



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

November 4, 2010

Tom Passanisi  
Planning, Housing & Economic Development  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

Subject: Redwood City Downtown Precise Plan Draft Environmental Impact Report

Dear Mr. Passanisi:

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(Vice-Chairperson)  
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Nate Miley

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Shirlee Zane  
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Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Redwood City Downtown Precise Plan (Plan). The Plan would establish new land use, development, and urban design policies for the City's approximately 186-acre Downtown area. Over a 20-year period, new policies would address all aspects of potential development, including: permitted uses of property; building heights; site design and planning; signage; public frontages; streets and streetscapes; and preservation and maintenance of historic resources.

The District commends the City for developing a Downtown Precise Plan that reflects a strong commitment to sustainable development, public health and climate protection. This is an excellent example of the kind of development the District seeks to encourage with our CEQA Guidelines.

Exemplary Climate Efficient Plan

District staff strongly supports the City's commitment to building a mixed use, walkable, transit-oriented downtown that takes advantage of the City's rich transit resources. District staff strongly supports the Plan's commitment to creating a model of transit integration focusing on a central transit station with seamless connections to adjacent neighborhoods. The emphasis on non-motorized modes of transportation through development of pedestrian and bicycle friendly infrastructure supports this commitment. Encouraging residents and employees to use transit, walking and bicycling for transportation needs, and actively discouraging reliance on private automobiles through parking pricing and management underscore the forward-thinking aspects of this Plan. This is the type of plan that will not only help the Bay Area move toward reaching the State's AB 32 greenhouse gas (GHG) reduction goals, but also will serve as a model for other jurisdictions seeking to reduce GHG emissions and build energy efficient communities.

While mitigating greenhouse gases is of utmost importance, adapting to the impacts of climate change is also critically necessary for communities. The Plan's consideration of impacts from climate change, specifically due to sea level rise, demonstrates forward-thinking and a pro-active planning approach. The Plan's inclusion of the development of response strategies to potential flooding, soil erosion

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and landslides due to sea level rise, as well as protection of threatened species, shows a comprehensive understanding of the climate change challenge to local communities.

While staff supports the above referenced attributes that will serve to reduce GHGs and air pollutants from this Plan, staff recommends two minor changes to the DEIR, which are unlikely to alter the less than significant conclusion of the Plan's air quality and climate impacts.

#### Clarify Population and Employment Estimates

The estimates for residents and employment in Table 13.2 are significantly higher than estimates in ABAG's Projections 2009 report. District staff understands that the DEIR estimates are higher because more precise information on the effects of higher density policies, planned housing projects (such as in the Cargill salt ponds) and sphere of influence were included in developing the DEIR than ABAG used in compiling Projections 2009. The reasons for the disparity in population and employment estimates between the DEIR and ABAG's Projections 2009 should be explained in the DEIR.

#### Develop Community Risk Reduction Plan

The Plan includes strategies to limit the impacts of toxic air contaminant (TAC) emissions in new developments. District staff commends the City for including these strategies in the Plan, and encourages the City to consider preparing a Community Risk Reduction Plan (CRRP) to reduce impacts related to TACs for the entire community as an alternative to addressing community health risk on a project by project basis. We offer our assistance in the preparation and completion of the CRRP.

District staff recognizes that the Downtown Precise Plan includes valuable analysis and policies, and represents a significant and impressive commitment by the City. District staff is available to assist the City in addressing these comments. If you have any questions, please contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom  
BAAQMD Director Carol Klatt