



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

October 13, 2011

John Davidson
City of San Jose
Department of Planning, Building, & Code Enforcement
200 East Santa Clara Street, 3rd floor
San Jose, CA 95113-1905

Subject: Notice of Preparation for the Draft Program Environmental Impact Report for the Diridon Station Area Plan

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Dear Mr. Davidson:

The Bay Area Air Quality Management District (District) staff reviewed the City's Notice of Preparation for a Draft Program Environmental Impact Report (DPEIR) for the Diridon Station Area Plan (DSAP). We understand the DSAP planning area to encompass approximately 250 acres in downtown San Jose which includes a mix of land uses placed in three distinct zones. The northern zone is planned for commercial, R&D, and light industrial; the central zone is planned for a mix of commercial, retail, restaurant, and entertainment; and the southern zone is primarily planned for residential development. In all, the DSAP is proposing approximately 4.9 million square feet of commercial/R&D/industrial development, 424,000 square feet of retail/restaurant, a new 32,000 seat baseball stadium, two hotels totaling 900 rooms, and 2,588 new dwelling units.

The DSAP planning area is also slated to foster a multi-modal environment that is consistent with the vision of the City's General Plan goals and policies for vehicle miles traveled (VMT) reductions and mode shift changes. The City has targeted this area to accommodate the future convergence of high speed rail, BART, and significant growth of the current intercity rail, commuter rail, light rail, and bus transit. The DSAP also proposes a host of measures aimed at reducing the City's overall VMT. The plan includes a parking management program to maximize the use of existing parking supply and a transportation demand management program to encourage the use of transit, car-sharing, and employee shuttles. Furthermore, the DSAP blends open space and circulation concepts to encourage walking and bicycling with an emphasis on neighborhood connectivity and enabling easy access to transit facilities within and around the planning area.

To help facilitate the City's goals of high density, infill development and protect public health, the District has been collaborating with the City on the development of a Community Risk Reduction Plan (CRRP). The CRRP is a comprehensive approach to address the siting of sensitive receptors in relation to sources of toxic air contaminants. For the City of San Jose, this has entailed assistance with setting goals, emissions modeling, and identifying effective measures to avoid or otherwise reduce the public's exposure to harmful levels of

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air pollution. We understand that developing the CRRP is an ongoing process, and in the interim, the City will require project-level review to identify and reduce air pollutant impacts as necessary. In support of this work, District staff has also provided the City with emissions information on existing stationary sources and major roadways within and around the DSAP planning area that can be used to provide the environmental analysis recommended in items #6 and #7 below. We encourage the City to incorporate what has been learned in the course of developing its CRRP and apply this information to the DSAP and DPEIR to the extent possible.

Environmental Analysis

The District has the following specific comments on the environmental analysis that should be included in the DPEIR.

1. The DPEIR should discuss the District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines; a discussion of the health effects of air pollution, especially on sensitive receptors; and a discussion of greenhouse gas (GHG) emissions and the potential impacts from climate change in the Bay Area.
2. The DPEIR should provide a map that clearly identifies the planning area boundary; current and future planned sensitive receptors such as residences, schools, day cares, hospitals, and nursing care facilities; and all stationary sources, major roadways, highways, and rail within 1,000 feet of the planning area boundary.
3. The District's *CEQA Air Quality Guidelines (May, 2011)* provide guidance on how to evaluate potential construction, operational, and cumulative air quality impacts. A copy is available for download from the District's CEQA web site under Updated CEQA Guidelines.
4. The DPEIR should provide a detailed analysis of the potential effects on local and regional air quality from construction and operations (including permitted and non-permitted stationary and area emissions, and mobile emissions). The cumulative impacts should also be evaluated.
5. The DPEIR should estimate both the maximum daily and annual emissions of reactive organic compounds (ROG), nitrogen oxides (NOx), greenhouse gasses (GHGs), and particulate matter (PM2.5 and PM10). These estimates should be compared to the significance thresholds in the District's *CEQA Air Quality Guidelines*.
6. The DPEIR should evaluate the potential health risks from construction and operation activities to existing and future sensitive populations within the DSAP planning boundary.
7. The DPEIR should identify and evaluate measures to reduce criteria pollutants, toxic air contaminants, and GHG to mitigate potential impacts. These measures should be incorporated into the DSAP such that, when implemented on a project-by-project basis, impacts will be below a level of significance.

The District appreciates the on-going collaboration on air quality issues with the City and looks forward to continue working with the City in the future. If you have any questions, please contact Ian Peterson, Environmental Planner, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

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