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EXECUTIVE OFFICER/APCO

November 23, 2015

Debby Fernandez  
City of Santa Clara  
1500 Warburton Avenue  
Santa Clara, CA 95050

Subject: DEIR for City Place Santa Clara

Dear Ms. Fernandez,

Bay Area Air Quality Management District (Air District) staff reviewed the Draft Environmental Impact Report (DEIR) prepared by the City of Santa Clara (City) for City Place Santa Clara (Project). The Project is located on seven City-owned parcels north of Tasman Drive, east of Great America Parkway, west of the Guadalupe River, and south of State Route 237.

The City is proposing to build up to 9.16 million square feet of office buildings, retail and entertainment facilities, residential units, and hotel rooms. In addition the Project would also include surface and structured parking facilities, large open spaces, pedestrian and vehicular entrances, roadway networks, and expanded infrastructure. To accommodate the Project, the City is proposing a new General Plan land use designation (Urban Center/Entertainment District) within the Mixed-Use designations.

The DEIR identified significant and unavoidable air quality impacts from reactive organic gas (ROG), oxides of nitrogen (NOx), particulate matter (PM 2.5), and greenhouse gas (GHG) emissions associated with long-term operational emissions generated by the Project (Impacts AQ-1, AQ-3, AQ-4, GHG-1). Emissions for ROG and NOx are estimated to be 7-10 times greater than the significance thresholds identified in Table 3.4-8. This substantial increase in emissions will make it more difficult for the region to attain and maintain health based National Ambient Air Quality Standards (NAAQS). As NAAQS become more stringent over time, as recently occurred for the ozone standard, it will be more important for projects like this to implement all feasible mitigation measures to reduce the severity of the air quality impacts.

Air District staff commends the City for including a number of mitigation measures (MM GHG 1.2, TRA 1.1) that will reduce these impacts. However, due to the magnitude of the Project's anticipated impacts, Air District staff recommends the City implement the following additional mitigation measures to further reduce the identified impacts to the maximum extent feasible:

- Increase the transportation demand management (TDM) plan requirement to reduce peak-hour and daily vehicle trips from 10% to at least 25%;
- Prepare a comprehensive parking plan for the entire project area that establishes parking pricing strategies, unbundling of parking costs, and shared parking for visitors and employees;
- Require electrical hook-ups for diesel trucks at loading docks;
- Prohibit all diesel powered trucks from idling for more than 2 minutes;
- Require truck fleets based within the Project site meet CARB's highest engine tier standard in place at the time the building permits are issued;
- Require only electrical landscaping equipment;

- Require solar hot water heating systems;
- Require electric heat pumps for space heating;
- Require recycling and composting programs for offices and residences;
- Require energy efficiency reductions at least 25% beyond Title 24 on all new development at the time the building permits are issued;
- Require on-site photovoltaic (PV) solar to meet at least 50% of the electricity demand; and
- For electricity not generated on-site (e.g., via PV), require that buildings receive the maximum amount achievable from renewable energy.

According to the DEIR, implementation of the Project could result in exposure of sensitive populations to increased local air pollution from roadway traffic, diesel-related truck activity, trains, and stationary sources such as emergency generators. To reduce these impacts, the DEIR includes mitigation measure AQ-7.1, which requires the implementation of filtration in residences and daycare facilities. Air District staff supports AQ-7.1 because it will help to reduce the exposure of sensitive populations to increased local air pollution. To further protect the health of new residents and children (who will utilize the daycare facilities referenced on pg. 3.4-39) from increased local air pollution, Air District staff recommends that the following measures be included as part of mitigation measure AQ-7.1:

- Locate residences or daycare facilities as far from major pollution sources as feasible;
- Require that all filtration systems be equipped with MERV 13 or higher filters;
- Build the residential and/or daycare facilities that are the closest to roadway and/or truck emission sources at a later date in time, as feasible (as new regulations to clean up the mobile fleet are phased in, potential cancer risks are anticipated to decrease);
- Place windows, balconies, and building air intakes as far away from any emission source(s) as possible;
- Plant trees and other vegetation between sensitive land uses (including residential and daycare facilities) and emission sources; and
- Avoid placing truck activity, including loading docks, near planned sensitive land uses such as residences and daycare facilities.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Jennifer Langfield, Senior Planner, at (415) 749-8619 or [jlangfield@baaqmd.gov](mailto:jlangfield@baaqmd.gov).

Sincerely,

  
Jean Roggenkamp  
Deputy Executive Officer

cc: BAAQMD Director Cindy Chavez  
BAAQMD Director Liz Kniss  
BAAQMD Director Jan Pepper  
BAAQMD Director Rod G. Sinks