



December 1, 2011

**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

David Petrovich  
City Planner  
City of Millbrae  
621 Magnolia Ave  
Millbrae, CA 94030

Subject: 120 S. El Camino Real New Mixed Use Infill Development Initial Study/Mitigated Negative Declaration

Dear Mr. Petrovich:

Bay Area Air Quality Management District (District) staff reviewed your agency's Initial Study/Mitigated Negative Declaration (IS/MND) for the 120 S. El Camino Real New Mixed Use Infill Development Project (Project). The proposed Project would include demolition of an existing fast food restaurant and the construction of a mixed use building with 54 dwelling units above 11,000 square feet of ground floor commercial space, intended for retail and medical office uses.

District staff is impressed with and strongly supports the City's commitment to building transit-friendly mixed use development and the goals of the 1998 Millbrae Station Area Specific Plan (MSASP). The MSASP's goals include supporting transit, bicycle and pedestrian circulation, and the intensification of land uses immediately surrounding the new intermodal BART and Caltrain rail station with a mixture of office, hotel, retail, and residential uses.

District staff agrees that the Project has excellent access to local and regional transit because of its location adjacent to the Millbrae BART and Caltrain Station, which is also served by Samtrans bus lines 359, 390, 391 and 397. According to the District's greenhouse gas (GHG) emissions inventory, approximately 28 percent of the Bay Area's total GHG emissions are from cars and light duty trucks. Thus, projects that provide access to alternative transportation modes not only help the Bay Area move towards reaching the State's AB32 greenhouse gas (GHG) reduction goals, but also serve as a model for other jurisdictions seeking to reduce GHG emissions and build energy efficient communities. Enhancing transit opportunities will also help reduce air pollutants for which the region exceeds health based air quality standards, specifically ozone and fine particulate matter. To help ensure that future employees and residents at the Project take advantage of these transit amenities, staff recommends that the City require the Project to include transit subsidies for future employees and residents.

Moreover, according to the Project's IS/MND, the applicant has proposed to include features in the Project to reduce greenhouse gas emissions, such as high reflective roofing material, water efficient landscaping, low-flow indoor water faucets, showers, and toilets, energy efficient appliances and HVAC units, and to provide bicycle storage for tenants. These sustainability features will further reduce the Project's greenhouse gas emissions. District staff encourages the City to make the inclusion of these features a binding and enforceable *requirement* of this Project.

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While District staff supports the transit-friendly location and the attributes referenced above that will serve to reduce air pollutants from this Project, staff is concerned that the IS/MND does not address the new residents' potential exposure to emissions from Caltrain diesel train engines. Staff recommends that the City evaluate fine particulate matter (PM<sub>2.5</sub>) concentrations and the cancer risk from toxic air contaminants (TACs) from the train's diesel emissions on new residents of the Project. In many instances, staff has found that these impacts from PM<sub>2.5</sub> and TAC emissions can be reduced through the implementation of the following mitigation measures:

- Installation of mechanical air filtration in the HVAC system that meet MERV 13 efficiency standards;
- Locating the building air intake at the furthest point away from the train station;
- Raising the floor that residential uses are on (e.g. third floor or higher) to be above the train emission stacks;
- Providing more distance between the residential uses and the train station;
- Planting trees between sensitive receptors and sources of pollution; and
- To prevent adding any emissions to the impact, prohibiting any diesel delivery trucks that serve the building from idling for more than 2 minutes.

District staff is available to assist the City in addressing these comments. For more information about the District's CEQA Guidelines, please see the webpage <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx>. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom  
BAAQMD Director Carol Klatt