



August 29, 2019

**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

Krinjal Mathur  
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: Garden Gate Tower – Draft Supplemental Environmental Impact Report

Dear Ms. Mathur,

Bay Area Air Quality Management District (Air District) staff has reviewed the draft Supplemental Environmental Impact Report (SEIR) for the proposed Garden Gate Tower (Project). This Project includes two development options for a 27-floor building on a 0.42-acre site in the City of San Jose. Option 1 would be a traditional multi-family development with up to 290 residential units and approximately 4,840 square feet of ground floor retail space. Option 2 would be a co-living community development with up to 850 bedrooms in a co-living configuration and approximately 6,000 square feet of ground floor retail space.

The Air District commends the City and the developer on this high-density mixed-use project located in a downtown priority development area near public transit, which will help reduce vehicle miles travelled and therefore reduce both air quality and greenhouse (GHG) impacts.

Staff recommends the Project demonstrate consistency with all measures identified in the 2017 Scoping Plan needed to meet the State’s strategy to achieve the Statewide 2030 GHG reduction goal and be on track to meet the 2050 climate stabilization goal.

Air District staff recommends the project incorporate all feasible mitigation measures to be consistent with the 2017 State Scoping Plan, both on-site and off-site including the following:

- Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code-compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.

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- Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Sections A4.106.5 and A5.106.11.2.
  - Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.
  - Require the project to meet SB 743 derived vehicle miles traveled (VMT) reductions of 15% below the regional average VMT.
  - Require 10% of parking spaces to include electric vehicle charging equipment and designated for electric vehicle parking only.
  - Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.
  - All construction activities shall implement waste reduction, disposal and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen). In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.

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](mailto:jfong@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

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