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Bay Area Air District:



August 1, 2019

Meenaxi Raval
Department of Planning, Building and Code Enforcement
City of San Jose
200 East Santa Clara Street, 3rd Floor Tower
San Jose, CA 95113-1905

RE: Avenues Silicon Valley Private School Project – Notice of Preparation

Dear Ms. Raval,

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 Avenues Silicon Valley Private School Project (Project). This Project would rezone an 11.87-acre site in the City of San Jose from Industrial Park to Combined Industrial Commercial zone to develop a private school for up to 2,392 students (Kindergarten through 12th Grade), 352 daycare students, and 275 faculty. The Project includes the conversion of two office buildings, demolition of an office and warehouse space, and construction of four buildings, a sports field, and other ancillary outdoor areas.

School siting warrants particular care. A site-specific analysis is recommended to evaluate the potential and cumulative health impacts due to nearby sources of air pollution, including Interstate 280 and Reed & Graham asphalt facility, which are both within ¼ mile from the fenceline of the Project site. More information regarding school siting is available on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.

Air District staff recommends the DEIR include the following information:

- **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_{2.5}) as a result of the Project's construction and operation.** Because the Project is near several sources of air pollution, Air District staff recommends that the DEIR also evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on nearby sensitive receptors. We understand that the City is planning to conduct an air quality assessment to evaluate exposure of vehicle and stationary sources to sensitive receptors. The stationary source, highway, and roadway screening analysis tools on the Air District's website are currently not recommended for evaluating sensitive land uses such as schools. Please contact the Air District to obtain more recent data for a site-specific analysis and guidance for complying with air quality analysis.

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- **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 greenhouse gas (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 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32.
 - **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>.
 - **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 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.

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