First Amendment to the Draft Environmental Impact Report

Graniterock Capitol Site Modernization Plan

Prepared by

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

In Consultation with
DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

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SECTION 1.0 INTRODUCTION

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the Graniterock Capitol Site Modernization Plan project.

1.1 PURPOSE OF THE FINAL EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of San José and any Responsible Agencies in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

(1) The Final EIR has been completed in compliance with CEQA;
(2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
(3) The Final EIR reflects the lead agency's independent judgment and analysis.

1.2 CONTENTS OF THE FINAL EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

a) The Draft EIR or a revision of the Draft;
b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
e) Any other information added by the Lead Agency.

1.3 PUBLIC REVIEW

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced in the Final EIR are available for public review at the Department of Planning, Building & Code Enforcement (200 E. Santa Clara Street, San José, CA) on weekdays during normal business hours. The Final EIR is also available for review on the City of San José's website: https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/graniterock-capitol-modernization-project.

SECTION 2.0 DRAFT EIR PUBLIC REVIEW SUMMARY

The Draft EIR for the Graniterock Capitol Site Modernization Plan project, dated September 2022, was circulated to affected public agencies and interested parties for a 45-day review period from September 20, 2022 to November 4, 2022. The City of San José undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of Draft EIR was published on the City's website (https://www.sanjoseca.gov/home/showpublisheddocument/89627), San Jose Post-Record, and in the San José Mercury News; and
- Notification of the availability of the Draft EIR was mailed and emailed to project-area residents and other members of the public who had indicated interest in the project; and
- The Draft EIR was delivered to the State Clearinghouse on September 19, 2022, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/graniterock-capitol-modernization-project), and
- A copy of the Draft EIR was made available for public review at the Dr. Martin Luther King Jr. Library located at 150 E. San Fernando Street, San Jose, CA 95112.

SECTION 3.0 DRAFT EIR RECIPIENTS

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies.

The Notice of Availability (NOA) for the Draft EIR was sent to owners and occupants adjacent to the project site and to adjacent jurisdictions.

The following agencies received a copy of the Draft EIR via the State Clearinghouse:

- California Air Resources Board (ARB)
- California Department of Conservation (DOC)
- California Department of Fish and Wildlife, Bay Delta Region 3 (CDFW)
- California Department of Forestry and Fire Protection (CAL FIRE)
- California Department of Parks and Recreation
- California Department of Resources Recycling and Recovery
- California Department of Transportation, District 4 (DOT)
- California Department of Transportation, Division of Aeronautics (DOT)
- California Department of Transportation, Division of Transportation Planning (DOT)
- California Department of Water Resources (DWR)
- California Highway Patrol (CHP)
- California Native American Heritage Commission (NAHC)
- California Natural Resources Agency
- California Public Utilities Commission (CPUC)
- California Regional Water Quality Control Board, San Francisco Bay Region 2 (RWQCB)
- California State Lands Commission (SLC)
- Department of Toxic Substances Control (DTSC)
- Office of Historic Preservation
- State Water Resources Control Board, Division of Drinking Water
- State Water Resources Control Board, Division of Water Quality

Copies of the Notice of Availability for the Draft EIR were also sent by mail and or email to the following agencies, organizations, businesses, and individuals:

- Kristen Garrison, Fish and Wildlife
- California Energy Commission, Media Office
- California Environmental Protection Agency
- California Air Resources Board
- Philip Crimmins, California Department of Transportation
- City of Mountain View, Planning Division
- City of Saratoga, Community Development Director
- Debbie Pedro, City of Saratoga
- F. Reed, City of Saratoga

- City of Sunnyvale, Planning Director
- A. Blizinski, City of Sunnyvale
- T. Ryan, City of Sunnyvale
- Colleen Hagerty, Santa Clara Valley Water District (Valley Water)
- Town of Los Gatos, Community Development Department
- Bay Area Air Quality Management District
- Santa Clara County, Planning Department
- Mark Connolly, Santa Clara County Planning
- Leza Mikhail, Santa Clara County Planning
- City of Palo Alto, Planning & Development Services
- City of Cupertino, Director of Community Development
- Jake Walsh, San Jose Water Company
- Bill Tuttle, San Jose Water Company
- City of Fremont, Community Development Director
- City of Milpitas
- M. Fossati, City of Milpitas
- City of Campbell
- Rob Eastwood, City of Campbell
- City of Morgan Hill, Planning Division
- Jennifer Carman, City of Morgan Hill
- Pacific Gas & Electric
- City of Santa Clara, Director of Planning and Inspection
- Reena Brilliot, City of Santa Clara
- J. Davidson, City of Santa Clara
- A. Crabtree, City of Santa Clara
- Santa Clara Valley Transportation Authority
- East Side Union High School District
- Kevin Johnston
- Guadalupe-Coyote Resource Conservation District
- Adams Broadwell Joseph & Cardozo
- Sierra Club-Loma Prieta Chapter
- Santa Clara Valley Audubon Society
- Greenbelt Alliance
- Ada Marquez, San Jose State University
- Alan Levanthal, San Jose State University
- Amanda Brown Stevens, Greenbelt Alliance
- Andre Luthard, Preservation Action Council of San Jose
- Andrew Galvan, The Ohlone Indian Tribe
- Annie Christie, SPUR
- Ann-Marie Sayers, Indian Canyon
- Kanyon Sayers-Roods, Kanyon Konsulting
- Ben Aghegnehu, Santa Clara Roads and Airports
- Ben Leech, Preservation Action Council of San Jose
- Brian Schmidt, Greenbelt Alliance

- Charlene Nijmeh, Muwekma Ohlone Tribe
- Corrina Gould, Confederated Villages of Lisjan
- Dee Dee Manzanares Ybarra, Rumsen
- Dorothy Talbo, Santa County
- Elizabeth Bugarin, Metropolitan Transportation Commission
- Hannah Hughes, Lozeau Drury LLP
- Richard, Lozeau Drury LLP
- Sophie, Lozeau Drury LLP
- Molly, Lozeau Drury LLP
- Janet Laurain, Adams Broadwell Joseph and Cardozo
- Wally Charles, Association of Bay Area Governments
- Jack_wms@pacbell.net
- Timothy Perez, North Valley Yokuts Tribe
- Shani Kleinhaus, Santa Clara Valley Audubon Society
- Scott Knies
- Chairwoman Quirina Luna Geary, Tamien Nation
- Monica Arellano, Muwekma Ohlone Tribe
- Valentin Lopez, Amah Mutsun Tribal Band
- Michael Lozeau, Lozeau Drury LLP
- J. Broadbent, Bay Area Air Quality Management District
- Alesia Hsiao, Bay Area Air Quality Management District
- H. Hilken, Bay Area Air Quality Management District
- Law Office of Joann Broderick Harms, Chicago, IL.
- Kathy Sutherland
- Scott Knies, San Jose Downtown Association
- William T. Brooks, Brooks & Hess
- Jean Dresden
- Laura Tolkoff, SPUR
- California Native Plant Society Organization, Santa Clara Valley Chapter
- Adina Levin, Friends of Caltrain

SECTION 4.0 RESPONSES TO DRAFT EIR COMMENTS

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of San José on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The verbatim comments from each of the letters and/or emails are presented with a direct response following that specific comment. Copies of the letters and emails received by the City of San José are included in their entirety in Appendix A of this document. Appendix B of this document contains supplementary information. Comments received on the Draft EIR are listed below.

Comment Letter and Commenter **Page of Response**

STATE, REGIONAL, AND LOCAL AGENCIES

A. Bay Area Air Quality Management District (dated November 4, 2022)

Comment A.1: Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan (Project). The proposed Project includes the expansion of the existing concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations. The proposed Project also includes the addition of an asphalt plant and cementitious distribution facility. Further, the equipment storage and maintenance yard would be removed, and the existing rail spur would be extended to accommodate roughly 55 railcars with an increase in unloading capacity to 2,000 tons per hour.

Greenhouse Gases

The Air District is concerned with the Project's significant greenhouse gas (GHG) emissions and proposed mitigation measures to reduce the GHG impact. The Air District recommends that the City of San José (City) require the Project to include more onsite GHG reductions in the Project design to minimize the need for the purchase of carbon offsets.

Response A.1: The Air District correctly represented the project description and identified concerns with the project's significant greenhouse gas emissions identified on page 107 of the Draft EIR. Significant greenhouse gas emissions are identified for the start of Phase 3 of project operation. With Phase 3, the asphalt plant would be operating, and non-stationary emissions would increase due to the increase in truck traffic. Non-stationary GHG emissions would exceed the BAAQMD significance threshold of 660 metric tons per year by 1,227 metric tons per year. Stationary GHG emissions from the asphalt batch plant would exceed the BAAQMD significance threshold of 10,000 metric tons per year by 2,640 metric tons. As described in Mitigation Measure MM GHG-1 on page 108 of the Draft EIR, the project shall be required to implement a GHG Reduction Plan that includes proper elements to reduce emissions below the significance level of 660 metric tons CO2e for non-stationary sources and 10,000 metric tons CO2e for stationary sources for the lifetime of the project. The mitigation measure lists several on-site elements that may be included in the GHG Reduction Plan, such as:

- Use of on-road and off-road vehicles and switching locomotives with lower GHG-emitting engines, such as electric or hybrid equipment.
- Use of clean truck fleet.
- Commitment to use carbon-free electricity provided by San José Clean Energy.
- Installation of solar power systems or other renewable electric generating systems that provide electricity to power on-site equipment and possibly provide excess electric power.
- Limit annual production, as GHG emissions would be proportional to annual production in tons.

- Construct on-site or fund off-site carbon sequestration projects

The mitigation measure also lists as a potential element in the GHG Reduction Plan the purchase and retirement of carbon credits to offset the project's annual emissions. Specific conditions regarding the nature of acceptable carbon credits are included in the measure to ensure that the offsets represent GHG emission reductions that are real, permanent, additional, quantifiable, verifiable and enforceable, consistent with the requirements of CEQA.

The Air District's recommendation to require the project to include more on-site GHG reductions to minimize the need for the purchase of carbon offsets is noted, but the comment letter does not provide evidence demonstrating that the purchase of carbon credits would not adequately mitigate the project's impacts under CEQA. Because MM GHG-1 would reduce the project's impacts to a less than significant level, a conclusion that is supported by substantial evidence in the Draft EIR, there is no need for the project to be required to exclude or minimize the purchase of carbon offsets as part of its GHG Reduction Plan. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.2: The DEIR specifies that the purchase of carbon offsets should prioritize offset projects occurring in Santa Clara County followed by the Bay Area, California, and the U.S.

Response A.2: The text mentioned in the comment does not appear in the Draft EIR. The comment is referring to text in the Air Quality and GHG Analysis contained in Appendix B to the Draft EIR. Mitigation measure MM GHG-1 on pages 108-110 of the Draft EIR, which is also included in the project's Mitigation Monitoring and Reporting Program (MMRP), represents the mitigation measure that will be applied to the project. There is no requirement in mitigation measure MM GHG-1 in the Draft EIR specifying that the purchase of carbon offsets should prioritize offset projects occurring in Santa Clara County, the Bay Area, or California. MM GHG-1 does, however, require that the carbon offsets be from credit projects developed in the United States. The text in Appendix B has been revised to be consistent with the text in the Draft EIR (refer to Section 5.0 Draft EIR Text Revisions). This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.3: The DEIR also specifies that only projects from California Air Resources Board (CARB) -approved registries may be selected. Currently only three CARB-approved projects are available in the Bay Area – two in Sonoma County and one in Napa County. The lack of available offset projects in or near Santa Clara County increases the importance of maximizing on site mitigations.

Response A.3: The text mentioned in the comment does not appear in the Draft EIR. The comment is referring to text on pages 74-75 of the Air Quality and GHG Analysis contained in Appendix B to the Draft EIR. Mitigation measure MM GHG-1 in the Draft EIR, which is also included in the project's Mitigation Monitoring and

Report Program (MMRP), represents the mitigation measure that will be applied to the project. There is no requirement in MM GHG-1 in the Draft EIR specifying that only projects from CARB-approved registries may be selected. As a result, the remainder of the comment regarding CARB-approved projects is not relevant to the discussion of the Draft EIR. As discussed above in Response A.2, MM GHG-1 does include on-site mitigation measures as options under the GHG Reduction Plan. The text in Appendix B has been revised to be consistent with the text in the Draft EIR (refer to Section 5.0 Draft EIR Text Revisions). Because MM GHG-1 would reduce the project's impacts relative to GHG emissions to a less than significant level with either on-site or offsite mitigation, or a combination of both, this comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.4: The DEIR includes Mitigation Measure GHG-1: Develop and Implement a GHG Reduction Plan, which includes a list of potential measures that could be included in a yet-to-be-developed GHG Reduction Plan for the Project. The GHG Reduction Plan should be reviewed and approved by the City before building permits are issued.

