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May 6, 2013

Ms. Kristin Pollot
City of Pittsburg
Development Services – Planning Department
65 Civic Avenue
Pittsburg, CA 94565

Subject: Montreux Residential Subdivision Notice of Preparation

Dear Ms. Pollot,

The Bay Area Air Quality Management District (District) staff reviewed the notice of preparation (NOP) and initial study (IS) for the proposed Montreux Residential Subdivision (Project). District staff understands that the Project consists of a request for rezoning, approval of a vesting tentative map and preliminary grading plan, approval of a development agreement, and annexation of the Project site into the City of Pittsburg and municipal utilities service area. This would allow for up to 356 single family detached residential units on a 148 acre site that is currently undeveloped grazing land at the City's outer urban boundary.

The analysis provided in the initial study concludes that potential impacts to local and regional air quality and greenhouse gases will be less than significant, and therefore, will not be further evaluated in the draft environmental impact report (DEIR). District staff does not support this conclusion based on the information provided in the NOP and IS.

District staff was unable to verify the emissions estimates provided in the analysis, and no justification was provided to explain changes to the URBEMIS model's default values. Construction and operational emissions should be evaluated in the DEIR and any changes to the default values should be fully explained and justified with substantial evidence. For example, operational emissions were estimated using URBEMIS with vehicle trip rates from the Project's traffic study (found in Appendix G). A trip rate of 7.54 per day is substantially lower than trip rate for a suburban single family subdivision (9.56 per day) and more comparable to rates for low rise apartments (6.84 per day). Staff believes the Project is more appropriately characterized as a suburban subdivision and recommends that City staff clearly explain any discount to trip generation, considering the following factors:

- Project location is on the outer fringe of current City limits
- Proposed in an area dominated by undeveloped grazing lands
- Minimal roadway access to retail or commercial areas
- Limited bicycle facilities and pedestrian connectivity
- Minimal access to the local or regional transit network
- Proposed street grid is relatively unconnected to surrounding neighborhoods

District staff conducted a separate greenhouse gas (GHG) analysis using the District's post-processor model, "BGM", with available information to confirm estimates. A copy of the modeling outputs are attached here for your convenience. Staff finds that GHG emissions exceed the City's thresholds, and therefore, recommends the DEIR include an analysis of GHG impacts, and incorporate fully enforceable measures to mitigate any potential impacts. Staff supports several

proposed mitigation measures but recommends that they be amended to make the measures mandatory. For example, require solar panels to be installed on all homes (GHG-1.1) and require solar or tankless water heaters (GHG-1.4) as opposed to just recommending they be installed. Additional measures include, but are not limited to, requiring the Project to:

- Meet or exceed Title 24 building energy efficiency standards by 20%
- Install low-flow or high-efficiency residential water fixtures
- Incorporate cool roof and cool paving strategies for buildings and streetscapes
- Plant drought tolerant landscaping or water efficient irrigation systems
- Use reclaimed water for irrigation
- Provide residents with composting services

District staff also recommends Project emissions be evaluated using "CalEEMod" because the URBEMIS model is no longer being supported and maintained by Air Districts in California. The CalEEMod model is available for free download at www.caleemod.com. Furthermore, staff recommends the City evaluate the Project's consistency with the goals and objectives of the Bay Area's regional draft Sustainable Communities Strategy (Plan Bay Area) and the District's 2010 Clean Air Plan.

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Ian Peterson, Environmental Planner II, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

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

Summary Report for Annual Emissions (Tons/Year)
 File Name: H:\Planning\Planning_Division\CEQA\CEQA General\CEQA Guidelines Update 2009\CEQA Guidelines Implementation\IP Projects
 Reviewed\Pittsburg\Montreux Project\MontreuxProject\IP_urb924

