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August 30, 2012

Mr. Chip Griffin, Associate Planner
City of Walnut Creek
Community Development Department, Planning Division
1666 North Main Street
Walnut Creek, CA 94596

Subject: Walnut Creek BART Transit Village DEIR

Dear Mr. Griffin,

Bay Area Air Quality Management District (District) staff has reviewed the City's Draft Environmental Impact Report (DEIR) prepared for the Walnut Creek BART Transit Village (Project). District staff understands that the Project would create a transit-oriented development on a 16.5 acre site surrounding the Walnut Creek BART Station. District staff has the following specific comments on the DEIR and the Health Risk Assessment (HRA).

District staff commends the City for its commitment to implement a variety of transit-supportive measures as part of the Project's design. This includes an emphasis on creating a multi-modal environment with improvements to pedestrian and bicycling circulation and access to the existing transit station and bus terminal. Furthermore, staff applauds the City's efforts to work with the developer to protect public health by minimizing exposure to elevated levels of air pollution. We recognize several proactive steps being taken which include: phasing project construction to allow state vehicle regulations to take effect; placing the parking structures closest to Hwy 680 as a barrier separating residents from the highway; and installing high efficiency particulate air (HEPA) filtration devices in residential buildings where high levels of air pollutant exposure have been identified.

District staff understands concentrations of toxic air contaminants (TACs) from automobiles traveling along Hwy 680 were modeled to assess localized risk and hazard impacts to the Project's residents. The modeling results were compared to the City's threshold of an increased cancer risk of 10 in a million. According to the HRA, there are potentially significant impacts within 400 feet east of Hwy 680. However, District staff is unable to verify the results of the HRA with the information provided in the DEIR or its technical appendices. District modeling of this stretch of Hwy 680 at 400 feet indicates the increased cancer risk is 87 in a million. District staff also estimates that the area above 10 in a million extends approximately 800 feet from the highway. District staff has discussed these discrepancies with City staff and its consultants and we appreciate the ongoing collaboration to reassess the modeling for the Final EIR.

To reduce this potentially significant impact, District staff recommends **MM AQ-3** be amended to require HEPA filters with a rating of *MERV16* be installed *on all buildings* with sensitive receptors (e.g. residential, schools, and health care facilities). As proposed, **MM AQ-3** requires MERV11 filtration, which is not

effective at reducing diesel PM from Hwy 680 that the DEIR determined will impact this project site.

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Ian Peterson, Environmental Planner, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Chairperson John Gioia
BAAQMD Director David Hudson
BAAQMD Director Mary Piepho
BAAQMD Director Mark Ross