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Bay Area Air District:



October 8, 2020

Charles Winter
Associate Environmental Planner
Caltrans, District 4
111 Grand Avenue, MS 8B
Oakland, CA 94612

RE: I-280/Winchester Boulevard Interchange Improvements Project – Notice of Preparation for the Draft Environmental Impact Report

Dear Charles Winter,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) for I-280/Winchester Boulevard Interchange Improvements Project (Project). The Project proposes to modify the existing Interstate 280 (I-280)/ Winchester Boulevard interchange by constructing a new off-ramp from northbound I-280 to the intersection of Tisch Way and Hatton Street and a new direct connector ramp from northbound State Route (SR) 17 to northbound I-280. Additionally, the Project would provide enhanced bicycle and pedestrian enhanced access on the Winchester Boulevard/Moorpark Avenue and the Winchester Boulevard/Tisch Way intersections

Air District staff commends the Project's inclusion of improved bicycle and pedestrian access, and transit connectivity through improvements for Bus Rapid Transit. Air District staff recommends the DEIR include the following information and analysis:

- **As identified by the Air District's CARE program and our Community Health Protection Program, the surrounding community is cumulatively impacted with toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}), which makes any additional air pollution a potentially significant localized impact.** Air District staff suggests employing all feasible environmental protection requirements and mitigation strategies to reduce exposure.
- **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from TACs and PM_{2.5} as a result of the Project's construction and operation.** Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TACs and PM_{2.5} emissions on sensitive receptors within and near the Project area. For example, the Giving Tree Montessori School and Santa Clara Baller Medical Center campuses are within 1000 feet of the Project boundary.

- **The greenhouse gas (GHG) impact analysis should include an evaluation of the Project's consistency with the most recent AB 32 Scoping Plan authored by the California Air Resources Board and with SB 32 State's 2030 and 2050 climate goals.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets which are now superseded by the 2030 GHG targets established in SB 32. The DEIR should demonstrate how the Project will be consistent with the Scoping Plan to ensure consistency with the State's climate change goals.
- **The DEIR should evaluate all feasible mitigation measures, both onsite and offsite, for air quality and GHG impacts.** The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures only if necessary. Examples of potential emission reduction measures that should be evaluated include, but are not limited to:
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Requiring the use of "renewable diesel" as a drop-in fuel for all diesel construction equipment.
 - Requiring the use of "green cement" instead of Portland cement to reduce the carbon footprint of building materials.
 - Employing vegetative barriers and noise walls between residential areas and the Project.
 - Planting more trees in the Project area than removed to improve carbon sequestration and reduce GHGs.
 - Adding Bus and/or HOV only lanes wherever possible.
 - Implementing per-mile tolling and congestion pricing policies during peak periods of traffic on I-280/SR-17. Per the Metropolitan Transportation Commission Plan Bay Area 2050 Final Blueprint, congestion pricing can help keep freeways flowing and reduce GHG.
 - Providing comprehensive, safe and convenient bicycle and pedestrian facilities beyond the project boundaries to reduce vehicle miles traveled.
- **The DEIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The DEIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
- **The Air District's CEQA website links to tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Project requires a site-specific analysis, please contact Air District staff to obtain the most recent data.

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- **Environmental Justice and Equity Issues:** CalEnviroScreen 3.0 indicates that communities to the northeast of the Project face elevated levels of air pollution. Air District staff encourages the Project to engage these disadvantaged communities early in the environmental review process to reach more equitable Project outcomes. We also recommend that the Project confer with the County of San Clara Health Department for any specific health-equity comments on the Project.

We encourage Caltrans to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have questions regarding these comments, please contact Matthew Hanson, Environmental Planner, at 415-749-8733 or mhanson@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Vice Chair Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Chair Rod G. Sinks