



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

July 14, 2014

Kevin Gardiner
Planning Manager
City of Burlingame, Community Development Department
501 Primrose Road
Burlingame, CA 94010

Subject: Notice of Preparation of a Draft Environmental Impact Report for the
Carolan Avenue/Rollins Road Residential Project

Dear Mr. Gardiner,

Bay Area Air Quality Management District (Air District) staff reviewed the City of Burlingame's (City) Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the Carolan Avenue/Rollins Road Residential Project (Project). We understand that the Project proposes to develop 209 multifamily residential units in place of existing buildings occupied by automotive repair, rental, and sales facilities. The project site is located between Highway 101 to the east and the Caltrain rail line to the west.

The Air District 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.
4. Air District staff recommends using the CalEEMod land use emissions software for estimating construction and operation emissions. CalEEMod is available for free at www.caleemod.com.

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

5. The DEIR should estimate and evaluate the potential health risk to current and future sensitive populations within the Project area from toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) as a result of Project construction and operation. The DEIR should evaluate potential cumulative health risks from the Project combined with impacts from stationary sources, highways, major roadways, and rail lines in proximity to the Project's area.
6. The DEIR should identify and evaluate mitigation measures to reduce criteria pollutants, TACs, PM_{2.5}, and GHGs to lessen any potential air quality impacts. The Air District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying mitigation measures.
7. The DEIR should evaluate the Project's 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 permit from the Air District, then 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 should 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, Air District staff and the public 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: previous 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/or to request assistance during the environmental analysis process. If you have any questions regarding these comments, please contact Sigalle Michael, Senior Environmental Planner, 415-749-4683.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom
BAAQMD Director Carol Klatt