



November 1, 2011

BAY AREA Kevin Thompson
AIR QUALITY Senior Planner
MANAGEMENT Town of Windsor Planning Department
DISTRICT P.O. Box 100
Windsor, CA 95492-0100

SINCE 1955 **Subject: Town of Windsor Station Area/Downtown Specific Plan Draft
Environmental Impact Report**

ALAMEDA COUNTY
Tom Bates
(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

Dear Mr. Thompson:

CONTRA COSTA COUNTY
John Gioia
(Vice-Chair)
David Hudson
Mark Ross
Gayle B. Uilkema

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Windsor Station Area/Downtown Specific Plan (Plan). The Plan proposes the development of a 390 acre mixed use, transit-oriented community that provides a development framework for a variety of land uses including residential, commercial, parks, schools and other public facilities, as well as open space. The DEIR examines potential impacts to the environment and qualitatively evaluates air quality impacts from the project.

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

The District appreciates the principles that will guide development of the Plan area, such as achieving a balance between housing and jobs, creating a pedestrian and bicycle friendly downtown area, and fostering green building practices. The transit-oriented development strategy is particularly suited for the Plan's location around Windsor Station, which is a planned stop for the Sonoma Marin Area Rail Transit (SMART) passenger rail service.

SAN FRANCISCO COUNTY
John Avalos
Eric Mar
Edwin M. Lee

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

SAN MATEO COUNTY
Carol Klatt
Carole Groom

Risks and Hazards for New Receptors Analysis

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Secretary)
Liz Kniss
Ken Yeager

To assist in assessing potential health risks from both stationary sources and roadways, District staff provided a list of all District-permitted stationary sources and high volume highways within the Plan's boundaries, as well as 1,000 feet beyond the planning area. District staff also provided the estimated cancer risks and particulate matter (PM) concentrations associated with these sources. We were pleased to see Town staff incorporate this detailed information in the DEIR. Town staff also included specific overlay zones around each source that could expose sensitive receptors to an increased cancer risk and PM concentration that exceeds the District's thresholds of significance.

SOLANO COUNTY
James Sperring

SONOMA COUNTY
Susan Gorin
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

On p. 3.3-32, the DEIR states that "No new industrial uses are included in the proposed Plan, indicating that no new sources [or toxic air contaminants] are anticipated."

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However, the proposed Plan does call for new commercial and mixed use zones. In these zones, commercial loading zones, as well as loading docks may be associated with individual commercial uses, generating truck-related diesel particulate emissions. These non-industrial types of unpermitted sources of toxic air contaminants and PM could result in adverse health impacts to nearby existing or future sensitive receptors. District staff recommends that the Town include measures and/or policies to ensure future significant impacts do not occur. These policies may include prohibiting truck idling, as well as route designations along non-residential arterial roads to reduce exposure, and electrification of all new and existing loading docks (e.g., for grocery store and hotels).

Additionally, on p. 3.3-32 of the DEIR, “enhanced air filters or equivalent indoor air quality equipment mechanism” is referenced in both policies EQ-10 and EQ-11. We recommend that the Town adopt more specific language regarding the required filtration equipment, to avoid any future confusion or misinterpretation of these policies during the project permitting process. For example, we recommend stating that the air filters ought to be “high-efficiency particulate air filters,” also known as HEPA filters.

Criteria Air Pollutant Emissions Analysis

According to the DEIR, “Implementation of the proposed Plan could result in an increase in VMT at a rate that would exceed the rate of population increase within the Town.” The DEIR therefore finds a significant and unavoidable impact due to an increase in criteria pollutants from build-out of the Plan. The Bay Area is currently classified as non-attainment for health-based state and federal ozone and PM 2.5 standards. The significant impact expected from the Plan should be mitigated to the maximum extent feasible to ensure the Plan does not adversely affect attainment of state and federal air quality standards. (See recommended additional mitigation measures below.)

Detailed analysis of emissions related to construction or operational activities associated with the implementation of the Plan was not included in the DEIR. When development within the Plan area occurs, analysis will have to be done to determine if construction or operational-related emissions would produce a significant impact to air quality.

Greenhouse Gas Emissions Analysis

In Section 3.4, page 34, the DEIR states that, while overall greenhouse gas (GHG) emissions are expected to rise with build-out in the Plan area, growth in service population (jobs plus residents) will increase at a higher rate. The result will be a GHG tons per service population ratio of 3.99 in 2035, which is below the District’s threshold of significance of 4.6 tons/service population. However, the Town did not follow the District’s methodology for determining significance for project-level GHG impacts (under District CEQA Guidelines, area plans are considered projects). The District’s CEQA Guidelines (May, 2011) state in section 4.2.1 that “all GHG emissions from a project be estimated, including a project’s direct and indirect GHG emissions from operations.” The analysis in the DEIR included community-wide assessment of GHG emissions and growth projections, rather than assessment focusing on the Plan area. This approach is not consistent with the District’s CEQA Guidelines because it does not correctly

identify GHG impacts of the Plan. District staff recommends that the final environmental impact report include GHG impacts specific to the Plan area. If this level of analysis is not performed for the Plan, future development within the Plan area should undergo project-specific analysis.

In addition, the assumption of job growth within the Plan area appears optimistic, compared to the Town's recent job growth trends and the general economic conditions and employment forecast for the Bay Area by ABAG.


Without a project-level analysis of GHG emissions, and a justification of the job growth estimate for the Plan area that takes recent trends and current economic forecasting into account, the District cannot support the Town's conclusion that the Plan would result in a less than significant impact for GHGs.

In addition, if many of the optional policies in the Plan (indicated by the word "should" rather than "shall") are not implemented, growth in GHG emissions could exceed current projections. In order to guard against this possibility, District staff has identified changes to existing measures and additional feasible mitigation measures that should be made conditions of approval for all subsequent development within the Plan area. Many of the recommended measures in the following list would reduce criteria pollutant emissions and PM concentrations as well as GHG emissions:

- Add specificity to all measures that currently use the term "should" (for example, measure DG-47, "New development *should* install solar panels and/or solar hot water systems as feasible") to ensure implementation
- Require all new commercial and residential buildings, and significant remodels, to exceed Title 24 energy efficiency standards by a minimum of 15%
- Require cool roofing and cool paving strategies to minimize urban heat islands
- Establish a minimum tree planting requirement for parking lots (requiring low VOC-emitting trees)
- Add a commuter benefit ordinance to measure CA-38
- Change measure CA-34 from *allowing* to *requiring* unbundled parking
- Set maximum parking requirements
- Require secure bicycle facilities and amenities (such as showers)

District staff is available to discuss any of the issues raised in this letter. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Susan Gorin
BAAQMD Director Shirlee Zane