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September 16, 2011

Sonia Urzua, AICP  
Senior Planner  
Alameda County Planning Department  
224 West Winton Avenue, Room 111  
Hayward, CA 94544

Subject: Revisions to the Draft Environmental Impact Report for the Castro Valley General Plan

Dear Ms. Sonia Urzua:

Bay Area Air Quality Management District (District) staff has reviewed your agency's revised Draft Environmental Impact Report (DEIR) for the proposed revision of the 2007 Castro Valley 2005-2025 General Plan (Plan). We understand that the revised draft Plan incorporates a new chapter to address climate change. As an unincorporated area, Castro Valley is subject to Alameda County's (County) General Plan; however, state law allows a county General Plan to be adopted as a series of area plans, such as those the County has produced for Castro Valley. These plans must conform to all countywide general plan elements and be consistent with one another.

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

Climate Change Analysis

If the intent of the Plan is to serve as a *Qualified GHG Reduction Strategy*, as defined by the District's CEQA Guidelines, then both the Plan and Alameda County's CAP must be consistent with the methodology and thresholds of significance outlined in the District's CEQA Guidelines for *Qualified GHG Reduction Strategies* (Section 4.3) for future tiering purposes. Based on District staff's review of the Plan's analysis in the DEIR, we do not believe it meets the standards of a *Qualified GHG Reduction Strategy* for the following reasons:

- The Plan is not consistent with any of the District's plan-level thresholds for GHG emissions;
- Quantification of emission reductions from each of the Plan reduction measures has not been provided;
- An implementation strategy for the Plan has not been included;
- There are no mandatory/enforceable emission reduction measures;
- An estimation of GHG emissions for 2020, the AB 32 benchmark year has not been provided; and
- A comparison of estimated GHG emissions for the build-out year of the Plan (2025) to the extrapolated efficiency metric for the build-out year (5.44 MT/CO<sub>2</sub>e/SP) has not been provided.

We strongly encourage the County to consider adding additional mandatory measures, as this would increase the likelihood that the Plan's GHG emissions will not exceed the State's reduction goals for 2025 and meet the District's thresholds of significance. The District recommends that the Plan include additional feasible measures such as:

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- A time of sale Residential Energy Conservation Ordinance/Commercial Energy Conservation Ordinance (RECO/CECO) with energy efficiency requirements that exceed Title 24 for existing development;
- Water conservation requirements on new construction and remodels;
- A County-wide pricing program for public parking; and
- Transportation Demand Management (TDM) requirements of employers (for example, transit subsidies; an ordinance similar to San Francisco's Commuter Benefit Ordinance)

Future projects seeking to tier off the environmental review for the Plan will have to apply all relevant measures in the Plan, whether mandatory or voluntary, as conditions of approval for the project. The Plan should include a mechanism for project applicants to demonstrate consistency with the Plan, such as San Francisco's "Compliance Checklist for New Development" (<http://sf-planning.org/index.aspx?page=1886>).

In addition, the revised DEIR utilizes ABAG Projections 2005 for population and employment projections; however, the revised DEIR should have used ABAG Projections 2009 for projecting population and employment for future years. It is also not clear how the term "per capita" is defined in the revised DEIR. Also, Table 3.14-6 does not clearly communicate which units of GHG emissions are being estimated, for example, are the estimates in English tonnes or metric tons. When comparing GHG emissions to the District's plan level threshold of significance, the GHG emissions in the revised DEIR should be expressed in metric tons of CO<sub>2</sub>e, divided by the projected service population (residents + employees).

District staff is available to assist County 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  
BAAQMD Director Nate Miley