



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

June 2, 2014

Neal Toft
City of Larkspur, Planning and Building
400 Magnolia Avenue
Larkspur, CA 94939

Subject: The Larkspur SMART Station Area Plan DEIR

Dear Mr. Neal Toft:

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Larkspur's (City) Draft Environmental Impact Report (DEIR) prepared for the Larkspur SMART Station Area Plan (Plan). According to the DEIR, the Plan consists of 405 acres surrounding the planned Larkspur SMART station, and the Larkspur ferry terminal. The Plan includes a diverse mix of uses including retail, hotel, office, low- and high-density residential, park and open space, and light industrial. The Plan also includes a recommended transportation demand management (TDM) policy to limit future increases in vehicle trips to the Plan area to no more than 10 percent above the current traffic. Air District staff supports this policy and recommends implementing the policy as a condition of approval.

Overall, Air District staff supports the Plan and applauds its efforts to reduce vehicle miles traveled and promote infill, transit-oriented, mixed-use development. Building such communities is imperative to assisting the Bay Area in attaining and maintaining health-based, ambient air quality standards and to meeting greenhouse gas (GHG) reduction goals.

Air District staff has the following comments on the air quality and GHG analysis in the DEIR.

Operational-Related Criteria Pollutant and GHG Impacts

The DEIR finds significant and unavoidable impacts from operational-related criteria pollutants and GHG emissions. The DEIR includes a number of mitigation measures that reduce these impacts but not to a less than significant level. Staff recommends the following mitigation measures to further reduce the identified impacts to be potentially less than significant: parking pricing strategies; mandated parking spaces for car sharing programs; the provision of bus/transit passes for employees or a mandatory comprehensive TDM program for all employers; mandated plug-in stations for electric vehicles; bicycle racks at each tenant space; require orientation of buildings to maximize and promote opportunities for on-site solar generation; provide permitting incentives for energy efficient and solar building projects; require the installation of cool roofs in all new development; require new development to meet energy efficiency reductions at least 25% beyond Title 24; and add a time of sale energy efficiency upgrade requirement to residential and commercial buildings, such as a residential/commercial energy conservation ordinance (RECO/CECO).

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Potential Local Air Quality Impacts to Nearby Receptors

According to the DEIR, implementation of the Plan could result in exposure of sensitive receptors to substantial pollutant concentrations from U.S. Highway 101, the future SMART train, and permitted stationary sources including several gasoline dispensing facilities. To reduce these impacts, the DEIR includes mitigation measure AIR-5 (pg. 190) which requires (as a condition of approval for new projects) an evaluation of health risks for any residential units proposed within 500 feet of Highway 101, Sir Francis Drake Boulevard, and/or any stationary sources. MM AIR-5 also requires that the evaluation identify any measures that could be incorporated into future projects to reduce health risks to less than 10 in a million, non-cancer risk to less than 1 on the hazard index (chronic or acute), and PM_{2.5} concentration to less than 0.3 ug/m³. Measures to reduce impacts could include air filtration systems, tiered tree plantings, and site design. Air District staff supports the inclusion of health protective measures as conditions of approval for development within the Plan. However, staff recommends requiring MM AIR-5 for all development which will house sensitive receptors (not only residential units), including daycare facilities, senior-living facilities, schools, etc.

In addition, staff also recommends the following measures be included as a part of MM AIR-5:

- Phasing of residential developments when proposed within 500 feet of Highway 101 such that homes nearest the freeway are built last, if feasible;
- Sites shall be designed to locate sensitive receptors as far as possible from freeways, roadways, diesel generators, and idling trains. Operable windows, balconies, and building air intakes shall be located as far from these sources as feasible;
- Limit ground floor uses in residential or mixed-use buildings that are located within 500 feet of non-elevated freeways or roadways;
- Place sensitive receptors as far away from truck activity areas as feasible, including loading docks and delivery areas;
- Require any diesel generators that will operate within the Plan area to meet ARB's Tier 4 emission standards;
- Require electrical hook-ups for diesel trucks at loading docks within the Plan area; and
- Include an enforcement mechanism for 2 minutes or less for all idling vehicles, including those not subject to California's idling rule (commercial motor vehicles with gross vehicular weight ratings of less than 10,000 pounds are not subject to the idling rule).

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

Sincerely,



for Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Susan Adams