Response A.4: As described in mitigation measure MM GHG-1 (pages 108-110 of the Draft EIR), the GHG Reduction Plan shall be submitted to the Director of Planning, Building and Code Enforcement or the Director's designee for review and approval prior to issuance of building permits for the asphalt plant (Phase 3 of the project), which is the point at which the project would exceed the applicable thresholds of significance for GHG emissions. Therefore, the City would approve the GHG Reduction Plan prior to issuance of building permits for Phase 3 (asphalt plant) of project operation. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.5: The Air District recommends that all additional on-site emission reduction measures be specific, effective, required, and actionable, clearly identify the party(ies) responsible for implementation and be included as design or programmatic elements of the Project, rather than as potential future measures, to avoid deferred mitigation. In addition to the carbon credits measures mentioned previously, additional measures include:

- Off-road equipment such as front loaders, sweepers, trucks, or other equipment should be zero-emission, as available; the City should require commitments to zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction and operational equipment for use prior to any ground disturbing, construction and operational activities.
- At minimum, off-road diesel equipment should meet Tier 4 emissions standards.
- Similarly, emissions from backup diesel generators should be further mitigated as much as possible including adoption of natural gas-fueled equipment and/or zero-emissions technologies. At a minimum, require Tier 4 diesel generators.

- Medium and heavy-duty diesel on-road vehicles should be equipped with newer engine models, no more than eight years old, or powered by zero or near zero-emissions technology, as certified by the California Air Resources Board, as feasible.
- Provide electrical hook-ups to the power grid, rather than using diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and using electric tools as feasible.
- Install electric vehicle (EV) supply equipment and/or 'EV Ready Spaces' to service light, medium and heavy-duty vehicles and on-site solar power systems or other zero-emission electric generating systems that provide electricity to power on-site equipment. At minimum, the Project Sponsor should comply with the City's Reach Code for building electrification, energy efficiency, solar and EV readiness.
- Commit to use carbon-free electricity provided by San José Clean Energy.

This will help the Project align with the Climate Smart San José Plan to be carbon neutral by 2030.

The Air District has invested in several efforts to promote the production and use of low-carbon cement, concrete and similar products. There are technologies that use recycled materials for aggregate and mineralization processes to create carbon-negative aggregate. Using recycled inputs in production can dramatically reduce energy needs and potentially sequester carbon. The Air District recommends that these technologies be considered as additional on-site Project mitigation measures.

> **Response A.5:** The Air District's recommendations for specific on-site GHG reduction measures have been added to the text of MM GHG-1 in the Draft EIR as additional elements that the project may include in its GHG Reduction Plan (refer to Section 5.0 Draft EIR Text Revisions). Measures that are not applicable to the project (specifically, measures related to backup generators since no backup generators are proposed as part of project operation) were not included in the text revisions. The GHG reduction measures listed in MM GHG-1 are merely examples of measures that could be included in the GHG Reduction Plan to achieve the required reductions in GHG emissions. MM GHG-1 allows for additional or different GHG emissions reduction measures to be included in the GHG Reduction Plan to be reviewed and approved by the Director of Planning, Building and Code Enforcement or the Director's designee, as long as the GHG Reduction Plan reduces emissions to a less-than-significant level. Furthermore, the comment letter does not provide evidence demonstrating that the specific measures recommended by the Air District are required to reduce the project's impacts to a less than significant level. As a result, these options are included in MM GHG-1's list of potential elements that could be applied to the project's GHG Reduction Plan, not required elements. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.6: Air Quality

The Air District is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the San Francisco Bay Area. In addition to its roles as either Lead Agency or Responsible Agency in

California Environmental Quality Act proceedings, the Air District also administers an air quality permitting program for stationary equipment to ensure all air quality requirements are met.

The Project Sponsor should submit an Air District permit application in parallel to the City's permit. The Air District will conduct a detailed engineering review of the stationary source emissions and perform a health risk assessment based on the Project's proposed operational parameters.

Response A.6: As stated in the comment, in addition to permits issued by the City, the project would be required to obtain Air District permits to construct and operate the proposed stationary equipment included in the project that falls under the Air District's jurisdiction. Although additional analysis may be completed by the Air District during its permitting process, a health risk assessment was completed for the project in accordance with BAAQMD methodology and is included in the EIR (refer to pages 59-61 and 63-65 of the Draft EIR, and pages 76-81 of Appendix B). The health risk assessment determined that the project would not result in significant impacts under CEQA. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.7: Several components of the DEIR's emissions analysis would be augmented by including additional details. These are referenced below with recommendations:

- Project Description (page 3): Many of the Project's potential air quality impacts are related to truck and railcar trip increases but are not adequately quantified. The DEIR should quantify the maximum number of annual and daily truck and railcar trip increases as a result of the Project and describe these in the Project Description.

Response A.7: The project's existing and proposed emissions from truck and railcar trips are quantified in Appendix B to the Draft EIR and are included in the overall project emissions presented in Tables 3.3-6 and 3.3-7 (pages 56-57) in the Draft EIR. The input assumptions for the emissions calculations are described in detail in Tables 6 through 14 of Appendix B. Input assumptions are described for each proposed project component/operation, and include such factors as: annual truck loads associated with each material type, average one-way truck travel distances, rail deliveries per year, locomotive model and weight, rail trip distance, railcars per delivery, locomotives used per delivery, locomotive idle time at the site, railcar capacity, railcar loading and unloading rates, and total unloading time per delivery. The full emissions calculations based on these input assumptions are shown in Attachments 2 and 3 of Appendix B. The project's emissions, including those related to truck and railcar trips, are adequately quantified. The conclusions in the Draft EIR are, therefore, supported by substantial evidence. Additionally, technical project details such as increases in trips resulting from proposed project activities need not be included in the EIR project description, as suggested in the comment. This information is more appropriate for inclusion in individual impact sections and technical appendices as part of the analysis of project impacts. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.8:

- Abatement and Mitigations (page 7): The Project proposes to "fully enclose" the new asphalt operation, aggregate distribution facility, cementitious distribution facility and concrete plant. The DEIR does not adequately define "fully enclose". Additionally, air abatement devices are only discussed for the cementitious distribution facility. The Air District recommends the DEIR describe the specific design details of enclosures and abatement devices, identify air abatement devices for each facility and include Project drawings and depictions that illustrate these proposals.

Response A.8: The term "fully enclosed" in the Draft EIR is used to describe operations on the site that would take place within enclosed buildings, silos, or conveyance apparatuses, as opposed to occurring in the open air. Additional details of the proposed enclosures and air abatement devices are included in Appendix B to the Draft EIR. For example, the following descriptions, which outline the assumptions of enclosures and abatement devices used in emissions calculations and modeling, are provided on page 62 of Appendix B:

> At the Aggregate Distribution Facility, emissions from aggregate unloading from rail cars were modeled as two area sources. Aggregate transfer and storage emissions would be controlled by dust collectors and were modeled as eleven point sources. Truck loading from the storage silos were modeled as nine volume sources.
>
> At the Cementitious Distribution Facility, all material receiving, handling, storage and truck loadout emissions would be controlled using dust collectors. Four point sources were used to represent these dust collectors.
>
> At the Concrete Plant, all emission sources other than the aggregate and sand conveyors bringing materials to the plant would be contained within a 110-foot tall building enclosed on all four sides. The base of the building will be open on two sides to allow concrete trucks to enter and exit the facility for loading. There would be two sets of vents on two sides of the building near the top of the building where emissions would be vented to the atmosphere. These vents were modeled as four volume sources. For the material conveyors, there would be four transfer points along the conveyors. Each transfer point was modeled as a volume source.
>
> At the Asphalt Plant, emission sources other than the main baghouse stack, transfer points along the aggregate and RAP conveyors, and asphalt loadout to trucks would be contained within a 101-foot tall building enclosed on all four sides. The base of the building will be open on two sides to allow asphalt trucks to enter and exit the facility for loading. There would be two sets of vents on two sides of the building near the top of the building where emissions would be vented to the atmosphere. These vents were modeled as four volume sources. Emissions from the aggregate and RAP conveyors were modeled using three volume sources for each conveyor system to represent

the conveyor transfer points. Emissions from truck loading from the silos were modeled as two volume sources, one at the truck entrance and one at the truck exit of the asphalt plant building. Emissions from a 63-foot tall asphalt plant baghouse stack were modeled as a point source.

The above text is just one excerpt of the project details and analytical assumptions, including those related to enclosures and abatement devices, disclosed in Appendix B. Additional information is provided throughout the document. The information included in the Draft EIR and in Appendix B provides adequate detail to support the conclusions of Draft EIR while also allowing members of the public and responsible agencies to complete a review of the analysis and provide informed comments regarding its adequacy. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.9: Community Engagement
Air Quality impacts and concerns were identified by community members during the Notice of Preparation scoping process. The DEIR identifies several sensitive receptors within 1,000 feet of the Project location. Although the air quality impacts are less than significant, the Air District recommends continued engagement with the community to identify and mitigate concerns.

Response A.9: As stated in the comment and discussed in Section 3.3.1.4 (Air Quality – Sensitive Receptors), the DEIR identifies several sensitive receptors within 1,000 feet of the project site, including residences approximately 300 feet to the north adjacent to Monterey Road and other nearby residential receptors approximately 1,000 feet south of the project site adjacent to Snell Avenue. As further noted in the comment, the Draft EIR determined that air quality impacts to sensitive receptors within 1,000 feet of the project site are less than significant. Therefore, no mitigation is required.

Consistent with the City's Public Outreach Policy for Land Use and Development Proposals (Policy 6-30), for large development proposals, a mailing radius of 1,000 feet was used to notice a community/scoping meeting and will be used to notice the public hearings. The Notice of Preparation for the Draft EIR was circulated for 30 days beginning on January 14, 2021, and a scoping and community meeting was held on January 25, 2021. The Draft EIR was circulated for public comment between September 20, 2022 and November 4, 2022, providing opportunity for public comments. The project and Draft EIR will be considered at future Planning Commission and City Council hearings, which will be noticed to property owners and tenants within 1,000 feet of the project site and will provide additional opportunities for public comment and community input. The Air District's recommendation for continued community engagement is included in the administrative record. The project would continue to keep open lines of communication with the neighboring community by maintaining an on-site coordinator and a posted phone number for any comments or complaints. During project construction, per the standard permit conditions outlined in Section 3.13 Noise of the Draft EIR, a noise disturbance coordinator will be designated to respond to any local complaints about construction

noise. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment A.10: Certain Project equipment may require an air quality permit (Authority to Construct/Permit to Operate) from the Air District. Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

Additionally, Air District Planning staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Mark Tang, Principal Environmental Planner, at (415) 749-4779 or mtang@baaqmd.gov.

Response A.10: As described in Response A.6, the project applicant would be required to obtain Air District permits to construct and operate the proposed stationary equipment included in the project that falls under the Air District's jurisdiction. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

B. County of Santa Clara Roads and Airports Department (dated November 9, 2022)

Comment B.1: The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice of Availability (NOA) and Public Comment Period for a draft Environmental Impact Report: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013). We submit the following comments:

- County would like the opportunity to review the CMP when it is available.

Response B.1: It is unclear what the comment is referring to when requesting the opportunity to "review the CMP". The acronym CMP typically refers to the Congestion Management Program, which is overseen by the Valley Transportation Authority (VTA) and is aimed at reducing regional traffic congestion. Section 3.17 of the Draft EIR includes an evaluation of intersection levels of service (LOS) against CMP operations standards. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.2:

- Figure 3.17-2 Existing Pedestrian Facilities – Ensure the existing pedestrian facilities and stop control match existing field conditions.

Response B.2: Figure 3.17-2 of the Draft EIR shows existing pedestrian facilities in the project area, including sidewalks, crosswalks, stop signs, and traffic signals. The pedestrian facilities shown in Figure 3.17-2 accurately reflect existing conditions. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.3:

- Consider improving pedestrian facilities by upgrading the existing non-ADA pedestrian ramps and providing a crosswalk at the Capitol Drive-In access on Hillcap Ave.

Response B.3: As described in Section 3.17.2.1 of the Draft EIR, the project would not result in significant impacts related to pedestrian facilities. The recommendations described in the comment are not required to reduce project impacts to a less than significant level. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.4:

- The project proposes a change in facility hours of operation from 6:00 AM – 8:00 PM to 12:00 AM – 12:00 PM. Provide proposed project trips during the Off-Peak period (11:00-13:00) and address any potential impacts.

Table 6 in Appendix F to the Draft EIR includes project-generated trips per hour for the full 24-hour period of project operations, including the requested off-peak period. During the 11:00-13:00 (or 11:00 AM to 1:00 PM) period, the project is estimated to generate 297 vehicle trips, which is an increase of 152 trips compared to existing conditions. Pursuant to Senate Bill (SB) 743 and CEQA Guidelines Section 15064.3, the CEQA metric for transportation impacts is Vehicle Miles Traveled (VMT). Traffic related metrics such as vehicle delay (or LOS) and storage capacity at intersections and freeway ramps are not impacts under CEQA. A discussion of the project's effects on LOS are included in the Draft EIR for informational purposes only. Per the requirements of the City's Transportation Analysis Policy (Policy 5-1) and Transportation Analysis Handbook, as well as the VTA's Congestion Management Program Transportation Impact Guidelines, the analysis of LOS is based on peak hour traffic, not off-peak periods. Neither the City nor VTA have operational standards for off-peak traffic periods. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.5:

- Report claims all employee vehicles and trucks would continue to enter and exit the site via the project driveway at the end of Granite Rock Way. Trucks are restricted from using Hillsdale Avenue. Therefore, trucks would continue to utilize Hillcap Avenue, Snell Avenue, and Capitol Expressway as their route to and from the project site. However, it appears there is an existing access gate to Graniterock at the County maintained portion of Hillsdale Ave. What is the purpose of this gate? See photo below.

Response B.5: As stated in the comment, and described in Section 2.2.3 of the Draft EIR, vehicles would enter and exit the project site via a two-way driveway at the end of the cul-de-sac on Granite Rock Way. The gate referenced in the comment provides access between the project site and the adjacent property to the north. Although the comment refers to a photo, no photo of the gate was provided in the comment letter. The adjacent property is utilized as a concrete production facility, and the gate, which is not located in the public right-of-way, is only used for the exchange and/or delivery

of materials between the project site and the adjacent property as a part of private transactions. The gate is not and would not be used by project traffic to access Hillsdale Avenue. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.6:

- A portion of Hillsdale and Hillcap Ave. within the vicinity of the project's access route are County maintained. It appears the County maintained portion of Hillsdale Ave. is severely impacted and damaged by the amount of truck traffic. If Graniterock uses this section of Hillsdale, they will have to contribute a fair-share to improve and maintain it. See Hillsdale pavement condition below.

Response B.6: As described in Response B.5, the project would not utilize the portion of Hillsdale Avenue and Hillcap Avenue referenced in the comment. As a result, there is no nexus for the project to be required to pay fair-share contributions for roadway improvements to this roadway segment. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment B.7:

- The Snell Avenue and Capitol Expressway intersection would operate at unacceptable levels under background and project conditions. Therefore, the project applicant should work with City staff during the review of the Planned Development Permit and consult with the County in determining an appropriate contribution towards the implementation of possible pedestrian improvements and mitigation measures to accommodate projected queues and resolve critical movement delays at Capitol and Snell. County's concern includes all CMP intersections along Capitol impacted by this project.

Thank you again for your continued outreach and coordination with the County. If you have any questions or concerns about these comments, please feel free to contact me at ben.aghegnehu@rda.sccgov.org

Response B.7: As described in Response B.4, LOS, vehicle queues, and critical movement delays are not considered environmental impacts under CEQA. Section 3.17.3 includes a discussion of the project's consistency with the City's transportation policy in these non-CEQA areas. The intersection of Snell Avenue and Capitol Expressway is explicitly addressed in this discussion. As described in the Draft EIR, the project applicant would work with City staff during review of the Planned Development Permit to determine an appropriate contribution towards the implementation of possible pedestrian improvements, such as the removal of each of the right-turn channelization islands at the intersection that create comfortable environment for people who walk and bike. Subsequent to circulation of the Draft EIR, the final Public Works memorandum issued for the project on November 21, 2022 identified a voluntary monetary contribution toward the implementation of future pedestrian crossing safety improvements at the Snell Avenue/Capitol Expressway intersection, which may include, but is not limited to, removal of the right-turn channelization islands at the northwest and northeast corners of Snell

Avenue/Capitol Expressway intersection. The improvement of pedestrian and bicycle facilities at the intersection would be consistent with the multi-modal transportation goals and policies outlined in the Envision San José 2040 General Plan that are intended to improve multi-modal accessibility to all land uses and encourage the use of non-automobile transportation modes to minimize vehicle trip generation and reduce VMT. Any voluntary contribution by the project would not be considered as mitigation for a CEQA impact. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

C. California High-Speed Rail Authority (dated November 4, 2022)

Comment C.1: This letter provides the California High-Speed Rail Authority's (Authority) comments on Graniterock's September 13, 2022, Draft Environmental Impact Report (EIR) for the Graniterock Capitol Site Modernization Project (Project) referenced as File No. GP19-010, PDC20-023, PD20-013.

Board Approval of Project Section

On April 28, 2022, the Authority Board of Directors certified the Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) and approved the approximately 89-mile San Jose to Merced Project Section of the statewide high-speed rail system. This action completes the state and federal environmental clearance for the high-speed rail Project Section connecting the Central Valley to the San Francisco Bay Area. Approval of this Project Section includes modifications to the existing railroad tracks near Caltrain Capitol Station and near the Project. These track modifications include curve straightening and moving the Caltrain Capitol Station south for the approved Authority's Preferred Alternative.

Comments on the Draft Environmental Impact Report

The Authority is supportive of Graniterock's improvements to their Capitol Site and have continued coordination to address design concerns between the Authority's and Graniterock's plans.

Overall, we found that the Graniterock Draft EIR did not sufficiently analyze transportation impacts, specifically missing an analysis of the Project's impacts on rail operations. Consistent with CEQA Guidelines 15064.3, 15125(d) and its Appendix G, an EIR must assess whether a project conflicts with a program, plan, ordinance, or policy addressing the circulation system, including current and reasonably foreseeable transit facilities such as passenger rail and must analyze any inconsistencies between the proposed project and applicable general plans, specific plans, regional plans. An EIR must also assess impacts on freight rail operations where the project might disrupt or interfere with freight operations to an extent that causes significant secondary impacts (e.g., air quality, noise, GHG emissions, transportation). Consistent with these standards, an adequate analysis must include an assessment of the project's impacts on the approved high-speed rail project near Graniterock (Authority San Jose to Merced Final EIR/EIS, certified April 2022) and Caltrain (Caltrain Business Plan). Absent this analysis, the public is unable to adequately assess the project's impacts on transportation programs, plans, policies, or systems, and the document does not meet its disclosure obligations.

- We believe this gap can be adequately addressed with the addition of a passenger and freight rail impacts analysis in the EIR. We provide below a few elements that would be important to have an adequate analysis of the Project's transportation impacts on the Authority, Caltrain, and other affected transit and rail facilities and plans.

Response C.1: The comment describes the High-Speed Rail Authority's certification of the Final EIR/EIS and approval of the San Jose to Merced Project Section, which includes modifications to the existing railroad tracks in the project vicinity. The comment also asserts that the Draft EIR did not adequately analyze impacts related to rail operations. To the extent that there is a lack of analysis of impacts to rail operations in the Draft EIR, it is because the project is not proposing any modifications to the rail system in the project vicinity. The only rail modifications proposed by the project consist of the expansion of existing on-site rail spurs for railcar storage. Additionally, proposed project facilities and activities were specifically designed and located in a manner to ensure they do not preclude future build out of high-speed rail infrastructure as shown in the San Jose to Merced Final EIR/EIS. Text has been added to the EIR to ensure the EIR discloses the project's lack of impacts to existing and future rail infrastructure and operations (refer to Section 5.0 Revisions to the text of the EIR). This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required. Responses to the specific issues raised in the comment letter are provided below.

Comment C.2:

- As configured in the Conceptual Site Plan, both junctions to access the new site would require reversing moves on the high-speed rail main line tracks which would significantly disrupt passenger rail operations (i.e., maintenance) on the line.

Response C.2: It is unclear what the comment is referring to when it mentions "both junctions to access the new site". The project site currently utilizes a single existing junction where a railroad spur extends from the main rail line onto the site, and the project would continue to utilize this single junction under project build out conditions (refer to Figures 2.2-1 and 2.2-1 of the Draft EIR). No new junctions are proposed as part of the project. To the extent any reversing moves are required, they would not represent a change compared to existing conditions. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.3:

- Adequately define the window of time that site operations will be utilizing the connection to the rail corridor to determine impacts on passenger rail operations and maintenance.

Response C.3: As described in Section 2.2.2.1 of the Draft EIR, railcars currently arrive on-site between the hours of 12:00 AM and 5:00 AM and are stored on an on-site spur track for processing. Railcars are also removed from the site during the same

timeframe. The project would not alter the timeframe in which railcars would be arriving and utilizing the existing junction to access the site. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.4:

- Freight train transfers between the Cement Rail Line and Rail Line #1 (as labeled on the Conceptual Site Plan) would lead to incidents that would foul the mainline and affect passenger rail traffic operations.

Response C.4: Both the Cement Rail Line and Rail Line #1 are located within the site boundaries and are not a part of the mainline. The project would include a dedicated on-site locomotive to manipulate railcars within the site. No access to the mainline is needed or proposed to manipulate railcars within the site. The comment does not provide evidence demonstrating that on-site rail operations would affect off-site rail operations on the mainline. To the extent that deliveries of materials to and from the site have the potential to disrupt operations on the mainline, these disruptions already occur under existing conditions. Deliveries associated with the proposed project would occur during the same timeframe as existing conditions (12:00 AM to 5:00 AM), a time at which passenger rail operations are at a minimum or are nonexistent. As stated on page 3.2-101 of the High-Speed Rail Authority's February 2022 Final EIR/EIS for the San Jose to Merced Project Section, "(b)etween midnight and 5 a.m., regular HSR service would not be operating…". It is possible that the proposed increased throughput of materials on the site would result in more frequent deliveries, thereby increasing the number of potential disruptions between 12:00 AM and 5:00 AM. However, deliveries to and from the site are scheduled, handled, and managed by UPRR, not the project applicant, and are part of larger scheduled deliveries by UPRR to other facilities along the entirety of the track during a time when the track is dedicated to that use. It is assumed that UPRR would schedule future deliveries in a manner to minimize disruptions to its own freight rail operations on the track and would do so in coordination with Caltrain and the High-Speed Rail Authority to avoid conflicts with passenger rail operations. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.5:

- The EIR does not provide information on when these moves from the Cement Rail and Rail Line #1 would take place. Without such information, it is impossible to evaluate the project's effects on passenger rail operations for the Authority's project.

Response C.5: Please refer to Responses C.3 and C.4. The comment does not provide evidence demonstrating that on-site rail operations would affect off-site rail operations on the mainline. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.6:

- The EIR does not provide information on the signaling system that will cover these new sidings, which must be disclosed to identify impacts on passenger rail operations.

> **Response C.6:** It is assumed that the term "sidings" in the comment is referring to the proposed spurs on the project site that would be utilized for storage of railcars. As discussed in Response C.2, the project would not alter the existing connection between the site and the mainline, and no new signaling system is proposed or needed as a result of the project. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.7:

- There is no direct connection to Main Line #1 (MT1) on the Conceptual Site Plan from the proposed freight track. All freight trains would be expected to use Main Line #2 (MT2) and #3 (MT3) including for the shunt moves mentioned. Given the operational analysis done to date by the Authority, it is almost certain that access could not be provided during peak commuting hours, and highly unlikely during off-peak commuting hours. Restricting freight operations to non-passenger times would impact railroad track maintenance work.

> **Response C.7:** It is unclear what the comment is referring to when it mentions Main Line #1, Main Line #2, and Main Line #3. The term main line (or mainline) is typically used to refer to the main line of the railroad track located in the public right of way. It is assumed that the comment is referring to Rail Line #'s 1-3 as depicted on the site plan for the proposed project (refer to Figure 2.2-2 in the Draft EIR). These are proposed on-site rail spurs that would be utilized to store railcars. It is also unclear what the comment is referring to when it mentions the "proposed freight track". The project is not proposing a new freight track, only additional on-site spurs. Regarding the comment's discussion of access during peak commuting hours, as mentioned previously, deliveries would only be scheduled between 12:00 AM and 5:00 AM, which is the same as existing conditions and is presumed to have been accounted for in the High-Speed Rail EIR/EIS analysis. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.8:

- The other infrastructure required to the north to cross over between MT1/MT2/MT3 was not included. The Conceptual Site Plan in the EIR must show all required track improvements as they relate to the proposed project's impacts to allow the Authority to determine potential impacts to passenger rail operations.

