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February 9, 2011

Mr. David Feinstein, Senior Planner  
Department of Community Development  
City of Fairfield  
1000 Webster Street  
Fairfield, CA 94533-4883

**Subject: Fairfield Train Station Specific Plan Draft Environmental Impact Report**

Dear Mr. Feinstein:

Bay Area Air Quality Management District (BAAQMD or District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Fairfield Train Station Specific Plan (Specific Plan). The Specific Plan proposes the development of a 2,972 acre transit-oriented community that provides a development framework for a variety of land uses including residential, industrial, commercial, parks, schools and other public facilities, as well as open space. The District commends the City of Fairfield's effort to provide a broad range of development near transit while minimizing the potential impacts associated with implementing the Specific Plan. The DEIR examines potential impacts to the environment and evaluates air quality impacts from the project during the construction and operational phase of the development.

After a thorough review of the DEIR, BAAQMD staff has the following comments regarding this project's impacts on local and regional air quality:

1. Short-term Construction Related Emissions

It is unclear in the DEIR if construction related criteria pollutant emissions will be above or below the District's significance thresholds. Table 4.3-6 indicates that the emission estimates shown in the table are in pounds per year, while the note (1) accompanying this reference indicates that the emissions are in pounds per day. If they are in pounds per day, then ROG and NOx emissions are above the District's significance thresholds. If the emission estimates in the table are in pounds per year, then the assumptions that were used for this analysis should have been provided in the DEIR to allow an evaluation of the appropriateness of those assumptions. For example, it does not seem reasonable that mass grading activities would be below the District's daily construction significance thresholds without assuming the use of Tier 3 or 4 construction equipment or limiting the amount of construction equipment operating at one time.

If it is determined that construction emissions would be a significant impact, District staff recommends the following feasible mitigation measure be added to the Specific Plan to address potentially significant air quality impacts associated with construction exhaust emissions:

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- Use of Tier 3 & 4 diesel equipment
- Prohibit the use of diesel generators for construction activity
- Prohibit idling of construction equipment for more than 5 minutes

## 2. Long-term Operational Emissions

Emissions from long-term operational activities associated with the implementation of the Specific Plan exceed BAAQMD's significance threshold for criteria pollutants. The Bay Area is currently in non-attainment for health based state and federal ozone and particulate matter (PM 2.5) standards. The emissions from this project should be mitigated to the maximum extent feasible to ensure this project does not adversely affect attainment of national and state air quality standards. District staff has identified feasible mitigation measures that should be made conditions of approval for all subsequent development within the Specific Plan area:

- Parking cash-out/unbundling of parking in rents
- Transit subsidies for retail/commercial employees
- Carpool parking preferences
- Employer trip reduction programs
- Light colored paving/roofing to minimize heat island impacts
- Shuttles to rail stations

## 3. Rail Line Toxic Air Contaminants (TAC)

The DEIR applies the District's thresholds of significance to assess risk and hazard impacts for new receptors in the proposed Specific Plan. Please note that the District's CEQA Guidelines advise that the thresholds for risk and hazard impacts for new receptors become effective May 1, 2011. However, since the DEIR has elected to use the District's threshold, we are providing feedback on the methodology used in the DEIR to assess risk and hazard impacts.

When estimating emissions from rail, the methodology used in the DEIR equates rail emissions to diesel truck emissions in 2030 as a surrogate emission source. The analysis then converts these emissions to truck trips and total vehicle trips per day and uses the District's surface street Roadway Screening Tables to identify PM2.5 and toxic air contaminant concentrations at the nearest future sensitive receptor location (approximately 110 feet away). The District does not agree with this methodology for estimating PM 2.5 concentrations and risk from toxic air contaminants associated with railroad traffic. The Roadway Screening Tables for surface streets were not designed for this type of an analysis and are not appropriate to determine impacts from railroad activity. The DEIR identifies rail emissions as a potentially significant impact and concludes that through implementation of a mitigation measure requiring a 185 foot setback and requiring future development within the 185 foot setback to conduct a Health Risk Assessment, that impacts are reduced to a less than significant level. The District does not believe the analysis supports this conclusion and recommends that the analysis directly evaluate rail emissions. The methodology and emission factors exist for a rail line specific Health Risk Assessment to be conducted to more accurately identify the potential adverse impacts that could occur to future sensitive receptors within the Specific Plan area. District staff can assist Fairfield staff with this analysis.

4. BAAQMD Rules and Regulations

The DEIR states that “residential, retail, and commercial uses such as those of the proposed Specific Plan typically do not require T-BACT measures because of the nominal amounts of TACs generated by these uses.” Note that backup generators that are typically found in some of these types of buildings require permits from the District and may require TBACT or permit conditions to reduce risks and PM2.5 concentrations.

General Comments

There does not appear to be a cumulative analysis done for the Specific Plan area related to PM2.5 and toxic air contaminants. We recommend that the final environmental impact report either include such an analysis or explain why it is omitted.

If you have any questions, please contact Andrea Gordon, Senior Environmental Planner, at (415) 749-4940.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director James Sperring