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DISTRICT 4

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Mr. Greg Stone  
Bay Area Air Quality Management District  
City of San Francisco  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**Bay Area Air Quality Management District Technical and Administrative Amendments to BAAQMD New Source Review & Title V Permit Regulations – Initial Study and Proposed Negative Declaration**

Dear Mr. Stone:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), the Caltrans *Strategic Management Plan 2015-2020* includes targets to reduce Vehicle Miles Traveled (VMT), in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments on the initial study and proposed negative declaration are based on these initiatives and goals.

***Lead Agency***

As the Lead Agency, the Bay Area Air Quality Management District is responsible for all project mitigation. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

***Project Understanding***

The Bay Area Air Quality Management District is proposing a set of technical and administrative amendments to two District permitting programs, the New Source Review (NSR) pre-construction permit program and the Title V Major Facility Review operating permit program. The proposed changes will not fundamentally alter the way these programs work, but they are important and necessary to address a number of legal development that occurred since the Air District last updated the programs in 2012. The proposed amendments will make revisions to three rules in the Air District's permitting regulation, Regulation 2: Rule 1 (Gen Req.) Rule 2 (New Source Review and Rule 6 (Major Facility Review).

***Air Quality***

1. Page 3-13, Regional Air quality, 2<sup>nd</sup> paragraph – Please revise “visibility” to “visibility reducing particles”.
2. Page 3-14, Table 3-1 – There are 11 pollutants for which there are California Ambient Air Quality Standards and two are missing from the table (i.e. Hydrogen Sulfide and Vinyl Chloride). Please revise this table and make any necessary edits to the analysis if needed (reference: <https://www.arb.ca.gov/research/aaqs/aaqs2.pdf>).
3. Page 3-14, Table 3-1 – The NAAQS secondary standards are also missing from the table. Please revise this table (reference: <https://www.arb.ca.gov/research/aaqs/aaqs2.pdf>).
4. Page 3-14, paragraph discussion, last sentence – The federal standard (NAAQS) for PM10 is 150µg/m<sup>3</sup>. Please revise.

***Noise***

1. Page 3-61, Setting 1<sup>st</sup> Paragraph– Traffic noise should also include automobiles, medium trucks, heavy trucks, buses and motorcycles. Please revise the 2<sup>nd</sup> sentence and include these factors into your analysis.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jerry Cheung at 510-286-5562 or [jerry.cheung@dot.ca.gov](mailto:jerry.cheung@dot.ca.gov).

Sincerely



PATRICIA MAURICE  
District Branch Chief  
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