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Bay Area Air District:



June 26, 2020

Mr. Michael P. Laughlin, AICP, City Planner
Planning Department
Town of Colma
1198 El Camino Real
Colma, CA 94014

RE: Draft Environmental Impact Report for the Town of Colma 2040 General Plan Update – Notice of Preparation

Dear Mr. Laughlin,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Environmental Impact Report for the Town of Colma 2040 General Plan Update (Plan). The Town of Colma intends to prepare a programmatic EIR to evaluate the environmental issues associated with the adoption and buildout of the Plan for Land Use, Circulation/Transportation, Housing, Natural Resources/Conservation, Hazards and Safety, and Historic Resources.

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

- **Provide a detailed analysis of the Plan's potential effects on local and regional air quality.** The EIR should include a discussion of 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>.
- **Estimate and evaluate the potential health risk to populations within and near the Plan area from toxic air contaminants (TAC) and fine particulate matter (PM2.5) as a result of the Plan's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM2.5 emissions on sensitive receptors within and near the Plan area. Additionally, Air District staff recommends going beyond current building codes for air filtration, when considering exposure reduction measures.

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- **The GHG impact analysis should include an evaluation of the Plan's consistency with the most recent draft of the California Air Resources Board's AB 32 Scoping Plan and with the State's 2030 and 2050 climate goals outlined in SB32, as well as the State's Carbon Neutrality by 2045 goals, SB 100, the 100 Percent Clean Energy Act of 2018, and Executive Order B-55-18.** 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 Plan will be consistent with the Scoping Plan, SB32, SB100 and Executive Order B-55-18.
 - **Identify and include all feasible Plan-level design features to reduce potential impacts of criteria pollutants, TACs, and GHGs.** Chapter 9, Section 6, of the Air District's CEQA Air Quality Guidelines provides recommended mitigation measures and policies for general plans.
 - **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.** 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>.
 - **Discuss how the Plan will address Senate Bill 1000 (SB1000), the Planning for Healthy Communities Act.** SB1000, which became effective January 1, 2018, requires all California jurisdictions to consider environmental justice issues in their General Plans. Environmental justice (EJ), 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 and health impacts. Although the Town of Colma has not identified any disadvantaged communities and does not plan to add an Environmental Justice element, the Air District supports the Town of Colma's efforts to integrate environmental justice policies into the Plan.

We encourage Town of Colma staff 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 Kelly Malinowski, Senior Environmental Planner, at (415) 749-8673 or kmalinowski@baaqmd.gov

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director David J. Canepa
BAAQMD Director Carole Groom
BAAQMD Director Davina Hurt
Ms. Anna Choudhuri, Planning Department, Town of Colma