



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 29, 2019

Mr. Barry Miller
City of San Rafael
Community Development Department
1400 Fifth Street
San Rafael, CA 94901

RE: Notice of Preparation of the Draft Environmental Impact Report for the General Plan 2040 and Downtown Precise Plan

Dear Mr. Miller:

Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the General Plan 2040 and Downtown Precise Plan (Plan). As we understand, the City will prepare a programmatic level DEIR to evaluate proposed policies of the Plan to determine if any of the future changes will have potential impacts on the environment. Per the NOP, both the proposed General Plan 2040 and the Downtown Precise Plan will direct the City's future growth and are intended to respond to local and regional housing needs.

The Air District has the following specific comments on the environmental analysis that we encourage the City to include in the Plan DEIR:

1. Please provide a detailed analysis of the Plan's potential effects on local and regional air quality. We recommend the DEIR 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; and a discussion of the health effects of air pollution. The Air District's *CEQA Air Quality Guidelines (May, 2017)* provide guidance on how to evaluate a Plan's construction, operational and cumulative air quality impacts. A copy may be downloaded from: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa>
2. Include in the DEIR an assessment of the potential health risk to current and future sensitive populations within the Plan area from toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) as a result of Plan build-out. Please include in the assessment an evaluation of potential cumulative health risks from the Plan including impacts from stationary sources, highways, major roadways, and rail lines in the Plan area.
3. The DEIR should also identify, evaluate and include measures to reduce criteria pollutants such as reactive organic gases (ROG), nitrogen oxides (NO_x) and fine particulate matter (PM 2.5) and incorporate measures to reduce toxic air contaminants (TACs) to minimize any potential air quality impacts. The Air District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying emission reduction measures.
4. We recommend the DEIR evaluate the Project's consistency with the Air District's *2017 Clean Air Plan, Spare the Air, Cool the Climate (2017 Plan)*. The Air District's *2017 Plan* may be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>

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5. To address air quality issues early in the planning process we suggest the City review the Air District's Planning Healthy Places guidance document for recommended best practices to reduce exposure and health risk to sensitive populations in local communities. Planning Healthy Places can be found on the the Air District's website: <http://www.baaqmd.gov/plans-and-climate/planning-healthy-places>
6. We recommend the DEIR include a discussion of greenhouse gas (GHG) emissions and the potential impacts based on an evaluation of the Plan's consistency with the California Air Resources Board's (CARB) 2017 Climate Change Scoping Plan and with the State's 2030 and 2050 climate stabilization goals. We also recommend aggressive, creative, climate policies and programs in the Plan.
7. Staff recommends all feasible emission reduction measures be implemented for potentially significant air quality impacts identified in the DEIR.
8. The DEIR should provide a map that clearly identifies the Plan's boundary; existing and future planned sensitive receptors (e.g., residences, schools, day cares, hospitals, and nursing care facilities), and all stationary sources, highways, major roadways, and rail lines within the Plan area.
9. Please discuss how the Plan will address Senate Bill 1000 the Planning for Healthy Communities Act (SB 1000). SB 1000 became effective January 1, 2018. With SB 1000, all California jurisdictions are now required to consider environmental justice issues in their General Plans. SB 1000 requires local jurisdictions that identify disadvantaged communities within the area covered by the city or county's general plan to adopt an Environmental Justice (EJ) element or incorporate EJ goals and policies into other elements of that city's general plans. The bill allows consideration to be given to low-income communities disproportionately affected by pollution and other EJ issues.

Please include in the DEIR all appendices or technical documents related to the air quality, toxic air contaminant, and GHG analyses, such as emission calculation and health risk assessment files. Without all the supporting air quality and GHG documentation, Air District staff and the public may be unable to review the air quality and GHG analysis in a timely manner.

The Air District's website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts, including: previous CEQA comment letters; guidance on quantifying plan level GHG emissions; and risk and hazard screening tools and guidance. View and download available tools here: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>

We urge lead agencies to contact Air District staff with any questions and/or to requested assistance during the environmental analysis process. If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner at, agordon@baaqmd.gov or 415.749.4940.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Katie Rice