



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

June 30, 2014

Elena Lee
Department of Planning and Community Environment
250 Hamilton Avenue
Palo Alto, CA 94301

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Palo Alto Comprehensive Plan Update

Dear Ms. Elena Lee:

Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Palo Alto's (City) Comprehensive Plan Update (Project). We understand that the Project will update goals and policies for future development within the City, and will also involve preparation of two concept plans to establish a broad vision for the California Fry's Site Area and the East Meadow Circle/Fabian Way Area.

Air District staff has the following specific comments on the environmental analysis that should be included in the DEIR:

1. The DEIR should provide a detailed analysis of the Project's potential effects on local and regional air quality impacts. The Air District's *CEQA Air Quality Guidelines (May, 2012)* provide guidance on how to evaluate a project's construction, operational and cumulative air quality impacts. A copy may be downloaded from: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx>.
2. The DEIR should include a discussion on 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; a discussion of the health effects of air pollution; and a discussion of greenhouse gas (GHG) emissions and the potential impacts from climate change in the Bay Area.
3. The DEIR should provide a map that clearly identifies the Project's boundary; existing and future planned sensitive receptors (e.g., residences, schools, day cares, hospitals, and nursing care facilities) and all stationary sources, highways, major roadways, and rail lines within 1,000 feet of the Project's boundary.

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EXECUTIVE OFFICER/APCO

4. The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TACs) as a result of Project construction and operation. Air District staff recommends that the DEIR evaluate potential impacts of TAC emissions with siting land uses attracting sensitive populations, such as residents, children, and seniors, near major transportation corridors and other sources of TACs.
5. The DEIR should identify and evaluate mitigation measures to reduce criteria pollutants, toxic air contaminants, and GHGs to lesson any potential air quality impacts. The Air District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying mitigation measures.
6. The DEIR should demonstrate its consistency with the Air District's *2010 Clean Air Plan*. The Air District's *2010 Clean Air Plan* may be found on the Air District's website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>.

If any aspects of the Project require a discretionary permit from the Air District, then the Air District is a responsible agency for CEQA purposes. The Project must obtain the appropriate permits from the Air District and comply with all applicable Air District rules and regulations and permitting requirements. If the Project will require an Air District permit, then the analysis methodology used in the DEIR and all subsequent environmental documents for the proposed Project must be consistent with the Air District's permitting requirements.

The DEIR should include all appendices or technical documents related to the air quality, toxic air contaminant, and GHG analyses, such as emission calculation and health risk assessment files. Without all the supporting air quality documentation, the Air District may be unable to review the air quality analysis in a timely manner.

The Air District's website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts, including: posted CEQA comment letters; guidance on quantifying plan-level GHG emissions; and risk and hazard screening tools and guidance. View and download available tools here: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

We encourage lead agencies to contact Air District staff with any questions, and request assistance during the environmental analysis process. If you have any questions regarding these comments, please contact Jackie Winkel, Environmental Planner, 415-749-4933.

Sincerely,



Jean Roggenkamp

Deputy Air Pollution Control Officer

cc: BAAQMD Director Cindy Chavez
BAAQMD Chair Ash Kalra
BAAQMD Director Liz Kniss
BAAQMD Director Jan Pepper