

DRAFT
MEMORANDUM

TO: Susie Murray, Senior Planner, City of Santa Rosa
FROM: Steve Ring and David Ford, Managing Principals
DATE: September 9, 2018
RE: 2028 Piner Road, Santa Rosa, CA APN 036-011-053
Regarding Air Quality Impact

The purpose of this memo is to demonstrate that our project as proposed satisfies the requirements of the CEQA Guidelines § 15332 (d), regarding Air Quality and that the Project could be determined to be categorically exempt from CEQA pursuant to Categorical Exemption No. 32, the Infill Exemption. In support of our findings we are using information and data from the “Bay Area Air Quality Management District-CEQA Guidelines, May 2017” and “Santa Rosa Climate Action Plan, June 5, 2012”.

The Bay Area Air Quality Management District CEQA Air Quality Guidelines were developed to assist lead agencies in evaluating air quality impacts for projects and plans in the San Francisco Bay Area Air Basin. The guidelines were updated in 2010 to include guidance on assessing greenhouse gas and climate change impacts as required under CEQA Section 15183.5(b) and to establish thresholds of significance for impacts related to greenhouse gas emissions. These thresholds can be used to assess plan-level and project-level impacts and allow a lead agency to determine that a project’s impact on GHG emissions is less than significant if it is in compliance with a Qualified Greenhouse Gas Reduction Strategy. The Santa Rosa Climate Action Plan (CAP; Plan) meets the programmatic threshold of the BAAQMD guidelines.

Using the BAAQMD table 3-1 as a reference below, utilizing the applicable Land Use Type for Congregate Care shows we are below the Threshold of Significance regarding Green House Gas and Construction-Related Screening Size. The applicant is proposing a 92 dwelling unit (“du”) Project, thus below the Threshold of Significance for Operational Related Criteria Air Pollutant

Screening Criteria



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

**Table 3-1
Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes**

| Land Use Type | Operational Criteria Pollutant Screening Size | Operational GHG Screening Size | Construction-Related Screening Size |
|-----------------------------------|---|--------------------------------|-------------------------------------|
| Single-family | 325 du (NOX) | 56 du | 114 du (ROG) |
| Apartment, low-rise | 451 du (ROG) | 78 du | 240 du (ROG) |
| Apartment, mid-rise | 494 du (ROG) | 87 du | 240 du (ROG) |
| Apartment, high-rise | 510 du (ROG) | 91 du | 249 du (ROG) |
| Condo/townhouse, general | 451 du (ROG) | 78 du | 240 du (ROG) |
| Condo/townhouse, high-rise | 511 du (ROG) | 92 du | 252 du (ROG) |
| Mobile home park | 450 du (ROG) | 82 du | 114 du (ROG) |
| Retirement community | 487 du (ROG) | 94 du | 114 du (ROG) |
| Congregate care facility | 657 du (ROG) | 143 du | 240 du (ROG) |
| Day-care center | 53 ksf (NOX) | 11 ksf | 277 ksf (ROG) |
| Elementary school | 271 ksf (NOX) | 44 ksf | 277 ksf (ROG) |
| Elementary school | 2747 students (ROG) | - | 3904 students (ROG) |
| Junior high school | 285 ksf (NOX) | - | 277 ksf (ROG) |
| Junior high school | 2460 students (NOX) | 46 ksf | 3261 students (ROG) |
| High school | 311 ksf (NOX) | 49 ksf | 277 ksf (ROG) |
| High school | 2390 students (NOX) | - | 3012 students (ROG) |
| Junior college (2 years) | 152 ksf (NOX) | 28 ksf | 277 ksf (ROG) |
| Junior college (2 years) | 2865 students (ROG) | - | 3012 students (ROG) |
| University/college (4 years) | 1760 students (NOX) | 320 students | 3012 students (ROG) |
| Library | 78 ksf (NOX) | 15 ksf | 277 ksf (ROG) |
| Place of worship | 439 ksf (NOX) | 61 ksf | 277 ksf (ROG) |
| City park | 2613 acres (ROG) | 600 acres | 67 acres (PM10) |
| Racquet club | 291 ksf (NOX) | 46 ksf | 277 ksf (ROG) |
| Racquetball/health | 128 ksf (NOX) | 24 ksf | 277 ksf (ROG) |
| Quality restaurant | 47 ksf (NOX) | 9 ksf | 277 ksf (ROG) |
| High turnover restaurant | 33 ksf (NOX) | 7 ksf | 277 ksf (ROG) |
| Fast food rest. w/ drive thru | 6 ksf (NOX) | 1 ksf | 277 ksf (ROG) |
| Fast food rest. w/o drive thru | 8 ksf (NOX) | 1 ksf | 277 ksf (ROG) |
| Hotel | 489 rooms (NOX) | 83 rooms | 554 rooms (ROG) |
| Motel | 688 rooms (NOX) | 106 rooms | 554 rooms (ROG) |
| Free-standing discount store | 76 ksf (NOX) | 15 ksf | 277 ksf (ROG) |
| Free-standing discount superstore | 87 ksf (NOX) | 17 ksf | 277 ksf (ROG) |
| Discount club | 102 ksf (NOX) | 20 ksf | 277 ksf (ROG) |
| Regional shopping center | 99 ksf (NOX) | 19 ksf | 277 ksf (ROG) |
| Electronic Superstore | 95 ksf (NOX) | 18 ksf | 277 ksf (ROG) |
| Home improvement superstore | 142 ksf (NOX) | 26 ksf | 277 ksf (ROG) |
| Strip mall | 99 ksf (NOX) | 19 ksf | 277 ksf (ROG) |
| Hardware/paint store | 83 ksf (NOX) | 16 ksf | 277 ksf (ROG) |
| Supermarket | 42 ksf (NOX) | 8 ksf | 277 ksf (ROG) |
| Convenience market (24 hour) | 5 ksf (NOX) | 1 ksf | 277 ksf (ROG) |
| Convenience market with gas pumps | 4 ksf (NOX) | 1 ksf | 277 ksf (ROG) |
| Bank (with drive-through) | 17 ksf (NOX) | 3 ksf | 277 ksf (ROG) |
| General office building | 346 ksf (NOX) | 53 ksf | 277 ksf (ROG) |

