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September 9, 2013
Revised October 30, 2013

Kevin Ebrahimi
Summerhill Homes
777 S. California Avenue
Palo Alto, CA 94304

Via email: KEbrahimi@shhomes.com

Subject: 5850 West Las Positas Residential Development

Dear Kevin:

We understand that the 5850 West Las Positas project, which would develop residences in Pleasanton, underwent environmental review as part of the city's recent Housing Element Update. Mitigation 4.B-4 requires that a qualified air quality consultant prepare a Health Risk Assessment (HRA) in accordance with BAAQMD requirements to address Toxic Air Contaminates (TACs) related to traffic on West Las Positas Blvd. The report will need to address both indoor air quality and outdoor air quality.

Traffic on high volume roadways are a source of TAC emissions that may adversely affect sensitive receptors that reside in close proximity. For roadways, the Bay Area Air Quality Management District (BAAQMD) has published screening tables and data to determine if roadways with traffic volumes of over 10,000 vehicles per day may have a significant effect on a proposed project. These screening tables provide estimates of excess lifetime cancer risk, annual $PM_{2.5}$ concentration and Hazard Index based on the county, roadway orientation, traffic volume, and distance from the roadway[1]. The latest City average daily traffic (ADT) traffic counts indicate this portion of Las Positas Boulevard has18,500 vehicles[2]. Project plans indicate that the closest residences for the 5850 West Las Positas Boulevard project would be 30 feet or further from the edge of the roadway (see Attachment 1). BAAQMD screening tables, shown in Attachment 2, indicate that the TAC impacts shown in Table 1 for an east-west roadway with ADT of 20,000 and setback distance of 10 feet. Impacts at project residences that would be further away than 10 feet would be less.

As indicated above, traffic on West Las Positas Boulevard would result in TAC impacts that are below the community risk thresholds that are recommended by BAAQMD. These thresholds address outdoor air quality. Concentrations of TACs from Las Positas Boulevard indoors would be less.

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[1] BAAQMD CEQA Tools - http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx (September 9, 2013)
[2] City traffic counts accessed from http://www.cityofpleasantonca.gov/services/traffic/traffic-counts-map.html (September 9, 2013)

Table 1. TAC Roadway Impacts at 10 feet from Las Positas Boulevard

TAC Effect	Project Level from BAAQMD Screening Table at 10 feet from Road	BAAQMD Recommended Threshold[3]
Excess Lifetime Cancer Risk	5.47 per million	10.0 per million
Annual $PM_{2.5}$ Concentration	0.223 $\mu g/m^3$	0.3 $\mu g/m^3$
Hazard Index	<0.03 Concentration/REL	1.0 Concentration/REL

Note: East-west roadway in Alameda County with ADT of 20,000 vehicles and setback of 10 feet.

* * *

This concludes our review of the changes in grading plans for the 5850 West Las Positas Boulevard Residential project in Pleasanton. If you have any questions or need additional information, please feel free to call us.

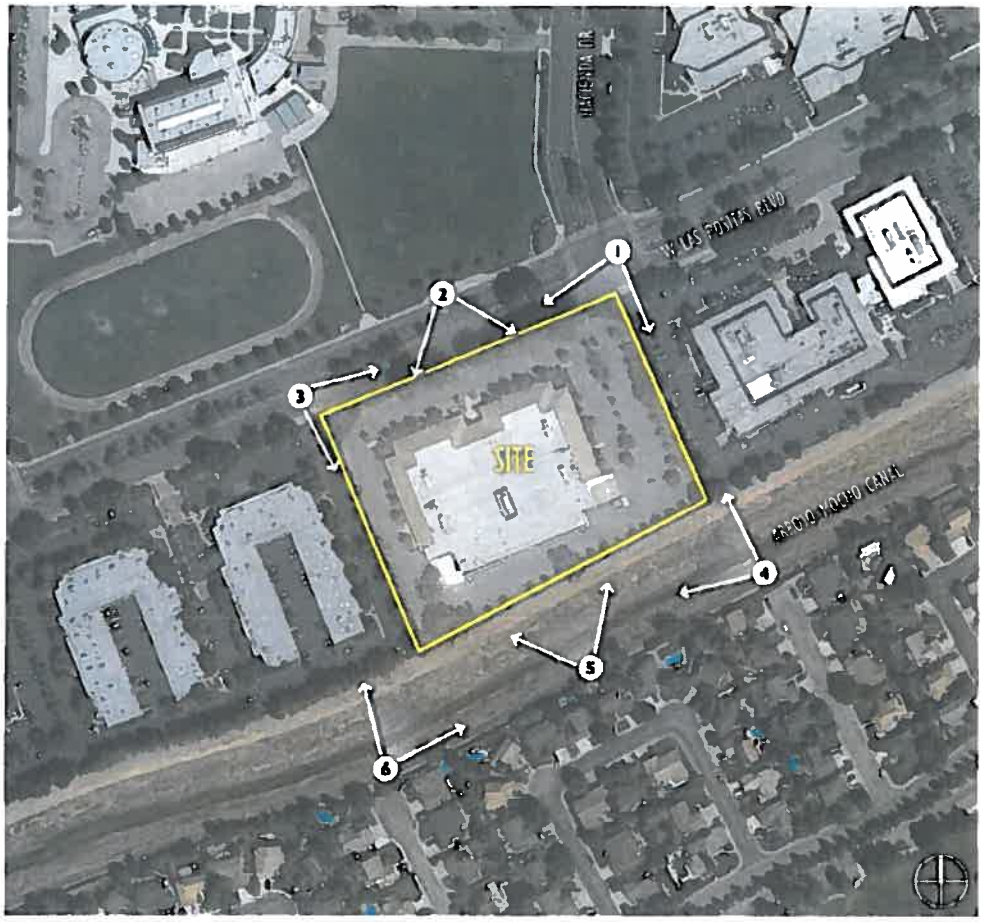
Sincerely,

James A. Reyff
Illingworth & Rodkin, Inc.
(13-170)

Attachment 1: Project Location
Attachment 2: BAAQMD Roadway Screening Analysis Tables

[3] BAAQMD. 2011. CEQA Air Quality Guidelines. May.

