961-971 MERIDIAN AVENUE AIR QUALITY & GREENHOUSE GAS ASSESSMENT

San José, California

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Introduction

The purpose of this report is to address air quality impacts and compute the greenhouse gas (GHG) emissions associated with the proposed mixed-use buildings at 961-971 Meridian Avenue in San José, California. The air quality impacts and GHG emissions would be associated with the demolition of the existing uses at the site, construction of the new building and infrastructure, and operation of the project. Air pollutant and GHG emissions associated with the construction and operation of the project were predicted using models. In addition, the potential construction health risk impact to nearby sensitive receptors and the impact of existing toxic air contaminant (TAC) sources affecting the proposed residences were evaluated. This analysis addresses those issues following the guidance provided by the Bay Area Air Quality Management District (BAAQMD).[1]

Project Description

The project site is currently developed with two vacant single-family residences and an accessory structure. The project proposes to demolish the existing on-site structures and construct a six-story, 233-unit residential building with approximately 1,780 square feet (sf) of ground-floor retail. The project proposes one level of below-grade parking and one level of at-grade parking which would consist of 290 parking spaces. Of the 290 parking spaces, 273 would be for residences, eight would be for retail parking, and the remaining nine are for electrical vehicles (EV).

Setting

The project is located in Santa Clara County, which is in the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the State and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

Air Pollutants of Concern

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant of the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

[1] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

Toxic Air Contaminants

Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. The most recent Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines were published in February of 2015.[2] See *Attachment 1* for a detailed description of the community risk modeling methodology used in this assessment.

Regulatory Agencies

CARB has adopted and implemented a number of regulations for stationary and mobile sources to reduce emissions of DPM. Several of these regulatory programs affect medium and heavy-duty diesel trucks that represent the bulk of DPM emissions from California highways. These regulations include the solid waste collection vehicle (SWCV) rule, in-use public and utility fleets, and the heavy-duty diesel truck and bus regulations. In 2008, CARB approved a new regulation to reduce emissions of DPM and nitrogen oxides from existing on-road heavy-duty diesel fueled vehicles.[3] The regulation requires affected vehicles to meet specific performance requirements between 2014 and 2023, with all affected diesel vehicles required to have 2010 model-year engines or equivalent by 2023. These requirements are phased in over the compliance period and depend on the model year of the vehicle.

The BAAQMD is the regional agency tasked with managing air quality in the region. At the State level, the CARB (a part of the California Environmental Protection Agency [EPA]) oversees regional air district activities and regulates air quality at the State level. The BAAQMD has published California Environmental Quality Act (CEQA) Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of projects.[4] The detailed community risk modeling methodology used in this assessment is contained in *Attachment 1*.

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[2] OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

[3] Available online: http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm. Accessed: November 21, 2014.

[4] Bay Area Air Quality Management District. 2017. *BAAQMD CEQA Air Quality Guidelines*. May.

City San José Envision 2040 General Plan

The San José Envision 2040 General Plan includes goals, policies, and actions to reduce exposure of the City's sensitive population to exposure of air pollution and toxic air contaminants or TACs. The following goals, policies, and actions are applicable to the proposed project:

Applicable Goals – Air Pollutant Emission Reduction

Goal MS-10 Minimize air pollutant emissions from new and existing development.

Applicable Policies – Air Pollutant Emission Reduction

MS-10.1 Assess projected air emissions from new development in conformance with the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines and relative to state and federal standards. Identify and implement feasible air emission reduction measures.

MS-10.2 Consider the cumulative air quality impacts from proposed developments for proposed land use designation changes and new development, consistent with the region's Clean Air Plan and State law.

Applicable Goals – Toxic Air Contaminants

Goal MS-11 Minimize exposure of people to air pollution and toxic air contaminants such as ozone, carbon monoxide, lead, and particulate matter.

Applicable Policies – Toxic Air Contaminants

MS-11.1 Require completion of air quality modeling for sensitive land uses such as new residential developments that are located near sources of pollution such as freeways and industrial uses. Require new residential development projects and projects categorized as sensitive receptors to incorporate effective mitigation into project designs or be located an adequate distance from sources of toxic air contaminants (TACs) to avoid significant risks to health and safety.

MS-11.2 For projects that emit toxic air contaminants, require project proponents to prepare health risk assessments in accordance with BAAQMD-recommended procedures as part of environmental review and employ effective mitigation to reduce possible health risks to a less than significant level. Alternatively, require new projects (such as, but not limited to, industrial, manufacturing, and processing facilities) that are sources of TACs to be located an adequate distance from residential areas and other sensitive receptors.

MS-11.4 Encourage the installation of appropriate air filtration at existing schools, residences, and other sensitive receptor uses adversely affected by pollution sources.

Actions – Toxic Air Contaminants

MS-11.7 Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.

Applicable Goals – Construction Air Emissions

Goal MS-13 Minimize air pollutant emissions during demolition and construction activities

Applicable Policies – Construction Air Emissions

MS-13.1 Include dust, particulate matter, and construction equipment exhaust control measures as conditions of approval for subdivision maps, site development and planned development permits, grading permits, and demolition permits. At minimum, conditions shall conform to construction mitigation measures recommended in the current BAAQMD CEQA Guidelines for the relevant project size and type.

Applicable Actions – Construction Air Emissions

MS-13.4 Adopt and periodically update dust, particulate, and exhaust control standard measures for demolition and grading activities to include on project plans as conditions of approval based upon construction mitigation measures in the BAAQMD CEQA Guidelines.

Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. The closest sensitive receptors to the project site are the adjacent single-family residences and senior living facility to the north, the adjacent multi-family residences to the west, and the adjacent San Jose Montessori School (ages 3 through 6) and multi-family residences to the south of the project site. There are additional residences at farther distances from the project site. This project would also introduce new sensitive receptors to the area.

Significance Thresholds

In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA and these significance thresholds were contained in the District’s 2011 *CEQA Air Quality Guidelines*. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA. The thresholds were challenged through a series of court challenges and were mostly upheld. BAAQMD updated the *CEQA Air Quality Guidelines* in 2017 to include the latest significance thresholds that were used in this analysis are summarized in Table 1.

Table 1. Community Risk Significance and GHG Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards	**Single Sources Within 1,000-foot Zone of Influence**	**Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)**	
Excess Cancer Risk	>10.0 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual $PM_{2.5}$	>0.3 $\mu g/m^3$	>0.8 $\mu g/m^3$	
Greenhouse Gas Emissions			
Land Use Projects – direct and indirect emissions	Compliance with a Qualified GHG Reduction Strategy OR 1,100 metric tons annually or 4.6 metric tons per capita (for 2020) 660 metric tons annually or 2.6 metric tons per capita (for 2030)*		

Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. GHG = greenhouse gases.

*BAAQMD does not have a recommended post-2020 GHG threshold.

Air Quality Impacts and Mitigation Measures

Impact: Conflict with or obstruct implementation of the applicable air quality plan?

BAAQMD is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin (SFBAAB). BAAQMD, with assistance from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), has prepared and implements specific plans to meet the applicable laws, regulations, and programs. The most recent and comprehensive of which is the *Bay Area 2017 Clean Air Plan*.[5] The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality impacts. In formulating compliance strategies, BAAQMD relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which in turn affects region-wide emissions of air pollutants and GHGs.

The 2017 Clean Air Plan, adopted by BAAQMD in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the Clean Air Plan. At the project-level, there are no consistency measures or thresholds. The proposed project would not conflict with the latest Clean Air planning efforts since 1) project would have emissions below the BAAQMD thresholds (see below), 2) the project would be considered urban infill, and 3) the project would be located near transit with regional connections.

Impact: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Bay Area is considered a non-attainment area for ground-level ozone and $PM_{2.5}$ under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM_{10} under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM_{10}, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$ and apply to both construction period and operational period impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction and operation of the site assuming full build-out of the project. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The model output from CalEEMod along with construction and operational inputs are included as *Attachment 2*.

[5] Bay Area Air Quality Management District (BAAQMD), 2017. *Final 2017 Clean Air Plan.*

Construction Period Emissions

CalEEMod provided annual emissions for construction. CalEEMod provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. A construction build-out scenario, including equipment list and schedule, was based a construction data sheet provided by the project applicant. The proposed project land uses and demolition/earthwork volumes were entered into CalEEMod as follows:

- 233 dwelling units, 190,050-sf, and 2.1 acres entered as “Apartments Mid Rise”,
- 1,780-sf entered as “Strip Mall”,
- 290 spaces and 105,077-sf entered as “Enclosed Parking with Elevator”,
- 15,000-sf of existing building demolition during the demolition phase,
- 20,000 cubic yards (cy) of soil exported during the site preparation phase,
- 100-cy of soil exported during the grading phase,
- 1-ton pavement demolition during the demolition phase,
- 6 one-way cement truck trips during the building construction phase, and
- 18,000-cy or 4,320 one-way truck trips for asphalt hauling during the paving phase.

The CalEEMod construction schedule assumed that the project would be built out over a period of approximately 20 months, beginning in February 2021. Based on the provided construction schedule and equipment usage assumptions, there were an estimated 438 construction workdays Average daily emissions were computed for each building by dividing the total construction emissions by the number of construction days. Table 2 shows average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project. The calculated construction period emissions would not exceed the BAAQMD significance thresholds and have a *less-than-significant* impact.