Stationary Internal Combustion Engine Exemption.

Per Regulation 9 of the Bay Area Quality Management District, the proposed stationary internal combustion engine proposed is a Emergency standby engine with a output rate over 50 brake horsepower, as outlined in 9-8-110.5. Per the regulation, the engine is not considered regulated by the BAQMD nor a significant contributor of air pollutant.

**REGULATION 9
INORGANIC GASEOUS POLLUTANTS
RULE 8
NITROGEN OXIDES AND CARBON MONOXIDE
FROM STATIONARY INTERNAL COMBUSTION ENGINES**

(Adopted January 20, 1993)

9-8-100 GENERAL

9-8-101 Description: This rule limits the emissions of nitrogen oxides and carbon monoxide from stationary internal combustion engines with an output rated by the manufacturer at more than 50 brake horsepower

(Amended 8/1/01; 7/25/07)

9-8-110 Exemptions: The requirements of Sections 9-8-301 through 305, 501 and 503 shall not apply to the following:

- 110.1 Until January 1, 2012, engines rated by the manufacturer at less than 250 brake horsepower output rating.
- 110.2 Engines rated by the manufacturer at 50 brake horsepower output rating or less. Effective January 1, 2012.
- 110.3 Until January 1, 2012, engines fired exclusively by liquid fuels including, but not limited to, diesel fuel, gasoline, and methanol.
- 110.4 Engines used directly and exclusively for the growing of crops or the raising of animals.
- 110.5 Emergency standby engines.

(Amended 8/1/01; 7/25/07)

9-8-111 Limited Exemption for Low Usage: The requirements of Sections 9-8-301, 302, 303, 304, and 305 shall not apply to the following low use operations provided the requirements of Sections 9-8-502.1 and 9-8-530 are met:

- 111.1 Until January 1, 2012, engines rated at, or below, 1000 brake horsepower that operate less than 200 hours, exclusive of any emergency use, in any 12-consecutive-month period.
- 111.2 Until January 1, 2012, engines rated above 1000 brake horsepower that operate less than 100 hours, exclusive of any emergency use, in any 12-consecutive-month period.
- 111.3 Effective January 1, 2012, engines that operate less than 100 hours, exclusive of any emergency use, in any 12-consecutive-month period

(Amended July 25, 2007)

9-8-112 Registered Portable Equipment: The requirements of this section shall not apply to an internal combustion engine registered as portable pursuant to the Statewide Portable Engine and Equipment Registration Program, Sections 2450-2465, Article 5, Title 13, California Code of Regulations.

(Adopted July 25, 2007)

The construction of a new building with current building codes in California, requires our project to be in compliance with all Title 24 and Part 11 CALGreen Energy policies and regulations providing a building that does not produce Significant Air Quality issues. In addition, we have attached Santa Rosa Climate Action Plan Appendix E, for your review.

