



February 6, 2020

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Ms. Kaitie Meador
Senior Planner
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

**RE: Notice of Preparation of an Initial Study and Environmental Impact Report
for the Menlo Portal Project**

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
Karen Mitchoff
(Secretary)
Mark Ross

MARIN COUNTY
Katie Rice

NAPA COUNTY
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(SF Mayor's Appointee)

SAN MATEO COUNTY
David J. Canepa
Carole Groom
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(Chair)

SOLANO COUNTY
James Spering
Lori Wilson

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Ms. Meador:

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Initial Study and Environmental Impact Report (EIR) for the Menlo Portal Project. The Project consists of demolition of existing office and industrial buildings and development of a project site with an approximately 327,970-gross-square-foot (gsf.), seven-story multi-family residential apartment building with approximately 335 dwelling units, a 34,819 gsf. commercial office building and associated open space and parking.

Air District staff recommend the EIR include the following information and analysis:

- **The GHG impact analysis should include an evaluation of the Project's consistency with the most recent draft of the AB 32 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current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets, established in SB 32.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 EIR should demonstrate how the Project will be consistent with the Scoping Plan.
- The proposed project site is located east of U.S. Highway 101 (US 101) in the City of Menlo Park. Based on the close proximity to US 101, **the EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors within and near the Project area.
- **The EIR should evaluate all feasible project features, both onsite and**

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offsite, to minimize air quality and GHG impacts. The EIR should prioritize the following desirable project features onsite and offsite within the Project area. Examples of potential project features that should be evaluated and considered include, but are not limited to:

- Requiring construction vehicles to operate with Tier 4 or the highest tier engines commercially available;
- Prohibiting trucks from idling for more than two minutes or prohibiting idling altogether;
- Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>);
- Implementing a program that incentivizes building residents and tenants to carpool, use electric vehicles (EVs), or use public transit to travel to and from the site. The program may include the following features, as feasible:
 - a. A residential transit pass program;
 - b. Shuttle service to and from Menlo Park Caltrain station, SamTrans bus routes and the Dumbarton Express;
 - c. Preferential parking to carpool vehicles, vanpool vehicles, and EVs;
 - d. Require that parking is paid for separately and is not included in rent (i.e., unbundled leases).
- Providing funding for zero-emission transportation projects, including a neighborhood EV program, community shuttle/van services and car sharing, bike racks and enhancement of active transportation initiatives;
- Providing infrastructure to facilitate bicycle access from the project to bike routes, public transit services and major activity centers and providing funding towards additional bicycle projects to promote and encourage bicycle activity;
- Providing safe and convenient pedestrian access and connections to streets, sidewalks, walkways and paths, transit stops, and local services;
- Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, electric heat pump water heaters, electric air source heat pump HVAC, and solar PV back-up generators with battery storage;
- Installing EV charging infrastructure on second level of parking garage to minimize potential flood damage;
- Installing outdoor flood resistant electrical receptacles for charging or powering of electric landscape equipment;
- Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.

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- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR 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 EIR should evaluate the Project's consistency with the City of Menlo Park's Climate Action Plan.** The EIR should analyze the Project's consistency with the City of Menlo Park's 2015 Climate Action Plan Update and Status Report (CAP) and discuss the CAP measures relevant to the Project.
 - **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: <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 more recent data.
 - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

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 415-749-4940 or agordon@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

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