



March 29, 2017

**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

Sue O'Strander  
Community Development Department  
City of Gilroy  
7351 Rosanna Street  
Gilroy, CA 95020

RE: Notice of Preparation for the Performance Food Group Distribution Center

**ALAMEDA COUNTY**  
Pauline Russo Culter  
Scott Haggerty  
Rebecca Kaplan  
Nate Miley

Dear Ms. O'Strander,

**CONTRA COSTA COUNTY**  
John Gioia  
David Hudson  
(Vice Chair)  
Karen Mitchoff  
Mark Ross

Bay Area Air Quality Management District (Air District) staff appreciates the opportunity to review the Notice of Preparation (NOP) and Initial Study (IS) for the Performance Food Group Distribution Center Project (Project). The Project includes development of a 29.24 acre site with a 340,271 square feet distribution center with 40 loading docks, dry and cold storage, office space, a truck maintenance building, and a fueling station.

**MARIN COUNTY**  
Katie Rice  
(Secretary)

The Initial Study incorrectly states on page 4 that no other public agency's approval is required. The EIR should indicate that an Authority to Construct and a Permit to Operate from the Air District will be needed for the fueling station, as well as for any other air pollutant emitting equipment associated with the project including, but not limited to, the truck maintenance facility.

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Edwin M. Lee  
Hillary Ronen  
Jeff Sheehy

Air District staff recommends that the EIR incorporate an analysis of the Project's impacts on nearby residential areas, including the closest sensitive receptor. This analysis should consider all types of emissions from the project, including emissions from employee trips, truck idling, transport refrigeration units (TRUs), and stationary sources. In order to address cumulative impacts, we recommend that this analysis also consider emissions from Highway 101 as well as any other emissions sources located within 1,000 feet of the receptor location being analyzed.

**SAN MATEO COUNTY**  
David Ganepa  
Carole Groom  
Doug Kim

**SANTA CLARA COUNTY**  
Margaret Abe-Koga  
Cindy Chavez  
Liz Kniss  
(Chair)  
Rod G. Sinks

In addition, the air quality analysis of construction impacts concludes that the impacts will be less than significant because the construction will occur in two distinct phases. Therefore, Air District staff recommends that the City require a condition of approval to ensure that the two phases of the project are built separately.

**SOLANO COUNTY**  
Pete Sanchez  
James Sperring

**SONOMA COUNTY**  
Teresa Barrett  
Shirlee Zane

The NOP already calls for an analysis of GHG impacts in the EIR for this project, and Air District staff concurs with that decision. As part of the GHG impact analysis, the NOP calls for estimates of GHG emissions in 2020 and 2030. Air District staff recommends that GHG impacts be assessed in light of 2030 GHG reduction goals, as set forth in SB 32.

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Connect with the  
Bay Area Air District:



Air District staff is available to assist the City in addressing these comments. For more information, or if you have any questions, please contact Karen Kristiansson, Principal Environmental Planner, at (415) 749-4753 or via email at [kkristiansson@baaqmd.gov](mailto:kkristiansson@baaqmd.gov).

Sincerely,



Jean Roggenkamp  
Deputy Executive Officer

cc: Director Margaret Abe-Koga  
Director Cindy Chavez  
Chair Liz Kniss  
Director Rod G. Sinks  
Robbie Morris, California Air Resources Board