



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

March 12, 2012

Ms. Julianne Ward, Associate Planner  
City of Napa  
Community Development Department  
1600 First Street  
Napa, CA 94559

**Subject: Draft Environmental Impact Report (DEIR) for the Downtown Napa Specific Plan**

Dear Ms. Ward:

Bay Area Air Quality Management District (District) staff has reviewed your agency's DEIR for the Downtown Napa Specific Plan. We commend the City of Napa (City) for developing a Downtown Specific Plan (Specific Plan) that promotes high density infill development with improved pedestrian and bicycle access. After a thorough review of the DEIR, District staff has the following comments regarding the project's impacts on local and regional air quality.

Long-term Operational Emissions

The DEIR identified significant and unmitigatable air quality impacts associated with implementation of the Specific Plan. 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 the state PM 10 standards. District staff recommends that the emissions from increased vehicle miles traveled be mitigated to the maximum extent feasible to ensure the Specific Plan does not adversely affect the region's ability to attain health based ambient air quality standards. We recommend the City implement the following additional measures to reduce the identified air quality impacts to the maximum extent feasible:

- Require employers with greater than 50 employees to provide transit subsidies for employees.
- Require employers to provide parking cash-out options to employees.
- Unbundle parking costs from residential leases and rents.
- Require bicycle facility amenities (such as showers and lockers).

Greenhouse Gas (GHG) Analysis

According to the DEIR, the project will have a significant impact with respect to GHG emissions. We encourage the City to require the following mitigation measures as conditions of approval for the Specific Plan:

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- New development should install solar panels/and or solar hot water systems as feasible.
- Site buildings to take advantage of shade and prevailing winds and design landscaping and sun screens to reduce energy use.
- Install efficient lighting in all buildings (including residential). Also install lighting control systems, where practical. Use daylight as an integral part of lighting systems in all buildings.
- Install Energy Star compliant highly reflective roofing materials.
- Install light-colored "cool" pavements, and strategically located shade trees along all bicycle and pedestrian routes.
- Implement waste recycling and composting programs for all types of development.
- Establish a tree planting requirement for parking lots (requiring low VOC-emitting trees).

#### Toxic Air Contaminants (TAC)

According to the DEIR, development proposed under the Specific Plan could expose resident to substantial levels of TACs. We were pleased to see the City incorporate mitigation measures that will reduce some TAC impacts under the Specific Plan. Measures such as installing diesel particulate filters on construction equipment, adopting idling-restrictions for large commercial diesel powered vehicles and requiring heating and ventilation systems that meet the efficiency standard of MERV 13 in residential units will help minimize TAC impacts.

If you have any questions regarding the issues raised in this letter, please contact Andrea Gordon, Senior Environmental Planner, at (415) 749-4940.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Brad Wagenknecht