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DISTRICT**

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EXECUTIVE OFFICER/APCO

October 26, 2015

Eric Luchini
City of Pleasanton
P.O. Box 520
Pleasanton, CA 94566

Subject: SEIR for Johnson Drive Economic Development Zone

Dear Mr. Luchini,

Bay Area Air Quality Management District (Air District) staff reviewed the Draft Supplemental Environmental Impact Report (SEIR) prepared by the City of Pleasanton (City) for the Johnson Drive Economic Development Zone (JDEDZ). The JDEDZ is located along Johnson Drive between Stoneridge Drive and I-580. The City is proposing to implement a pilot Economic Development Zone (EDZ) within a forty acre area along Johnson Drive currently developed with 224,688 sf of office, commercial, institutional, and industrial uses. The EDZ would allow the City to use zoning and land use designations, incentive programs, and CEQA tiering in order to streamline the development process and encourage investment.

The SEIR identified significant and unavoidable air quality impacts from emissions of oxides of nitrogen (NOx) and particulate matter (PM) associated with long-term operations within the EDZ area (Impact 4.B-3). The SEIR includes a number of mitigation measures consistent with the Pleasanton General Plan (2025) that will reduce these impacts, but not to a less than significant level. Air District staff recommends the City implement the following measures, many of which are voluntary measures in the City's Climate Action Plan, to further reduce the identified impacts to the maximum extent feasible:

- Require commute based trip reduction programs for all businesses that may include transit subsidies, parking cash out incentives, and carpool parking preferences;
- Provide preferred parking spaces and recharging stations for electric vehicles;
- Require businesses to provide bicycle facility amenities such as showers and lockers;
- Provide safe access for pedestrians, cyclists, and transit users;
- Require electrical hook-ups for diesel trucks at loading docks;
- Require existing and future diesel generators to meet CARB's Tier 4 emission standards;
- Prohibit all vehicles including commercial motor vehicles with gross vehicular weight ratings of less than 10,000 pounds from idling for more than 2 minutes; and
- Require truck fleets based in the plan area to meet CARB's highest engine tier available at the time the building permits are issued.

October 26, 2015

In Table 4.E-5, the operational and construction greenhouse gas emission (GHG) calculations are based on output data from both CalEEMod and the BGM Greenhouse Gas Calculator. However, the BGM GHG Emissions Calculator is outdated and not appropriate to estimate this project's GHG emissions. Air District staff recommends that the City recalculate the operational and construction GHG emissions from this project using only CalEEMod.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Jennifer Langfield, Senior Planner, at (415) 749-8619 or jlangfield@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Director Tom Bates
BAAQMD Director Margaret Fujioka
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley