



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

March 18, 2021

Mr. Billy Gross
City of South San Francisco
315 Maple Avenue
South San Francisco, CA 94080

RE: City of South San Francisco General Plan Update – Notice of Preparation

Dear Mr. Gross,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the City of South San Francisco General Plan Update (General Plan) Draft Program Environmental Impact Report (Program DEIR). The General Plan will serve as the blueprint for the City through the year 2040. The goals, policies, and actions in the proposed General Plan will serve as a compass for decision-makers and will shape the City’s future plans and actions. This revised document will replace the 1999 General Plan and will inform updates to the City’s Zoning Ordinance.

Air District staff commends the City for its work to increase density, housing, and new employment opportunities by 2040 through the General Plan. Air District staff also applaud the City for its inclusion of affordable neighborhoods and a convenient, accessible transportation network in the General Plan’s guiding principles. Having transportation options, such as bicycle and pedestrian support, as well as public transit, supports the Air District’s climate and air quality goals by reducing vehicle miles traveled.

Air District staff recommends the Program DEIR include the following information and analyses:

- **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Plan area from Toxic Air Contaminants (TACs) and fine particulate matter (PM_{2.5}) because of construction and operations anticipated under the Plan.** The General Plan includes new land uses in areas previously zoned for industrial use. Changing Industrial Zones to High Density Mixed Use Zones, which includes housing and other uses for sensitive receptors, may result in new exposures of sensitive receptors to TACs and PM_{2.5}. Thus, Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TACs and PM_{2.5} emissions on sensitive receptors within the Plan area.

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- **The greenhouse gas (GHG) impact analysis should include an evaluation of the Plan's consistency with the most recent AB 32 Scoping Plan by the California Air Resources Board (CARB) and with the State's 2030 and 2050 climate goals.** 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 Project will be consistent with the Scoping Plan.

 - **The DEIR should evaluate all feasible measures, both onsite and offsite, to minimize air quality and GHG impacts.** The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Plan area. Examples of potential emission and exposure reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>);
 - Implementing green infrastructure and fossil fuel alternatives in the Plan, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity;
 - Implementing a building decarbonization goal or policy in the Plan (<https://www.buildingdecarb.org/compass.html>);
 - Requiring construction vehicles to operate with the highest tier engines commercially available;
 - Providing funding for zero- and low-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others;
 - Providing funding for expanding and improving bicycle and pedestrian infrastructure and projects that improve bicycle and pedestrian access to transit, employment, and major activity centers;
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption; and
 - Include air filtration for new and existing buildings that may be exposed to air pollution, such as MERV 13 filters, as well as vegetative buffers between new and existing buildings, and sources of pollution. For more emissions and exposure reduction best practices, see the Air District's Planning Healthy Places guidance, Appendices A and B, here: https://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf

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- **The DEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The DEIR 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: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The DEIR should evaluate the Plan's consistency with the City of South San Francisco's Climate Action Plan (2014), as well as San Mateo County's Sea Level Rise Vulnerability Assessment (2018.)** The DEIR should analyze the Plan's consistency with the City of South San Francisco's most recently adopted Climate Action Plan and consider any updates from San Mateo County's more recent work on Sea Level Rise Vulnerability Assessments.
 - **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. 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>. If the Plan requires a site-specific analysis, please contact Air District staff to obtain more recent data.
 - **Certain aspects of the Plan may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

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 Kelly Malinowski, Senior Environmental Planner, (415) 749-8673, 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