



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

September 14, 2020

Mr. Christian Murdock, AICP
Senior City Planner
City of Pacifica
1800 Francisco Blvd.
Pacifica, CA 94044

RE: Pacifica General Plan Update and New Sharp Park Specific Plan – Notice of Preparation of a Draft Environmental Impact Report

Dear Mr. Murdock,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Pacifica General Plan Update (General Plan) and New Sharp Park Specific Plan (Specific Plan). The City of Pacifica (City) intends to prepare a programmatic EIR to evaluate the environmental issues associated with the adoption and buildout of the General Plan for Land Use, Circulation/Transportation, Housing, Natural Resources/Conservation, Hazards and Safety, and Historic Resources, as well as for the environmental issues associated with the adoption and build out for the Specific Plan. The Specific Plan encompasses approximately 104 acres (1.2 percent of the General Plan), which was designated as a Priority Development Area by the Metropolitan Transportation Commission and the Association of Bay Area Governments.

The Specific Plan builds on a first phase of pedestrian improvements made along Palmetto Avenue in February 2020 and formalizes a community vision for Sharp Park to enhance Sharp Park's livability and create a vital center with opportunities to shop, dine, and gather. The Specific Plan will increase density, enhance bicycle and pedestrian connectivity, improve transit and wayfinding, and include needed upgrades to public services, among other improvements, and includes guiding principles informed by community and decision maker input throughout the planning process.

Air District staff commends the City for their inclusion of increased housing density, and increased bike/ped mobility throughout the General Plan and Specific Plan. Air District Staff recommends the EIR include the following information and analysis in both the General Plan and the Specific Plan:

- **Provide a detailed analysis of the General Plan/ Specific 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

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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>.

- **The GHG impact analysis should include an evaluation of the General Plan/Specific Plan'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 outlined in SB 32, 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 General Plan/Specific Plan will be consistent with the Scoping Plan, SB 32, SB 100, and Executive Order B-55-18.
- **The EIR should evaluate the General Plan/Specific Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Specific Plan 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 estimate and evaluate the potential cumulative health risk to existing and future sensitive populations within and near the General Plan/Specific Plan area from toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) as a result of the General Plan/Specific Plan's project(s) construction and operation.** Air District staff recommends analyzing these potential health impacts and including measures to minimize such impacts early in the planning process. In particular, we recommend an EIR health risk analysis be conducted to consider potential cumulative health impacts of TACs and PM_{2.5} emissions on sensitive receptors within and near any project area(s) to be implemented under the General Plan/Specific Plan that would be within 1,000 ft of a freeway. For projects within 1,000 ft of freeways, Air District staff recommends the General Plan include requirements for air filtration beyond current building codes, such as a minimum efficiency reporting value (MERV) of 13 or higher, and/or vegetative barriers, as exposure reduction measures. Please see the Air District's Planning Healthy Places Best Practices to Reduce Exposure to Local Air Pollution for additional information on these two proposed measures, as well as additional measures to consider to reduce TACs and PM_{2.5} exposure to sensitive receptors: <https://www.baaqmd.gov/plans-and-climate/planning-healthy-places>
- **The EIR should identify, evaluate, and include all feasible General Plan/Specific Plan-level design features and mitigation measures that reduce potential impacts of criteria pollutants, TACs, and GHGs to lessen potential impacts.** At a minimum, we recommend you consider minimizing construction impacts by requiring Tier 4 construction equipment for projects implemented under the General Plan and Specific Plan. [Chapter 9, Section 6, of](#)

[the Air District's CEQA Air Quality Guidelines](#) provides recommended mitigation measures and policies for general plans. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:

- Require Tier 4 construction equipment,
 - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free by '33 initiative (<http://dieselfree33.baaqmd.gov/>),
 - The NOP indicates that the General Plan will include parking strategies. We encourage you to implement parking strategies to discourage vehicle travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and related strategies,
 - Install electric vehicle charging infrastructure and provide preferential parking to EVs, carpool vehicles and vanpool vehicles,
 - Provide comprehensive, safe and convenient bicycle and pedestrian facilities throughout the City, linking residential areas and activity centers and connecting to regional networks where appropriate,
 - Install outdoor electrical receptacles for charging or powering of electric landscape equipment,
 - Implement green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity,
 - Eliminate use of natural gas, a high global warming potential greenhouse gas, and
 - Implement a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery or edible food for human consumption.
- **Discuss how the Plan addresses 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.

- **Environmental Justice and Equity Issues:** Although the City of Pacifica has not identified any disadvantaged communities within its jurisdiction, the Air District supports the City of Pacifica's efforts to integrate environmental justice policies into the Plan. Air District staff encourage the City to bolster its EJ policies by examining the Plan area for vulnerable nontraditional communities that might elude the census-based mapping or that might not be captured by formal mapping tools. We also recommend that the City confer with the San Mateo County Health Department for any specific health-equity comments on the Plan and the Project.
- **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: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.

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 Matthew Hanson, Environmental Planner, at (415) 749-8733 or mhanson@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

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