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November 16, 2011

Janice Stern  
Planning Manager  
Community Development Department  
P.O. Box 520  
Pleasanton, CA 94566

Subject: The City of Pleasanton Housing Element Update, Climate Action Plan, General Plan Amendment and Rezoning, Draft Supplemental Environmental Impact Report

Dear Ms. Janice Stern:

Bay Area Air Quality Management District (District) staff has reviewed the Draft Supplemental Environmental Impact Report (SEIR) for the City of Pleasanton's (City) Housing Element Update, Climate Action Plan, and General Plan Amendment and Rezoning (Project). District staff understands that the Project consists of an update to the City's General Plan Housing Element, which was primarily revised to expand the inventory of land available to meet the City's share of the regional housing need through 2014, and adoption of a Climate Action Plan. The City's share of regional housing needs, as designated by the Regional Housing Needs Assessment (RHNA), is 3,277 dwelling units, and the proposed Housing Element includes policies and/or programs, including increased density, zone change, etc., intended to ensure that the City can fully accommodate its RHNA. Seventeen sites within the City's urban growth boundary are currently under consideration to accommodate the housing needs, and some of the sites may require General Plan Amendments or rezoning to allow for multi-family housing, mixed-use and/or increased densities (up to 30 dwelling units per acre).

District staff has the following specific comments on the Project's environmental analysis.

**Housing Element Update- Risks and Hazards for New Receptors Analysis**

The SEIR identified potentially significant impacts to future sensitive receptors from toxic air contaminant (TAC) and particulate matter (PM) due to roadway traffic (particularly from Interstates 580 and 680) as well as permitted stationary sources. The SEIR included Mitigation Measure 4.B-4 (MM 4.B-4) to reduce this potentially significant impact below the significance level.

The District commends the City for the strong measures included in MM 4.B-4, which include the required completion of a Health Risk Assessment (HRA) pursuant to the District's guidance and implementation of the recommendations in the HRA, and/or the required implementation of project-level best-management-practices (BMP) such as the use of MERV 13 filters in the air intake system of a building, site redesign, and the incorporation of tiered plantings of trees. MM 4.B-4, if properly implemented, will reduce the exposure of sensitive receptors to TAC's and PM concentrations.

To ensure potential impacts will remain below the significance level, the District recommends amending MM 4.B-4 to maximize reductions in the exposure of sensitive receptors to TAC's and/or PM concentrations. The first bullet under MM 4.B-4 (pg. 4.B-

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22) for Indoor Air Quality should be amended to define or make clear what is considered “acceptable interior air quality levels for sensitive receptors”. The first compliance method under Indoor Air Quality in MM 4.B-4 (pg. 4.B-22) should be amended to require that the project applicant implement the approved HRA recommendations necessary to reduce health risks below the District’s thresholds of significance at the time of the project approval. Finally, the second compliance method under Indoor Air Quality of MM 4.B-4 should be amended to require the following features, in addition to those already included in the measure:

- Phase project build-out such that sensitive receptors will not occupy areas above thresholds until a future date when risks are expected to drop below the thresholds;
- Locate the buildings air intake at the furthest point away from the source of emissions to provide the cleanest ventilation to building users; and
- Avoid placement of sensitive receptors on ground levels, where possible. Generally, TAC and PM2.5 concentrations decrease with building height, and by placing sensitive receptors on higher floors exposure to TAC’s and PM2.5 may be decreased.

The District supports the City’s intent to promote compatible land uses. Housing and other land uses that may result in long-term exposure of new sensitive receptors to TAC’s or PM2.5 should be located at a safe distance from emission sources to the extent possible, or developed at a future date when risks are expected to be below the thresholds. The District commends the City for including goals, policies and programs that are directed at protecting sensitive receptors from exposure to TACs and/or PM concentrations in the City’s 2005-2025 General Plan. For example, on pg. 4.B-12 in the SEIR (which describes policies in the General Plan), Goal 2-Policy 3 states: “Separate air pollution sensitive land uses from sources of air pollution”; and Program 3.2 states: “Locate new sensitive receptors, such as residences...away from point sources of pollution and busy traffic corridors...” Implementation of such policies and programs will reduce exposure of sensitive receptors to TAC’s and PM concentrations, while aiding the City in achieving its goals.

#### **Climate Action Plan Analysis**

The District applauds the City’s comprehensive approach to reducing GHG emissions and supports its efforts in developing the Draft Climate Action Plan (Plan). The District’s intent in creating the Qualified GHG Reduction Strategy as an operational threshold of significance in its CEQA Guidelines is to ensure that communities will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32. In its Plan, the City has demonstrated that it is supporting the State in this endeavor by establishing a climate protection goal of reducing greenhouse gas (GHG) emissions 15% below 2005 levels by 2020.

To meet the City’s GHG reduction goals, the Plan reduced the City’s estimated transportation emissions based on an anticipated reduction in VMT due to future projected increases in gasoline prices. The Plan relied on the current four-step travel demand model developed by the Metropolitan Transportation Commission (MTC) and used by the Alameda County Congestion Management Agency (ACCMA) to project Pleasanton’s future VMT. The Plan states on page 26 that the four-step travel demand model “is insensitive to fuel price changes,” and that “fuel pricing has little to no effect on the model output.” However, it is our understanding that MTC did project increasing fuel prices as a component of total auto operating costs in the development of its four-step travel demand model. If the transportation modeling does account for increases in fuel prices *and* if the Plan also projects off-model VMT reductions based on increasing fuel prices, it is likely that effects on VMT, and associated GHG reductions, are overstated. The MTC model also took predicted increases in fuel economy due to state “Pavley” regulations into account, which effectively offsets the effects of all increases in fuel price on VMT growth. The District recommends the City revise the Plan to clarify exactly how future fuel prices and state regulations will

affect VMT and transportation GHG emissions. Adjustments to the estimated GHG reductions associated with fuel price increases may leave the Plan approximately 11,000 tons short of achieving its GHG reduction target. However, there appear to be ample opportunities in the Plan to strengthen proposed mitigation measures to make up for this shortfall. The City's Plan includes a broad list of GHG mitigation measures that address both existing and new development. We suggest that the Plan could be more effective at reducing GHG emissions if the voluntary measures were made mandatory. We encourage the City to consider making the following changes, as this would increase the likelihood that the City's GHG reduction target would be met:

- Change "incentivize" to "require" in all Land Use measures addressing municipal development codes related to density, infill, mixed-use, and transit-oriented development;
- Change "assist employers" or "work with employers" to "require employers" to offer transportation and parking demand management programs; and
- Reduce minimum size requirements of employers targeted for TDM programs from 100+ employees to 50+ employees.

The City has included text in the Plan stating that, should annual monitoring efforts find that the Plan is falling short of its goals, the City will modify the Plan as necessary in order to meet the Plan's GHG reduction target, and that such modification may include the addition of more prescriptive GHG reduction measures. The District acknowledges this important emphasis on monitoring the implementation of the GHG mitigation measures in the Plan. Ongoing monitoring is critical in order to demonstrate that the Plan is achieving its goals, thereby maintaining its status as a Qualified GHG Reduction Strategy over time.

With the suggested changes identified above the District believes that the City's Plan meets the standard elements laid out in the District's CEQA Guidelines for a Qualified GHG Reduction Strategy. However, the implementation and monitoring of the Plan noted above will be critical to the ability of subsequent projects to tier their GHG analysis required under CEQA.

District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Chairperson Tom Bates  
BAAQMD Director Scott Haggerty  
BAAQMD Director Jennifer Hosterman  
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