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Connect with the
Bay Area Air District:



September 19, 2016

City of Santa Clara Planning Division
John Davidson, Principal Planner
1500 Warburton Avenue
Santa Clara, CA 95050

RE: Draft EIR for the Lawrence Station Area Plan

Dear Mr. Davidson,

Bay Area Air Quality Management District (Air District) staff appreciates the opportunity to review the Draft EIR for the Lawrence Station Area Plan (LSAP). The LSAP has been prepared for an approximately 73 acre area located southeast of the intersection of the Lawrence Expressway and Central Expressway, one block from the Lawrence Caltrain Station. The proposed plan would allow for the demolition of existing vacant and industrial buildings and the development of 3,500 new residential dwelling units, 104,000 square feet of retail space, and approximately 6.3 acres of public open space. Three development projects are being proposed at the same time as the plan itself, and they would be built as Phase 1 of the project. Those projects are also analyzed in the Draft EIR.

The Air District commends the City of Santa Clara for creating a plan with mixed use and high density housing that brings housing to a non-residential area within walking distance of transit. This type of development has many benefits, including helping the Bay Area to reduce vehicle miles traveled and greenhouse gases and to improve air quality.

Air District staff is concerned that the DEIR uses consistency with the City's 2013 Climate Action Plan as the threshold of significance for greenhouse gas emissions, for two reasons. First, the 2013 Climate Action Plan relies on meeting the 2020 goal for greenhouse gas emissions, which is only an interim goal in moving towards climate stabilization, although the Climate Action Plan does recognize that additional measures will be needed to achieve long term greenhouse gas reductions and identifies some potential reach measures for looking beyond 2020. Second, the DEIR states that the Climate Action Plan needs to be amended to make the documents consistent (page 4.6-8) in order to account for the increased population provided for in the LSAP. This amendment would therefore need to be completed before the DEIR could use consistency with the Climate Action Plan as a significance threshold. Additionally, in order to tier off the Climate Action Plan, the plan must be being fully implemented and on track to meet its target; this should be confirmed in the DEIR. Another option city staff could consider would be to revise the analysis to use a service population-based threshold based on 2030 climate goals in lieu of the qualified greenhouse gas reduction strategy consistency threshold.

The DEIR also finds that the project has significant unavoidable air quality impacts due to lack of consistency with the 2010 Clean Air Plan (Plan). Air District staff believes that additional measures could be incorporated into the project which would improve consistency with the Clean Air Plan and decrease both air pollutants and greenhouse gas emissions. In particular, improving the connection

between the LSAP area and the Lawrence Caltrain station for pedestrians and bicyclists would increase consistency with Clean Air Plan Control Measure TCM-1, Safe Routes to School and Transit. For example, the crossing could potentially be improved by adjusting signal timing as appropriate, improving crosswalk striping, or use of special pavement materials. Incorporating solar power, not just in the Westlake Urban project but also into the Summerhill Homes and True Life Companies projects and future development, would increase consistency with Clean Air Plan Control Measure ECM-2, Renewable Energy and also long-term climate stabilization goals. Finally, more efforts could be made to mitigate the urban heat island effect by planting additional trees, or using cool paving or cool roofing, which would increase consistency with Clean Air Plan Control Measure ECM-3

The DEIR considers potential health risks to project residents due to elevated levels of Toxic Air Contaminants and fine Particulate Matter near the Lawrence and Central Expressways and proposes air filtration to improve indoor air quality to acceptable levels. While high-efficiency filters can help reduce air pollution entering buildings, additional measures could be helpful for this project. The Air District's 2016 publication, Planning Healthy Places (available online at www.baaqmd.gov/planninghealthyplaces), lists on page 11 a number of measures which can be taken to reduce exposure to air pollutants for residents. For example, increasing the distance between the expressways and residences, placing parking between the expressways and the building, planting dense rows of trees and other vegetation between the expressways and the building, and locating residential units above the first floor are all measures that would reduce residents' exposure to air pollutants. Planning Healthy Places also provides guidance on ways to reduce emissions from a project, including actions such as electrifying loading docks and limiting idling times. See page 9 of that publication for additional actions to reduce emissions.

Finally, the DEIR includes air quality mitigation measures that would apply to future development (AQ-1, AQ-2, and AQ-6). Because the characteristics of development beyond Phase 1 are not known or assessed in the DEIR, the document should clarify that air quality and greenhouse gas impacts from future projects in the plan area will need to be assessed pursuant to CEQA.

Air District staff is available to assist the City in addressing these comments. For more information, or if you have any questions, please contact Karen Kristiansson, Principal Planner, at (415) 749-4753 or via email at kkristiansson@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: Director Cindy Chavez
Director Liz Kniss
Director Jan Pepper
Director Rod G. Sinks