



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

April 19, 2011

Heather Hines  
City of Petaluma  
Community Development - Planning Division  
11 English Street  
Petaluma, CA 94952

Subject: Deer Creek Village Draft EIR

Dear Ms. Hines:

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

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(Vice-Chair)  
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(Secretary)  
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SOLANO COUNTY  
James Sperring

SONOMA COUNTY  
Susan Gorin  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Bay Area Air Quality Management District (District) staff reviewed the City of Petaluma's (City's) Draft Environmental Impact Report (DEIR) for the Deer Creek Village project (Project). The Project proposes the development of 343,998 square feet of a mix of commercial land uses on a currently vacant 36.55 acre site adjacent to Highway 101 in Petaluma. The developed Project will include a home improvement superstore, four major anchor retail stores, smaller retail shops, a restaurant, grocery store, pharmacy, fitness center, commercial office space and open space. The DEIR examines potential impacts to the environment and evaluates air quality impacts from the Project during the construction and operational phases of development.

After a review of the DEIR, BAAQMD staff has the following comments regarding the Project's impact on local and regional air quality.

#### Short-term Construction-related Emissions

The DEIR states that construction-related emissions will exceed the District significance threshold for NOx. The DEIR identifies only limited mitigation measures to reduce this impact. In our 2010 CEQA Guidelines, the District recommends that all proposed projects, where construction-related emissions would exceed the applicable significance threshold, implement the *Additional Construction Mitigation Measures* listed in Table 8-3 of the Guidelines. District staff recommends that the final EIR identify the full suite of *Additional Construction Mitigation Measures* to minimize construction impacts.

#### Long-term Operational Emissions

The DEIR has identified significant and unmitigable impacts associated with greenhouse gas (GHG) emissions and less than significant impacts associated with criteria air pollutants. Several factors in the analysis of vehicle travel associated with the long-term operation of the Project appear to be based on unclear assumptions. Lack of specificity on different land uses and other modeling assumptions may have resulted in an underestimation of trip rates and thus vehicle miles travelled (VMT) resulting from the Project. District staff believe the input variables and land use categories used in the URBEMIS analysis

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underestimate the long-term operational emissions from this Project. Specifically, the DEIR's combining of different retail uses into three categories: "Home improvement superstore," "Free-standing discount store," and "General office building" underestimates the total number of trips that this Project would generate. This is because trip rates vary widely across different commercial land use types and the three categories used for all proposed land uses for this Project have trip rates that are, on average, lower than if they were broken out into more specific land use categories (see land use categories listed below).

In addition, it appears that the default values in URBEMIS for the vehicle fleet mix were changed when producing the modeling runs used in the DEIR (included in Appendix J). Neither the DEIR nor Appendix J provides any justification for changing the fleet mix values. District staff recommends that the URBEMIS default values for fleet mix be used, or a justification for modifying these values be provided.

District staff produced an URBEMIS report on operational vehicle emission estimates using the default vehicle mix values provided in URBEMIS. Staff's analysis also included the square footage for all the specific commercial land uses described in the DEIR, including:

- Home improvement superstore
- Free-standing discount store
- Racquetball/health club (for fitness center)
- Quality restaurant
- Supermarket
- Medical office building
- General office building
- Pharmacy

*Note: land uses used in staff's analysis are illustrative only – the final EIR should reflect analysis that is as specific as possible (e.g., defining the restaurant as "quality," "high volume," or "fast food" as appropriate).*

Staff's modeling results indicate that vehicle emissions from the Project would be above the District's significance thresholds for criteria pollutants (see attached URBEMIS report). Therefore, District staff recommends that additional mitigation measures for GHG and criteria pollutants be included in the Project. Examples of potential mitigation measures include:

- Achieve energy efficiency performance that exceeds 2008 Title 24 standards by 20%
- Require on-site renewable energy systems, such as wind turbines, solar photovoltaic or solar hot water heating systems (solar hot water heating is particularly applicable to the restaurant and fitness center)
- Require cool roof and cool paving strategies for buildings and parking lots to minimize heat island impacts and reduce evaporative emissions
- Require mandatory recycling programs
- Require mandatory composting program for restaurant
- Require employers to offer parking cash-out and transit subsidies to employees
- Unbundle parking costs from rents and leases
- Improve existing and/or construct new bus stops, shelters and pullouts

- Provide additional transit or shuttle service

If you have any questions, please 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