> **Response C.8:** It is unclear what the comment is referring to when it mentions "other infrastructure required to the north to cross over between MT1/MT2/MT3". As described in Response C.7, there are no MT1/MT2/MT3 tracks proposed by the project. Additionally, the project is not proposing any alterations to the mainline track or its connection to the site. The conceptual site plan (Figure 2.2-2) included on page

26 in the Draft EIR shows all proposed project improvements, thus allowing the High-Speed Rail Authority to complete a meaningful review of the project to determine its potential impacts as well as the adequacy of the analysis of impacts in the Draft EIR. The only rail infrastructure improvements that are proposed would occur within the boundaries of the project site and would not affect the mainline. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.9:

- The Project's Transportation Analysis includes the existing Caltrain station and level of service, but no consideration is given to planned future rail service volumes in this corridor, including consideration of the Authority's approved project in this corridor.

Response C.9: The Transportation Analysis prepared for the project (refer to Appendix F to the Draft EIR) discusses the Capitol Caltrain Station in the context of existing transit facilities in the project vicinity. While the Transportation Analysis does not use the term "level of service" when discussing impacts to transit services, it does evaluate the project's potential impacts to passenger rail operations resulting from the possible addition of new passengers. The Transportation Analysis determined that, due to the small increase in new employees and type of the project operations, the new transit trips generated by the project are not expected to create demand in excess of the transit service that is currently provided. To the extent the comment may be referring to similar issues related to passenger demand, it is assumed that the future high-speed rail would be able to accommodate any small increase in passengers generated by additional employees on the site in a similar manner. To the extent the comment may be referring to the project's effect on the general operation of railroads on the mainline, please refer to Responses C.1 through C.4. The comment does not provide evidence demonstrating that the project would affect future rail service volumes in a manner that would result in a significant environmental impact under CEQA. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.10:

- The application is for increased handling capacity on the site and for 24/7 hours of operation. We cannot find any reference to what this would mean for frequency of freight train operations to/from the site.

Response C.10: As described in Section 2.2.2.1 of the Draft EIR, railcars currently arrive on-site between the hours of 12:00 AM and 5:00 AM and are stored on an on-site spur track for processing, a practice that would continue with the proposed project. The frequency of deliveries to and from the site currently varies, and will continue to vary, based on several factors, including economic conditions and the seasonality of construction work that utilizes materials produced on the site. As discussed in Response C.4, it is possible that the proposed increased throughput of materials on the site would result in more frequent deliveries. It is also possible that

the frequency of deliveries to and from the site would remain similar to existing conditions, albeit with an increased number of railcars delivered to and from the site during each delivery operation. Deliveries to and from the site are scheduled and completed by UPRR, not the project applicant, and are part of larger scheduled deliveries to other facilities along the entirety of the track. It is assumed that UPRR would schedule future deliveries in a manner to minimize disruptions to its own freight rail operations on the track and would do so in coordination with Caltrain and the High-Speed Rail authority to avoid conflicts with passenger rail operations. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.11:

- This EIR does not account for the Authority's approved project, including impacts to the Overhead Catenary System (OCS) poles/portals– there would be several relocations required that are not accounted for.

Response C.11: The project does not propose any changes to existing off-site rail infrastructure and, as described in Response C.1, proposed project facilities and activities were specifically designed and located in a manner to ensure they do not preclude future build out of high-speed rail infrastructure as shown in the San Jose to Merced Final EIR/EIS. It is unclear how the project would impact future Overhead Catenary System poles/portals (which are understood by the City to refer to proposed overhead electricity lines and supporting poles/infrastructure associated with the future high-speed rail line), and the comment does not provide any evidence supporting this statement. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.12:

- Crossovers required to accommodate movement of freight trains from MT1 to MT2/MT3, in order to be delivered to Graniterock site, need to be electrified to prevent mis-routed passenger trains causing a rip-down of the OCS.

Response C.12: As described in Response C.8, there are no MT1, MT2, or MT3 proposed by the project. It is assumed that the comment is referring to the proposed on-site rail spurs described and illustrated in Figure 2.2-2 as Rail Lines #1-#3). Based on this assumption, it is unclear how these on-site spurs would affect the routing of passenger trains on the mainline in a manner that would result in rip-down of the OCS. As discussed in Response C.1, other than these on-site spurs, the project is not proposing any modifications to the rail system in the project vicinity. No evidence is provided to support this statement, and no further response is required. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.13:

- The Authority's approved project proposes to run 110 mph trains on a curve where this Conceptual Site Plan indicates Graniterock would install a crossover/turnout. The installation of a crossover/turnout here would require significant track level changes to accommodate superelevation, causing an impact to operations.

> **Response C.13:** As described in Response C.1, the project does not propose any changes to off-site rail infrastructure, including new crossovers or turnouts connecting to the mainline. The Conceptual Site Plan shown on Figure 2.2-2 does not include installation of a new crossover/turnout, as asserted in the comment. The project would utilize the existing connection to the mainline. No further response is required. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.14:

- The Conceptual Site Plan seemingly proposes a crossover and turnout connection to the rail corridor on the northern side of the property. This would require a redesign or evaluation of the suitability of mainline operations. This redesign or evaluation should evaluate 79 mph and 110 mph mainline operation. This evaluation must also analyze any impacts that track profile redesign has on the reduction of clearances to nearby structures.

> **Response C.14:** As described in Response C.1, the project does not propose any changes to off-site rail infrastructure, including new crossovers or turnouts connecting to the mainline. Therefore, the Draft EIR would not require analysis of a redesign as suggested. No further response is required. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.15:

- More information on the Rail Pits (size, location, depth) and other site utilities (e.g., lighting structures) is needed to evaluate the impacts to the Authority's project.

> **Response C.15:** As described in Response C.1, proposed project facilities and activities were specifically designed and located in a manner to ensure they do not preclude future build out of high-speed rail infrastructure as shown in the San José to Merced Final EIR/EIS. It is unclear how on-site infrastructure would impact the Authority's project, and no evidence is provided in the comment to support a conclusion of potential impacts. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.16:

- The EIR must document how their project is going to protect the rail corridor from unauthorized ingress/egress to adequately disclose if the project may substantially increase hazards due to a design feature (e.g. dangerous intersections or inadequate securitization of the rail perimeter) or incompatible uses. (See CEQA Guidelines Appendix G, Section XVII.C.)

Response C.16: The project site is currently enclosed by a perimeter fence that restricts access between the UPRR right-of-way and the site. Access to the site for locomotives is provided by opening a gate between the on-site spur and the mainline. The gate is closed after completion of delivery operations. These conditions would be maintained with build out of the proposed project and, therefore, would not represent a change from exiting conditions. Additionally, it should be noted that UPRR is responsible for maintenance and access restrictions within its right-of-way corridor. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment C.17: Moving Forward

The Authority appreciates the opportunity to review the EIR and continue to coordinate with your team as both your and our projects advance. We are now actively pursuing funding to advance our work in this corridor and we believe ongoing communication and collaboration with Graniterock will be valuable as both of us move forward. Authority staff are ready to meet with you to work together to realize this opportunity.

Response C.17: This comment provides closing remarks. The comment does not pertain to the analysis in the Draft EIR and, therefore, no further response is required. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

D. Santa Clara Valley Water (dated November 3, 2022)

Comment D.1: Valley Water has reviewed the NOA of a DEIR for the Graniterock Capitol Site Modernization Project received on September 20, 2022. Please see below for comments:

Page 127, Groundwater Monitoring Wells
Valley Water records show two wells located at the site. Our records indicate that these wells have not been properly destroyed and are considered active. These wells need to be protected from damage during construction if they are to remain. If they are to be modified or no longer needed the applicant needs to obtain a permit from Valley Water in accordance with Valley Water Ordinance 90-1 for modification or destruction of the well(s).

Response D.1: The existing groundwater monitoring wells mentioned in the comment are acknowledged in Section 3.9.2.1 of the Draft EIR. Impact HAZ-2 identifies a potential impact should these monitoring wells be encountered during construction, and mitigation measure MM HAZ-2.1 requires that the wells be properly destroyed in accordance with Valley Water Ordinance 90-1 to reduce the impact to a less than significant level. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment D.2: Page 131, Water Resources Protection Ordinance and District Well Ordinance: For accuracy and clarity, please consider the following revision to the section.

Valley Water operates as a flood protection agency for Santa Clara County. Additionally, Valley Water provides stream stewardship, is a wholesale water supplier, and manages the groundwater basin in the County. Under Valley Water's District Ordinance 90-1, permits are required for well construction, modification, and destruction in addition to exploratory borings of 45 feet in depth or greater. Work within Valley Water property or easement requires a permit under Valley Water's Water Resources Protection Ordinance.

Response D.2: Text consistent with this comment is included in Section 3.10.1.1 of the Draft EIR: "Valley Water operates as the flood control agency for Santa Clara County. Their stewardship also includes creek restoration, pollution prevention efforts, and groundwater recharge. Permits for well construction and destruction work, most exploratory boring for groundwater exploration, and projects within Valley Water property or easements are required under Valley Water's Water Resources Protection Ordinance and District Well Ordinance." As a result, no revisions to the text of the EIR are needed. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment D.3: Page 134, Groundwater: Valley Water has published a more recent Groundwater Management Plan than the one cited in this section. Please update the reference to Valley Water's 2021 Groundwater Management Plan linked on this page: https://www.valleywater.org/your-water/where-your-water-comes/groundwater/sustainable.

Response D.3: The text of the EIR has been revised to refer to the 2021 Groundwater Management Plan instead of the 2016 Groundwater Management Plan (refer to Section 5.0 Draft EIR Text Revisions). This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Comment D.4: Page 134, Flooding: The site is shown on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRM) No. 06085C0261H, 06085C0262H, and 06085C0264H with effective dates of 05/18/2009. Please update this section to reflect all of the FIRMs that the site spans.

Response D.4: The comment is correct that the site spans three Flood Insurance Rate Maps. The text of the EIR has been revised to include references to maps 06085C0261H and 06085C0264H in addition to map 06085C0262H, which was originally listed in the Draft EIR (refer to Section 5.0 Draft EIR Text Revisions). All three maps show the site as being located in Flood Zone D, as described in the Draft EIR. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

E. Adams Broadwell Joseph & Cardozo (dated September 20, 2022)

Comment E.1: Can you tell me how many square feet are involved in the proposed expansion of the Graniterock Capitol Site Modernization Plan? The project calls for the expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations along with the addition of an asphalt plant and cementitious distribution facility. However, square footage is not mentioned.

> **Response E.1:** As described in Section 2.2 of the Draft EIR, the project includes a new railcar offloading system and storage and distribution facility, nine 122-foot high silos, a new asphalt plant, a new cementitious distribution facility, and ancillary facilities (including a new one-story 10,000-square foot materials warehouse and storage facility and a new one-story 5,500-square foot quality assurance/quality control facility with office space). For most of the project's components, square footage is not the relevant metric for determining project impacts. Instead, since these project components are primarily operations and/or mechanical apparatuses, as opposed to standard structures, the relevant metrics for determining environmental impacts are capacity, throughput, and activity levels. This information is presented in Table 2.2-1 of the Draft EIR. The commenter received a direct response from City staff with this relevant information via email on September 21, 2022 (refer to Appendix B of this First Amendment to the Draft EIR). This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

F. Atonina Ettare (dated September 21, 2022)

Comment F.1: Does this CEQA include the expansion to accommodate 55 railcars and run 24 hours per day? This would mean these railcars will be moving into/out of the yard. Is the rail going through neighborhoods? We had a similar situation here in D3 regarding railcars moving through all hours and blowing their horns at intersections. There are a number of these intersections and the horns were heard all hours of the night throughout our district. It was the Mayor and CM Peralez that had to work with Union Pacific to install quiet zones in a number of intersections. Is this part of this project?

> **Response F.1:** As described in Section 2.2 of the Draft EIR, the existing rail spur on the site would be extended to accommodate roughly 55 railcars. While operations on the site would be allowed to occur 24 hours per day, rail deliveries to and from the site would be limited to the hours between 12:00 AM and 5:00 AM, which is consistent with the existing operations of the site. Additionally, the freight trains delivering materials to and from the site would travel along the same tracks that are currently used under existing conditions. Deliveries to and from the site are scheduled, handled, and managed by UPRR, not the project applicant. These trains deliver materials to various sites along the entire lengths of the tracks extending beyond the northern and southern boundaries of San José. Any trains travelling through "quiet zones" established as part of the agreement between the City and

UPRR would be required to adhere to prohibitions on the sounding of train horns during certain hours. The commenter received a direct response from City staff with this relevant information via email on September 22, 2022 (refer to Appendix B of this First Amendment to the Draft EIR). This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

G. Justin Chongtoua (dated September 22, 2022)

Comment G.1: I would like to comment on the below notice. I strongly oppose it and hope it does not proceed. It will negatively impact the area. Thank you for considering my comment. NOTICE OF CEQA POSTING - NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT (GP19-010, PDC20-023, PD20-013)

Response G.1: The comment identifies opposition for the proposed project. The commenter, however, does not include specific project details they are opposed to and to which the City can respond. The commenter received a direct response from City staff to expand on the comment via email on September 22, 2022 (refer to Appendix B of this First Amendment to the Draft EIR). This comment does not raise any issues regarding the adequacy of the Draft EIR; therefore, no further response is required.

H. Kanyon Konsulting, LLC (dated September 22, 2022)

Comment H.1: miSmin Tuuhis [Good Day] Kan rakat Kanyon Sayers-Roods. I am writing this on behalf of the Indian Canyon Band of Costanoan Ohlone People as requested, responding to your letter. As this project's Area of Potential Effect (APE) overlaps or is near the management boundary of a potentially eligible cultural site, I am interested in consulting and voicing our concerns. With some instances like this, usually we recommend that a Native American Monitor and an Archaeologist be present on-site at all times during any/all ground disturbing activities. The presence of a Native monitor and archaeologist will help the project minimize potential effects on the cultural site and mitigate inadvertent issues.

Kanyon Konsulting, LLC has numerous Native Monitors available for projects such as this, if applicable, we recommend a Cultural Sensitivity Training at the beginning of each project. This service is offered to aid those involved in the project to become more familiar with the indigenous history of the peoples of this land that is being worked on. Kanyon Konsulting is a strong proponent of honoring truth in history, when it comes to impacting Cultural Resources and potential ancestral remains, we need to recognise the history of the territory we are impacting. We have seen that projects like these tend to come into an area to consult/mitigate and move on shortly after - barely acknowledging the Cultural Representatives of the territory they steward and are responsible for. Because of these possibilities, we highly recommend that you receive a specialized consultation provided by our company as the project commences, bringing in considerations about the Indigenous peoples and environment of this territory that you work, have settled upon and benefit from.

As previously stated, our goal is to Honor Truth in History. And as such we want to ensure that there is an effort from the project organizer to take strategic steps in ways that #HonorTruthinHistory. This will make all involved aware of the history of the Indigenous communities whom we acknowledge as the first stewards and land managers of these territories.

Potential Approaches to Indigenous Cultural Awareness/History:

- Signs or messages to the audience or community of the territory being developed. (ex. A commerable plaque, page on the website, mural, display, or an Educational/Cultural Center with information about the history/ecology/resources of the land)
- Commitment to consultation with the Native Peoples of the territory in regards to presenting and messaging about the Indigenous history/community of the land (Land Acknowledgement on website, written material about the space/org/building/business/etc, Cultural display of cultural resources/botanical knowledge or Culture sharing of Traditional Ecological Knowledge - Indigenous Science and Technology)
- Advocation of supporting indigenous lead movements and efforts. (informing one's audience and/or community about local present Indigenous community)

Response H.1: This comment offers to provide consulting and monitoring services to the project applicant in the area of cultural and tribal cultural resources, and includes recommendations for measures the applicant can take to increase indigenous cultural awareness. Mitigation measures MM CUL-1.1 and MM CUL-1.2 were applied after the City's consultation with the Tamien Nation tribe through the AB 52 Notification process and require that a qualified Native American representative that is traditionally and culturally affiliated with the geographic area provide cultural resources sensitivity training to construction workers and monitor all major earthmoving activities to ensure the project does not result in significant impacts to cultural and/or tribal cultural resources. Because the measures identified in the Draft EIR are sufficient to reduce impacts to a less-than-significant level, the additional measures recommended in the comment are not required. The comment does not raise any issues regarding the adequacy of the Draft EIR; therefore, no further response is required.

I. Kelly (dated September 22, 2022)

Comment I.1: Please do not move the trees on granite walking way. We need all the trees we can grow.

Response I.1: As described in Section 3.4.2.1 of the Draft EIR, the project initially proposed to remove 47 trees on the site. Subsequent to circulation of the Draft EIR, the number of trees to be removed has been reduced to 30, nine of which would be ordinance-size. Of the 30 trees to be removed, 21 are located along Granite Rock Way. In accordance with the City's Tree Replacement Policy, the project is proposing to plant 35 24-inch box replacement trees on the project site. The project, therefore, would result in a net increase in trees on the project site. The commenter received a direct response from City staff on September 23, 2022. This comment does not

identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

J. Pacific Gas and Electric Company (dated September 26, 2022)

Comment J.1: Thank you for submitting the 120 Granite Rock Way plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.
Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Response J.1: The comment was shared with the project applicant and is included in the administrative record. This comment does not raise any issues regarding the adequacy of the Draft EIR; therefore, no further response is required.

K. Pacific Gas and Electric Company (dated November 1, 2022)

Comment K.1: Thank you for giving us the opportunity to review the subject plans. The proposed Granite Rock Capitol Site Modernization is within the same vicinity of PG&E's existing facilities that impact this property.

PG&E operates existing distribution facilities on this property within multiple easements. Said easements were recorded at Alpha E in Book 529 at Page 547, at Alpha E in Book 943 at Page 584, and at Alpha F in Book 233 at Page 717. Said easements prohibit the erection or construction of any building or other structure or the drilling or operation of any well within the easement strips. The Company intends to keep rights-of-way clear of all buildings and structures that may have an adverse effect on Company's facilities.

The proposed improvements appear to be in conflict and impact the easement areas. The Company requests the above-referenced easements be included in the project plans so that a proper review can be executed.

Please contact the Building and Renovation Center (BRSC) for facility map requests by calling 1-877-743-7782 and PG&E's Service Planning department at www.pge.com/cco for any modification or relocation requests, or for any additional services you may require.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact me at alexa.gardea@pge.com.

Response K.1: The project applicant is aware of the PG&E easements mentioned in the comment, which are depicted as light gray dashed lines in Figure 2.2-9 of the Draft EIR. The commenter's letter was shared with the applicant and is included in the administrative record. No permanent structures or wells are proposed within the easements. There is one location in which a portion of portable conveyor belt would cross over the natural gas pipeline easement noted on Book 529, Page 547. This is a subsurface easement, and the installation of a portable mechanical equipment apparatus overhanging the easement would not represent a conflict with the requirements of the easement. As a result, the project would not conflict with any PG&E easements. This comment does not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the Graniterock Capitol Site Modernization Plan Draft EIR dated September 2022. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~. These text changes do not constitute "significant new information" requiring re-circulation of the EIR, as defined in CEQA Guidelines Section 15088.5.

Page iii Table of Contents, the following text is **ADDED** to the end of the list of Appendices:

Appendix G: Long-Range Transportation Analysis 2021

Page xii Summary, the text of the second paragraph on the page is **REVISED** as follows:

As described in Section 3.8, the net increase in GHG emissions associated with the project site would exceed both the operational and stationary source thresholds. The net increase in operational emissions from non-stationary sources would be 1,887 MT CO2e, exceeding the threshold by 1,227 MT CO2e. The overall operational emissions of 9,651 MT CO2e ~~Operational emissions~~ would need to be reduced by 1,227 MT CO2e, or roughly 13 percent, to be below the threshold. Similarly, stationary source emissions would total 12,240 MT CO2e, exceeding the threshold by 2,240 MT CO2e. Stationary source emissions would need to be reduced by roughly 21 percent to be below the threshold. The stationary source emissions are all associated with the proposed asphalt plant. Therefore, reducing the throughput of the asphalt plant by 21 percent would reduce associated GHG emissions in a corresponding manner. The operational emissions are associated with all other operations on the site. Reducing the throughput of the remaining operations by 13 percent would reduce associated GHG emissions in a corresponding manner.

Page 3 Section 2.2, the text of the last sentence of the only paragraph in the section is **REVISED** as follows:

Development of the project would also result in the removal of ~~47~~ 30 trees on the site, ~~43~~ nine of which are ordinance-size.

Page 10 Section 2.2.4, the text of the last sentence of the only paragraph in the section is **REVISED** as follows:

Development of the project would result in the removal of ~~47~~ 30 trees on the site, ~~43~~ nine of which are ordinance-size.

Page 71 Section 3.4.2.1, the text of the second sentence of the first paragraph in the section is **REVISED** as follows:

Development of the project would result in the removal of ~~47~~ 30 trees on the site, ~~43~~ nine of which are ordinance-size.

Page 73 Section 3.4.2.1, the text of the second paragraph on the page is **REVISED** as follows:

The project proposes to remove ~~47~~ 30 existing trees, ~~43~~ nine of which are ordinance-size. The trees to be removed are located either within the project building/equipment footprint, within the path of the newly laid rail spur line, within the path of required public improvements, or are dead. The trees to be removed include 13 Mexican Fan Palms, nine (9) Blue Gums, three (3) Red Ironbarks, two (2) Trees of Heaven, two (2) Black walnuts, and one (1) Canary Island Date Palm. No native trees would be removed by the project. ~~The 43 ordinance-size trees to be removed consist of 28 eucalyptus trees, 11 Mexican fan palms, two black walnut trees, one Canary Island date palm, and one tree of heaven. The non-ordinance-size trees to be removed consist of two eucalyptus trees, one black walnut tree, and one California black oak. Of the trees to be removed, only the non-ordinance-size California black oak is considered a native tree.~~

Page 74 Section 3.4.2.1, the text of the first bullet point on the page is **REVISED** as follows:

- ~~47~~ 30 trees onsite would be removed, ~~43~~ nine trees would be replaced at a 4:1 ratio, ~~3~~ 12 trees would be replaced at a 2:1 ratio, and ~~1~~ nine trees would be replaced at a 1:1 ratio. ~~There is 1 native tree on site that~~ No native trees would be removed. The total number of replacement trees required to be planted is ~~179~~ either 69 15-gallon trees or 35 24-inch box trees. The species of trees to be planted shall be determined in consultation with the City Arborist and the Department of Planning, Building and Code Enforcement. The project is currently proposing to plant 35 24-inch box trees consisting of 15 Coast Live Oaks and 20 Sierra Oaks.

Page 108 Section 3.8.2.1, the text of mitigation measure MM GHG-1 is **REVISED** to include the five additional bullet points shown below. The remainder of the text of the MM GHG-1 would not change:

MM GHG-1: Prior to the issuance of building permits for and operation of the asphalt plant (Phase 3 of the project), the project applicant shall retain a qualified consultant to complete a greenhouse gas (GHG) emissions inventory which shall be used to implement a GHG Reduction Plan that includes the proper elements to reduce emissions below the significance level of 660 metric tons CO2e for non-stationary sources and 10,000 metric tons CO2e for stationary sources for the lifetime of the project. The GHG Reduction Plan shall be submitted to the Director of Planning, Building and Code Enforcement or the Director's designee for review and approval prior to issuance of building permits for the asphalt plant (Phase 3 of the project). Elements of this plan may include, but would not be limited to, the following:

- Use of on-road and off-road vehicles and switching locomotives with lower GHG-emitting engines, such as electric or hybrid equipment.
- Use of clean truck fleet.

- Commitment to use carbon-free electricity provided by San José Clean Energy.
- Installation of solar power systems or other renewable electric generating systems that provide electricity to power on-site equipment and possibly provide excess electric power.
- Limit annual production, as GHG emissions would be proportional to annual production in tons.
- Construct on-site or fund off-site carbon sequestration projects (such as a forestry or wetlands projects for which inventory and reporting protocols have been adopted). If the project develops an off-site project, it must be registered with the Climate Action Reserve or otherwise be approved by BAAQMD in order to be used to offset project emissions.
- Use of zero-emission off-road equipment, as available.
- Use of off-road diesel equipment meeting Tier 4 emissions standards.
- Use of medium and heavy-duty diesel on-road vehicles equipped with newer engine models (no more than eight years old) or powered by zero or near zero-emissions technology, as certified by the California Air Resources Board, as feasible.
- Install electric vehicle (EV) supply equipment and/or 'EV Ready Spaces' to service light, medium and heavy-duty vehicles and on-site solar power systems or other zero-emission electric generating systems that provide electricity to power on-site equipment.
- Use of carbon-free electricity.

Page 134 Section 3.10.1.2, the text of the second paragraph on the page is **REVISED** as follows:

The project site is located in the Santa Clara Valley Groundwater Basin between the Diablo Mountains to the east and the Santa Cruz Mountains to the west. The Santa Clara Valley Groundwater Basin is filled by valley floor alluvium and the Santa Clara Formation. Groundwater at the project site is estimated to occur at depths of approximately 20-30 feet bgs; however, the depth to groundwater is a seasonal occurrence, and according to Valley Water's ~~2016~~ 2021 Groundwater Management Plan, the general depth to groundwater in the Santa Clara Valley is 80 feet bgs. The project site is developed and does not contribute to the recharging of the County's groundwater aquifers managed by Valley Water.

Page 134 Section 3.10.1.2, the text of the fourth paragraph on the page is **REVISED** as follows:

Based on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (Map Nos. 06085C0261H, 06085C0262H, 06085C0264H and dated May 18, 2009), the project site is located in Flood Zone D. Zone D is an area of

undetermined but possible flood hazard. The City of San José has no floodplain requirements for Zone D.

Page 139 Section 3.10.2.1, the text of the third paragraph on the page is **REVISED** as follows:

Valley Water prepared a Groundwater Management Plan (GMP) for the Santa Clara and Llagas subbasins in ~~2016~~ 2021, describing its comprehensive groundwater management framework including objectives and strategies, programs and activities to support those objectives, and outcome measures to gauge performance. The GMP is the guiding document for how Valley Water will ensure groundwater basins within its jurisdiction are managed sustainably. The Santa Clara subbasin has not been identified as a groundwater basin in a state of overdraft.

Page 174 Section 3.17, the text of the first paragraph on the page is **REVISED** as follows:

The following discussion is based, in part, on a Transportation Analysis Report prepared for the project by Hexagon Transportation Consultants, Inc. A copy of this report, dated December 2020, is included in Appendix F of this Environmental Impact Report. The discussion is also based, in part, on the Long-Range Transportation Analysis Report for the City of San José 2021 General Plan Amendments prepared by Hexagon Transportation Consultants, Inc. A copy of this report, dated August 2021, is included in Appendix G of this Environmental Impact Report.

Page 183 Section 3.17.2.1, the text of the final paragraph on the page is **REVISED** as follows:

The project site is served by the existing VTA buses with bus stops within one mile from the project site. The nearest bus stops to the project site are located along Capitol Expressway at its intersection with Snell Avenue, approximately 2,200 feet from the project site. Additionally, the Capitol Caltrain Station is located at the intersection of Monterey Road and Fehren Drive, about 1.15 miles from the project site. Based on the small increase in new employees and the type of proposed project operations, the new transit trips generated by the project are not expected to create demand in excess of the transit services that are currently provided. Additionally, the project does not propose any modifications to the rail system in the project vicinity. The only rail modifications proposed by the project consist of on-site rail spurs for railcar storage. Further, proposed project facilities and activities were specifically designed and located in a manner to ensure they do not preclude future build out of high-speed rail infrastructure. As a result, the project would not result in impacts to planned future high-speed rail operations. Therefore, implementation of the proposed project would not conflict with any program, plan, ordinance or policy addressing transit facilities.

Page 186 Section 3.17.2.2, the following text is **ADDED** after the last paragraph in the section:

Cumulative Long-Range Transportation Impact Analysis

In addition to an analysis of long-range transportation impacts of individual General Plan Amendments (GPAs), the City also evaluates cumulative long-range transportation impacts of all proposed GPAs in each annual GPA cycle. The purpose of this analysis is to evaluate the combined effect of all proposed GPAs on the three Measures of Effectiveness (MOE) thresholds used to evaluate long-range transportation impacts citywide at build out of the 2040 General Plan. The results of the cumulative Long-Range transportation analysis are discussed below and provided in Appendix G of this Draft EIR.

General Plan Amendment

The City of San José adopted policies and goals in General Plan to reduce the drive alone mode share to no more than 40 percent of all daily commute trips, and to reduce the VMT per service population by 40 percent from existing (year 2015) conditions. To meet these goals by the General Plan horizon year and to satisfy CEQA requirements, the City developed a set of MOEs and associated significance thresholds to evaluate long-range transportation impacts resulting from land use adjustments. Table 3.17-2 summarizes the significance thresholds associated with vehicular modes of transportation as defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11) for the evaluation of long-range traffic impacts resulting from proposed land use adjustments and used in this analysis.

Table 3.17-2
MOE Significance Thresholds

MOE	**Citywide Threshold**
VMT/Service Population	Any increase over current 2040 General Plan conditions
Mode Share (Drive Alone %)	Any increase in journey-to-work drive alone mode share over current 2040 General Plan conditions
Transit Corridor Travel Speeds	Decrease in average travel speed on a transit corridor below current 2040 General Plan conditions in the AM peak one-hour period when: 1. The average speed drops below 15 mph or decreases by 25% or more, or 2. The average speed drops by 1 mph or more for the transit corridor with average speed below 15 mph under current 2040 General Plan conditions.
Source: *City of San José Transportation Analysis Handbook*, April 2018	

In addition to the MOEs described above, the effects of the proposed land use adjustments on transit, bicycle, and pedestrian facilities were evaluated. A significant long-range transportation impact would occur if the adjustments would:

- Disrupt existing, or interfere with, planned transit services or facilities;
- Disrupt existing, or interfere with, planned bicycle facilities;
- Conflict or create inconsistencies with adopted bicycle plans, guidelines, policies, or standards;
- Not provide secure and safe bicycle parking in adequate proportion to anticipated demand;
- Disrupt existing, or interfere with, planned pedestrian facilities;
- Not provide accessible pedestrian facilities that meet current ADA best practices; or
- Create inconsistencies with adopted pedestrian plans, guidelines, policies, or standards.

Vehicle Miles Traveled Per Service Population

The San José General Plan Travel Demand Forecasting (TDF) model was used to project daily VMT per service population, where service population is defined as the number of residents plus the number of employees citywide. This approach focuses on the VMT generated by new population and employment growth. VMT is calculated as the number of vehicle trips multiplied by the length of the trips in miles.

As shown in Table 3.17-3, below, the citywide daily VMT would decrease slightly but the VMT per service population would remain unchanged due to the proposed land use amendments when compared to the current General Plan. The reduction in citywide daily VMT is due to (1) the total number of jobs and households would not change citywide as a result of the GPAs (only shifting of households and jobs would occur) and (2) the addition of households to areas with more jobs and transit options. Therefore, cumulatively, the proposed 2021 GPAs would result in a less than significant impact on citywide daily VMT per service population. Vehicle trips citywide would be reduced due to the reallocation of jobs and housing within and surrounding the downtown area which provides for greater opportunities for multi-modal travel. The availability of current and planned transit, bicycle, and pedestrian facilities in the area of the GPA sites will result in an increase in trips made by transit and other non-vehicular modes.

Table 3.17-3 Daily Vehicle Miles Traveled Per Service Population			
	Base Year (2015)	**2040 General Plan (Baseline)**	**2040 General Plan Plus GPAs**
Citywide Daily VMT	17,505,088	27,984,522	27,978,033
Citywide Service Population	1,392,946	2,054,758	2,054,758
- Total Households	319,870	429,350	429,350
- Total Residents	1,016,043	1,303,108	1,303,108
- Total Jobs	376,903	751,650	751,650
Daily VMT Per Service Population	12.57	13.62	13.62
Increase in VMT/Service Population Over General Plan Conditions			**0.00**
Significant Impact?			**No**

Compared to the current General Plan, the proposed land use adjustments would not result in an increase in citywide VMT per service population. Therefore, cumulatively, the proposed 2021 GPAs would result in a less than significant impact on citywide daily VMT per service population. It is important to note that the VMT per service population is based on raw model output and does not reflect the implementation of adopted General Plan policies and goals that would further reduce VMT by increased use of non-auto modes of travel.

Journey-to-Work Mode Share

The San José General Plan TDF model was used to calculate citywide journey-to-work mode share percentages. Journey-to-work mode share is the distribution of all daily work trips by travel mode, including drive alone, carpool with two persons, carpool with three persons or more, transit (rail and bus), bike, and walk trips. Although work trips may occur at any time of the day, most of the work trips occur during typical peak commute periods (6:00 – 10:00 AM and 3:00 – 7:00 PM). As defined in the City of San José Transportation Analysis Handbook, any increase in the journey-to-work drive alone mode share percentage over the current General Plan conditions due to the proposed land use amendments is considered a significant impact. Table 3.17-4, below, summarizes the citywide journey-to-work mode share analysis results. When compared to the current Envision San José 2040 General Plan, the percentage of journey-to-work drive alone trips would decrease slightly and the percentage of transit and bike trips would increase slightly as a result of the proposed 2021 GPAs.

Table 3.17-4 Journey-to-Work Mode Share						
	Base Year (2015)		2040 General Plan (Baseline)		2040 General Plan Plus GPAs	
Mode	Trips	%	Trips	%	Trips	%
Drive Alone	753,264	76.69	1,089,830	71.55	1,089,733	71.54
Carpool 2	85,496	9.04	137,919	9.05	138,013	9.06
Carpool 3+	28,526	3.02	54,929	3.61	54,941	3.61
Transit	48,181	5.10	184,648	12.12	184,594	12.12
Bicycle	14,120	1.49	26,394	1.73	26,385	1.73
Walk	15,666	1.66	29,514	1.94	29,515	1.94
Increase in Drive Alone Percentage over General Plan Conditions						**-0.01**
Significant Impact?						**No**

The proposed land use adjustments will not result in an increase of drive alone trips when compared to the current General Plan conditions. Therefore, cumulatively, the proposed 2021 GPAs would result in a less than significant impact on citywide journey-to-work mode share.

Average Vehicle Speeds in Transit Priority Corridors

The San José General Plan TDF model was used to calculate the average vehicle travel speeds during the AM peak hour for the City's 14 transit corridors that were evaluated in the Envision San José 2040 General Plan TIA. A transit corridor is a segment of roadway identified as a Grand Boulevard in the Envision San José 2040 General Plan Land Use/Transportation Diagram. Grand Boulevards serve as major transportation corridors and, in most cases, are primary routes for VTA's LRT, BRT, local buses, and other public transit vehicles. The travel speeds are calculated by dividing the segment distance by the vehicle travel time. As defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11), land use amendments that result in a decrease in average travel speed on a transit corridor in the AM peak one-hour period when the average speed drops below 15 miles per hour (mph) or decreases by 25 percent (%) or more, or the average speed drops by one mph or more for a transit corridor with average speed below 15 mph when compared to the current GP conditions is considered a significant impact.

Table 3.17-5 presents the average vehicle speeds on the City's 14 transit priority corridors (i.e., Grand Boulevard segments) during the AM peak-hour of traffic. When compared to travel speeds under current General Plan conditions, the change in traffic resulting from the proposed land use amendments would have minimal effect on the travel speeds in the transit corridors. The TDF model estimates a decrease in travel speeds of 0.3 mph or less (or a change of 2.1% or less) on one corridor due to the proposed GPAs. Travel speeds on the remaining corridors would improve slightly or remain unchanged when compared to the current General Plan. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on the AM peak-hour average vehicle speeds on the transit priority corridors.

Table 3.17-5
AM Peak-Hour Vehicle Speeds (mph) for San José Transit Priority Corridors

Transit Priority Corridor	Base Year (2015) Speed (mph)	2040 General Plan (Baseline) Speed (mph)	2040 General Plan GPAs Speed (mph)	2040 General Plan GPAs % Change	2040 General Plan GPAs Absolute Change
2nd Street from San Carlos Street to St. James Street	16.6	15.1	15.3	1.3%	0.2
Alum Rock Avenue from Capital Avenue to US 101	21.3	16.6	16.7	0.6%	0.1
Camden Avenue from SR17 to Meridian Avenue	23.1	16.5	16.5	0.0%	0.0
Capitol Avenue from South Milpitas Boulevard to Capitol Expressway	27.1	22.6	22.7	0.4%	0.1
Capitol Expressway from Capital Avenue to Meridian Avenue	33.0	26.6	26.6	0.0%	0.0
East Santa Clara Street from US 101 to Delmas Avenue	20.4	15.8	15.8	0.0%	0.0
Meridian Avenue from Park Avenue to Blossom Hill Road	24.9	20.0	20.0	0.0%	0.0
Monterey Road from Keyes Street to Metcalf Road	27.4	19.3	19.4	0.5%	0.1
North 1st Street from SR 237 to Keyes Street	21.3	13.8	13.7	-0.7%	-0.1
San Carlos Street from Bascom Avenue to SR 87	24.8	19.9	19.9	0.0%	0.0
Stevens Creek Boulevard from Bascom Avenue to Tantau Avenue	24.3	18.9	18.9	0.0%	0.0
Tasman Drive from Lick Mill Boulevard to McCarthy Boulevard	22.7	14.0	13.7	-2.1%	-0.3
The Alameda from Alameda Way to Delmas Avenue	20.5	14.0	14.0	0.0%	0.0
West San Carlos Street from SR 87 to 2nd Street	20.0	18.8	18.7	-0.5%	-0.1

The proposed land use adjustments would not result in a decrease in travel speeds greater than 1 mph or 25 percent on any of the 14 transit priority corridors when compared to current General Plan conditions. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant impact* on the AM peak-hour average vehicle speeds on the transit priority corridors.

Page 214 Section 7.4.1.3, the text of the second paragraph in the section is **REVISED** as follows:

As described in Section 3.8, the net increase in GHG emissions associated with the project site would exceed both the operational and stationary source thresholds. The net increase in operational emissions from non-stationary sources would be 1,887 MT CO2e, exceeding the threshold by 1,227 MT CO2e. The overall operational emissions of 9,651 MT CO2e ~~Operational emissions~~ would need to be reduced by 1,227 MT CO2e, or roughly 13 percent, to be below the threshold. Similarly, stationary source emissions would total 12,240 MT CO2e, exceeding the threshold by 2,240 MT CO2e. Stationary source emissions would need to be reduced by roughly 21 percent to be below the threshold. The stationary source emissions are all associated with the proposed asphalt plant. Therefore, reducing the throughput of the asphalt plant by 21 percent would reduce associated GHG emissions in a corresponding manner. The operational emissions are associated with all other operations on the site. Reducing the throughput of the remaining operations by 13 percent would reduce associated GHG emissions in a corresponding manner.

Appendix B The text on pages 74-75 is **REVISED** as follows:

Mitigation Measure GHG-1: Develop and implement a GHG Reduction Plan.

Prior to the ~~operation of Phase 3,~~ issuance of building permits for and operation of the asphalt plant (Phase 3 of the project), the project applicant shall retain a qualified consultant to complete a GHG emissions inventory ~~shall be developed and~~ which shall be used to implement a GHG reduction plan that includes the proper elements ~~would~~ to reduce emissions to below the significance level of 660 metric tons ~~GHG~~ CO2e for non-stationary sources and 10,000 metric tons CO2e ~~per year~~ for stationary sources for the lifetime of the project. The GHG Reduction Plan shall be submitted to the Director of Planning, Building and Code Enforcement or the Director's designee for review and approval prior to issuance of building permits for the asphalt plant (Phase 3 of the project). Elements of this plan may include, but would not be limited to, the following:

- Use of on-road and off-road vehicles and construction equipment and switching locomotives with lower GHG-emitting engines, such as electric or hybrid equipment.
- ~~Explore u~~Use of clean truck fleet.
- Commitment to use carbon-free electricity provided by Silicon Valley Clean Energy~~, which could reduce GHG emissions by about 200 metric tons per year~~.
- Installation of solar power systems or other renewable electric generating systems that provide electricity to power on-site equipment and possibly provide excess electric power.
- Limit annual production, as GHG emissions would be proportional to annual production in tons.

- Construct onsite or fund off-site carbon sequestration projects (such as a forestry or wetlands projects for which inventory and reporting protocols have been adopted). If the project develops an off-site project, it must be registered with the Climate Action Reserve or otherwise approved by the BAAQMD in order to be used to offset Project emissions.
- ~~Purchase of carbon credits to offset Project annual emissions. Carbon offset credits must be verified and registered with The Climate Registry, the Climate Action Reserve, or another source approved by the California Air Resources Board or BAAQMD. The preference for offset carbon credit purchases include those that can be achieved as follows: 1) within the County; 2) within the San Francisco Bay Area Air Basin; 3) within the State of California; then 4) elsewhere in the United States. Provisions of evidence of payments, and funding of an escrow-type account or endowment fund would be overseen by the City.~~
- ~~Application of applicable GHG reduction strategies that could be subsequently adopted by the City as part of a qualified GHG reduction plan. These strategies have the ability to reduce project GHG impacts if any such plan includes the effect of the project operations.~~
- ~~Reduction targets for each phase of the project implemented.~~
- Use of zero-emission off-road equipment, as available.
- Use of off-road diesel equipment meeting Tier 4 emissions standards.
- Use of medium and heavy-duty diesel on-road vehicles equipped with newer engine models (no more than eight years old) or powered by zero or near zero-emissions technology, as certified by the California Air Resources Board, as feasible.
- Install electric vehicle (EV) supply equipment and/or 'EV Ready Spaces' to service light, medium and heavy-duty vehicles and on-site solar power systems or other zero-emission electric generating systems that provide electricity to power on-site equipment.
- Use of carbon-free electricity.
- Purchase of carbon credits to offset project annual emissions.

~~The project GHG Reduction Plan would be developed every five years and approved by the City.~~

Appendix G Appendix G: Long-Range Transportation Analysis 2021, included as Appendix C to this First Amendment to the Draft EIR, is **ADDED** to the text of the Draft EIR.

Appendix A: Draft EIR Comment Letters

November 4, 2022

Maira Blanco, Planner
City of San Jose, PBCE
200 E. Santa Clara Street Tower
3rd Floor, PBCE
San Jose, CA 95113

RE: Graniterock Capitol Site Modernization Plan Draft Environmental Impact Report (DEIR)

Dear Maira Blanco,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan (Project). The proposed Project includes the expansion of the existing concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations. The proposed Project also includes the addition of an asphalt plant and cementitious distribution facility. Further, the equipment storage and maintenance yard would be removed, and the existing rail spur would be extended to accommodate roughly 55 railcars with an increase in unloading capacity to 2,000 tons per hour.

Greenhouse Gases

The Air District is concerned with the Project's significant greenhouse gas (GHG) emissions and proposed mitigation measures to reduce the GHG impact. The Air District recommends that the City of San José (City) require the Project to include more onsite GHG reductions in the Project design to minimize the need for the purchase of carbon offsets. The DEIR specifies that the purchase of carbon offsets should prioritize offset projects occurring in Santa Clara County followed by the Bay Area, California, and the U.S. The DEIR also specifies that only projects from California Air Resources Board (CARB) -approved registries may be selected. Currently only three CARB-approved projects are available in the Bay Area – two in Sonoma County and one in Napa County. The lack of available offset projects in or near Santa Clara County increases the importance of maximizing on-site mitigations.

The DEIR includes Mitigation Measure GHG-1: Develop and Implement a GHG Reduction Plan, which includes a list of potential measures that could be included in a yet-to-be-developed GHG Reduction Plan for the Project. The GHG Reduction Plan should be reviewed and approved by the City before building permits are issued. The Air District recommends that all additional on-site emission reduction

measures be specific, effective, required, and actionable, clearly identify the party(ies) responsible for implementation and be included as design or programmatic elements of the Project, rather than as potential future measures, to avoid deferred mitigation. In addition to the carbon credits measures mentioned previously, additional measures include:

- Off-road equipment such as front loaders, sweepers, trucks, or other equipment should be zero-emission, as available; the City should require commitments to zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction and operational equipment for use prior to any ground disturbing, construction and operational activities.
- At minimum, off-road diesel equipment should meet Tier 4 emissions standards.
- Similarly, emissions from backup diesel generators should be further mitigated as much as possible including adoption of natural gas-fueled equipment and/or zero-emissions technologies. At a minimum, require Tier 4 diesel generators.
- Medium and heavy-duty diesel on-road vehicles should be equipped with newer engine models, no more than eight years old, or powered by zero or near zero-emissions technology, as certified by the California Air Resources Board, as feasible.
- Provide electrical hook-ups to the power grid, rather than using diesel-fueled generators, for electric construction tools, such as saws, drills, and compressors, and using electric tools as feasible.
- Install electric vehicle (EV) supply equipment and/or 'EV Ready Spaces' to service light, medium and heavy-duty vehicles and on-site solar power systems or other zero-emission electric generating systems that provide electricity to power on-site equipment. At minimum, the Project Sponsor should comply with the City's Reach Code[1] for building electrification, energy efficiency, solar and EV readiness.
- Commit to use carbon-free electricity provided by San José Clean Energy.

This will help the Project align with the Climate Smart San José Plan to be carbon neutral by 2030.

The Air District has invested in several efforts to promote the production and use of low-carbon cement, concrete and similar products. There are technologies that use recycled materials for aggregate and mineralization processes to create carbon-negative aggregate. Using recycled inputs in production can dramatically reduce energy needs and potentially sequester carbon. The Air District recommends that these technologies be considered as additional on-site Project mitigation measures.

[1] City of San José, *Ordinance No. 30311*, October 1, 2019.
https://www.sanjoseca.gov/home/showpublisheddocument/44078/637082139871830000

Air Quality

The Air District is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the San Francisco Bay Area. In addition to its roles as either Lead Agency or Responsible Agency in California Environmental Quality Act proceedings, the Air District also administers an air quality permitting program for stationary equipment to ensure all air quality requirements are met.

The Project Sponsor should submit an Air District permit application in parallel to the City's permit. The Air District will conduct a detailed engineering review of the stationary source emissions and perform a health risk assessment based on the Project's proposed operational parameters.

Several components of the DEIR's emissions analysis would be augmented by including additional details. These are referenced below with recommendations:

- **Project Description (page 3):** Many of the Project's potential air quality impacts are related to truck and railcar trip increases but are not adequately quantified. The DEIR should quantify the maximum number of annual and daily truck and railcar trip increases as a result of the Project and describe these in the Project Description.
- **Abatement and Mitigations (page 7):** The Project proposes to "fully enclose" the new asphalt operation, aggregate distribution facility, cementitious distribution facility and concrete plant. The DEIR does not adequately define "fully enclose". Additionally, air abatement devices are only discussed for the cementitious distribution facility. The Air District recommends the DEIR describe the specific design details of enclosures and abatement devices, identify air abatement devices for each facility and include Project drawings and depictions that illustrate these proposals.

Community Engagement

Air Quality impacts and concerns were identified by community members during the Notice of Preparation scoping process. The DEIR identifies several sensitive receptors within 1,000 feet of the Project location. Although the air quality impacts are less than significant, the Air District recommends continued engagement with the community to identify and mitigate concerns.

Certain Project equipment may require an air quality permit (Authority to Construct/Permit to Operate) from the Air District. Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

Additionally, Air District Planning staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Mark Tang, Principal Environmental Planner, at (415) 749-4779 or mtang@baaqmd.gov.

Sincerely,

Greg Nudd
Deputy Air Pollution Control Officer – Policy

Cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Director Otto Lee
BAAQMD Director Sergio Lopez
BAAQMD Director Rob Rennie

County of Santa Clara

Roads and Airports Department

101 Skyport Drive
San Jose, CA 95110-1302
(408) 573-2460 FAX 441-0276

November 9, 2022

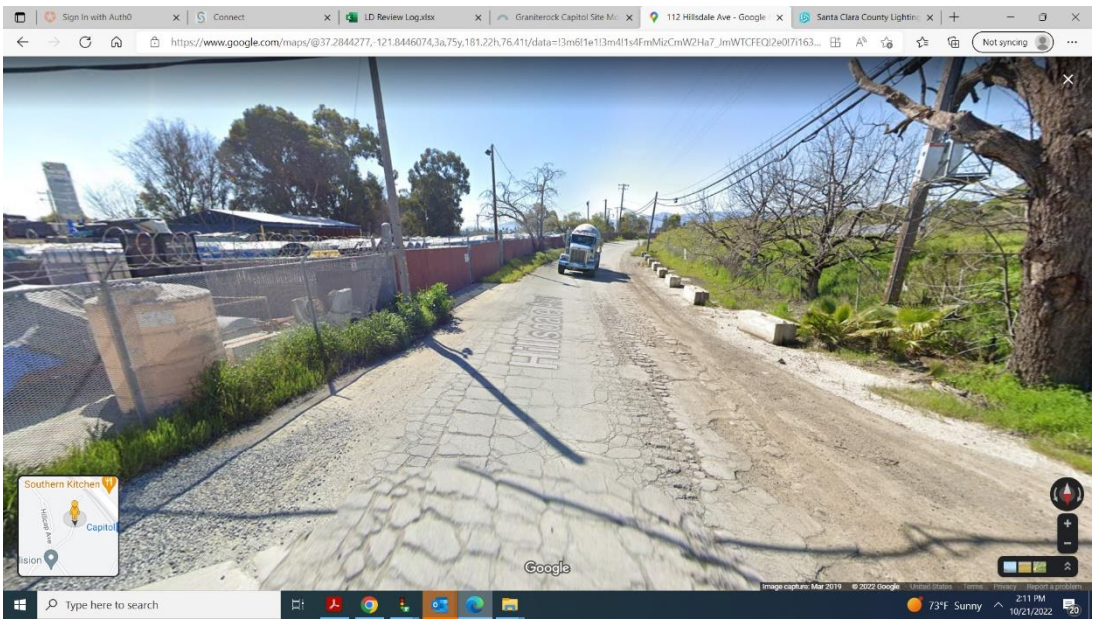
Maira Blanco
Planner |
Planning, Building & Code Enforcement
City of San José
200 East Santa Clara Street
Maira.Blanco@sanjoseca.gov

SUBJECT: Notice of Availability (NOA) and Public Comment Period for a draft Environmental Impact Report: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice of Availability (NOA) and Public Comment Period for a draft Environmental Impact Report: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013). We submit the following comments:

- County would like the opportunity to review the CMP when it is available.
- Figure 3.17-2 Existing Pedestrian Facilities – Ensure the existing pedestrian facilities and stop control match existing field conditions.
- Consider improving pedestrian facilities by upgrading the existing non-ADA pedestrian ramps and providing a crosswalk at the Capitol Drive-In access on Hillcap Ave.
- The project proposes a change in facility hours of operation from 6:00 AM – 8:00 PM to 12:00 AM – 12:00 PM. Provide proposed project trips during the Off-Peak period (11:00-13:00) and address any potential impacts.

