



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

February 14, 2022

Ms. Avalon Schultz
Principal Planner
City of San Leandro
835 East 14th Street
San Leandro, CA 94577

RE: City of San Leandro Housing Element and General Plan Update – Notice of Preparation

Dear Ms. Schultz

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the City of San Leandro (City) Housing Element and General Plan Update (Plan) Supplemental Draft Program Environmental Impact Report (Program SDEIR). The City’s Housing Element Update is based on the City’s latest Regional Housing Needs Allocation (RHNA) estimates, which determined that the City must plan for 3,855 residential units, plus a buffer of some number of units to reduce barriers to housing development. The City will evaluate potential increases in allowable densities and units over allowable development under the existing land uses and development regulations of the General Plan. The Land Use Element of the General Plan will be updated to reflect new housing sites identified in the Housing Element Update and include updates to other elements of the General Plan and Zoning Map and Zoning Code Amendments, as needed.

Air District staff supports the City’s efforts to increase residential development and thus help address the region’s severe housing crisis. Pursuit of this laudable goal must also assure that potential air quality and health impacts be avoided. Air District staff recommends the Program SDEIR include the following information and analysis:

- As identified by the Air District’s CARE program and Assembly Bill (AB) 617 Community Health Protection Program, the San Leandro community census tracts that are in the top 30 percent of pollution burden statewide, as identified in CalEnviroScreen 4.0, are currently cumulatively impacted with air pollution, which highlights the urgency of avoiding additional air pollution in these communities. Increases in air pollution exposure in areas that are already overburdened would be of concern; therefore, the City should fully evaluate potential significant impacts and implement all feasible measures to minimize air quality impacts to the greatest extent possible.
- The Program SDEIR should provide a detailed analysis of the Plan’s potential effects on local and regional air quality. The Air District’s CEQA Air Quality Guidelines, which provide guidance on how to evaluate a Plan’s construction, operational, and cumulative air quality

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impacts, can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmentalquality-act-ceqa/updated-ceqa-guidelines>.

- The greenhouse gas (GHG) impact analysis should include an evaluation of the Plan's consistency with the California Air Resources Board's most recent AB 32 Scoping Plan and with the State's 2030, 2045, and 2050 climate goals. The Air District's current GHG thresholds and CEQA Guidelines are based on the State's 2020 targets which are now superseded by the 2030 targets established in SB 32. The Air District recommends that cities and counties evaluate such plans based on whether they would be consistent with California's long-term climate goal of achieving carbon neutrality by 2045. To be consistent with this goal, these plans should reduce GHG emissions in the relevant jurisdiction to meet an interim milestone of 40 percent below the 1990 emission levels by 2030, consistent with SB 32, and to achieve carbon neutrality by 2045 as defined in Executive Order B-55-18.
- The Program SDEIR should evaluate all feasible measures to minimize air pollutant emissions and exposure and should prioritize onsite measures within the Plan area, followed by offsite measures. Examples of potential emission and exposure reduction measures that should be evaluated and considered include, but are not limited to:
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of 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.
 - Including a building decarbonization goal or policy in the Plan (<https://www.buildingdecarb.org/compass.html>) and requiring no natural gas use in proposed structures.
 - Include air filtration for new and existing buildings that may be exposed to elevated 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.
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>).
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Meeting the vehicles miles traveled (VMT) requirement under SB 743.
 - Requiring installation of electric vehicle (EV) charging infrastructure and capacity to meet power requirements to meet future EV charging needs.
 - Providing funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.

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- Providing funding for expanding and improving bicycle and pedestrian infrastructure and projects that improve pedestrian access to transit, employment, and major activity centers.
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets.
 - The Program SDEIR should evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP) and should discuss 2017 CAP measures relevant to the Plan. 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 Program SDEIR should evaluate and analyze the Plan's consistency with the San Leandro 2021 Climate Action Plan and consider any updates on San Leandro's 2017 Climate Hazards Assessment.
 - 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 SDEIR.

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 Alesia Hsiao, Senior Environmental Planner, (415) 745-8419, ahsiao@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Vice Chair John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director David Haubert
BAAQMD Director Nate Miley