



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

August 10, 2015

Paul Kermoyan  
Community Development Director  
City of Campbell  
70 N. First St.  
Campbell, CA 95008

RE: DEIR for Draft Dell Avenue Area Plan

Dear Mr. Kermoyan,

Bay Area Air Quality Management District (Air District) staff reviewed the City of Campbell's (City) Draft Environmental Impact Report (DEIR) for the Draft Dell Avenue Area Plan (Plan). According to the DEIR, the Plan encompasses 113 acres in the southeast portion of the City along the western edge of Highway 17. The Plan would transform the area into a technology sector based employment district with 300 new housing units, 20,000 sf of retail, and 2,292,000 sf of office space resulting in 726 new residents and 7,394 net new jobs.

Air District staff has the following comments on the air quality analysis in the DEIR:

**Regional Growth Projections for VMT and Population and Employment**

One of the thresholds of significance used in the DEIR for Impact AIR-1 states that a project would be consistent with the 2010 Bay Area Clean Air Plan if ... "the project VMT or vehicle trip increase is less than or equal to the projected population increase." However, in the analysis on page 4.2-28, the methodology used to determine if the Plan will have significant impacts combines population and employment estimates for buildout of the Plan area to the estimated increase in vehicles miles traveled (VMT). The DEIR then concludes that because "VMT per capita" is decreasing with the Plan, impacts would be "less than significant." However, if the analysis included only the estimated population increase and not the estimated increase in employment as the significance criteria indicates, it would appear that VMT would increase greater than population.

Air District staff recommends that the City consider the following feasible mitigation measures to reduce the potentially significant air quality impacts associated with the Plan:

- Require employee trip commute reduction programs for all employees regardless of the size of the employer;
- Require parking for carpools and electric vehicles;
- Establish parking pricing strategies;
- Require that parking is paid for separately and is not included in the rent or sale of residential or commercial space;
- Provide safe access for pedestrians, cyclists, and transit users;
- Require EV charging stations for electric vehicles;
- Require on-site solar generation, hot water heating, electric heat pumps, and cool roofs; and

- ALAMEDA COUNTY  
Tom Bates  
Margaret Fujioka  
Scott Haggerty  
Nate Miley
- CONTRA COSTA COUNTY  
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Rod G. Sinks
- SOLANO COUNTY  
James Spering
- SONOMA COUNTY  
Teresa Barrett  
Shirlee Zane
- Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

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- Make energy efficiency reductions at least 25% beyond Title 24 on all new development.

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 [jangfield@baaqmd.gov](mailto:jangfield@baaqmd.gov).

Sincerely,



FOR J. ROGGENKAMP

Jean Roggenkamp  
Deputy Air Pollution Control Officer

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