



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 28, 2014

Margaret Netto
City of Mountain View, Community Development Department
P.O. Box 7540
Mountain View, CA 94039-7540

Subject: The Village at San Antonio Center Phase II Project

Dear Ms. Margaret Netto:

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Mountain View's (City) Draft Environmental Impact Report (DEIR) prepared for the Village at San Antonio Center Phase II project (Project). According to the DEIR, the Project involves redeveloping an approximately 9.9 acre site to hold office, commercial, hotel, retail, cinema and restaurant uses. The Project is located less than ¼ mile from the San Antonio Caltrain station (and is served by the Bay Area Bike Share Program), and is well-connected to bus lines and bicycle paths.

Air District staff has the following comments on the air quality analysis in the DEIR.

The Project includes a development agreement which requires a transportation demand management (TDM) plan demonstrating a 30 percent reduction in office-related trips. Air District staff applauds this requirement. However, because the Project is located in an area with transit, bicycle and pedestrian infrastructure, Air District staff recommends that the City take full advantage of the Project's location and require additional measures to reduce vehicle miles traveled and associated emissions to the greatest extent feasible. Air District staff recommends the following measures: parking pricing strategies; mandated parking spaces for car sharing programs; a requirement for *all* employers to reduce employee trips by 30% (i.e. all worksites, not only office-related); the provision of bus/transit passes for employees; an increase in the number of plug-in stations for electric vehicles; bicycle racks at each tenant space; revising the Project's promenade to pedestrian-only at all times (rather than pedestrian-only on weekend evenings, as shown in the DEIR); and incorporating bike paths that connect within the Project site (rather than paths which travel around the perimeter, as shown in the DEIR). These measures will help to further reduce vehicle miles traveled and emissions associated with the Project.

Potential Health Risks to Nearby Receptors

The DEIR states (on pg. 3.2-15) that the Project itself is not expected to represent a significant source of operational-related emissions of diesel particulate matter (DPM) because DPM generating equipment and activities are not associated with Project operations, and therefore no analysis of exposure of nearby sensitive receptors to toxic air contaminants (TACs) or DPM is required (pg. 3.2-24). The DEIR also states on pg. 3.2-23 that service vehicles such as those for picking up trash or delivering goods were not included in the analysis because the number and frequency of such vehicles is "unknown but likely to be minimal." However, the DEIR does not provide justification demonstrating why the number of service vehicles associated with the Project is

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assumed to be minimal, or why DPM-generating equipment such as trucks or back-up generators will not result in localized air quality impacts.

Air District staff believes that due to the size and nature of the Project (a 9.9 acre site developed into 1.2 million square feet of office, commercial, retail, and entertainment uses), there is potential for a significant number of diesel-powered service vehicles or equipment which may adversely impact local air quality and nearby sensitive receptors. For example, according to the California Emissions Estimator Model (CalEEMod), a similarly-sized shopping center would generate approximately 26 trips per day made by service vehicles (mix of medium-duty and heavy-duty). Accordingly, Air District staff recommends including measures to reduce potential impacts to nearby sensitive receptors to the greatest extent feasible. Recommended measures include: electrification of loading/unloading docks; locating loading/unloading docks as far from existing sensitive receptors as possible; and an enforcement mechanism for all idling vehicles, including those not subject to California's idling rule (commercial motor vehicles with gross vehicular weight ratings of less than 10,000 pounds are not subject to the idling rule).

Air District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Cindy Chavez
BAAQMD Director Ash Kalra
BAAQMD Director Liz Kniss
BAAQMD Director Jan Pepper