



February 19, 2021

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Maira Blanco, Environmental Project Manager
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: Graniterock Capitol Site Modernization Plan EIR – Notice of Preparation

Dear Ms. Blanco,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Graniterock Capitol Site Modernization Plan (Project). The Project applicant proposes changes in operations at an existing 22.18-acre concrete and asphalt recycling, manufacturing, and distribution facility. The proposed modernization of the existing facility would allow the demolition of an existing 12,800-square foot distribution facility, construction of a 40,000-square foot warehouse and storage facility, installation of truck wash system, and construction of a new quality assurance/quality control facility with office space.

Although the NOP contains many details about the project, the project description does not identify other critical information about the project, such as the parts of the existing facility that are proposed for expansion, replacement or enclosure, imported materials that would be processed, or the anticipated truck and rail activity associated with these activities. Air District staff recommends that the project description include this information and conduct a robust air quality and greenhouse gas (GHG) analysis within the EIR.

Air District staff recommends the EIR include the following information and analysis:

- **As identified by the Air District’s Community Air Risk Evaluation program and Community Health Protection Program, the city of San Jose community is currently cumulatively impacted with air pollution, making any additional air pollution a potentially significant localized impact.** We recommend that the EIR use a conservative significance threshold to identify, evaluate, and mitigate any potential adverse air quality impacts that could occur from all phases of the project and all air pollution sources related to the Project.

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- **The EIR should estimate and evaluate the potential health risk to sensitive populations within and surrounding the Project area from toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operations.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TACs and PM_{2.5} emissions on current and future sensitive receptors including several residential neighborhoods that are located to the north, south, east, and west of the Project area. Additionally, State Route 82 (SR 82) is east of the Project and should be included in the cumulative assessment.
- **Quantify and characterize the Project's potential construction and operational impacts to local and regional air quality.** The analysis should evaluate whether the Project will have a cumulatively considerable net increase for construction and/or operational emissions from all pollutants including GHGs
- **The EIR should evaluate all feasible mitigation measures, both onsite and offsite, for air quality and GHG impacts.** The EIR should first prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>).
 - Require construction equipment to be zero-emission when available, operate on renewable fuel or, at a minimum, use the highest tier engines commercially available.
 - Implement green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.
 - Require zero-emission trucks for all facility operations, on-site and offsite, as early as feasible.
 - Provide funding to expand and improve access to transit, employment, and major activity centers for workers.
- **Include all appendices or technical documents in the EIR that relate to air quality, TACs and GHG analyses, such as emissions assessment calculations and the health risk assessment files.** Without all the supporting air quality documentation, the public may be unable to effectively review all air quality and GHG analyses in a timely manner and engage during the public review period.

- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. 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 GHG impact analysis should include an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's current CEQA Guidelines recommended GHG thresholds which were based on the State's 2020 GHG targets and are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Project will be consistent with the most recent Scoping Plan.
- **The EIR should evaluate the Project's consistency with the City of San Jose's most recently adopted Climate Action Plan.** The 2018 update can be found at this link: <https://www.sanjoseca.gov/home/showdocument?id=32171>
- **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.
- **Certain aspects of the Project may require a permit from the Air District including, but not limited to:**
 - Modifications to the existing railcar infrastructure and operation,
 - New aggregate storage silos and any associated abatement devices,
 - Cementitious material operation, and
 - Asphaltic material operation

Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

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 Matthew Hanson, Environmental Planner at 415-749-8733 mhanson@baaqmd.gov, or Alesia Hsiao, Senior Environmental Planner 415-749-8419 ahsiao@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Chair Cindy Chavez
BAAQMD Director Margaret Abe-Koga
BAAQMD Director Rich Constantine
BAAQMD Director Rob Rennie