Project Name: Montreux - BAAQMD

Project Location: Contra Costa County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5	PM2.5	CO2
2014 TOTALS (tons/year unmitigated)	0.40	2.37	2.97	0.00	13.06	0.14	13.20	2.73	0.12	2.85	484.22
2014 TOTALS (tons/year mitigated)	0.40	2.37	2.97	0.00	2.97	0.14	3.11	0.62	0.12	0.75	484.22
Percent Reduction	0.00	0.00	0.00	0.00	77.26	0.00	76.47	77.21	0.00	73.85	0.00
2015 TOTALS (tons/year unmitigated)	0.55	2.88	7.24	0.01	0.04	0.17	0.21	0.01	0.16	0.17	1,150.74
2015 TOTALS (tons/year mitigated)	0.55	2.88	7.24	0.01	0.04	0.17	0.21	0.01	0.16	0.17	1,150.74
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2016 TOTALS (tons/year unmitigated)	0.50	2.63	6.82	0.01	0.04	0.15	0.19	0.01	0.14	0.15	1,150.88
2016 TOTALS (tons/year mitigated)	0.50	2.63	6.82	0.01	0.04	0.15	0.19	0.01	0.14	0.15	1,150.88
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2017 TOTALS (tons/year unmitigated)	9.24	0.60	1.67	0.00	0.01	0.03	0.04	0.00	0.03	0.03	297.53
2017 TOTALS (tons/year mitigated)	5.59	0.60	1.67	0.00	0.01	0.03	0.04	0.00	0.03	0.03	297.53
Percent Reduction	39.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

AREA SOURCE EMISSION ESTIMATES

TOTALS (tons/year, unmitigated)	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
	4.46	1.38	2.01	0.00	0.00	0.00	1,734.40

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

TOTALS (tons/year, unmitigated)	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
	3.00	3.58	34.57	0.05	9.13	1.74	4,953.40

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

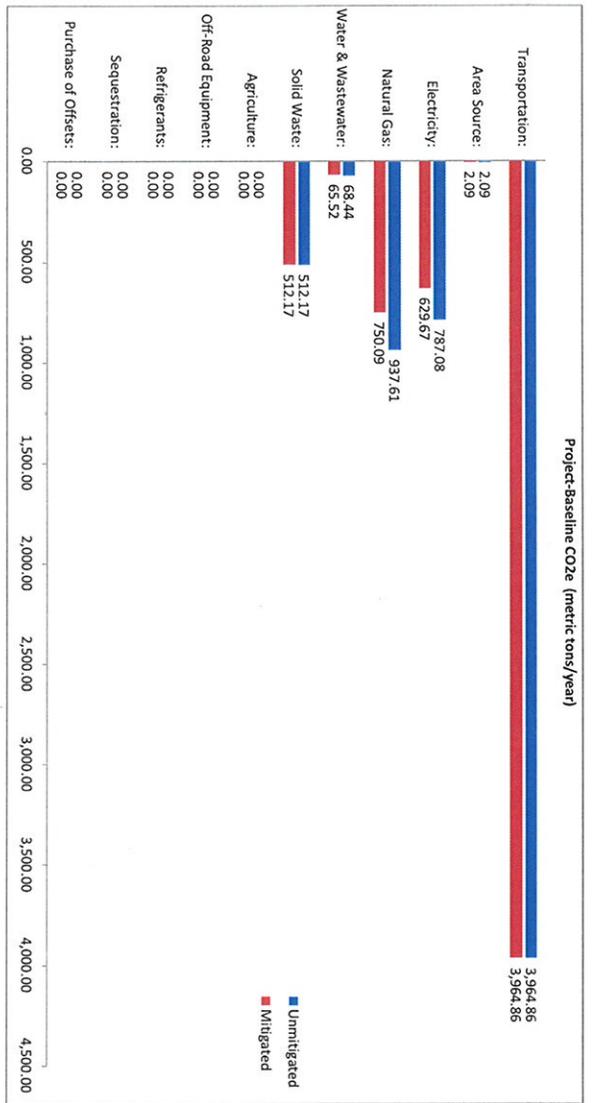
TOTALS (tons/year, unmitigated)	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
	7.46	4.96	36.58	0.05	9.13	1.74	6,687.80

Summary Results

Project Name: Montreux - BGM BAAQMD Run
 Project and Baseline Years: 2018 N/A

Results	Unmitigated Project- Baseline CO2e (metric tons/year)	Mitigated Project- Baseline CO2e (metric tons/year)
Transportation:	3,964.86	3,964.86
Area Source:	2.09	2.09
Electricity:	787.08	629.67
Natural Gas:	937.61	750.09
Water & Wastewater:	68.44	65.52
Solid Waste:	512.17	512.17
Agriculture:	0.00	0.00
Off-Road Equipment:	0.00	0.00
Refrigerants:	0.00	0.00
Sequestration:	N/A	0.00
Purchase of Offsets:	N/A	0.00
Total:	6,272.24	5,924.39

Baseline is currently: **OFF**
 Baseline Project Name:
 Go to Settings Tab to Turn On Baseline



