



April 26, 2017

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Ms. Alicia Giudice
City of Petaluma
11 English St.
Petaluma, CA 94952

RE: EIR for the Davidon Ranch

Dear Ms. Giudice,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Davidon/Scott Ranch General Plan Amendment, Rezoning, and Vesting Tentative Map Project. This project will demolish two barns on a former farmstead, create a recreational trail segment, and convert nearly 59 acres of greenfield into 63-66 single-family homes at the edge of Petaluma’s urban growth boundary and adjacent to a regional parkland.

This project’s EIR assesses greenhouse gas (GHG) impacts and determines that “[o]peration of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions” (Impact GHG-2). Air District staff observes that this assessment of greenhouse gas (GHG) impacts uses significance thresholds based on the State’s 2020 GHG target under AB 32, which is now being superceded under SB 32 by a target of 40% reduction of GHGs below 1990s levels by 2030. This 2030 goal is itself only an interim step toward a longer-term climate stabilization goal of GHG emissions 80% below 1990 levels by 2050 (EO S-3-05). The Air District’s recently finalized 2017 Clean Air Plan, as well as the Air Resources Board’s draft 2030 Scoping Plan, also provide a basis for stronger action to reduce GHG levels.

We encourage the City to look beyond 2020 toward the State’s 2030 target as a basis for GHG significance determination. For this reason, as well as in light of this project’s limited public transit and walking options to everyday amenities, we recommend that the City require the project developer to implement these additional best management practices (BMPs): (1) integration of solar energy systems into all homes; (2) inclusion of charging infrastructure for electric vehicles in all homes; (3) integration of bike storage that provides easy bike ingress/egress in all homes; and (4) enhancement of bike lanes along D Street to assure enticing bike commute to the SMART station.

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Air District staff is available to assist the City in addressing these comments. For more information, or if you have any questions, please contact Chad White, Senior Planner, at (415) 749-8619 or via email at cwhite@baaqmd.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Roggenkamp", with a long, sweeping horizontal line extending to the right.

Jean Roggenkamp
Deputy Executive Officer

cc: Director Teresa Barrett
Director Shirlee Zane