



November 17, 2017

Via E-mail ([cjmorales@smcgov.org](mailto:cjmorales@smcgov.org))

Carmelisa Morales  
Project Planner  
County of San Mateo  
455 County Center, 2nd Floor  
Redwood City, CA 94063

**Re: Sunrise Senior Living- Application PLN 2017-00251 and PRE 2017-00006 (Health Risk Assessment)**

Dear Ms. Morales:

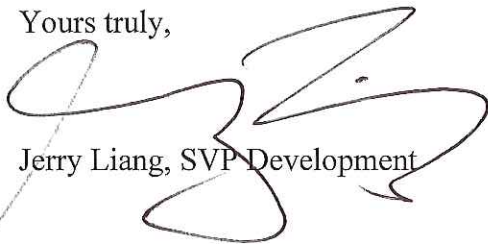
In response to your email dated October 31 2017, this letter reiterate our plan and commitment to comply with the requirements of the North Fair Oaks Community Plan Environmental Impact Report Mitigation Measure 5-2(2)(b) in the project design and operation to mitigate any potential risk as a sensitive receptors located within the specified distance (within 100 feet) from El Camino Real, an identified source of TACs and PM<sub>2.5</sub>. Specifically, consistent with Mitigation Measure 5-2(2)(b), the Sunrise Team is committed to do all of the following (with references to the project plans for confirmation) and we would anticipate and accept a condition of approval for the project to confirm compliance as part of the final design.

- Air Filtration. Install and maintain air filtration for HVAC equipment that achieve BAAQMD effectiveness performance standards in removing PM<sub>2.5</sub> from indoor air. The system effectiveness will be confirmed during final design. See sheet A2.4.
- Location of Air Intakes. Locate ventilation air intakes and operable windows away from El Camino Real as possible. Operable windows are required by code for emergency egress purposes, but management will monitor operable windows to remain close during occupancy. See A1.0 for location of effected windows.
- Passive Filtering System. Installing passive (drop-in) electrostatic filtering systems where appropriate, especially those with low air velocities (i.e., 1 mph);
- Trees. Plantings of trees, such as Quercus agrifolia (Coast Live Oak), Ulmus parvifolia 'Drake' (Chinese Elm), and Tristaniopsis laurina (Water Gum), between the building and El Camino Real. See sheet L-1.
- Phasing. In light of the fact that the project involves only a single phase, there is no opportunity to phase occupancy of units.

- Truck Loading. There will be no truck parking along El Camino Real and alley. See A1.1.
- Truck Idling. Illegal parking and/or idling restrictions on heavy-duty trucks in the vicinity will be signed and enforced. “No Idling” signs will be installed. See note on A1.0.
- Air Quality Monitoring. Air quality monitoring units in buildings will be installed. See A1.0 (Sustainability Notes).

Attached to this letter (Appendix A) is a copy of the full mitigation measure addressing the “Community Risk and Hazard Impacts,” with the relevant portion highlighted in yellow for ease of reference.

Yours truly,

A handwritten signature in black ink, appearing to read 'Jerry Liang', is written over the typed name.

Jerry Liang, SVP Development

**APPENDIX A**

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to Sunrise Senior Living Project
<b>AIR QUALITY</b>					
<p><b>Impact 5-2: Community Risk and Hazard Impacts.</b> Future development in accordance with the updated Plan could expose sensitive receptors to levels of toxic air contaminants (TACs) or PM<sub>2.5</sub> that cause an unacceptable cancer risk or hazard, which represents a <b>potentially significant impact</b>.</p>	<p align="center">S</p>	<p><b>Mitigation 5-2.</b> For future discretionary development intended for occupancy by sensitive receptors located within the following specified distances from the identified sources of TACs and PM<sub>2.5</sub> within the Plan area, the County shall implement one of the mitigation measure options listed below:</p> <ul style="list-style-type: none"> <li>• El Camino Real – 100 feet,</li> <li>• Caltrain and Dumbarton Rail Corridor – 100 feet,</li> <li>• Dry cleaning operations – 300 feet (see Figure 5.1), and</li> <li>• Other stationary sources — 100 feet (see Figure 5.1).</li> </ul> <p>(Site-specific modeling for future development projects proposed within these distances may provide a data basis upon which this buffer distance may be reconsidered and reduced.)</p> <p>(1) Change the updated Plan proposed land use map to avoid the siting of new sensitive receptors (e.g., residential uses) within these setback areas.</p> <p>(This mitigation option may be considered by the County to be inconsistent with the basic objectives of the updated Plan to provide additional housing along these corridors in order to generate additional vitality and foot traffic, ridership for transit, and social and business activity.)</p>	<p align="center">County</p>	<p align="center">LS</p>	<p>Applicable due to the Project's proximity to El Camino Real</p>

		<p>(2) Alternatively, require future individual discretionary development projects within the Plan area that would place air quality sensitive receptors within these specified distances from identified sources, to either:</p> <p>(a) For projects within the specified distances from identified sources, conduct a site-specific health risk assessment using air quality dispersion modeling methodologies and screening thresholds recommended by the BAAQMD to demonstrate that, despite a location within the screening setback distances, modeled site-specific exposures would be less-than-significant.</p> <p style="text-align: center;"><u>or</u></p> <p>(b) Mitigate anticipated community risks and hazards through implementation of the following mitigations:</p> <ul style="list-style-type: none"> <li>• Where residential uses or other sensitive receptors are proposed to be located within the setback distances specified above or identified through site-specific health risk assessment using air quality dispersion modeling to indicate potentially significant exposure, air filtration units shall be installed and maintained. The air filtration systems shall be installed to achieve BAAQMD effectiveness performance standards in removing PM<sub>2.5</sub> from indoor air. The system effectiveness requirement shall be determined during final design, when the exact level of exposure is known,</li> </ul>		
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		<p>based on proximity to these sources;</p> <ul style="list-style-type: none"> <li>• Locate ventilation air intakes and operable windows away from these sources;</li> <li>• Where appropriate, install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mph);</li> <li>• Consider tiered plantings of trees, such as redwood, deodar cedar, live oak and oleander, between sensitive uses and these sources;</li> <li>• Consider plan implementation phasing that delays occupancy of units with highest exposure so that source emissions regulations and vehicle fleet turnover that would result in lower emissions may take more effect and lower exposure levels (since emission rates will decrease in the future, projects developed later in the updated Plan buildout timeframe would have less exposure);</li> <li>• Avoid locating truck loading zones near sensitive units;</li> <li>• Require rerouting of nearby heavy-duty truck routes;</li> <li>• Enforce illegal parking and/or idling restrictions on heavy-duty trucks in the vicinity; and</li> <li>• Install indoor air quality monitoring units in buildings.</li> </ul> <p>With implementation of either one of these mitigation options, the potential TAO and PM<sub>2.5</sub> exposure impacts of the updated Plan would be reduced to a <b>less-than-significant level</b>.</p>			
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		Potential future preparation and implementation by the County of a Community Risk Reduction Plan (CRRP) to bring TAC and PM <sub>2.5</sub> concentrations for the entire community down below BAAQMD thresholds of significance as an alternative to addressing associated community health risk on a project-by-project basis would also reduce this impact to a <b><i>less-than-significant level</i></b> .			
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