Detailed Results

Unmitigated	CO2 (metric tpy)	CH4 (metric tpy)	N2O (metric tpy)	CO2e (metric tpy)	% of Total
Transportation*	2.09	0.00	0.00	3,964.86	63.21%
Area Source:	785.83	0.01	0.00	787.08	0.03%
Electricity:	935.21	0.09	0.00	937.61	12.55%
Natural Gas:	68.33	0.00	0.00	68.44	1.09%
Water & Wastewater:	3.63	24.22	N/A	512.17	8.17%
Solid Waste:	0.00	0.00	0.00	0.00	0.00%
Agriculture:	0.00	0.00	0.00	0.00	0.00%
Off-Road Equipment:	0.00	0.00	0.00	0.00	0.00%
Refrigerants:	N/A	N/A	N/A	N/A	0.00%
Sequestration:	N/A	N/A	N/A	N/A	N/A
Purchase of Offsets:	N/A	N/A	N/A	N/A	N/A
Total	6,272.24	24.32	0.00	6,272.24	100.00%

Baseline	CO2 (metric tpy)	CH4 (metric tpy)	N2O (metric tpy)	CO2e (metric tpy)	% of Total
Transportation*	0.00	0.00	0.00	0.00	N/A
Area Source:	0.00	0.00	0.00	0.00	N/A
Electricity:	0.00	0.00	0.00	0.00	N/A
Natural Gas:	0.00	0.00	0.00	0.00	N/A
Water & Wastewater:	0.00	0.00	0.00	0.00	N/A
Solid Waste:	0.00	0.00	0.00	0.00	N/A
Agriculture:	0.00	0.00	0.00	0.00	N/A
Off-Road Equipment:	0.00	0.00	0.00	0.00	N/A
Refrigerants:	N/A	N/A	N/A	N/A	N/A
Sequestration:	N/A	N/A	N/A	N/A	N/A
Purchase of Offsets:	N/A	N/A	N/A	N/A	N/A
Total	0.00	0.00	0.00	0.00	0.00%

* Several adjustments were made to transportation emissions after they have been imported from URBEMIS. After importing from URBEMIS, CO2 emissions are converted to metric tons and then adjusted to account for the "Pavley" regulation. Then, CO2 is converted to CO2e by multiplying by 100/95 to account for the contribution of other GHGs (CH4, N2O, and HFCs (from leaking air conditioners)). Finally, CO2e is adjusted to account for the low carbon fuels rule.

Mitigated	CO2 (metric tpy)	CH4 (metric tpy)	N2O (metric tpy)	CO2e (metric tpy)	% of Total
Transportation*	2.09	0.00	0.00	3,964.86	66.92%
Area Source:	628.66	0.01	0.00	629.67	0.04%
Electricity:	748.17	0.07	0.00	750.09	10.63%
Natural Gas:	65.42	0.00	0.00	65.52	1.11%
Water & Wastewater:	3.63	24.22	N/A	512.17	8.65%
Solid Waste:	0.00	0.00	0.00	0.00	0.00%
Agriculture:	0.00	0.00	0.00	0.00	0.00%
Off-Road Equipment:	0.00	0.00	0.00	0.00	0.00%
Refrigerants:	N/A	N/A	N/A	N/A	0.00%
Sequestration:	N/A	N/A	N/A	N/A	0.00%
Purchase of Offsets:	N/A	N/A	N/A	N/A	0.00%
Total	5,924.39	24.32	0.00	5,924.39	100.00%

Mitigation Measures Selected:

Transportation: Go to the following tab: [Transp. Detail Mit](#) for a list of the transportation mitigation measures selected (in URBEMIS)

Electricity: The following mitigation measure(s) have been selected to reduce electricity emissions.

Natural Gas: The following mitigation measure(s) have been selected to reduce natural gas emissions.

Water and Wastewater: The following mitigation measure(s) have been selected to reduce water and wastewater emissions.
Drought Tolerant Landscaping 10 % Reduction Outdoor Use
Low Flush Toilets 2 % Reduction Indoor Use

Solid Waste: The following mitigation measure has been selected to reduce solid waste related GHG emissions.

Ag: No existing mitigation measures available.

Off-Road Equipment: No existing mitigation measures available.

Refrigerants: The following mitigation measure has been selected to reduce refrigerant emissions:

Carbon Sequestration: Project does not include carbon sequestration through tree planting.

Emission Offsets/Credits: Project does not include purchase of emission offsets/credits.