



November 1, 2019

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

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: Charcot Avenue Extension Project – Draft Environmental Impact Report

ALAMEDA COUNTY

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Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
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Bay Area Air District:



Dear Ms. Raval,

Bay Area Air Quality Management District (Air District) staff has reviewed the draft Environmental Impact Report (DEIR) for the proposed Charcot Avenue Extension (Project). The City of San Jose proposes to extend Charcot Avenue from its eastern boundary at Paragon Drive, over Interstate 880 (I-880), to Oakland Road in the North San Jose area to improve connectivity around the freeway. The proposed two-lane extension is approximately 0.6 miles and includes an overcrossing of O'Toole Avenue and I-880 that would be approximately 720 feet in length. The project is expected to impact 0.44 acres of Orchard School campus, which includes an elementary and middle school as well as the on-site Champions preschool.

The Air District understands that the City considers the Project to be an important roadway connection that is anticipated to alleviate traffic congestion on nearby Brokaw Road, Trimble Road, and Montague Expressway. However, by diverting traffic to Charcot Road, nearby sensitive receptors at the Orchard School campus could potentially be exposed to a significant increase in air pollution and elevated health risk from mobile sources. According to the DEIR, roadway volumes along the Charcot Avenue extension could have approximately 1,080 peak-hour trips and 8,700 daily trips under the Existing Plus Project conditions and approximately 1,720 peak-hour trips and 13,900 daily trips under the Year 2040 Project conditions. In addition, the new road connection would increase traffic, including heavy-duty truck traffic, and may discourage students from using active modes of transportation, such as walking or biking, to get to and from the campus.

Staff reviewed the Project Air Quality and Greenhouse Gas Emissions Assessment (Appendix E). The DEIR concludes that the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant. However, the modeling methodology concerning exposure of sensitive receptors to pollutant concentrations of toxic air contaminants and PM_{2.5} deviates from practices recommended by the Air District and the State of California's Office of Environmental Health Hazard Assessment. While the DEIR used CT-EMFAC2014 and Sacramento Metropolitan Air Quality Management District's Road

Construction Emissions Model, the Air District recommends that the analysis use the most recent models to calculate emissions, such as EMFAC2017 and CalEEMod 2016.3.2. Furthermore, the modeling underestimated the exposure duration, used inconsistent breathing rates, and included several discrepancies regarding construction, VMT, and vehicle speeds. Therefore, the Air District is concerned that cancer risk and PM_{2.5} concentrations may be significantly underestimated in the DEIR. Staff highly recommends that the City revise the air quality and health risk analysis and coordinate with the Air District on the best practices and protocols to ensure the most current models and methods are used.

The DEIR also does not demonstrate consistency with the California 2017 Climate Change Scoping Plan, which recommends a 15 percent reduction in light-duty VMT beyond what existing plans and policies achieve to meet the State's GHG reduction targets. The Project's increase in VMT would contribute to an increase in greenhouse gas (GHG) emissions. Staff recommends the Project demonstrate consistency with all applicable measures identified in the 2017 Climate Change Scoping Plan needed to achieve the Statewide 2030 GHG reduction goal and be on track to meet the 2050 climate stabilization goal.

Furthermore, Air District staff recommends that the City strongly consider an alternative project that would not site a major roadway within ¼ mile of a school. The DEIR considers eight project alternatives, including options that would not require encroachment on the Orchard School campus. The DEIR should evaluate the potential health risk for each alternative, and the Air District recommends that the City consider an alternative that would either not increase or have the smallest possible increase on the exposure of sensitive receptors to air pollutants.

Air District staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov.

Sincerely,



Henry Hilken
Director of Planning and Climate Protection

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