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August 15, 2011

John Davidson
Senior Planner, Department of Planning, Building & Code
200 East Santa Clara Street, 1st Floor
San José, CA 95113

Subject: Envision San José 2040 General Plan Draft Program Environmental Impact Report (PEIR)

Dear Mr. Davidson:

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Program Environmental Impact Report (PEIR) for the Envision San José 2040 General Plan (Plan). The Plan is a comprehensive update of the City's current Focus on the Future San José 2020 General Plan, adopted by the City Council in 1994. The City's General Plan is a long-term plan that describes the amount, type and phasing of development needed to achieve the City's social, economic, and environmental goals. The General Plan is the policy framework for decision-making on both private development projects and City capital expenditures.

Plan Summary

The Plan's Preferred Land Use Scenario provides growth capacity for development of up to 470,000 additional jobs and 120,000 new dwelling units to be built by year 2035. This scenario would allow capacity for a population of approximately 1,313,800 people, including 839,450 jobs and 429,250 dwelling units in San José. At this level of full development the jobs to employed residents ratio would be 1.3 to 1.

The Preferred Land Use Scenario, compared to the 1994 Focus on the Future San José 2020 General Plan, allows for further intensification of employment in specific urban areas and increased Floor Area Ratios. New residential growth in the Preferred Land Use Scenario is also focused in identified Growth Areas and precludes large scale residential development from occurring on sites outside of these Growth Areas. New residential growth is planned to occur at a minimum of 55 dwelling units per acre (DU/PA), with some allowances for 30 DU/PA at interfaces with single-family home neighborhoods.

The Plan establishes Growth Areas that create a more interconnected city with strong linkages to transit and the Downtown, or to provide additional services to existing neighborhoods through the development of neighborhood villages. These investments would promote transit use and reduce the need for automobile travel while achieving other Plan goals.

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Comments on the Draft PEIR

Section 3.4.3.3 *Impacts to Sensitive Receptors from Substantial Pollutant Concentrations* states that the City of San José is currently developing a Community Risk Reduction Plan (CRRP) to address the exposure of residents to toxic air contaminants and PM_{2.5} emissions from all sources. The PEIR requires the adoption of a CRRP as a mitigation measure, and until that time site-specific modeling would be required prior to development of sensitive land uses that could be affected by TACs in accordance with District health risk criteria. The District supports this community-wide approach to mitigating emissions and exposure and commitment to site-specific modeling until the CRRP is adopted.

Section 3.15 *Greenhouse Gas Emissions* describes the Plan's approach to reduce the City's greenhouse gas (GHG) emissions. In its Guidelines, the District lays out options for demonstrating consistency with the State's GHG reduction goals, including the 2020 target specified under AB 32, and the 2050 goal articulated in Executive Order S-3-05. The Draft PEIR states that the Preferred Land Use Scenario would result in emission levels below the District's plan-level GHG efficiency threshold of 6.6 metric tons per service population by 2020. However, the Draft PEIR finds a significant cumulative impact from GHG emissions beyond 2020 because the Preferred Land Use Scenario GHG estimates would exceed the State's GHG emission reduction goals for year 2050.

The District's Guidance for developing a "Qualified GHG Reduction Strategy" requires that a community-wide GHG inventory be conducted for a base year consistent with AB 32 (2008 or earlier). The City's Plan includes inventories for the target years of 2020 and 2035, but does not include an inventory for a base year that characterizes existing emissions levels. However, within the Plan's back-up documentation it does appear that the City has collected adequate data for 2008 to fulfill this requirement. The District recommends that the City include a full GHG inventory for year 2008 along with years 2020 and 2035 in the relevant sections of the Plan.

In several instances, GHG reduction estimates have not been developed for measures included in the Plan. The District recommends that the City add quantified estimates of GHG reductions from these measures. Doing so may assist the Plan in reaching the identified GHG reduction target for 2035. The following GHG reduction measures are not quantified in the Plan.

- Green Building Ordinance (BEE-2)
- Green Building Incentives (BEE-3)
- Community Energy Programs (BEE-4), although this is largely an outreach program and so emission reductions should be attributed cautiously
- Increase Density of Development (LUT-1)
- Provide Bike Parking in Non-residential Development (LUT-4)
- Provide Bike Parking in Multi-unit Residential Projects (LUT-5)
- Urban Tree-planting (OM-1)

In a few instances, it appears that the City may have overestimated the reductions anticipated from some GHG reduction measures. In the case of measure BEE-5 (solar power), for example, the City must increase the amount of installed solar power in the City to 100 MW by 2035. This exceeds the current total installed solar capacity for the entire State of California. Measure RWR-1 (wastewater) assumes that 100% of the City's wastewater will be recycled. Because such

large amounts of GHG emissions are estimated to be reduced from these measures, the District urges a cautionary and transparent approach to developing these emissions reduction estimates.

The Plan's implementation strategy identifies lead departments for each reduction measure and annual reporting via the city's Green Vision program. We recommend that the City add text to the Plan stating that, should monitoring efforts find that the Plan is falling short of its goals, the City will add additional mandatory and voluntary measures to the Plan in order to meet the Plan's GHG reduction targets. The District emphasizes the importance of monitoring and implementation of the GHG mitigation measures in the Plan. Ongoing monitoring is critical in order to demonstrate that the Plan is achieving its goals.

Overall, the Plan's commitment to directing employment and residential growth to existing urban areas and creating a more interconnected city with a transit orientation is an excellent example of the kind of development the District seeks to encourage to protect air quality, public health and the climate. The District commends the City for developing a Plan that reflects a strong commitment to climate protection.

If you have any questions regarding these comments, please contact Alison Kirk, Senior Environmental Planner, 415-749-5169. District staff is available to assist City staff in addressing these comments. In addition, the District's CEQA website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts. Available tools can be viewed and downloaded at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: District Director Susan Garner
District Secretary Ash Kalra
District Director Liz Kniss
District Director Ken Yeager

