



April 14, 2020

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Connect with the
Bay Area Air District:



Mr. John Swiecki
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: Brisbane Baylands Specific Plan NOP of a Draft Environmental Impact Report

Dear Mr. Swiecki:

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Brisbane's (City) Notice of Preparation of a Draft Environmental Impact Report prepared for the Brisbane Baylands Specific Plan (Plan). The proposed project, located in the northeast corner of San Mateo County, will consist of 685 acres which includes development of 1,800-2,200 residential dwelling units, 7 million square feet of commercial office space and a 261,400 square-foot industrial park.

Air District staff recommends the Draft Environmental Impact Report (DEIR) include the following information and analysis:

The DEIR should provide a detailed analysis of the Plan's potential effects on local and regional air quality. 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. The Air District's CEQA Air Quality Guidelines, which provide guidance on how to evaluate a Plan's construction, operational, and cumulative air quality impacts, can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/California-environmental-quality-act-ceqa/updated-ceqa-guidelines>.

The GHG impact analysis should include an evaluation of the Plan's consistency with the most recent draft of the AB32 Scoping Plan by the California Air Resources Board and with the 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current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32.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 Plan will be consistent with the Scoping Plan.

The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Plan area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Plan'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 Plan area.

The DEIR should discuss how the Plan will address environmental justice impacts. Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act, became effective January 1, 2018, and requires all California jurisdictions to consider

environmental justice issues in their General Plans. Environmental justice as defined by the State, focuses on disproportionate and adverse human health impacts that affect low income and minority communities already suffering from cumulative and legacy environmental health impacts. Although this is not a General Plan, build-out of the Plan may impact air quality and/or community health within the eastern neighborhoods of San Francisco. These neighborhoods have been identified by the Air District as high cumulative exposure burden areas. We suggest the City assess cumulative air pollution exposure from Plan buildout and incorporate appropriate measures to minimize such impacts into the Plan.

The DEIR should evaluate all feasible emission reduction measures to minimize adverse air quality impacts. Examples of potential measures that should be evaluated and considered include, but are not limited to:

- Requiring construction vehicles to operate with the highest tier engines commercially available.
- Creating a Transportation Demand Management Program that includes funding for zero emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.
- Providing funding for expanding and improving bicycle and pedestrian infrastructure and projects that improve pedestrian access to transit, employment, and major activity centers.
- Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.
- Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.

The DEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The EIR should discuss 2017 CAP measures relevant to the Plan and show the Plan's consistency with the measures. The 2017 CAP can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

The Air District's CEQA website contains several 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: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Plan requires a site-specific analysis, please contact Air District staff to obtain more recent data.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner, at (415) 749-4949 or agordon@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director David J. Canepa
BAAQMD Director Carole Groom
BAAQMD Director Davina Hurt