



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

October 2, 2012

Ms. Mindy Gentry, Senior Planner
City of Antioch
P. O. Box 5007
Antioch, CA 94531

Re: City of Antioch - Roddy Ranch Project DEIR

Dear Ms. Gentry:

Bay Area Air Quality Management District (BAAQMD) staff has reviewed your agency's Draft Environmental Impact Report (DEIR) for the City of Antioch's (City) Roddy Ranch Project located in eastern Contra Costa County. Plans for the development include up to 600 single family detached residential units and up to 100 multi-family townhomes. The development will also include a hotel with up to 250 rooms, recreational facilities, resort facilities, parks and open space, trails, roadways and landscaping.

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

Short-term Construction Related Emissions

The DEIR states that the construction of the project would result in an increase in criteria pollutants and result in significant adverse air quality impacts. The DEIR identifies a limited number of measures to reduce this impact. We recommend the City implement the following additional measures to reduce the identified construction air quality impacts to the maximum extent feasible, including but not limited to:

- Require electrification of motor, pumps, and other power tools whenever feasible
- Prohibit diesel generators where access to the electrical grid is available
- Require the use of biodiesel or other alternative fuels in diesel generators, construction equipment, and/or off-road vehicles
- Establish minimum construction waste reduction and recycling standards
- Require the use of diesel particulate filters on equipment where Tier 3 engines are not available

Long-term Operational Emissions

The DEIR concludes that emissions from implementation and operation of the project would result in significant air quality impacts. The San Francisco Bay Area Air Basin is currently in nonattainment for state and federal ozone standards and fine particulate matter (PM 2.5) standards, and for the state PM 10 standards. Many intersections within the vicinity of the project will experience increased traffic volumes at build out of the project. The DEIR contains several mitigation measures aimed at reducing vehicle trips and several measures to reduce area source emissions from new buildings constructed as part of the project. BAAQMD staff recommends the City apply these measures to mitigate to the maximum extent feasible air quality impacts in the project area.

Spare the Air

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper




Greenhouse Gas Emissions

According to the DEIR, the project will have a significant impact with respect to GHG emissions. The DEIR also states that the City's final building plans will reflect as many BAAQMD recommended mitigation measures as feasible for the project. BAAQMD staff supports this effort and encourages the City to incorporate the follow additional mitigation measures to the extent feasible for the project:

- 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
- 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
- Unbundle parking costs from rents and leases
- Improve existing and/or construct new bus stops, shelters and pullouts
- Provide transit or shuttle services
- Carpool parking preferences
- Require employers to provide transit subsidies for retail/commercial employees
- Require employers with greater than 50 employees to implement TDM programs

District staff is available to assist you in addressing these comments, 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 Chairperson John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross