriate,
 - Installing outdoor electrical receptacles for charging or powering of electric landscape equipment,
 - Implementing electric infrastructure and fossil fuel alternatives in the development and operation of the Plan, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity,
 - Meeting the vehicles miles traveled (VMT) requirement under SB 743,
 - Including a building decarbonization goal or policy in the Plan (<https://www.buildingdecarb.org/compass.html>) and requiring no natural gas use in proposed structures,
 - Including air filtration for new and existing buildings that may be exposed to elevated air pollution, such as MERV 13 filters, as well as vegetative buffers between new and existing buildings, and sources of pollution. For more emissions and exposure reduction best practices, see the Air District's Planning Healthy Places guidance, Appendices A and B, here: https://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf., and
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets.
- Discuss how the Plan addresses Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act. SB 1000, which became effective January 1, 2018, requires all California jurisdictions to consider environmental justice issues in their General Plans. Environmental justice (EJ), as defined by the State, focuses on disproportionate and adverse human health impacts that affect low-income and minority communities already suffering from cumulative and legacy environmental and health impacts.
 - 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>.
 - Certain aspects of the Plan 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 questions regarding these comments, please contact Alesia Hsiao, Senior Environmental Planner, (415) 745-8419, ahsiao@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