



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

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

Margaret Abe-Koga
Cindy Chavez
(Vice Chair)
Liz Kniss
Rod G. Sinks
(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:



May 4, 2020

Alexis Morris, Planning Manager
City of Antioch
Planning Division
200 H Street
Antioch, CA 94531

RE: The Ranch Project – Draft Environmental Impact Report

Dear Ms. Morris,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for The Ranch at Sand Creek Project (Project). The Project proposes to amend the City of Antioch General Plan and Zoning Code to allow for 1,177 single family residential units of various densities and include age-restricted housing, a 5.00-acre village center with commercial, office, and retail space, and 3.00 acres of public use facilities, including a new fire station, as well as a trail staging area. The Project also includes 22.50 acres of public parks and landscaped areas, 229.50 acres of public open space including trails, and 38.00 acres of roadway improvements.

Air District staff appreciates and supports efforts to incorporate best practices into the Project's design to minimize air quality impacts such as:

- Installing on-site solar panels for a portion or all the Project's energy consumption,
- Installing on-site electric vehicle charging units,
- Implementing a ride sharing program for employees, and
- Construction of sidewalk network and off-street trails.

However, since the Project anticipates significant and unavoidable impacts for greenhouse gas emissions, Air District staff recommends incorporating the following measures to further reduce these impacts:

- Increase on-site solar power generation to account for all of the Project's calculated energy consumption,
- Require use of electrically powered landscape equipment,
- Install all-electric appliances, and
- Eliminate the use of natural gas, a high global warming potential greenhouse gas.

The Project also anticipates significant and unavoidable impacts for operational emissions, in particular ROG emissions from area sources like consumer products, parking surface degreasers, and pesticides/fertilizers. Air District staff recommends incorporating the following measures to further reduce these impacts:

- Incorporate locally-based compost/mulch into landscaped areas for soil enrichment and weed suppression to minimize need for synthetic fertilizers and pesticide use,
- Employ integrated pest management techniques, and
- Consider alternative paving materials to reduce the use of asphalt such as pervious pavement, porous concrete, or other low impact options.

In addition, Air District staff appreciates the Projects' efforts to address air quality and health impacts and for incorporating construction best management practices. Beyond the proposed mitigation measure (MM Air-2a) to control fugitive dust and engine idling, Air District staff recommends the Project incorporate Tier 4 or zero-emissions off-road equipment, whenever feasible. This would help reduce the detrimental health impacts from particulate matter to nearby residents and Kaiser Permanente Antioch Medical Center, both adjacent to the Project site, during the approximate 8-years of construction.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

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