Table 2. Construction Period Emissions

Scenario	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Total construction emissions (tons)	1.7 tons	3.0 tons	0.1 tons	0.1 tons
Average daily emissions (pounds)[1]	7.6 lbs/day	13.6 lbs/day	0.4 lbs/day	0.48 lbs/day
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	**No**	**No**	**No**	**No**
Notes: [1]Assumes 438 workdays.				

However, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD *CEQA Air Quality Guidelines* consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. *Mitigation Measure AQ-1 would implement BAAQMD-recommended best management practices*.

Mitigation Measure AQ-1: **Include measures to control dust and exhaust during construction.**

During any construction period ground disturbance, the applicant shall ensure that the project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. Additional measures are identified to reduce construction equipment exhaust emissions. The contractor shall implement the following best management practices that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).

5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Effectiveness of Mitigation Measure AQ-1

The measures above are consistent with BAAQMD-recommended basic control measures for reducing fugitive particulate matter that are contained in the BAAQMD CEQA Air Quality Guidelines.

Operational Period Emissions

Operational air emissions from the project would be generated primarily from autos driven by future residents, customers, and employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical emissions from these types of uses. CalEEMod was also used to estimate emissions from operation of the proposed project assuming full build-out.

Land Uses

The project land uses were entered into CalEEMod as described above for the construction period modeling.

Model Year

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest the project site could possibly be constructed and begin operating would be 2023. Emissions associated with build-out later than 2023 would be lower.

Trip Generation

CalEEMod allows the user to enter specific vehicle trip generation rates, which were input to the model using the daily trip generation rate provided in the project trip generation table. The Saturday and Sunday trip rates were assumed to be the weekday rate adjusted by multiplying the ratio of the CalEEMod default rates for Saturday and Sunday trips. The project traffic analysis provided project trip generation values for the proposed mixed-use development.[6] The *Residential-Retail Internal Reduction, Location Based Reduction, and VMT Reduction* were applied. For the multi-family housing land use, the trip generation rates would be 4.28 trips per dwelling unit for the weekdays, 4.11 trips per dwelling unit for Saturday, and 3.77 trips per dwelling unit for Sunday. For the commercial use, the trip generation rates would be 20.79 trips per 1,000-sf for weekdays, 19.72 trips per 1,000-sf for Saturday, and 9.58 trips per 1,000-sf for Sunday. The default trip lengths and trip types specified by CalEEMod were used.

Energy

CalEEMod defaults for energy use were used, which include the 2016 Title 24 Building Standards. Indirect emissions from electricity were computed in CalEEMod. The model has a default rate of 641.3 pounds of CO_2 per megawatt of electricity produced, which is based on PG&E's 2008 emissions rate. The rate was adjusted to account for PG&E's projected 2020 CO_2 intensity rate. This 2020 rate is based, in part, on the requirement of a renewable energy portfolio standard of 33

[6] Hexagon Transportation Consultants. *961-971 Meridian Avenue Mixed-Use Development Transportation Analysis*. August 2019.

percent by the year 2020. The derived 2020 rate for PG&E was estimated at 290 pounds of CO_2 per megawatt of electricity delivered.[7]

Other Inputs

Default model assumptions for emissions associated with solid waste generation use were applied to the project. Water/wastewater use were changed to 100% aerobic conditions to represent wastewater treatment plant conditions. All hearths were assumed to be gas powered.

Existing Uses

The existing land uses on the project site include approximately 15,000-sf of vacant single-family residences and accessory structures. These vacant uses produce low operational and traffic emissions that they would not make a considerable offset to the proposed project. Therefore, the existing uses emissions were not included.

Project Operational Emissions

As shown in Table 3, operational emissions would not exceed the BAAQMD significance thresholds. This would be considered a *less-than-significant* impact.

Table 3. Operational Period Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2023 Project Operational Emissions (*tons/year*)	1.2 tons	0.9 tons	0.9 tons	0.3 tons
BAAQMD Thresholds (tons /year)	*10 tons*	*10 tons*	*15 tons*	*10 tons*
Exceed Threshold?	No	No	No	No
2023 Project Operational Emissions (*lbs/day*)[1]	6.4 lbs.	5.1 lbs.	4.8 lbs.	1.4 lbs.
BAAQMD Thresholds (pounds/day)	*54* lbs.	*54* lbs.	*82* lbs.	*54* lbs.
Exceed Threshold?	No	No	No	No
Notes: [1] Assumes 365-day operation.				

Impact: Expose sensitive receptors to substantial pollutant concentrations?

Project impacts related to increased community risk can occur either by generating emissions of TACs and air pollutants during construction and operation and by introducing a new sensitive receptor, such as a residential use, in proximity to an existing source of TACs.

Temporary project construction activity would also generate dust and equipment exhaust on a temporary basis that could affect nearby sensitive receptors. A construction community health risk assessment was prepared to address project construction impacts on the surrounding off-site sensitive receptors. Operation of the project is not expected to be a source of TAC or localized air

[7] Pacific Gas & Electric, 2015. *Greenhouse Gas Emission Factors: Guidance for PG&E Customers*. November.

pollutant emissions, as the project would not generate substantial truck traffic or include stationary sources of emissions, such as generators powered by diesel engines.

The project would introduce new residents that are sensitive receptors. There are also several sources of TACs and localized air pollutants in the vicinity of the project. The impact of the existing sources of TAC upon the existing sensitive receptors and new incoming sensitive receptors was assessed.

Community risk impacts are addressed by predicting increased lifetime cancer risk, the increase in annual $PM_{2.5}$ concentrations and computing the Hazard Index (HI) for non-cancer health risks. The methodology for computing community risks impacts is contained in *Attachment 1*.

Construction Community Health Risk Impacts

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations as show in Table 2. Construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issue associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and $PM_{2.5}$.[8] This assessment included dispersion modeling to predict the offsite and onsite concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated.

Construction Emissions

The CalEEMod model provided total annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles, with total emissions from all construction stages as 0.0827 tons (165 pounds). The on-road emissions are a result of haul truck travel during demolition and grading activities, worker travel, and vendor deliveries during construction. A trip length of one mile was used to represent vehicle travel while at or near the construction site. It was assumed that these emissions from on-road vehicles traveling at or near the site would occur at the construction site. Fugitive $PM_{2.5}$ dust emissions were calculated by CalEEMod as 0.0166 tons (33 pounds) for the overall construction period.

Dispersion Modeling

The U.S. EPA AERMOD dispersion model was used to predict DPM and $PM_{2.5}$ concentrations at sensitive receptors (residences) in the vicinity of the project construction area. The AERMOD dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities for CEQA projects.[9] The modeling utilized two area sources to represent the

[8] DPM is identified by California as a toxic air contaminant due to the potential to cause cancer.
[9] Bay Area Air Quality Management District (BAAQMD), 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0.* May.

on-site construction emissions, one for exhaust emissions and one for fugitive dust emissions. To represent the construction equipment exhaust emissions, an emission release height of 6 meters (19.7 feet) was used for the area source. The elevated source height reflects the height of the equipment exhaust pipes plus an additional distance for the height of the exhaust plume above the exhaust pipes to account for plume rise of the exhaust gases. For modeling fugitive $PM_{2.5}$ emissions, a near-ground level release height of 2 meters (6.6 feet) was used for the area source. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area sources. Construction emissions were modeled as occurring daily between 7:00 a.m. to 4:00 p.m., when the majority of construction activity would occur.

The modeling used a five-year data set (2006-2010) of hourly meteorological data from the San José International Airport that was prepared for use with the AERMOD model by BAAQMD. Annual DPM and $PM_{2.5}$ concentrations from construction activities during the 2021-2022 period were calculated using the model. DPM and $PM_{2.5}$ concentrations were calculated at nearby sensitive receptors. Receptor heights of 1.5 meters (4.9 feet), 4.5 meters (14.8 feet), and 7 meters (23 feet) were used to represent the breathing height on the first, second, and third floors of nearby single- and multi-family residences and senior apartments. A receptor height of 1.0 meter was used for modeling impacts to children at the nearby school.

Construction Impacts

The maximum-modeled annual DPM and $PM_{2.5}$ concentrations, which includes both the DPM and fugitive $PM_{2.5}$ concentrations, were identified at nearby sensitive receptors (as shown in Figure 1) to find the maximally exposed individuals (MEIs). Using the maximum annual modeled DPM concentrations, the maximum increased cancer risks were calculated using BAAQMD recommended methods and exposure parameters described in *Attachment 1*. Non-cancer health hazards and maximum $PM_{2.5}$ concentrations were also calculated and identified. *Attachment 3* to this report includes the emission calculations used for the construction area source modeling and the cancer risk calculations.

Results of this assessment indicated that the cancer risk MEI was located on the first floor (1.5 meters) in the southwest corner of the multi-family residence to the east of the project site opposite Meridian Avenue and the $PM_{2.5}$ concentration MEI was located on the first floor (1.5 meters) of the school adjacent to the southern project boundary (as seen in Figure 1). The maximum increased cancer risks and maximum $PM_{2.5}$ concentration from construction exceed their respective BAAQMD single-source thresholds of greater than 10.0 per million for cancer risk and greater than 0.3 $\mu g/m^3$ for $PM_{2.5}$ concentration. Table 4 summarizes the maximum cancer risks, $PM_{2.5}$ concentrations, and health hazard indexes for project related construction activities affecting the MEIs.

Figure 1. Project Construction Site, Point Source Locations, Locations of Off-Site Sensitive Receptors, and TAC Impacts

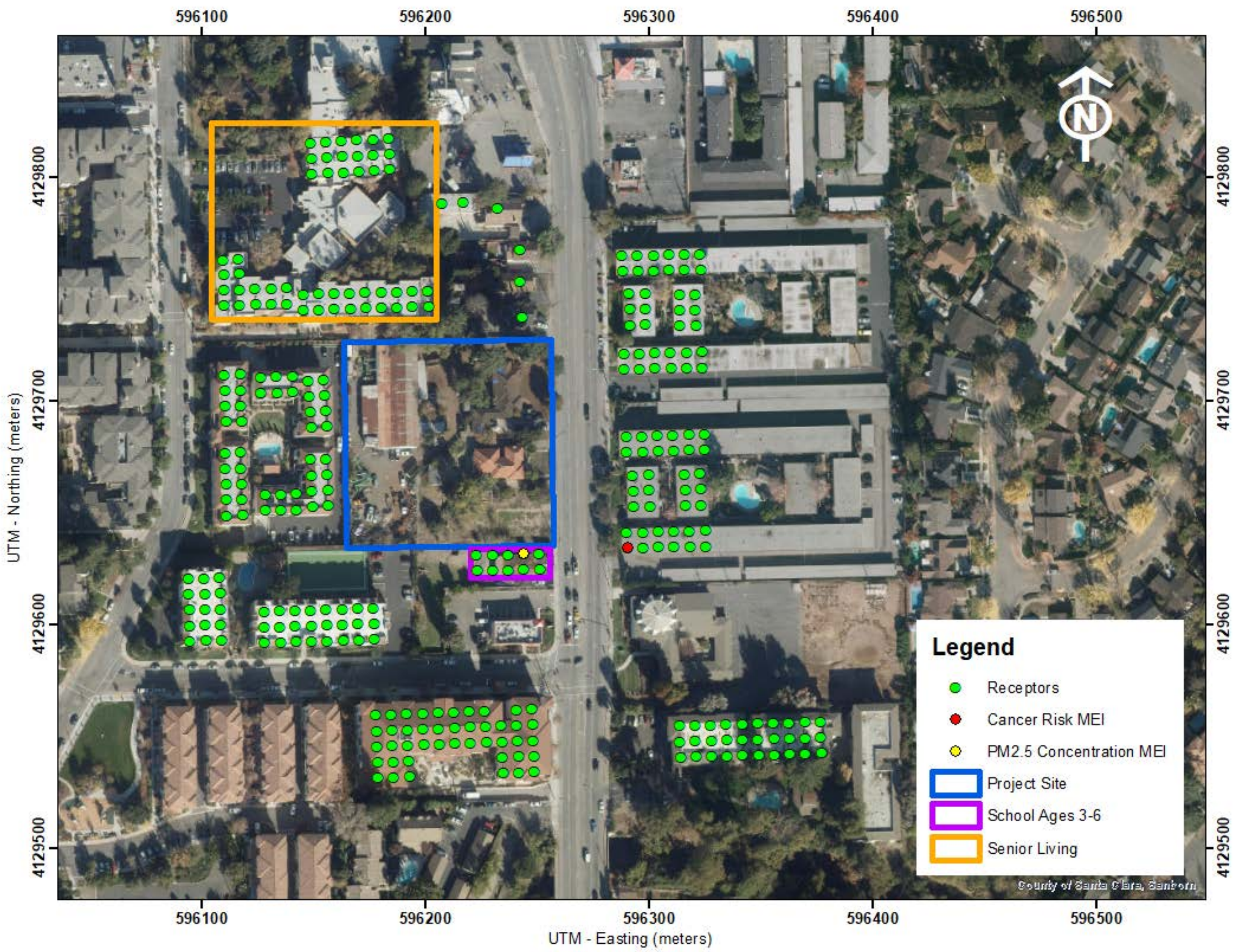


Table 4. Construction Risk Impacts at the Offsite MEIs

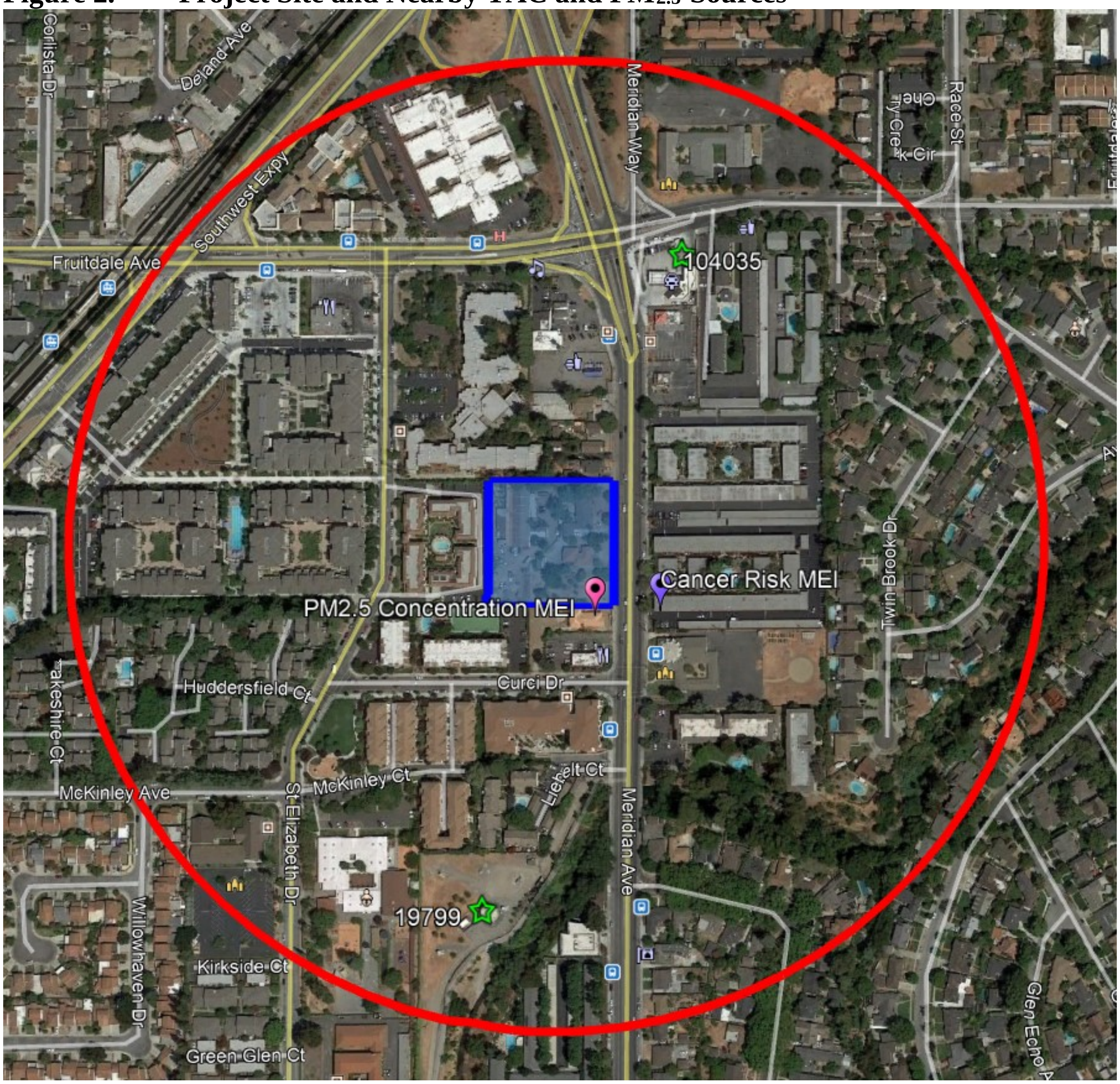
Source		Cancer Risk[1] (per million)	Annual $PM_{2.5}$[2] ($\mu g/m^3$)	Hazard Index[2]
Project Construction	Unmitigated Mitigated	**36.3 (infant)** 5.6 (infant)	**0.43** 0.12	0.06 0.01
	BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Significant?	Unmitigated Mitigated	***Yes*** *No*	***Yes*** *No*	*No* *No*

Notes: [1] Values at residential cancer risk MEI location.
[2] Values at school $PM_{2.5}$ concentration MEI location.

Combined Impact of All TAC Sources on the Off-Site Construction MEI

Community health risk assessments typically look at all substantial sources of TACs located within 1,000 feet of the project site and at new TAC sources that would be introduced by the project. These sources include highways, rail lines, busy surface streets, and stationary sources identified by BAAQMD. A review of the project area indicates that traffic on Meridian Avenue and Southwest Expressway have an average daily traffic (ADT) of over 10,000 vehicles. All other roadways within the area are assumed to have an ADT that is less than 10,000 vehicles. Two stationary sources were identified within the 1,000-foot influence area using BAAQMD's stationary source stationary source website map and Google Earth map. This project would not introduce any new TAC sources, such as substantial truck traffic or generators powered by diesel engines. Figure 2 shows the sources affecting the project site. Details of the screening, modeling, and community risk calculations are included in *Attachment 4.*

Figure 2. Project Site and Nearby TAC and $PM_{2.5}$ Sources



Local Roadways – Meridian Avenue and Southwest Expressway

For local roadways, BAAQMD has provided the *Roadway Screening Analysis Calculator* to assess whether roadways with traffic volumes of over 10,000 vehicles per day may have a potentially significant effect on a proposed project. Note this is a screening model and more refined modeling could be conducted if potentially significant impacts are identified. Two adjustments were made to the cancer risk predictions made by this calculator: (1) adjustment for latest vehicle emissions rates predicted using EMFAC2014 and (2) adjustment of cancer risk to reflect OEHHA guidance (see *Attachment 1*).

The calculator uses EMFAC2011 emission rates for the year 2014. However, a new version of the emissions factor model, EMFAC2014 is available. This version predicts lower emission rates. An adjustment factor of 0.5 was developed by comparing emission rates of total organic gases (TOG) for running exhaust and running losses developed using EMFAC2011 for year 2014 and those from EMFAC2014 for 2018. The predicted cancer risk was then adjusted using a factor of 1.3744 to account for new OEHHA guidance. This factor was provided by BAAQMD for use with their CEQA screening tools that are used to predict cancer risk.[10]

The ADT on Meridian Avenue was estimated to be 31,675 vehicles and the ADT on Southwest Expressway was estimated to be 16,370 vehicles. These estimates were based on traffic volumes included in the project's traffic analysis for background plus project conditions.[11] The AM and PM peak-hour volumes were averaged and then multiplied by 10 to estimate the ADT.

The BAAQMD *Roadway Screening Analysis Calculator* for Santa Clara County was used for these roadways. Meridian Avenue was identified as a north-south directional roadway with the cancer risk MEI located approximately 40 feet east of the roadway and the $PM_{2.5}$ concentration MEI located approximately 60 feet west of the roadway. Southwest Expressway was also identified as north-south directional roadway with both MEIs located approximately 1,000 feet east of the roadway. Estimated risk values for these roadways at the MEIs are listed in Table 5. Note that BAAQMD has found that non-cancer hazards from all local roadways would be well below the BAAQMD thresholds. Chronic or acute HI for the roadway would be below 0.03.

Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using BAAQMD's *Stationary Source Risk & Hazard Analysis Tool*. This mapping tool uses Google Earth and identifies the location of nearby stationary sources and their estimated risk and hazard impacts. In addition, *BAAQMD's Permitted Stationary Sources 2017* GIS website[12] was used to locate updated nearby permitted stationary sources. A Stationary Source Information Form (SSIF) containing the identified sources was prepared and submitted to BAAQMD. BAAQMD provided updated

[10] Correspondence with Alison Kirk, BAAQMD, November 23, 2015.
[11] Hexagon Transportation Consultants. *961-971 Meridian Avenue Mixed-Use Development Transportation Analysis.* August 2019.
[12] BAAQMD,
https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65

emissions data.[13] Those data were input into BAAQMD's *Risk and Hazards Emissions Screening Calculator* which computes the cancer risk, annual $PM_{2.5}$ concentrations, and HI using adjustments to account for new OEHHA guidance and distance from the sources.

Two stationary sources were identified; Plant #104035 is a gas station and Plant #21492 is a diesel-powered generator. Estimated risk values for these stationary sources at the MEIs are listed in Table 5.

Combined Community Health Risk at Off-site Construction MEI

Table 5 reports both the project and cumulative community risk impacts at the sensitive receptors most affected by construction (i.e. the construction MEIs). Without mitigation, the project would have a *significant* impact with respect to community risk caused by project construction activities, since the maximum cancer risk and $PM_{2.5}$ concentration do exceed their single-source thresholds. The combined annual cancer risk, $PM_{2.5}$ concentration, and Hazard risk values, which includes unmitigated and mitigated, would exceed their respective cumulative thresholds. However, with the incorporation of *Mitigation Measures AQ-1* and *AQ*-2, the project construction's single-source risk and cumulative risk would all be reduced to a *level-of-significance.*

Table 5. Impacts from Combined Sources at Off-Site Construction MEIs

Source		Cancer Risk[1] (per million)	Annual $PM_{2.5}$[2] ($\mu g/m^3$)	Hazard Index[2]
Project Construction	Unmitigated Mitigated	**36.3 (infant)** 5.6 (infant)	**0.43** 0.12	0.06 0.01
Meridian Avenue (north-south), ADT 31,675 40 feet east for Cancer MEI, 60 feet west for $PM_{2.5}$ MEI		15.6	0.25	<0.03
Southwest Expressway (north-south), ADT 16,370 1,000 feet east for both MEIs		0.6	0.02	<0.03
Plant #104035 (GDF) at 740 feet for both MEIs		0.1	--	<0.01
Plant #19799 (Generator) at 740 feet for both MEIs		6.1	0.01	<0.01
Combined Sources	Unmitigated Mitigated	58.7 (infant) 28.0 (infant)	0.71 0.40	<0.14 <0.09
	BAAQMD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Significant?	Unmitigated Mitigated	*No* *No*	*No* *No*	*No* *No*

Notes: [1] Values at residential cancer risk MEI location.
[2] Values at school $PM_{2.5}$ concentration MEI location.

***Mitigation Measure AQ-2*: Selection of equipment during construction to minimize emissions. Such equipment selection would include the following:**

The project shall develop a plan demonstrating that the off-road equipment used onsite to construct the project would achieve a fleet-wide average 75-percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

[13] Correspondence with Areana Flores, BAAQMD, July 18, 2019.

- All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 3 engines with CARB-certified Level 3 Diesel Particulate Filters[14] or equivalent. The use of equipment meeting U.S. EPA Tier 4 Interim standards would also meet this requirement. Alternatively, the use of equipment that includes electric or alternatively-fueled equipment (i.e., non-diesel) would meet this requirement.

Effectiveness of Mitigation Measure AQ-2

Implementation of *Mitigation Measure AQ-1* is considered to reduce exhaust emissions by 5 percent and fugitive dust emissions by over 50 percent. Implementation of *Mitigation Measure AQ-2* would further reduce on-site diesel exhaust emissions from construction equipment by 84percent. With mitigation, the computed maximum increased lifetime residential cancer risk from construction at the cancer risk MEI location, assuming infant exposure, would be 5.6 in one million or less. At the $PM_{2.5}$ concentration MEI location, the mitigated maximum annual $PM_{2.5}$ concentration would be 0.12 $\mu g/m^3$ and the Hazard Index would be 0.01. As a result, impacts would be reduced to *less-than-significant* with respect to community risk caused by construction activities.

<u>Operational Community Health Risk Impacts – New Project Residences</u>

Additionally, a health risk assessment was completed to assess the impact that existing TAC sources would have on the new proposed sensitive receptors that that project would introduce. The same TAC sources identified above were used in this HRA assessment.[15]

Local Roadways – Meridian Avenue and Southwest Expressway

The roadway analysis was conducted in the same manner for the new project sensitive receptors as described above for the construction MEIs. The project sensitive receptors would be located on the second floor of the project site. The second-floor project receptors would be 35 feet or further west of Meridian Avenue and approximately 880 feet east of Southwest Expressway. The health risk results are listed in Table 6.

Stationary Sources

The stationary source screening analysis for the project site receptors was conducted in the same manner as described above. The new project sensitive receptors would be approximately 425 feet away from the gas station and approximately 720 feet away from the diesel generator. Table 6 shows the health risk results.

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[14] See http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm

[15] We note that to the extent this analysis considers *existing* air quality issues in relation to the impact on *future residents* of the Project, it does so for informational purposes only pursuant to the judicial decisions in *CBIA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473, which confirm that the impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" such impacts.

Combined Community Health Risk at Project Site

Community risk impacts from the single and combined TAC sources upon the project site are reported in Table 6. The TAC sources are compared against the BAAQMD single-source threshold and then combined are compared against the BAAQMD cumulative-source threshold. As shown in Table 6, the sources do not exceed the single-source or cumulative source thresholds. There would be a *less-than-significant* impact upon the proposed project sensitive receptors from existing TAC sources.

Table 6. Community Risk Impact to New Project Residences

Source	Maximum Cancer Risk (per million)	Maximum Annual $PM_{2.5}$ ($\mu g/m^3$)	Maximum Hazard Index
Meridian Avenue (north-south) at 35 feet west ADT 31,675	9.9	0.29	<0.03
Southwest Expressway (north-south) at 880 feet east ADT 16,370	0.7	0.02	<0.03
Plant #104035 (GDF) at 425 feet	0.2	--	<0.01
Plant #19799 (Generator) at 720 feet	6.1	0.01	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	*No*	*No*	*No*
Cumulative Total	13.7	0.36	0.14
BAAQMD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Significant?	*No*	*No*	*No*

Greenhouse Gas Emissions

Setting

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semi-conductor manufacturing.

Each GHG has its own potency and effect upon the earth's energy balance. This is expressed in terms of a global warming potential (GWP), with CO_2 being assigned a value of 1 and sulfur hexafluoride being several orders of magnitude stronger. In GHG emission inventories, the weight of each gas is multiplied by its GWP and is measured in units of CO_2 equivalents (CO_2e).

An expanding body of scientific research supports the theory that global climate change is currently affecting changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

Recent Regulatory Actions

Assembly Bill 32 (AB 32), California Global Warming Solutions Act (2006)

AB 32, the Global Warming Solutions Act of 2006, codified the State's GHG emissions target by directing CARB to reduce the State's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, CEC, California Public Utilities Commission (CPUC), and Building Standards

Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the State's main strategies to reduce GHGs from business-as-usual emissions projected in 2020 back down to 1990 levels. Business-as-usual (BAU) is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

As directed by AB 32, CARB has also approved a statewide GHG emissions limit. On December 6, 2007, CARB staff resolved an amount of 427 million metric tons (MMT) of CO_2e as the total statewide GHG 1990 emissions level and 2020 emissions limit. The limit is a cumulative statewide limit, not a sector- or facility-specific limit. CARB updated the future 2020 BAU annual emissions forecast, in light of the economic downturn, to 545 MMT of CO_2e. Two GHG emissions reduction measures currently enacted that were not previously included in the 2008 Scoping Plan baseline inventory were included, further reducing the baseline inventory to 507 MMT of CO_2e. Thus, an estimated reduction of 80 MMT of CO_2e is necessary to reduce statewide emissions to meet the AB 32 target by 2020.

Senate Bill 375, California's Regional Transportation and Land Use Planning Efforts (2008)

California enacted legislation (SB 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 provides incentives for local governments and applicants to implement new conscientiously planned growth patterns. This includes incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows applicants to bypass certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Development of more alternative transportation options that would reduce vehicle trips and miles traveled, along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g. Association of Bay Area Governments [ABAG] and Metropolitan Transportation Commission [MTC]) to align their regional transportation, housing, and land use plans to reduce vehicle miles traveled and demonstrate the region's ability to attain its GHG reduction targets. A similar process is used to reduce transportation emissions of ozone precursor pollutants in the Bay Area.

SB 350 Renewable Portfolio Standards

In September 2015, the California Legislature passed SB 350, which increases the states Renewables Portfolio Standard (RPS) for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewables target by 2030.

Executive Order EO-B-30-15 (2015) and SB 32 GHG Reduction Targets

In April 2015, Governor Brown signed Executive Order which extended the goals of AB 32, setting a greenhouse gas emissions target at 40 percent of 1990 levels by 2030. On September 8, 2016, Governor Brown signed SB 32, which legislatively established the GHG reduction target of 40 percent of 1990 levels by 2030. In November 2017, CARB issued *California's 2017 Climate Change Scoping Plan*. While the State is on track to exceed the AB 32 scoping plan 2020 targets, this plan is an update to reflect the enacted SB 32 reduction target.

SB 32 was passed in 2016, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. CARB is currently working on a second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32. The proposed Scoping Plan Update was published on January 20, 2017 as directed by SB 32 companion legislation AB 197. The mid-term 2030 target is considered critical by CARB on the path to obtaining an even deeper GHG emissions target of 80 percent below 1990 levels by 2050, as directed in Executive Order S-3-05. The Scoping Plan outlines the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure, providing a blueprint to continue driving down GHG emissions and obtain the statewide goals.

The new Scoping Plan establishes a strategy that will reduce GHG emissions in California to meet the 2030 target (note that the AB 32 Scoping Plan only addressed 2020 targets and a long-term goal). Key features of this plan are:

- Cap and Trade program places a firm limit on 80 percent of the State's emissions;
- Achieving a 50-percent Renewable Portfolio Standard by 2030 (currently at about 29 percent statewide);
- Increase energy efficiency in existing buildings;
- Develop fuels with an 18-percent reduction in carbon intensity;
- Develop more high-density, transit-oriented housing;
- Develop walkable and bikable communities;
- Greatly increase the number of electric vehicles on the road and reduce oil demand in half;
- Increase zero-emissions transit so that 100 percent of new buses are zero emissions;
- Reduce freight-related emissions by transitioning to zero emissions where feasible and near-zero emissions with renewable fuels everywhere else; and
- Reduce "super pollutants" by reducing methane and hydrofluorocarbons or HFCs by 40 percent.

In the updated Scoping Plan, CARB recommends statewide targets of no more than 6 metric tons CO_2e per capita (statewide) by 2030 and no more than 2 metric tons CO_2e per capita by 2050. The statewide per capita targets account for all emissions sectors in the State, statewide population forecasts, and the statewide reductions necessary to achieve the 2030 statewide target under SB 32 and the longer-term State emissions reduction goal of 80 percent below 1990 levels by 2050.

City of San Jose Greenhouse Gas Reduction Strategy

The Greenhouse Gas Reduction Strategy (GHGRS) was a document prepared by the City of San José to help the City to quantify, reduce, and manage their GHG emissions.[16] The GHGRS was prepared alongside the *Envision San José 2040 General Plan Update* to ensure that the General Plan aligned with AB32. The City uses the following 'Plan-level' GHG significance threshold to reduce GHG emissions to meet the 2020 goal of AB32: 6.6 metric tons of CO_2 equivalent per service population per year (MT CO_2e / SP / year). Service population is defined as the number of residents plus the number of people working within San José. The City has also estimated an efficiency threshold of 3.04 MT CO_2e /SP for 2035. However, since this project would be operational post-2020, the 2020 efficiency threshold is not appropriate. This analysis uses an efficiency threshold for projects operational post-2020 that is more aggressive than the 2035 efficiency threshold proposed by the City of San José. Additionally, the GHGRS has several measures that would implemented, monitored, and enforced by the City. These policies and measures are listed as attachments in the GHGRS. New development projects are subject to the greenhouse gas policies s listed in Attachment B and D of the GHGRS.

BAAQMD Significance Thresholds

The BAAQMD's CEQA Air Quality Guidelines do not use quantified thresholds for projects that are in a jurisdiction with a qualified GHG reductions plan (i.e., a Climate Action Plan). The plan has to address emissions associated with the period that the project would operate (e.g., beyond year 2020). For quantified emissions, the guidelines recommended a GHG threshold of 1,100 metric tons or 4.6 metric tons (MT) per capita. These thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. Development of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate.

Although BAAQMD has not published a quantified threshold for 2030 yet, this assessment uses a "Substantial Progress" efficiency metric of 2.6 MT CO_2e/year/service population and a bright-line threshold of 660 MT CO_{2e}/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.6 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. [17] The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO_{2e}/year threshold.

Impact: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

[16] City of San José, 2011. *Greenhouse Gas Reduction Strategy for the City of San José*. June (updated December 2015). http://www.sanjoseca.gov/documentcenter/view/9388

[17] Association of Environmental Professionals, 2016. *Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*. April.

Emissions for the proposed project are discussed below and were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines.

CalEEMod Modeling

CalEEMod was used to predict GHG emissions from operation of the site assuming full build-out of the project. The project land use types and size and other project-specific information were input to the model, as described above within the operational period emissions. CalEEMod output is included in *Attachment 2*.

Service Population Emissions

The project service population efficiency rate is based on the number of future residents and future employees. For this project, the number of future residents was estimated by multiplying the total number of units (e.g. 233 units) by the persons per household rate for the City of San José found in the California Department of Finance Population and Housing Estimate report.[18] Using the 3.20 person per household 2019 rate, the number of futures residents is estimated to be 746 residents. The number of future employees is based on a rate of one employee per 250 square feet.[19] Using this rate and 1,780-sf of commercial use, the number of future employees would be 7 employees. The total service population would be 753 individuals.

Construction Emissions

GHG emissions associated with construction were computed to be 775 MT of CO_2e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

Operational Emissions

The CalEEMod model, along with the project vehicle trip generation rates, was used to estimate daily emissions associated with operation of the fully-developed site under the proposed project. As shown in Table 7, the annual emissions resulting from operation of the proposed project are predicted to be 1,235 MT of CO_2e for the year 2023 and 1,094 MT of CO_{2e} for the year 2030. The Service Population Emissions for the year 2023 would be 1.6 and 1.5 MT CO_{2e}/year/service population for the year 2030.

To be considered significant, the project must exceed both the GHG significance threshold in metric tons per year and the service population significance threshold. The 2023 and 2030 emissions do exceed the 2030 "bright-line" threshold of 660 MT of CO_{2e}/year. However, the 2023

[18] State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011-2019*. Sacramento, California, May 2019.
[19] Strategic Economics, Inc., 2016. *San Jose market Overview and Employment Land Analysis*. January.

and 2030 per capita emissions do not exceed the "Substantial Progress" efficiency metric of 2.6 MT CO_2e/year/service population. Therefore, the project would have a *less-than-significant* impact regarding GHG emissions.

Table 7. Annual Project GHG Emissions (CO_2e) in Metric Tons and Per Capita

Source Category	Proposed Project	
	2023	**2030**
Area	12	12
Energy Consumption	320	320
Mobile	823	682
Solid Waste Generation	55	55
Water Usage	25	25
Total (MT CO_2e/yr)	**1,235**	**1,094**
Significance Threshold	***660 MT CO_2e/yr***	
Service Population Emissions (MT CO2e/year/service population)	1.6	1.5
Significance Threshold	***2.6 in 2030***	
Significant (exceed both thresholds)?	*No*	*No*

Impact: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The proposed project would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's Scoping Plan. For example, proposed buildings would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures and water-efficient irrigation systems.

Additionally, the project would implement and comply with the greenhouse gas reduction policies found in the *Envisions San José 2040 General Plan Policy*, which are also found in GHGRS as Attachment B. The project is also subject to the GHG reduction strategies listed in the *Greenhouse Gas Reduction Strategy Implementation Tracking* (Attachment D) tool in the GHGRS. The project would implement and comply with all relevant GHG reduction measures as determined by the City.

Supporting Documentation

Attachment 1 is the methodology used to compute community risk impacts, including the methods to compute lifetime cancer risk from exposure to project emissions.

Attachment 2 includes the CalEEMod output for project construction and operational criteria air pollutant and GHG emissions. The operational outputs for 2030 uses are also included in this attachment. Also included are any modeling assumptions.

Attachment 3 is the construction health risk assessment. AERMOD dispersion modeling files for this assessment, which are quite voluminous, are available upon request and would be provided in digital format

Attachment 4 includes the screening community risk calculations, modeling results, and health risk calculations from sources affecting the project and construction MEIs.

Attachment 1: Health Risk Calculation Methodology

Health Risk Calculation Methodology

A health risk assessment (HRA) for exposure to Toxic Air Contaminates (TACs) requires the application of a risk characterization model to the results from the air dispersion model to estimate potential health risk at each sensitive receptor location. The State of California Office of Environmental Health Hazard Assessment (OEHHA) and California Air Resources Board (CARB) develop recommended methods for conducting health risk assessments. The most recent OEHHA risk assessment guidelines were published in February of 2015.[20] These guidelines incorporate substantial changes designed to provide for enhanced protection of children, as required by State law, compared to previous published risk assessment guidelines. CARB has provided additional guidance on implementing OEHHA's recommended methods.[21] This HRA used the 2015 OEHHA risk assessment guidelines and CARB guidance. The BAAQMD has adopted recommended procedures for applying the newest OEHHA guidelines as part of Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants.[22] Exposure parameters from the OEHHA guidelines and the recent BAAQMD HRA Guidelines were used in this evaluation.

Cancer Risk

Potential increased cancer risk from inhalation of TACs are calculated based on the TAC concentration over the period of exposure, inhalation dose, the TAC cancer potency factor, and an age sensitivity factor to reflect the greater sensitivity of infants and children to cancer causing TACs. The inhalation dose depends on a person's breathing rate, exposure time and frequency and duration of exposure. These parameters vary depending on the age, or age range, of the persons being exposed and whether the exposure is considered to occur at a residential location or other sensitive receptor location.

The current OEHHA guidance recommends that cancer risk be calculated by age groups to account for different breathing rates and sensitivity to TACs. Specifically, they recommend evaluating risks for the third trimester of pregnancy to age zero, ages zero to less than two (infant exposure), ages two to less than 16 (child exposure), and ages 16 to 70 (adult exposure). Age sensitivity factors (ASFs) associated with the different types of exposure are an ASF of 10 for the third trimester and infant exposures, an ASF of 3 for a child exposure, and an ASF of 1 for an adult exposure. Also associated with each exposure type are different breathing rates, expressed as liters per kilogram of body weight per day (L/kg-day). As recommended by the BAAQMD for residential exposures, 95th percentile breathing rates are used for the third trimester and infant exposures, and 80th percentile breathing rates for child and adult exposures. For children at schools

[20] OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

[21] CARB, 2015. *Risk Management Guidance for Stationary Sources of Air Toxics*. July 23.

[22] BAAQMD, 2016. *BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*. December 2016.

and daycare facilities, BAAQMD recommends using the 95th percentile breathing rates. Additionally, CARB and the BAAQMD recommend the use of a residential exposure duration of 30 years for sources with long-term emissions (e.g., roadways). For workers, assumed to be adults, a 25-year exposure period is recommended by the BAAQMD.

Under previous OEHHA and BAAQMD HRA guidance, residential receptors are assumed to be at their home 24 hours a day, or 100 percent of the time. In the 2015 Risk Assessment Guidance, OEHHA includes adjustments to exposure duration to account for the fraction of time at home (FAH), which can be less than 100 percent of the time, based on updated population and activity statistics. The FAH factors are age-specific and are: 0.85 for third trimester of pregnancy to less than 2 years old, 0.72 for ages 2 to less than 16 years, and 0.73 for ages 16 to 70 years. Use of the FAH factors is allowed by the BAAQMD if there are no schools in the project vicinity that would have a cancer risk of one in a million or greater assuming 100 percent exposure (FAH = 1.0).

Functionally, cancer risk is calculated using the following parameters and formulas:

Cancer Risk (per million) = $CPF \times Inhalation\ Dose \times ASF \times ED/AT \times FAH \times 10^6$

Where:

CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = $C_{air} \times DBR \times A \times (EF/365) \times 10^{-6}$

Where:

C_{air} = concentration in air ($\mu g/m^3$)
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

The health risk parameters used in this evaluation are summarized as follows:

Parameter	***Exposure Type →***	**Infant**		**Child**		**Adult**
	Age Range →	**3rd Trimester**	**0<2**	**2 < 9**	**2 < 16**	**16 - 30**
DPM Cancer Potency Factor $(mg/kg\text{-}day)^{-1}$		1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
Daily Breathing Rate (L/kg-day) 80th Percentile Rate		273	758	631	572	261
Daily Breathing Rate (L/kg-day) 95th Percentile Rate		361	1,090	861	745	335
Inhalation Absorption Factor		1	1	1	1	1
Averaging Time (years)		70	70	70	70	70
Exposure Duration (years)		0.25	2	14	14	14
Exposure Frequency (days/year)		350	350	350	350	350
Age Sensitivity Factor		10	10	3	3	1
Fraction of Time at Home		0.85-1.0	0.85-1.0	0.72-1.0	0.72-1.0	0.73

Non-Cancer Hazards

Potential non-cancer health hazards from TAC exposure are expressed in terms of a hazard index (HI), which is the ratio of the TAC concentration to a reference exposure level (REL). OEHHA has defined acceptable concentration levels for contaminants that pose non-cancer health hazards. TAC concentrations below the REL are not expected to cause adverse health impacts, even for sensitive individuals. The total HI is calculated as the sum of the HIs for each TAC evaluated and the total HI is compared to the BAAQMD significance thresholds to determine whether a significant non-cancer health impact from a project would occur.

Typically, for residential projects located near roadways with substantial TAC emissions, the primary TAC of concern with non-cancer health effects is diesel particulate matter (DPM). For DPM, the chronic inhalation REL is 5 micrograms per cubic meter ($\mu g/m^3$).

Annual $PM_{2.5}$ Concentrations

While not a TAC, fine particulate matter ($PM_{2.5}$) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under the California Environmental Quality Act (CEQA). The thresholds of significance for $PM_{2.5}$ (project level and cumulative) are in terms of an increase in the annual average concentration. When considering $PM_{2.5}$ impacts, the contribution from all sources of $PM_{2.5}$ emissions should be included. For projects with potential impacts from nearby local roadways, the $PM_{2.5}$ impacts should include those from vehicle exhaust emissions, $PM_{2.5}$ generated from vehicle tire and brake wear, and fugitive emissions from re-suspended dust on the roads.

Attachment 2: CalEEMod Modeling Output

Attachment 3: Construction Health Risk Calculations

961-971 Meridian Ave, San Jose, CA

DPM Emissions and Modeling Emission Rates - Unmitigated

Construction Year	Activity	DPM (ton/year)	Area Source	DPM Emissions (lb/yr)	(lb/hr)	(g/s)	Modeled Area (m^2)	DPM Emission Rate ($g/s/m^2$)
2021	Construction	0.0710	CON_DPM	142.0	0.04323	5.45E-03	8516.454	6.40E-07
2022	Construction	0.0117	CON_DPM	23.4	0.00712	8.98E-04	8516.454	1.05E-07
Total		***0.0827***	#	***165.4***	***0.0504***	***0.0063***		

Construction Hours

hr/day = 9 (7am - 4pm)

days/yr = 365

hours/year = 3285

961-971 Meridian Ave, San Jose, CA

PM2.5 Fugitive Dust Emissions for Modeling - Unmitigated

Construction Year	Activity	Area Source	PM2.5 Emissions (ton/year)	(lb/yr)	(lb/hr)	(g/s)	Modeled Area (m^2)	PM2.5 Emission Rate $g/s/m^2$
2021	Construction	CON_FUG	0.0152	30.4	0.00925	1.17E-03	8,516.5	1.37E-07
2022	Construction	CON_FUG	0.0014	2.7	0.00083	1.04E-04	8,516.5	1.23E-08
Total			***0.0166***	***33.1***	***0.0101***	***0.0013***		

Construction Hours

hr/day = 9 (7am - 4pm)

days/yr = 365

hours/year = 3285

DPM Construction Emissions and Modeling Emission Rates - With Mitigation

Construction Year	Activity	DPM (ton/year)	Area Source	DPM Emissions (lb/yr)	(lb/hr)	(g/s)	Modeled Area (m^2)	DPM Emission Rate ($g/s/m^2$)
2021	Construction	0.0099	CON_DPM	19.9	0.00605	7.63E-04	8516.454	8.95E-08
2022	Construction	0.0029	CON_DPM	5.8	0.00177	2.22E-04	8516.454	2.61E-08
Total		***0.0128***	#	***25.7***	***0.0078***	***0.0010***		

Construction Hours

hr/day = 9 (7am - 4pm)

days/yr = 365

hours/year = 3285

PM2.5 Fugitive Dust Construction Emissions for Modeling - With Mitigation

Construction Year	Activity	Area Source	PM2.5 Emissions (ton/year)	(lb/yr)	(lb/hr)	(g/s)	Modeled Area (m^2)	PM2.5 Emission Rate $g/s/m^2$
2021	Construction	CON_FUG	0.0080	16.1	0.00489	6.17E-04	8,516.5	7.24E-08
2022	Construction	CON_FUG	0.0014	2.7	0.00083	1.04E-04	8,516.5	1.23E-08
Total			***0.0094***	***18.8***	***0.0057***	***0.0007***		

Construction Hours		
hr/day =	9	(7am - 4pm)
days/yr =	365	
hours/year =	3285	

961-971 Meridian Ave, San Jose, CA - Construction Health Impact Summary

Maximum Impacts at MEI Location - Unmitigated

Emissions Year	Maximum Concentrations: Exhaust PM10/DPM ($\mu g/m^3$)	Fugitive PM2.5 ($\mu g/m^3$)	Cancer Risk (per million): Infant/Child	Adult	Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu g/m^3$)
2021	0.17706	0.04746	31.5	0.5	0.04	0.22
2022	0.02905	0.00426	4.8	0.1	0.01	0.03
Total	-	-	**36.3**	**0.6**	-	-
Maximum	0.1771	0.0475	**-**	**-**	**0.04**	**0.22**

Maximum Impacts at MEI Location - With Mitigation

Emissions Year	Maximum Concentrations: Exhaust PM10/DPM ($\mu g/m^3$)	Fugitive PM2.5 ($\mu g/m^3$)	Cancer Risk (per million): Infant/Child	Adult	Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu g/m^3$)
2021	0.02476	0.02508	4.4	0.07	0.005	0.05
2022	0.00722	0.00426	1.2	0.02	0.001	0.01
Total	-	-	**5.6**	**0.09**	-	-
Maximum	0.0248	0.0251	**-**	**-**	**0.005**	**0.05**

- Tier 3 DPF 3 Mitigation

Maximum Impacts at San Jose Montessori School - Unmitigated

Construction Year	Unmitigated Emissions				
	Maximum Concentrations				
	Exhaust PM2.5/DPM ($\mu g/m^3$)	Fugitive PM2.5 ($\mu g/m^3$)	Infant/Child Cancer Risk (per million)	Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu g/m^3$)
2021	0.2787	0.1469	10.8	0.06	0.43
2022	0.0457	0.0132	1.8	0.01	0.06
Total	-	-	**12.6**	-	-
Maximum	0.2787	0.1469	-	**0.06**	**0.43**

Maximum Impacts at San Jose Montessori School - Mitigated

Construction Year	Unmitigated Emissions				
	Maximum Concentrations				
	Exhaust PM2.5/DPM ($\mu g/m^3$)	Fugitive PM2.5 ($\mu g/m^3$)	Infant/Child Cancer Risk (per million)	Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu g/m^3$)
2021	0.0390	0.0776	1.5	0.01	0.12
2022	0.0114	0.0132	0.4	0.002	0.02
Total	-	-	**2.0**	-	-
Maximum	0.0390	0.0776	-	**0.01**	**0.12**

- Tier 3 DPF 3 Mitigation

Maximum Impacts at Chai House Senior Living - Unmitigated

Construction Year	Unmitigated Emissions				
	Maximum Concentrations				
	Exhaust PM2.5/DPM ($\mu g/m^3$)	Fugitive PM2.5 ($\mu g/m^3$)	Adult Cancer Risk (per million)	Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu g/m^3$)
2021	0.1466	0.0563	0.42	0.03	0.20
2022	0.0241	0.0051	0.07	0.005	0.03
Total	-	-	**0.49**	-	-
Maximum	0.1466	0.0563	-	**0.03**	**0.20**

3411 Capitol Ave, Fremont, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction
Impacts at Off-Site MEI Location - 1.5 meter receptor height

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air ($\mu g/m^3$)
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				Adult
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information: DPM Conc (ug/m3) Year	Annual	Age Sensitivity Factor	Infant/Child Cancer Risk (per million)	Adult - Exposure Information: Modeled DPM Conc (ug/m3) Year	Annual	Age Sensitivity Factor	Adult Cancer Risk (per million)	Maximum Fugitive PM2.5	Maximum Total PM2.5
0	0.25	-0.25 - 0*	2021	0.1771	10	2.41	2021	0.1771	-	-		
1	1	0 - 1	2021	0.1771	10	29.08	2021	0.1771	1	0.51	0.0475	0.2245
2	1	1 - 2	2022	0.0291	10	4.77	2022	0.0291	1	0.08	0.0043	0.0333
3	1	2 - 3	0	0.0000	3	0.00		0.0000	1	0.00		
4	1	3 - 4	0	0.0000	3	0.00		0.0000	1	0.00		
5	1	4 - 5	0	0.0000	3	0.00		0.0000	1	0.00		
6	1	5 - 6	0	0.0000	3	0.00		0.0000	1	0.00		
7	1	6 - 7	0	0.0000	3	0.00		0.0000	1	0.00		
8	1	7 - 8	0	0.0000	3	0.00		0.0000	1	0.00		
9	1	8 - 9	0	0.0000	3	0.00		0.0000	1	0.00		
10	1	9 - 10	0	0.0000	3	0.00		0.0000	1	0.00		
11	1	10 - 11	0	0.0000	3	0.00		0.0000	1	0.00		
12	1	11 - 12	0	0.0000	3	0.00		0.0000	1	0.00		
13	1	12 - 13	0	0.0000	3	0.00		0.0000	1	0.00		
14	1	13 - 14	0	0.0000	3	0.00		0.0000	1	0.00		
15	1	14 - 15	0	0.0000	3	0.00		0.0000	1	0.00		
16	1	15 - 16	0	0.0000	3	0.00		0.0000	1	0.00		
17	1	16-17	0	0.0000	1	0.00		0.0000	1	0.00		
18	1	17-18	0	0.0000	1	0.00		0.0000	1	0.00		
19	1	18-19	0	0.0000	1	0.00		0.0000	1	0.00		
20	1	19-20	0	0.0000	1	0.00		0.0000	1	0.00		
21	1	20-21	0	0.0000	1	0.00		0.0000	1	0.00		
22	1	21-22	0	0.0000	1	0.00		0.0000	1	0.00		
23	1	22-23	0	0.0000	1	0.00		0.0000	1	0.00		
24	1	23-24	0	0.0000	1	0.00		0.0000	1	0.00		
25	1	24-25	0	0.0000	1	0.00		0.0000	1	0.00		
26	1	25-26	0	0.0000	1	0.00		0.0000	1	0.00		
27	1	26-27	0	0.0000	1	0.00		0.0000	1	0.00		
28	1	27-28	0	0.0000	1	0.00		0.0000	1	0.00		
29	1	28-29	0	0.0000	1	0.00		0.0000	1	0.00		
30	1	29-30	0	0.0000	1	0.00		0.0000	1	0.00		
Total Increased Cancer Risk						**36.3**				**0.59**		

* Third trimester of pregnancy

3411 Capitol Ave, Fremont, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction
Impacts at Off-Site MEI Location - 4.5 meter receptor height

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air $(\mu g/m^3)$
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				Adult
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

			Infant/Child - Exposure Information			Infant/Child	Adult - Exposure Information			Adult		
	Exposure				Age	Cancer	Modeled		Age	Cancer	Maximum	
Exposure	Duration		DPM Conc (ug/m3)		Sensitivity	Risk	DPM Conc (ug/m3)		Sensitivity	Risk	Fugitive	Total
Year	(years)	Age	Year	Annual	Factor	(per million)	Year	Annual	Factor	(per million)	PM2.5	PM2.5
0	0.25	-0.25 - 0*	2021	0.1557	10	2.12	2021	0.1557	-	-		
1	1	0 - 1	2021	0.1557	10	25.57	2021	0.1557	1	0.45	0.0384	0.1941
2	1	1 - 2	2022	0.0256	10	4.20	2022	0.0256	1	0.07	0.0034	0.0290
3	1	2 - 3	0	0.0000	3	0.00		0.0000	1	0.00		
4	1	3 - 4	0	0.0000	3	0.00		0.0000	1	0.00		
5	1	4 - 5	0	0.0000	3	0.00		0.0000	1	0.00		
6	1	5 - 6	0	0.0000	3	0.00		0.0000	1	0.00		
7	1	6 - 7	0	0.0000	3	0.00		0.0000	1	0.00		
8	1	7 - 8	0	0.0000	3	0.00		0.0000	1	0.00		
9	1	8 - 9	0	0.0000	3	0.00		0.0000	1	0.00		
10	1	9 - 10	0	0.0000	3	0.00		0.0000	1	0.00		
11	1	10 - 11	0	0.0000	3	0.00		0.0000	1	0.00		
12	1	11 - 12	0	0.0000	3	0.00		0.0000	1	0.00		
13	1	12 - 13	0	0.0000	3	0.00		0.0000	1	0.00		
14	1	13 - 14	0	0.0000	3	0.00		0.0000	1	0.00		
15	1	14 - 15	0	0.0000	3	0.00		0.0000	1	0.00		
16	1	15 - 16	0	0.0000	3	0.00		0.0000	1	0.00		
17	1	16-17	0	0.0000	1	0.00		0.0000	1	0.00		
18	1	17-18	0	0.0000	1	0.00		0.0000	1	0.00		
19	1	18-19	0	0.0000	1	0.00		0.0000	1	0.00		
20	1	19-20	0	0.0000	1	0.00		0.0000	1	0.00		
21	1	20-21	0	0.0000	1	0.00		0.0000	1	0.00		
22	1	21-22	0	0.0000	1	0.00		0.0000	1	0.00		
23	1	22-23	0	0.0000	1	0.00		0.0000	1	0.00		
24	1	23-24	0	0.0000	1	0.00		0.0000	1	0.00		
25	1	24-25	0	0.0000	1	0.00		0.0000	1	0.00		
26	1	25-26	0	0.0000	1	0.00		0.0000	1	0.00		
27	1	26-27	0	0.0000	1	0.00		0.0000	1	0.00		
28	1	27-28	0	0.0000	1	0.00		0.0000	1	0.00		
29	1	28-29	0	0.0000	1	0.00		0.0000	1	0.00		
30	1	29-30	0	0.0000	1	0.00		0.0000	1	0.00		
Total Increased Cancer Risk						**31.9**				**0.52**		

* Third trimester of pregnancy

San Jose Montessori School, San Jose, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk Calculations From Construction
Learning Center - 1.0 meters - Child Exposure

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air $(\mu g/m^3)$
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				Adult
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and school children and 80th percentile adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	Exposure Duration (years)	Child - Exposure Information: DPM Conc (ug/m3) Year	Annual	Age* Sensitivity Factor	Child Cancer Risk (per million)	Maximum Fugitive PM2.5	Maximum Total PM2.5
1	1	2021	0.2787	3	10.8	0.1469	0.4252
2	1	2022	0.0457	3	1.8	0.0132	0.0588
Total Increased Cancer Risk					**12.6**		

* Students assumed to be from 3 to 6 years

Chai House, San Jose, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk Calculations From Construction
Senior Apartments - 1.5 meters - Adult Only Exposure

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air $(\mu g/m^3)$
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				**Adult**
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and school children and 80th percentile adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	**Exposure Duration (years)**	**Adult - Exposure Information** DPM Conc (ug/m3) Year	Annual	**Age* Sensitivity Factor**	**Adult Cancer Risk (per million)**	**Maximum Fugitive PM2.5**	**Maximum Total PM2.5**
1	1	2021	0.1466	1	0.42	0.0563	0.2029
2	1	2022	0.0241	1	0.07	0.0051	0.0291
Total Increased Cancer Risk					**0.49**		

* Senior adults only, no infants or children.

Chai House, San Jose, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk Calculations From Construction
Senior Apartments - 4.5 meters - Adult Only Exposure

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air $(\mu g/m^3)$
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				**Adult**
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and school children and 80th percentile adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	**Exposure Duration (years)**	**Adult - Exposure Information** DPM Conc (ug/m3) Year	Annual	**Age* Sensitivity Factor**	**Adult Cancer Risk (per million)**	**Maximum** Fugitive PM2.5	**Maximum** Total PM2.5
1	1	2021	0.1595	1	0.46	0.0402	0.1997
2	1	2022	0.0262	1	0.08	0.0036	0.0298
Total Increased Cancer Risk					**0.53**		

* Senior adults only, no infants or children.

Chai House, San Jose, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk Calculations From Construction
Senior Apartments - 7 meters - Adult Only Exposure

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air ($\mu g/m^3$)
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				**Adult**
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and school children and 80th percentile adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	**Exposure Duration (years)**	**Adult - Exposure Information**			**Adult Cancer Risk (per million)**	**Maximum**	
		DPM Conc (ug/m3)		**Age* Sensitivity Factor**		**Fugitive PM2.5**	**Total PM2.5**
		Year	**Annual**				
1	1	2021	0.1448	1	0.42	0.0246	0.1693
2	1	2022	0.0238	1	0.07	0.0022	0.0260
Total Increased Cancer Risk					**0.48**		

* Senior adults only, no infants or children.

3411 Capitol Ave, Fremont, CA - Construction Impacts - With Mitigation
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction Impacts at Off-Site MEI Location - 1.5 meter receptor height

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air $(\mu g/m^3)$
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				Adult
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

			Infant/Child - Exposure Information			Infant/Child	Adult - Exposure Information			Adult	Maximum	
	Exposure				**Age**	**Cancer**	**Modeled**		**Age**	**Cancer**		
Exposure	**Duration**		**DPM Conc (ug/m3)**		**Sensitivity**	**Risk**	**DPM Conc (ug/m3)**		**Sensitivity**	**Risk**	**Fugitive**	**Total**
Year	**(years)**	**Age**	**Year**	**Annual**	**Factor**	**(per million)**	**Year**	**Annual**	**Factor**	**(per million)**	**PM2.5**	**PM2.5**
0	0.25	-0.25 - 0*	2021	0.0248	10	0.34	2021	0.0248	-	-		
1	1	0 - 1	2021	0.0248	10	4.07	2021	0.0248	1	0.07	0.0251	0.0498
2	1	1 - 2	2022	0.0072	10	1.19	2022	0.0072	1	0.02	0.0043	0.0115
3	1	2 - 3	0	0.0000	3	0.00		0.0000	1	0.00		
4	1	3 - 4	0	0.0000	3	0.00		0.0000	1	0.00		
5	1	4 - 5	0	0.0000	3	0.00		0.0000	1	0.00		
6	1	5 - 6	0	0.0000	3	0.00		0.0000	1	0.00		
7	1	6 - 7	0	0.0000	3	0.00		0.0000	1	0.00		
8	1	7 - 8	0	0.0000	3	0.00		0.0000	1	0.00		
9	1	8 - 9	0	0.0000	3	0.00		0.0000	1	0.00		
10	1	9 - 10	0	0.0000	3	0.00		0.0000	1	0.00		
11	1	10 - 11	0	0.0000	3	0.00		0.0000	1	0.00		
12	1	11 - 12	0	0.0000	3	0.00		0.0000	1	0.00		
13	1	12 - 13	0	0.0000	3	0.00		0.0000	1	0.00		
14	1	13 - 14	0	0.0000	3	0.00		0.0000	1	0.00		
15	1	14 - 15	0	0.0000	3	0.00		0.0000	1	0.00		
16	1	15 - 16	0	0.0000	3	0.00		0.0000	1	0.00		
17	1	16-17	0	0.0000	1	0.00		0.0000	1	0.00		
18	1	17-18	0	0.0000	1	0.00		0.0000	1	0.00		
19	1	18-19	0	0.0000	1	0.00		0.0000	1	0.00		
20	1	19-20	0	0.0000	1	0.00		0.0000	1	0.00		
21	1	20-21	0	0.0000	1	0.00		0.0000	1	0.00		
22	1	21-22	0	0.0000	1	0.00		0.0000	1	0.00		
23	1	22-23	0	0.0000	1	0.00		0.0000	1	0.00		
24	1	23-24	0	0.0000	1	0.00		0.0000	1	0.00		
25	1	24-25	0	0.0000	1	0.00		0.0000	1	0.00		
26	1	25-26	0	0.0000	1	0.00		0.0000	1	0.00		
27	1	26-27	0	0.0000	1	0.00		0.0000	1	0.00		
28	1	27-28	0	0.0000	1	0.00		0.0000	1	0.00		
29	1	28-29	0	0.0000	1	0.00		0.0000	1	0.00		
30	1	29-30	0	0.0000	1	0.00		0.0000	1	0.00		
Total Increased Cancer Risk						**5.6**				**0.09**		

* Third trimester of pregnancy

San Jose Montessori School, San Jose, CA - Construction Impacts - With Mitigation
Maximum DPM Cancer Risk Calculations From Construction
Learning Center - 1.0 meters - Child Exposure

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor $(mg/kg\text{-}day)^{-1}$
ASF = Age sensitivity factor for specified age group
ED = Exposure duration (years)
AT = Averaging time for lifetime cancer risk (years)
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10^{-6}

Where: C_{air} = concentration in air ($\mu g/m^3$)
DBR = daily breathing rate (L/kg body weight-day)
A = Inhalation absorption factor
EF = Exposure frequency (days/year)
10^{-6} = Conversion factor

Values

	Infant/Child				**Adult**
Age -->	**3rd Trimester**	**0 - 2**	**2 - 9**	**2 - 16**	**16 - 30**
Parameter					
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	861	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and school children and 80th percentile adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	**Exposure Duration (years)**	**Child - Exposure Information: DPM Conc (ug/m3) Year**	**DPM Conc (ug/m3) Annual**	**Age* Sensitivity Factor**	**Child Cancer Risk (per million)**		**Maximum Fugitive PM2.5**	**Maximum Total PM2.5**
1	1	2021	0.0390	3	1.5		0.0776	0.1166
2	1	2022	0.0114	3	0.4		0.0132	0.0245
Total Increased Cancer Risk					**2.0**			

* Students assumed to be from 3 to 6 years

Attachment 4: Community Risk Screening and Calculations