Attachment 1: Project Location



5850 WEST LAS POSITAS BLVD

Attachment 2: BAAQMD Roadway Screening Analysis Tables – Alameda County

Alameda County
PM2.5 Concentrations and Cancer Risks Generated from Surface Streets

How to use the screening tables:

- Distance is from the edge of the nearest travel lane of a street to the facility or development
- When two or more streets are within the influence area, sum the contribution from each street

$PM_{2.5}$ CONCENTRATIONS (UG/M^3)

NORTH-SOUTH DIRECTIONAL ROADWAY							
Annual Average Daily Traffic	Distance East or West of Surface Street - PM2.5 Concentration (ug/m^3)						
	10 feet	50 feet	100 feet	200 feet	500 feet	700 feet	1,000 feet
1,000	No analysis required						
5,000							
10,000	0.159	0.135	0.095	0.045	0.015	0.014	0.014
20,000	0.199	0.191	0.175	0.111	0.043	0.029	0.016
30,000	0.278	0.270	0.238	0.167	0.062	0.045	0.027
40,000	0.342	0.334	0.302	0.215	0.087	0.058	0.041
50,000	0.485	0.477	0.421	0.278	0.103	0.072	0.049
60,000	0.640	0.624	0.529	0.346	0.123	0.087	0.060
70,000	0.795	0.771	0.638	0.413	0.143	0.103	0.070
80,000	0.908	0.881	0.727	0.472	0.164	0.118	0.080
90,000	1.022	0.991	0.818	0.531	0.184	0.133	0.090
100,000	1.136	1.101	0.908	0.590	0.204	0.148	0.100

EAST-WEST DIRECTIONAL ROADWAY							
Annual Average Daily Traffic	Distance North or South of Surface Street - PM2.5 Concentration (ug/m^3)						
	10 feet	50 feet	100 feet	200 feet	500 feet	700 feet	1,000 feet
1,000	No analysis required						
5,000							
10,000	0.431	0.095	0.072	0.050	0.024	0.020	0.014
20,000	0.223	0.191	0.143	0.095	0.039	0.030	0.025
30,000	0.264	0.246	0.223	0.135	0.053	0.035	0.027
40,000	0.334	0.318	0.254	0.191	0.070	0.053	0.033
50,000	0.638	0.572	0.461	0.223	0.095	0.066	0.048
60,000	0.680	0.604	0.469	0.262	0.115	0.081	0.056
70,000	0.723	0.638	0.477	0.302	0.135	0.095	0.065
80,000	0.827	0.727	0.545	0.345	0.154	0.109	0.074
90,000	0.930	0.818	0.613	0.388	0.174	0.123	0.084
100,000	1.033	0.908	0.681	0.431	0.193	0.138	0.093

LIFETIME CANCER RISK

NORTH-SOUTH DIRECTIONAL ROADWAY							
Annual Average Daily Traffic	Distance East or West of Surface Street - Cancer Risk (per million)						
	10 feet	50 feet	100 feet	200 feet	500 feet	700 feet	1,000 feet
1,000	No analysis required						
5,000							
10,000	4.60	3.83	2.87	1.26	0.61	0.49	0.38
20,000	5.01	4.63	4.06	2.77	1.15	0.88	0.61
30,000	6.56	6.33	5.79	3.86	1.50	1.12	0.77
40,000	8.11	8.06	7.33	5.39	2.08	1.54	1.08
50,000	11.58	11.42	8.93	6.93	2.62	1.92	1.38
60,000	15.25	14.97	11.99	8.30	3.14	2.29	1.63
70,000	18.91	18.52	15.06	9.66	3.66	2.65	1.88
80,000	21.62	21.17	17.21	11.04	4.18	3.03	2.15
90,000	24.32	23.81	19.36	12.42	4.70	3.41	2.42
100,000	27.02	26.46	21.51	13.80	5.22	3.79	2.69

EAST-WEST DIRECTIONAL ROADWAY							
Annual Average Daily Traffic	Distance North or South of Surface Street - Cancer Risk (per million)						
	10 feet	50 feet	100 feet	200 feet	500 feet	700 feet	1,000 feet
1,000	No analysis required						
5,000							
10,000	2.59	2.39	1.92	1.46	0.84	0.65	0.53
20,000	5.47	4.63	3.47	2.65	1.33	1.07	0.80
30,000	6.17	5.79	5.40	3.46	1.53	1.11	0.89
40,000	8.10	8.01	6.17	4.63	2.03	1.53	1.11
50,000	15.06	12.78	10.45	5.40	2.68	2.03	1.42
60,000	15.75	13.92	11.38	6.55	3.20	2.39	1.69
70,000	16.44	15.06	12.31	7.70	3.72	2.76	1.95
80,000	18.79	17.21	14.07	8.80	4.25	3.15	2.23
90,000	21.14	19.36	15.83	9.90	4.79	3.55	2.51
100,000	23.49	21.51	17.59	11.00	5.32	3.94	2.79

- Screening tables based on meteorological data collected from Pleasanton in 2005
- The maximum acute and chronic hazard index for the distances and AADT shown in the table will be less than 0.03.
- Cancer risk were estimated based on exposure from 2014 through 2084. PM2.5 concentrations were based on emissions in 2014.