



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

December 8, 2011

Rachel Warner
Marin County Community Development Agency
Planning Division
3501 Civic Center Drive
San Rafael, CA 94903

Subject: Draft Supplement to the Grady Ranch/Big Rock Ranch Master Plan 1996 Final Environmental Impact Report

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Dear Ms. Warner:

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Supplement to the Grady Ranch/Big Rock Ranch Master Plan 1996 Final Environmental Impact Report (SEIR). We understand that a final environmental impact report for the *Lucasfilm, Ltd. Grady Ranch/Big Rock Ranch Master Plan* was certified by the Marin County Board of Supervisors in 1996, and that the proposed *Grady Ranch Precise Development Plan* (Plan) details a second phase of the implementation of the Master Plan. The Plan proposes development on 52 acres of the 239-acre Grady Ranch property, with the remaining 187 acres being preserved as private open space.

The District appreciates the principles that will guide development of the Plan area, such as incorporating low impact development practices, emphasizing restoration, preservation and conservation in development areas, utilizing highly efficient energy systems, offering a rideshare incentive program to employees and shuttle service to the nearest bus stop.

The SEIR finds that operational greenhouse gas (GHG) emissions associated with implementation of the proposed Plan would total 1,755 metric tons (MT) of CO₂e per year, or 10.32 MT CO₂e per year per service population. These amounts exceed the District's significance thresholds of 1,100 MT CO₂e/year and 4.6 MT CO₂e/year/service population. Mitigation measures such as the rideshare incentive program and the shuttle service would reduce total annual GHG emissions to 1,649 MT.

In order to avoid a significant and unavoidable impact for GHGs, the SEIR proposes an off-site mitigation measure to reduce annual GHG emissions below the District's threshold of significance. This mitigation would include an off-site mitigation fee of \$100,000 to fund feasible GHG reduction projects in Marin County that are real, surplus, quantifiable and permanent (e.g., energy efficiency upgrades in affordable housing). The project applicant would also provide \$175,000 to Marin County to be used to fund the preparation of a Countywide Climate Action Plan that satisfies the criteria for "Qualified GHG Reduction Strategies" included in the District's CEQA Guidelines.

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The District acknowledges that an aggressive and comprehensive climate action plan can serve to reduce countywide GHG emissions well into the future. We support the County's efforts to develop a communitywide climate action plan, as we believe that long-range planning is the best way to ensure permanent reductions in GHG emissions. Such countywide reductions would likely far exceed the 549 MT needed for this Plan to meet the District's threshold of significance. However, it is the District's experience that climate action plans can be developed at significantly less cost than the \$175,000 figure included in the SEIR. It is also the District's experience that achieving significant emission reductions that are real, surplus, quantifiable and permanent is likely to require more than the \$100,000 allotted in the SEIR. District staff therefore recommends that the majority of the off-site mitigation funds be used to fund direct, near-term GHG-reducing activities, with the balance allocated to the preparation of the Countywide Climate Action Plan.

District staff is available to discuss any of the issues raised in this letter. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer