



May 28, 2014

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Mr. Brad Beck
Contra Costa Transportation Authority
2999 Oak Road, Suite 100
Walnut Creek, CA 94597

**Subject: Notice of Preparation of a DEIR for the 2014 Update to the Contra Costa
Countywide Comprehensive Transportation Plan**

ALAMEDA COUNTY

Tom Bates
Scott Haggerty
Nate Miley
(Chair)
Tim Sbranti

CONTRA COSTA COUNTY

John Gioia
David Hudson
Mary Piepho
Mark Ross

MARIN COUNTY

Susan Adams

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

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(Secretary)

SAN MATEO COUNTY

Carole Groom
(Vice-Chair)
Carol Klatt

SANTA CLARA COUNTY

Cindy Chavez
Ash Kalra
Liz Kniss
Jan Pepper

SOLANO COUNTY

James Spering

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Beck:

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the 2014 Update to the Countywide Comprehensive Transportation Plan (CTP). We understand the CTP will result in the implementation of Measures C and J projects which entail allocating revenues from the collection of a one-half percent sales tax to a variety of projects and programs for "Regional Transportation Planning and Growth Management."

According to the NOP, the proposed draft 2014 CTP Thresholds of Significance in Attachment C include a proposed criterion that may be used to compare whether vehicle use between existing and future project improvements will have a potentially significant adverse impact on total per capita vehicle miles travelled (VMT) and air quality. According to the NOP, the proposed Total VMT criterion in Attachment C will be used to determine if implementation of CTP projects result in "an appreciable increase" in per capita vehicle miles traveled. It is not clear, however, just how "an appreciable increase" in total per capita VMT is substantiated for these projects. Air District staff recommends that the justification used to show how "an appreciable increase" will be determined should be included in the DEIR.

Air District staff has the following specific comments on the environmental analysis that should be addressed in the DEIR:

1. The DEIR should provide background information regarding the Bay Area's attainment status for all criteria pollutants and the implications for the region if these standards are not attained, by statutory deadlines, or maintained. A discussion of the health effects of air pollution; and background information on greenhouse gas emissions and the potential impacts from climate change in the Bay Area should be provided.
2. The Air District's *Air Quality Guidelines (May, 2012)* provide guidance on how to evaluate a project's or plan's construction, operational and cumulative air quality impacts. You may download a copy from the Air District's web site at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-GUIDELINES.aspx>. The DEIR should provide a detailed analysis of the CTP's potential effects on local and regional air quality from construction, operations and cumulative impacts for the CTP

and each of the alternatives analyzed, including a discussion of the CTP's consistency with the 2010 Clean Air Plan.

3. The DEIR should evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TACs) as a result of CTP construction and implementation. We recommend that the DEIR analyze the potential impacts of TAC emissions associated with major transportation corridors on nearby sensitive receptors. Please see the local pollutant analysis in MTC's Plan Bay Area DEIR for an example of the type of analysis we are recommending here.
4. Construction equipment generates fugitive dust emissions, exhaust emissions of criteria pollutants and TACs, especially diesel particulate matter (DPM), a known carcinogen. The DEIR should require that all construction activities associated with the CTP comply with the Basic Construction Mitigation Measures in the Air District's CEQA Guidelines. The DEIR should also include all feasible mitigation measures to reduce construction equipment exhaust emissions to reduce potentially significant exposure to TACs for the existing community. Feasible mitigation measures can be found in the Air District's *CEQA Air Quality Guidelines*.
5. The DEIR should mitigate any identified potentially significant air quality impacts to the maximum extent feasible. The Air District's *CEQA Air Quality Guidelines* contain numerous mitigation measures for lead agencies to consider.

The Air District's CEQA website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts. Available documents include guidance on quantifying plan level greenhouse gas emissions and risk and hazard screening and modeling guidance. View and download available tools here:

<http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

Air District staff is available to assist in addressing these comments. If you have any questions, please contact Andrea Gordon, Senior Environmental Planner at agordon@baaqmd.gov or 415-749-4940.

Sincerely,


for
Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross