



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

March 22, 2012

Sean Charpentier  
Project Coordinator II  
Attn: Plan/Program EIR  
City of East Palo Alto  
1960 Tate Street  
East Palo Alto, CA 94303

Subject: The Ravenswood / 4 Corners TOD Plan DEIR

Dear Mr. Charpentier:

Bay Area Air Quality Management District (District) staff has reviewed your agency's Draft Environmental Impact Report (DEIR) for the Draft Ravenswood/4 Corners TOD Plan (Plan) located in the City of East Palo Alto. We commend a number of features of the Plan, including a mix of land uses, a network of off-street pedestrian and bicycle facilities, and enhancement of public spaces, which will aid in decreasing vehicle miles traveled, thereby helping to improving air quality and public health.

District staff has the following specific comments on the environmental analysis in the DEIR.

**Risks and Hazards: New Sources and New Receptors**

We commend the City for the risk and hazard analysis in the DEIR and for including mitigation measure **AQ-2**, which requires site-specific analysis for all development that includes sensitive receptors within 60 feet of University Avenue. Measure **AQ-2** also requires that additional measures be employed to reduce the impacts from significant exposures (if applicable), and if this is not possible, to relocate sensitive receptors.

However, **AQ-2** does not address the potential impacts from future development which could generate new sources of toxic air contaminants (TACs) and/or fine particulate matter (PM<sub>2.5</sub>) concentrations in proximity to existing or new sensitive receptors within the Plan area. According to the DEIR, there is potential for new sources to enter the Plan area that would not be evaluated through CEQA or District permit processes, including truck loading docks, truck parking, etc. (pg. 4.3-40). In addition, the DEIR states (on pg. 3-21) that commuter rail service is currently being planned for the existing (now unused) rail line that passes adjacent to the north of the Plan area. The Plan also calls for the City to pursue a rail station for the proposed commuter rail service, which would be located adjacent to the Plan area.

Accordingly, we recommend that the City modify **MM AQ-2** to require that measures shall be utilized in the site planning and building designs to reduce TAC and PM<sub>2.5</sub> exposure where new sensitive receptors are located within 60 feet of University Avenue, *as well as* in proximity to new, future sources of TACs and/or PM<sub>2.5</sub> concentrations.

**ALAMEDA COUNTY**  
Tom Bates  
Scott Haggerty  
Jennifer Hosterman  
Nate Miley  
(Secretary)

**CONTRA COSTA COUNTY**  
John Gioia  
(Chairperson)  
David Hudson  
Mary Piepho  
Mark Ross

**MARIN COUNTY**  
Katie Rice

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
John Avalos  
Edwin M. Lee  
Eric Mar

**SAN MATEO COUNTY**  
Carole Groom  
Carol Klatt

**SANTA CLARA COUNTY**  
Susan Garner  
Ash Kalra  
(Vice-Chair)  
Liz Kniss  
Ken Yeager

**SOLANO COUNTY**  
James Sperring

**SONOMA COUNTY**  
Susan Gorin  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

In addition, we encourage the City to incorporate additional policy measures related to truck parking and goods movement which will help to address future potential impacts from TAC emissions and/or PM2.5 concentrations, such as the following examples:

- Require projects generating significant heavy duty truck traffic to designate truck routes that minimize exposure of sensitive receptors to TACs and PM;
- For new projects that generate truck traffic, require signage which reminds drivers that State law limits idling to five minutes;
- Require the electrification of all loading docks and require that all trucks plug into grid power and shut off their main engines to the greatest extent feasible;
- Require operators of trucks delivering refrigerated goods to utilize a CARB-approved Transportation Refrigeration Unit (TRU) in lieu of utilizing the main engine;
- Prohibit truck parking in residential neighborhoods, or areas with other sensitive land uses.

### **Greenhouse Gas (GHG) Emissions Analysis**

According to pg. 4.7-18 of the DEIR, the Plan tiers off of the City's Climate Action Plan (CAP) which was adopted on September 20, 2011, and therefore, GHG emissions from implementation of the Plan would be *less than significant*. We understand that the City adopted a GHG reduction goal of reducing GHG emissions 15% below "current" levels by 2020, which will help to enable the State to meet its GHG reduction goals pursuant to AB 32 and beyond. However, District staff recommends that environmental documents which rely on a GHG reduction plan for a cumulative impacts analysis identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as binding mitigation measures applicable to the project (State CEQA Guidelines Section 15183.5).

District staff recommends that the DEIR assess the consistency of the Plan with *all* of the relevant measures in the City's CAP. We understand that several of the goals and policies in the Plan are consistent with the measures laid out in the CAP; however, a number of policies in the CAP (for example, E-1.3: Promote water efficiency; E-2.1: Participate in/promote PACE program; W-2.2: Institute a mandatory requirement for businesses to recycle; etc.) were not included in the Plan nor assessed in the DEIR. Therefore, the DEIR does not provide a comprehensive analysis of all of the measures in the City's CAP to determine if the Plan is consistent with the CAP. Staff recommends including a "compliance checklist" in the FEIR similar to what is utilized in other jurisdictions, for example, the City/County of San Francisco's "Compliance Checklist for Private Development Projects" ([http://sfmea.sfplanning.org/GHG\\_Checklist\\_T1.doc](http://sfmea.sfplanning.org/GHG_Checklist_T1.doc)).

Additionally, a number of the GHG reduction policies and measures in both the Plan and the CAP are not mandatory. As mentioned above, policies and/or measures in the CAP that are not binding and enforceable must still be included as mitigation measures in order for the Plan to tier off of the CAP. For example, the DEIR states on pg. 4.7-19, "the goals and standards in this section require the City to establish a mandatory green building checklist and ordinances on new commercial and residential construction and retrofit projects". However, the DEIR does not include this "requirement" as a mitigation measure and it is not included as a mandatory policy in the Plan, and therefore implementation of the measure cannot be assured. We recommend including all of the non-mandatory measures in the CAP as mitigation measures in the Plan.

District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Roggenkamp". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom  
BAAQMD Director Carol Klatt