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April 11, 2019

Lily Lim
Senior Planner
City of San Mateo
Community Development Department
Planning Division
330 W. 20<sup>th</sup> Avenue
San Mateo, CA 94403

RE: NOP SEIR Concar Passage Mixed Use Project

Dear Ms. Lily Lim:

The Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) for the Supplemental EIR (SEIR) Concar Passage Mixed Use Project. The project is a 14.505 -acre site located at 640, 666 & 690 Concar Drive; 1855 South Delaware Street; 1820 & 1880 South Grant Street. The proposed project includes demolishing six existing onsite commercial buildings to develop a transit-oriented development (TOD) which includes 961 residential units, 40,000 square feet of commercial and retail, a theatre, a day care, and other amenities; with a total of 1,343 parking spaces, and 6.83 acres of open space. The proposed project will be located near residential and commercial areas, U.S. Highway Route 101, State Route 92, the Hayward Park CalTrain Station, and Hillsdale CalTrain Station. This project is tiering off from the San Mateo Rail Corridor Transit-Oriented Development Plan.

Air District staff recommends the SEIR include the following information and analysis regarding potential regional and local air quality impacts and greenhouse gas (GHG) emissions in the San Francisco Bay Area Air Basin.

- Evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The 2017 CAP can be found on the Air District's website http://www.baagmd.gov/plans-and-climate/air-quality-plans/current-plans
- Provide baseline information on the Bay Area's attainment status for all criteria
  pollutants and the implications for the region if the National Ambient Air Quality
  Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are
  not attained or maintained by statutory deadlines. The SEIR should include a
  discussion of the potential health effects of exposure to criteria pollutants. (Sierra
  Club v. County of Fresno (S219783).
- 3. Quantify the Project's potential construction and operational impacts to local and regional air quality. The analysis should evaluate whether the project will have a cumulatively considerable net increase for construction, and operational emissions.
- 4. The SEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM<sub>2.5</sub>) as a result of the project's construction and operation. Staff recommends all feasible mitigation measures be implemented to minimize air pollutant exposure to existing and future sensitive receptors.
- 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. View and download tools at

http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-cega/cega-tools.

- 6. If a permit is required from the Air District (for example, back-up diesel generators), the SEIR should include an analysis of the air pollutant and GHG emissions associated with the permitted activity. Please contact Barry Young, Senior Advanced Projects Advisor at (415)749-4721 or byoung@baaqmd.gov to discuss permit requirements.
- 7. Include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions assessment and calculation and health risk assessment files in the SEIR. Without all the supporting air quality documentation, the public may be unable to effectively review the air quality and GHG analyses in a timely manner.
- 8. Evaluate the Project's consistency with the City of San Mateo Climate Action Plan (CAP) and demonstrate consistency with all the measures identified in the California Air Resources Board's 2017 Scoping Plan needed to meet the State's strategy to achieve Statewide 2030 GHG reduction goals and being on track to meet 2050 climate stabilization goals. Please be advised that the Air District is in the process of updating the CEQA guidelines/thresholds and current thresholds for GHGs may not be sufficient for this analysis.

If you have any questions about the Air District's review of this NOP, please contact Ada Márquez, Principal Environmental Planner, at (415) 749-8673 or amarquez@baaqmd.gov.

Sincerely.

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Deputy Air Pollution Control Officer

my HMI

cc: BAAQMD Director David J. Canepa BAAQMD Director Carole Groom BAAQMD Director Doug Kim