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March 27, 2012

Lauren Barr, Principal Planner
City of San Ramon
Planning/Community Development Department
Planning Services Division
2401 Crow Canyon Road
San Ramon, CA 94583

Subject: Draft Environmental Impact Report Prepared for the North Camino Ramon Specific Plan

Dear Mr. Barr,

Bay Area Air Quality Management District (District) staff reviewed the Draft Environmental Impact Report (DEIR) for the City of San Ramon's (City) North Camino Ramon Specific Plan (Plan). We support the City's commitment to implementing sustainability measures as part of the Plan which include a mix of land uses, a network of off-street pedestrian and bicycle facilities, enhancement of public spaces, reducing water demand, and parking management strategies.

District staff has the following specific comments on the environmental analysis in the DEIR.

Risks and Hazards Analysis

District staff supports the Plan's objective of minimizing adverse impacts to sensitive receptors through site planning and design techniques. We also support the inclusion of mitigation measure MM AIR-4, which directs future project applicants to utilize the District's roadway screening tools to assess local risk and hazard impacts. The District recommends that MM AIR-4 also reference the District's stationary source screening tools that allow for a location specific analysis. These tools can be downloaded at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

In addition, the District recommends that the Plan require analysis of potential new sources of pollution, including land uses that attract heavy duty diesel trucks, such as distribution centers and loading docks. These types of land uses can adversely impact nearby sensitive receptors if feasible mitigation measures are not applied to the project. These measures include:

- Require projects generating heavy duty truck traffic to designate truck routes that minimize exposure of sensitive receptors;
- For new projects that generate heavy duty truck traffic, require signage which reminds drivers that State law limits idling to five minutes;

- Require the electrification of all loading docks and require that all heavy duty trucks plug into grid power and shut off their main engines to the extent feasible;
- Require operators of trucks delivering refrigerated goods to utilize a CARB-approved Transportation Refrigeration Unit (TRU) in lieu of utilizing the main engine; and
- Prohibit heavy duty truck parking in residential neighborhoods, or areas with other sensitive land uses

Criteria Pollutant Analysis

The traffic study used in the air quality analysis indicates that vehicle miles traveled will increase by 94%. This increase in VMT was found to be potentially significant and the DEIR references mitigation MM AIR-4 to reduce this impact below a level of significance. However, MM AIR-4 does not address VMT or reduce criteria pollutant emissions. Therefore, the following measures should be required of all new projects in addition to transportation demand measures that are already included in the Plan:

- Require commute-based trip reduction programs for businesses with 50 or more employees that may include transit subsidies, parking cash-out incentives, and carpool parking preferences;
- Require all businesses to provide bicycle facility amenities such as showers and lockers; and
- Require residential development to unbundle parking costs from rent or leases

Greenhouse Gas (GHG) Emissions Analysis

According to page 3.2-52 of the DEIR, the Plan utilizes the City's Climate Action Plan (CAP) to determine GHG emissions from implementation of the Plan would be *less than significant*. However, an environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify measures specified in the greenhouse gas reduction plan which apply to later projects, and, if those measures are not otherwise required and enforceable, they should be incorporated as mitigation (see State CEQA Guidelines Section 15183.5).

We understand that several of the goals and policies in the Plan are consistent with the measures laid out in the CAP. However, a number of implementation actions in the CAP (e.g. E-1.2: require new development to achieve energy efficiency improvements consistent with state targets of 15%; E-2.2: achieve the state target of 20% reduction in water consumption; E-2.3: implement the state model water efficient landscape ordinance; E-3.3: continue to improve per capita solid waste rates, etc.) are briefly discussed in the Plan (e.g. Chapter Seven: Sustainability Guidelines) but it is not clear if these actions will be required of future projects within the Plan area. We recommend that the FEIR should provide a comprehensive analysis of all of the measures in the City's CAP and include in the Plan as mitigation those measures from the CAP that are not otherwise required to be implemented.

We appreciate the collaboration that the City and their consultants have provided to the District. District staff is available to assist in addressing these comments. If you have any questions, please contact Ian Peterson, Environmental Planner, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Chair John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross