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October 7, 2019

Ms. Meily Sheehan
Senior Planner
City of Fairfield
1000 Webster Street, 2nd Floor
Fairfield, CA 94533

RE: Green Valley II Mixed-Use Project Draft Environmental Impact Report

Dear Ms. Sheehan:

Air District staff reviewed the Draft Environmental Impact Report (DEIR) for the Green Valley II Mixed-Use Project (Project) located at the southwest corner of Business Center Drive and Suisun Valley Road in Fairfield, California. The proposed project includes a combination of residential and commercial land uses on a 13.32-acre project site. The residential element consists of approximately 10.55 acres and includes an estimated 270-unit apartment complex. The proposed apartment units would have an overall density of approximately 26 dwelling units per acre. The commercial component would occupy a 22,000 square foot complex on 2.77 acres on the same site, and would provide retail shopping, restaurant space and parking for commercial businesses.

Air District staff support high-density mixed-use development projects that have the potential to reduce vehicle use and greenhouse gas emissions that contribute to global warming. While we recognize that certain energy efficient features that will be incorporated into the Project have the potential to reduce greenhouse gas emissions, we recommend the Project incorporate all feasible measures identified in the 2017 Scoping Plan needed to meet the State's strategy to achieve the Statewide 2030 GHG reduction goal and be on track to meet the 2050 climate stabilization goal. Air District staff recommend the Project seek consistency with the State 2017 State Scoping Plan by incorporating on-site and offsite measures including the following:

- All construction activities shall implement waste reduction, disposal and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen). In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.
- Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1.

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- Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use. Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Sections A4.106.5 and A5.106.11.2.
 - Require the electrification of all loading docks to facilitate plug-in capability.
 - Require the project to meet SB 743 derived vehicle miles traveled (VMT) reductions of 15% below the regional average VMT.
 - Require 10% of parking spaces to include electric vehicle charging equipment and be designated for electric vehicle parking only.
 - Require the use of zero emission off-road equipment for construction as well as renewable fuels (such as renewable diesel and biogas), if available.

New Vehicle Trips

Table 4.9-6 of the DEIR states the proposed project will generate 4,120 net new vehicle trips. We suggest the City of Fairfield (City) identify and encourage alternative modes of transportation in order to minimize air pollutant and greenhouse gas emissions associated with the project. We recommend the City include the following strategies to reduce vehicle trips related to this Project.

- Ridesharing or carpool services
- Mandate parking capacity for carshare programs
- Providing safe and convenient pedestrian, worker and bicyclist access to streets, sidewalks, bike paths and, public transit bus stops
- Provide bicycle racks and lockers
- Promote the use of zero emission vehicles and alternative fuels
- Parking cash-out/unbundling of parking in rents
- Shuttles to rail stations
- Install electric vehicle parking and charging infrastructure
- Establish a neighborhood electric vehicle program
- Institute an alternative fuel community shuttle

Mitigation Measure Air-3 (MM AIR-3)

The DEIR finds that implementation of the proposed project would expose sensitive receptors to substantial pollutant concentrations (Impact AIR-3). The DEIR states in MM AIR-3 (Page 4.1-25) that “all diesel-powered off-road equipment larger than 50 horsepower and operating on the site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emissions standards for 4 Tier engines or equivalent.” We recommend that measure be revised to the following to reduce exposure to construction diesel particulate matter to a less than significant level:

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- Require the use of Tier 4 engines or equivalent construction equipment for all diesel-powered off-road equipment larger than 50 horsepower operating on site, whether or not the equipment operates more than two days consecutively.

Air District staff is available to assist you in addressing these comments. If you have any questions please contact Andrea Gordon, Senior Environmental Planner at agordon@baaqmd.gov or 415.749.4940.

Sincerely,

A handwritten signature in black ink, appearing to read "Henry Hilken", with a stylized flourish at the end.

Henry Hilken
Director, Planning & Climate Protection Division

cc: BAAQMD Director Jim Spering
BAAQMD Director Lori Wilson