



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

February 28, 2022

Mr. Hector Rojas, Planning Manager
City of Martinez
525 Henrietta Street
Martinez, CA 94533

RE: City of Martinez General Plan Update Draft Environmental Impact Report -
Notice of Preparation

Dear Mr. Rojas,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the City of Martinez General Plan Update Draft Environmental Impact Report (DEIR). As we understand, the City intends to prepare a programmatic DEIR to update goals and policies in the General Plan (Plan) and has included implementation measures by which to evaluate future development, infrastructure improvements, and other projects throughout the City of Martinez (City). The City is located in central Contra Costa County west of Interstate 680 (I-680) and State Route 4 (SR4) and has a total area of 13.1 square miles. The City's residential and commercial areas represent a variety of land uses, from Downtown land uses to older neighborhoods adjacent to Downtown, and the suburban land use patterns separating the City's commercial centers. Projects will be required to implement updated policies and measures to be consistent with the City's General Plan.

Air District staff recommends the DEIR include the following information and analysis:

- The DEIR should provide a detailed analysis of the General Plan's potential effects on local and regional air quality. The DEIR should include a discussion of the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. The Air District's CEQA Guidelines, which provide guidance on how to evaluate a Plan's construction, operational, and cumulative air quality impacts can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/update-ceqa-guidelines>.
- The DEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP) and should discuss 2017 CAP measures relevant to the Plan. The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

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- The greenhouse gas (GHG) impact analysis should include an evaluation of the Plan's consistency with the California Air Resources Board's most recent Assembly Bill (AB) 32 Scoping Plan and with the State's 2030, 2045, and 2050 climate goals. The Air District's current GHG thresholds and CEQA Guidelines are based on the State's 2020 targets which are now superseded by the 2030 targets established in Senate Bill (SB) 32. The Air District recommends that cities and counties evaluate such plans based on whether they would be consistent with California's long-term climate goal of achieving carbon neutrality by 2045. To be consistent with this goal, these plans should reduce GHG emissions in the relevant jurisdiction to meet an interim milestone of 40 percent below the 1990 emission levels by 2030, consistent with SB 32, and to achieve carbon neutrality by 2045 as defined in Executive Order B-55-18.
- The Program DEIR should evaluate all feasible measures to minimize air pollutant emissions and exposure and should prioritize onsite measures within the Plan area, followed by offsite measures. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Requiring construction vehicles to operate with the highest tier engines commercially available,
 - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free by '33 initiative (<http://dieselfree33.baaqmd.gov/>),
 - Implement parking strategies to discourage vehicle travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and related strategies,
 - Providing funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others,
 - Provide comprehensive, safe, and convenient bicycle and pedestrian facilities throughout the city, linking residential areas and activity centers and connecting to regional networks where appropriate,
 - Install outdoor electrical receptacles for charging or powering of electric landscape equipment,
 - Implement green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity,
 - Meeting the vehicles miles traveled (VMT) requirement under SB 743,
 - Including a building decarbonization goal or policy in the Plan (<https://www.buildingdecarb.org/compass.html>) and requiring no natural gas use in proposed structures,
 - Include air filtration for new and existing buildings that may be exposed to elevated air pollution, such as MERV 13 filters, as well as vegetative buffers between new and existing buildings, and sources of pollution. For more emissions and exposure reduction best practices, see the Air District's Planning Healthy Places guidance, Appendices A and B, here:

https://www.baaqmd.gov/~/media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf., and

- Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets.

- Discuss how the Plan addresses SB 1000, the Planning for Healthy Communities Act. SB 1000, which became effective January 1, 2018, requires all California jurisdictions to consider environmental justice issues in their General Plans. Environmental justice (EJ), as defined by the State, focuses on disproportionate and adverse human health impacts that affect low-income and minority communities already suffering from cumulative and legacy environmental and health impacts.

- The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts. These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.

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 questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner, at (415) 749-4940, agordon@baaqmd.gov or Alesia Hsiao, Senior Environmental Planner, (415) 745-8419, ahsiao@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

Cc: BAAQMD Chair Karen Mitchoff
BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mark Ross