



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

July 21, 2014

Margaret Kavanaugh-Lynch
Development Services Manager
City of El Cerrito
10890 San Pablo Avenue
El Cerrito, CA 94530-2323

Subject: San Pablo Avenue Specific Plan Draft Environmental Impact Report (DEIR)

Dear Ms. Kavanaugh-Lynch:

Bay Area Air Quality Management District (Air District) staff reviewed the Draft Environmental Impact Report (DEIR) for the San Pablo Avenue Specific Plan (Plan). The Plan is a joint effort between the cities of El Cerrito and Richmond, and represents a multi-year collaborative planning effort between the cities to identify a shared vision for the future of San Pablo Avenue. The Plan anticipates approximately 1,700 additional residential units and 234,000 additional square feet of commercial use in the Plan area by 2040. The Air District supports infill development and applauds efforts of El Cerrito and Richmond to ensure that these developments are protective of public health.

Air District staff has the following comments on the DEIR.

Toxic Air Contaminant (TAC) Exposure Long-Term Operations Impact 5-3 and

Mitigation 5-3: The DEIR finds that sensitive receptors within the Plan area could potentially be exposed to TAC emissions above the stated thresholds and that this would be a potentially significant impact. Mitigation 5-3 states that if a site-specific analysis reveals significant exposure, the installation of an indoor air filtration system shall be required. The Air District recommends the following specifications be added to this mitigation:

- Air filtration systems installed shall be rated MERV-13 or higher and a maintenance plan for the air filtration system shall be implemented.
- Trees and/or vegetation shall be planted between sensitive receptors and pollution source, if feasible. Trees that are best suited to trapping particulate matter shall be planted, including the following: Pine (*Pinus nigra* var. *maritima*), Cypress (*X Cupressocyparis leylandii*), Hybrid poplar (*Populus deltoids X trichocarpa*), and Redwoods (*Sequoia sempervirens*).
- Sites shall be designed to locate sensitive receptors as far as possible from any freeways, roadways, diesel generators, distribution centers, and rail lines.

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- Operable windows, balconies, and building air intakes shall be located as far away from these sources as feasible. If near a distribution center, residents shall not be located immediately adjacent to a loading dock or where trucks concentrate to deliver goods.

The Air District also recommends that the language in Mitigation 5-3 be modified to make clear that an analysis be completed that considers the *cumulative* cancer risk and fine particulate matter (PM2.5) concentration from all sources within a set distance of the project. For more information on risk analysis methodologies, please see the Air District's *Recommended Methods for Screening and Modeling Local Risks and Hazards*, available for download at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

If you have any questions regarding these comments, please contact Alison Kirk, Senior Environmental Planner, at 415-749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

C: BAAQMD Director John Gioia
BAAQMD Director David E. Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross