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Connect with the  
Bay Area Air District:



June 28, 2019

Kara Hawkins  
Department of Planning, Building and Code Enforcement  
City of San Jose  
200 East Santa Clara Street, 3<sup>rd</sup> Floor Tower  
San Jose, CA 95113-1905

RE: Almaden Office Project – Notice of Preparation

Dear Ms. Hawkins,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the proposed Almaden Office Project (Project). This Project would remove an existing public parking lot and develop an approximately 2.6 million square foot building on a 3.67-gross acre site in downtown San Jose. The building would be up to 17 stories containing 2,111,000 square feet of office space in two towers connected via a podium building, 35,200 square feet of ground floor commercial space, and up to 1,815 below-grade parking spaces.

Because the Project includes over two million square feet of office and commercial space and no housing, it is quite likely that increases in vehicle trips will impact air quality and greenhouse gas (GHG) emissions. Air District staff recommends the DEIR include the following information and analysis regarding potential regional and local air quality impacts and GHG emissions in the San Francisco Bay Area Air Basin:

- **The DEIR should quantify the Project's potential construction and operational impacts to local and regional air quality.** The Air District's California Environmental Quality Act (CEQA) Guidelines provide guidance on how to evaluate a project's construction, operational, and cumulative air quality and GHG impacts. The CEQA Guidelines can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **The Air District recommends that a significance determination for GHG emissions be based on an evaluation of the Project's consistency with the most recent draft of the SB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 greenhouse gas targets, which are now superseded by the 2030 targets for greenhouse gases established in SB 32.

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- **The DEIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
  - **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM<sub>2.5</sub>) as a result of the project's construction and operation.** Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TAC and PM<sub>2.5</sub> emissions on nearby sensitive receptors.
  - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.
  - **If any aspects of the Project may require a permit from the Air District (for example, back-up diesel generators), then the Air District may be a responsible agency for CEQA purposes.** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov) to discuss permit requirements.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or [jfong@baaqmd.gov](mailto:jfong@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga  
BAAQMD Director Cindy Chavez  
BAAQMD Director Liz Kniss  
BAAQMD Director Rod G. Sinks