



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

July 14, 2020

Erik Nolthenius, Planning Manager  
Planning Division  
City of Brentwood Community Development Department  
150 City Park Way  
Brentwood, CA 94513

RE: Bridle Gate Project – Draft Environmental Impact Report

Dear Mr. Nolthenius:

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for Bridle Gate Project (Project). The proposed Project includes development of 252 single-family homes, a 258-unit apartment complex, 19.59 acres of commercial development, and 4.3 acres for use as public parks. In addition, the project includes an 11.35-acre area either to be developed as an elementary school or additional residential development with 63 single-family units.

Air District staff appreciates and supports efforts to incorporate measures into the Project’s design to mitigate air quality impacts such as:

- Installing electric vehicle charging infrastructure in excess of existing California Building Standards Code,
- Installing on-site electric vehicle charging units,
- Implementing a ride sharing program and subsidized transit passes for employees, and
- Constructing a sidewalk network and off-street trails.

**Recommendations to Achieve Additional NOx Reductions**

While staff supports the above-mentioned measures that will help reduce air pollutants from this Project, staff is concerned about the significant and unavoidable air impacts associated with nitrogen oxides (NOx) emissions after incorporating Mitigation Measures 4.1-2 (MM 4.1-2). The Bay Area Air Basin is currently in non-attainment for state and federal ozone standards and fine particulate matter (PM<sub>2.5</sub>) and for state PM<sub>10</sub> standards. Due to the magnitude of the Project’s anticipated impacts, we suggest the City of Brentwood (City) consider incorporating the following measures into MM 4.1-2 to help reduce emissions to the maximum extent feasible. Examples of potential emission reduction measures that should be considered include, but are not limited:

- Subsidized transit passes for residents,

**ALAMEDA COUNTY**  
John J. Bauters  
Pauline Russo Cutter  
Scott Haggerty  
Nate Miley

**CONTRA COSTA COUNTY**  
John Gioia  
David Hudson  
Karen Mitchoff  
(Secretary)  
Mark Ross

**MARIN COUNTY**  
Katie Rice

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
VACANT  
Shamann Walton  
Tyrone Jue  
(SF Mayor’s Appointee)

**SAN MATEO COUNTY**  
David J. Canepa  
Carole Groom  
Davina Hurt

**SANTA CLARA COUNTY**  
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(Vice Chair)  
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(Chair)

**SOLANO COUNTY**  
James Spering  
Lori Wilson

**SONOMA COUNTY**  
Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Connect with the  
Bay Area Air District:



- Install outdoor outlets for electrically-powered landscape equipment,
- Require that truck fleets based within the Project site at a minimum meet CARB's highest engine tier standard at the time the building permits are issued; consider requiring electric trucks to the maximum degree feasible,
- Require electrical hook-ups to power Transport Refrigeration Units (TRU) while trucks are parked at loading docks and EV charging stations to support possible use of electric trucks
- Install all-electric appliances for both residential and commercial development to eliminate the use of natural gas, a high global warming potential greenhouse gas that also produces NOx and other pollutants when combusted.

### **Health Risk Assessment**

Air District staff appreciates the City's efforts to include a Health Risk Assessment (HRA) for the Project. However, page 4.1-27 of the Bridle Gate Project DEIR states that the HRA was done "to evaluate the health risk posed to future students as a result of ongoing freeway operations," on the school development site (Parcel H). The HRA does not fully reflect diesel PM impacts for short-term construction nor long-term operational activities for the Project. We recommend the City evaluate construction and operational activities to determine health risk to nearby residents, and to assess the level of exposure of heavy duty truck traffic associated with the Project to sensitive receptors, such as current students at the Loma Vista Elementary School, which is within 1,000 feet of the Project.

### **Cumulative Impacts**

After reviewing the DEIR, Air District staff is concerned that the cumulative air quality impact analysis does not include all the emissions associated with the surrounding Project area. We recommend the DEIR include an evaluation of projects in the area associated with oil/gas well emissions and other crude extraction related activities as well as other residential developments that may lead to increased emissions. The Powerdrive Oil and Gas Company Wells Project and the Ranch Project in Antioch are both projects within adjacent areas that may cumulatively contribute to incremental reactive organic gases (ROG), toxic air contaminant (TAC), and greenhouse (GHG) emissions which should be assessed for air quality impacts.

The Air District is available to assist the City of Brentwood in addressing these comments. Please contact Matthew Hanson, Environmental Planner at 415-749-8733 or [mhanson@baaqmd.gov](mailto:mhanson@baaqmd.gov) if you have any questions or for recommendations on conducting the health risk assessment.

Sincerely,

A handwritten signature in black ink, appearing to be 'Greg Nudd', written in a cursive style.

Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia  
BAAQMD Director David Hudson  
BAAQMD Secretary Karen Mitchoff  
BAAQMD Director Mark Ross