Utilizing the Santa Rosa Climate Action Plan, we have attached below APPENDIX E: CAP NEW DEVELOPMENT CHECKLIST.

NEW DEVELOPMENT CHECKLIST

APPENDIX E

APPENDIX E: CAP NEW DEVELOPMENT CHECKLIST

To ensure new development projects are compliant with the City's Climate Action Plan, the following checklist has been developed. This checklist should be filled out for each new project, subject to discretionary review, to allow new development to find a less than significant impact for greenhouse gas emissions in the environmental review process.

| # | Description | Compliance | | | |
|-------|--|------------|-----------------|-----|----------------|
| | | Complies | Does Not Comply | N/A | See Discussion |
| 1.1.1 | Comply with CALGreen Tier 1 standards* | Yes | | | |
| 1.1.3 | After 2020, all new development will utilize zero net electricity* | | | N/A | |
| 1.3.1 | Install real-time energy monitors to track energy use* | Yes | | | |
| 1.4.2 | Comply with the City's tree preservation ordinance* | Yes | | | |
| 1.4.3 | Provide public & private trees in compliance with the Zoning Code* | Yes | | | |
| 1.5 | Install new sidewalks and paving with high solar reflectivity materials* | yes | | | |
| 2.1.3 | Pre-wire and pre-plumb for solar thermal or PV systems | Yes | | | |
| 3.1.2 | Support implementation of station plans and corridor plans | Yes | | | |
| 3.2.1 | Provide on-site services such as ATMs or dry cleaning to site users | | | N/A | |
| 3.2.2 | Improve non-vehicular network to promote walking, biking | Yes | | | |
| 3.2.3 | Support mixed-use, higher-density development near services | | | N/A | |
| 3.3.1 | Provide affordable housing near transit | | | N/A | |
| 3.5.1 | Unbundle parking from property cost | | | N/A | |
| 3.6.1 | Install calming features to improve ped/bike experience | Yes | | | |
| 4.1.1 | Implement the Bicycle and Pedestrian Master Plan | Yes | | | |
| 4.1.2 | Install bicycle parking consistent with regulations* | Yes | | | |
| 4.1.3 | Provide bicycle safety training to residents, employees, motorists | Yes | | | |
| 4.2.2 | Provide safe spaces to wait for bus arrival | Yes | | | |
| | | | | | |

APPENDIX E

NEW DEVELOPMENT CHECKLIST

| # | Description | Compliance | | | |
|-------|---|------------|-----------------|-----|----------------|
| | | Complies | Does Not Comply | N/A | See Discussion |
| 4.3.2 | Work with large employers to provide rideshare programs | | | N/A | |
| 4.3.3 | Consider expanding employee programs promoting transit use | Yes | | | |
| 4.3.4 | Provide awards for employee use of alternative commute options | Yes | | | |
| 4.3.5 | Encourage new employers of 50+ to provide subsidized transit passes* | | | N/A | |
| 4.3.7 | Provide space for additional park-and-ride lots | | | N/A | |
| 4.5.1 | Include facilities for employees that promote telecommuting | | | N/A | |
| 5.1.2 | Install electric vehicle charging equipment | Yes | | | |
| 5.2.1 | Provide alternative fuels at new refueling stations* | Yes | | | |
| 6.1.3 | Increase diversion of construction waste* | Yes | | | |
| 7.1.1 | Reduce potable water use for outdoor landscaping* | Yes | | | |
| 7.1.3 | Use water meters which track real-time water use* | Yes | | | |
| 7.3.2 | Meet on-site meter separation requirements in locations with current or future recycled water capabilities* | Yes | | | |
| 8.1.3 | Establish community gardens and urban farms | | | N/A | |
| 9.1.2 | Provide outdoor electrical outlets for charging lawn equipment | Yes | | | |
| 9.1.3 | Install low water use landscapes* | Yes | | | |
| 9.2.1 | Minimize construction equipment idling time to 5 minutes or less* | Yes | | | |
| 9.2.2 | Maintain construction equipment per manufacturer's specs* | Yes | | | |
| 9.2.3 | Limit GHG construction equipment emissions by using electrified equipment or alternative fuels* | Yes | | | |

**To be in compliance with the CAP, all measures denoted with an asterisk are required in all new development projects unless otherwise specified. If a project cannot meet one or more of the mandatory requirements, substitutions may be made from other measures listed at the discretion of the Community Development Director.*