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Bay Area Air District:



January 3, 2019

Karen Vaughn  
Principal Planner  
City of Redwood City  
Community Development Department  
Planning and Housing Division  
1017 Middlefield Road  
Redwood City, CA 94063

RE: The Draft EIR (DEIR) for the Broadway Plaza Project

Dear Ms. Vaughn:

The Bay Area Air Quality Management District (Air District) staff reviewed the Draft EIR (DEIR) for the Broadway Plaza Project located in Redwood City, near the Highway 101/ Woodside Interchange. The Project is a 11-parcel development at two sites: the Broadway Block site and the Bay Road Block site. The Broadway Block site of 11.2 acres will include demolishing the current Redwood Plaza Shopping Center to build a new residential, childcare, commercial, parking, and retail project. Separated by Woodside Road, the Bay Block will include a new CVS Pharmacy with surface parking (1.9 acre) and an undeveloped area of 2.2 acres. A General Plan and Zoning Amendment is required on the Bay Road Site. The demolition and construction will occur over approximately four years in three overlapping phases. Currently, the entire project site requires review and approval of a Remedial Action Plan (RAP) to remediate soil and groundwater contamination from the Regional Water Quality Control Board (RWQCB) and the CA Department of Toxic Substance Control (DTSC).

The Air District has the following recommendations regarding the DEIR's air quality impact analysis.

1. In the Final EIR (FEIR), staff recommends identifying and disclosing air emission impacts from remediation activities. The DEIR lists at least ten different remediation reports but does not summarize the air quality impacts occurring during remediation, demolition, and construction activity in these remediated areas. For example, on road and off-road heavy-duty diesel equipment used during all phases of remediation have not been included in any air quality analysis and the potential for asbestos impacts from existing buildings during demolition has not been disclosed. Demolition may require a specific remediation plan to comply with BAAQMD Regulation 11, Rule 2 and 14.
2. Based on Staff's analysis of the Project site and nearby vicinity using our on-line Planning Healthy Places guidance and mapping tool, this area has elevated levels of toxic air contaminants (TACs) and fine particulate matter from existing nearby stationary and mobile sources. The Project's contribution to the existing air pollution levels was not identified through a health risk assessment (HRA) or dispersion modeling for the Project's operation, only construction activity was analyzed with a HRA. Staff recommends that an operational and cumulative HRA be prepared for the Project or all feasible mitigation measures be implemented to minimize air

pollutant exposure to existing and future sensitive receptors. The Project's mixed uses, on-site child care center, and implementation of Transportation Demand Management (TDM) measures will help reduce the Project's contribution to cumulative impacts but may not be sufficient to reduce the project's impacts below the significance level, therefore Air District staff recommend the following feasible mitigation measures be required of future development:

- Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.
- Promote Zero Emission Vehicles and Alternative Fuels by requiring the installation of EV charging stations and allowing alternative fueling stations in the Project.
- Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.
- Require the installation of air filters rated at a minimum efficiency reporting value (MERV) 13 or higher in buildings associated with sensitive land uses
- Require the planting of dense rows of trees and other vegetation between sensitive land uses and emission source(s). Large, evergreen trees with long life spans work best in trapping air pollution, including: Pine, Cypress, Hybrid Poplar, and Redwoods.
- Truck routes can be planned or re-rerouted through non-residential neighborhoods, and to avoid other sensitive land uses such as daycare centers, schools, and elderly facilities.
- Generally, air pollution decreases with distance. Placing residential and sensitive land uses as far from emission sources can be an effective strategy for reducing exposure to local pollutants from a nearby at-grade highway or busy roadway.

Thank you for the opportunity to submit comments. If you have any questions about the Air District's review of this DEIR, please contact Ada Márquez, Principal Environmental Planner, at (415) 749-8673 or [amarquez@baaqmd.gov](mailto:amarquez@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director David Canèpa  
BAAQMD Director Carole Groom  
BAAQMD Director Doug Kim