- Report claims all employee vehicles and trucks would continue to enter and exit the site via the project driveway at the end of Granite Rock Way. Trucks are restricted from using Hillsdale Avenue. Therefore, trucks would continue to utilize Hillcap Avenue, Snell Avenue, and Capitol Expressway as their route to and from the project site. However, it appears there is an existing access gate to Graniterock at the County maintained portion of Hillsdale Ave. What is the purpose of this gate? See photo below. A portion of Hillsdale and Hillcap Ave. within the vicinity of the project's access route are County maintained. It appears the County maintained portion of Hillsdale Ave. is severely impacted and damaged by the amount of truck traffic. If Graniterock uses this section of Hillsdale, they will have to contribute a fair-share to improve and maintain it. See Hillsdale pavement condition below.
- The Snell Avenue and Capitol Expressway intersection would operate at unacceptable levels under background and project conditions. Therefore, the project applicant should work with City staff during the review of the Planned Development Permit and consult with the County in determining an appropriate contribution towards the implementation of possible pedestrian improvements and mitigation measures to accommodate projected queues and resolve critical movement delays at Capitol and Snell. County's concern includes all CMP intersections along Capitol impacted by this project.



Thank you again for your continued outreach and coordination with the County. If you have any questions or concerns about these comments, please feel free to contact me at ben.aghegnehu@rda.sccgov.org

Thank you,

CALIFORNIA
High-Speed Rail Authority

November 4, 2022

Mrs. Maira Blanco
Department of Planning, Building, and Code Enforcement
200 East Santa Clara Street, 3rd Floor
San Jose, CA 95113
Submitted via e-mail to Maira.Blanco@sanjoseca.gov

RE: Draft Environmental Impact Report (EIR) for the Graniterock Capitol Site Modernization Project

Dear Mrs. Blanco:

This letter provides the California High-Speed Rail Authority's (Authority) comments on Graniterock's September 13, 2022, Draft Environmental Impact Report (EIR) for the Graniterock Capitol Site Modernization Project (Project) referenced as File No. GP19-010, PDC20-023, PD20-013.

Board Approval of Project Section

On April 28, 2022, the Authority Board of Directors certified the Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) and approved the approximately 89-mile San Jose to Merced Project Section of the statewide high-speed rail system. This action completes the state and federal environmental clearance for the high-speed rail Project Section connecting the Central Valley to the San Francisco Bay Area. Approval of this Project Section includes modifications to the existing railroad tracks near Caltrain Capitol Station and near the Project. These track modifications include curve straightening and moving the Caltrain Capitol Station south for the approved Authority's Preferred Alternative.

Comments on the Draft Environmental Impact Report

The Authority is supportive of Graniterock's improvements to their Capitol Site and have continued coordination to address design concerns between the Authority's and Graniterock's plans.

Overall, we found that the Graniterock Draft EIR did not sufficiently analyze transportation impacts, specifically missing an analysis of the Project's impacts on rail operations. Consistent with CEQA Guidelines 15064.3, 15125(d) and its Appendix G, an EIR must assess whether a project conflicts with a program, plan, ordinance, or policy addressing the circulation system, including current and reasonably foreseeable transit facilities such as passenger rail and must analyze any inconsistencies between the proposed project and applicable general plans, specific plans, regional plans. An EIR must also assess impacts on *freight* rail operations where the project might disrupt or interfere with freight operations to

an extent that causes significant secondary impacts (e.g. air quality, noise, GHG emissions, transportation). Consistent with these standards, an adequate analysis must include an assessment of the project's impacts on the approved high-speed rail project near Graniterock (Authority San Jose to Merced Final EIR/EIS, certified April 2022) and Caltrain (Caltrain Business Plan). Absent this analysis, the public is unable to adequately assess the project's impacts on transportation programs, plans, policies, or systems, and the document does not meet its disclosure obligations.

We believe this gap can be adequately addressed with the addition of a passenger and freight rail impacts analysis in the EIR. We provide below a few elements that would be important to have an adequate analysis of the Project's transportation impacts on the Authority, Caltrain, and other affected transit and rail facilities and plans.

- As configured in the Conceptual Site Plan, both junctions to access the new site would require reversing moves on the high-speed rail main line tracks which would significantly disrupt passenger rail operations (i.e. maintenance) on the line.
- Adequately define the window of time that site operations will be utilizing the connection to the rail corridor to determine impacts on passenger rail operations and maintenance.
- Freight train transfers between the Cement Rail Line and Rail Line #1 (as labeled on the Conceptual Site Plan) would lead to incidents that would foul[1] the mainline and affect passenger rail traffic operations.
- The EIR does not provide information on when these moves from the Cement Rail and Rail Line #1 would take place. Without such information, it is impossible to evaluate the project's effects on passenger rail operations for the Authority's project.
- The EIR does not provide information on the signaling system that will cover these new sidings, which must be disclosed to identify impacts on passenger rail operations.
- There is no direct connection to Main Line #1 (MT1) on the Conceptual Site Plan from the proposed freight track. All freight trains would be expected to use Main Line #2 (MT2) and #3 (MT3) including for the shunt moves mentioned. Given the operational analysis done to date by the Authority, it is almost certain that access could not be provided during peak commuting hours, and highly unlikely during off-peak commuting hours. Restricting freight operations to non-passenger times would impact railroad track maintenance work.
- The other infrastructure required to the north to cross over between MT1/MT2/MT3 was not included. The Conceptual Site Plan in the EIR must show all required track improvements as they relate to the proposed project's impacts to allow the Authority to determine potential impacts to passenger rail operations.
- The Project's Transportation Analysis includes the existing Caltrain station and level of service, but no consideration is given to planned future rail service volumes in this corridor, including consideration of the Authority's approved project in this corridor.
- The application is for increased handling capacity on the site and for 24/7 hours of operation. We cannot find any reference to what this would mean for frequency of freight train operations to/from the site.

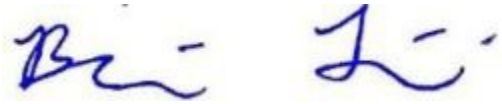
[1] Definition for fouling a track per 49 CFR Part 214 (1992), means the placement of an individual or an item of equipment in such proximity to a track that the individual or equipment could be struck by a moving train or on-track equipment, or in any case is within four feet of the field side of the near running rail.

- This EIR does not account for the Authority's approved project, including impacts to the Overhead Catenary System (OCS) poles/portals– there would be several relocations required that are not accounted for.
- Crossovers required to accommodate movement of freight trains from MT1 to MT2/MT3, in order to be delivered to Graniterock site, need to be electrified to prevent mis-routed passenger trains causing a rip-down of the OCS.
- The Authority's approved project proposes to run 110 mph trains on a curve where this Conceptual Site Plan indicates Graniterock would install a crossover/turnout. The installation of a crossover/turnout here would require significant track level changes to accommodate superelevation, causing an impact to operations.
- The Conceptual Site Plan seemingly proposes a crossover and turnout connection to the rail corridor on the northern side of the property. This would require a redesign or evaluation of the suitability of mainline operations. This redesign or evaluation should evaluate 79 mph and 110 mph mainline operation. This evaluation must also analyze any impacts that track profile redesign has on the reduction of clearances to nearby structures.
- More information on the Rail Pits (size, location, depth) and other site utilities (e.g., lighting structures) is needed to evaluate the impacts to the Authority's project.
- The EIR must document how their project is going to protect the rail corridor from unauthorized ingress/egress to adequately disclose if the project may substantially increase hazards due to a design feature (e.g. dangerous intersections or inadequate securitization of the rail perimeter) or incompatible uses. (See CEQA Guidelines Appendix G, Section XVII.C.)

Moving Forward

The Authority appreciates the opportunity to review the EIR and continue to coordinate with your team as both your and our projects advance. We are now actively pursuing funding to advance our work in this corridor and we believe ongoing communication and collaboration with Graniterock will be valuable as both of us move forward. Authority staff are ready to meet with you to work together to realize this opportunity.

Sincerely,



Boris Lipkin

Northern California Regional Director

Mimi McNamara

From: Matthew Sasaki <MSasaki@valleywater.org>
Sent: Thursday, November 3, 2022 2:56 PM
To: Blanco, Maira
Subject: RE: Notice of Availability (NOA) and Public Comment Period for a draft Environmental Impact Report: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Hi Maira,

Valley Water has reviewed the NOA of a DEIR for the Graniterock Capitol Site Modernization Project received on September 20, 2022. Please see below for comments:

Page 127, Groundwater Monitoring Wells

Valley Water records show two wells located at the site. Our records indicate that these wells have not been properly destroyed and are considered active. These wells need to be protected from damage during construction if they are to remain. If they are to be modified or no longer needed the applicant needs to obtain a permit from Valley Water in accordance with Valley Water Ordinance 90-1 for modification or destruction of the well(s).

Page 131, Water Resources Protection Ordinance and District Well Ordinance: For accuracy and clarity, please consider the following revision to the section.

Valley Water operates as a flood protection agency for Santa Clara County. Additionally, Valley Water provides stream stewardship, is a wholesale water supplier, and manages the groundwater basin in the County. Under Valley Water's District Ordinance 90-1, permits are required for well construction, modification, and destruction in addition to exploratory borings of 45 feet in depth or greater. Work within Valley Water property or easement requires a permit under Valley Water's Water Resources Protection Ordinance.

Page 134, Groundwater: Valley Water has published a more recent Groundwater Management Plan than the one cited in this section. Please update the reference to Valley Water's 2021 Groundwater Management Plan linked on this page: https://www.valleywater.org/your-water/where-your-water-comes/groundwater/sustainable.

Page 134, Flooding: The site is shown on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRM) No. 06085C0261H, 06085C0262H, and 06085C0264H with effective dates of 05/18/2009. Please update this section to reflect all of the FIRMs that the site spans.

Thank you,

Matt Sasaki
Community Projects Review Unit
(408) 630-3776

From: Blanco, Maira <Maira.Blanco@sanjoseca.gov>
Sent: Tuesday, September 20, 2022 1:33 PM
Subject: Notice of Availability (NOA) and Public Comment Period for a draft Environmental Impact Report: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

NOTICE OF AVAILABILITY (NOA) OF
A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE
GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT AND PUBLIC COMMENT PERIOD

Project Description: The project consists of a General Plan Amendment, Planned Development Rezoning, and Planned Development Permit to facilitate proposed changes in operations at an existing Graniterock recycling, manufacturing, and distribution facility for aggregate, asphalt, concrete, and other construction materials. The project proposes an expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations. The project also includes the addition of an asphalt plant and cementitious distribution facility. The existing equipment storage and maintenance yard would be removed from the site. In addition, the existing rail spur would be extended from a 25-railcar spur to accommodate 55 railcars with an increase in unloading capacity to 2,000 tons per hour. The expanded facility would operate 24 hours per day, seven days per week. Development of the project would also result in the removal of 47 trees on-site trees, 43 of which are ordinance-size trees.

Location: The approximately 22-acre project site is located at 120 Granite Rock Way in San José.

Council District: 7 **File No.:** GP19-010, PDC20-023, PD20-013

The proposed project will have potentially significant environmental effects on Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Greenhouse Gas Emissions. The California Environmental Quality Act (CEQA) requires this notice to disclose whether any listed toxic sites are present at the project location. The site is listed on the Cortese List as a closed diesel Leaking Underground Storage Tank (LUST) case with a status of “Completed – Case Closed, as of November 8, 1996,” confirming the contamination has been adequately remediated.

The Draft EIR and documents referenced in the Draft EIR are available for review online at the City of San José’s “Active EIRs” website at www.sanjoseca.gov/activeeirs.

A hard copy of the of EIR is available for viewing at the Dr. Martin Luther King Jr. Library located at 150 E. San Fernando Street, San Jose, CA 95112 or by appointment at the San José City Hall Permit Center located at 200 E. Santa Clara St, San José, CA 95113. Should you wish to review a hard copy, please contact by email Maira.Blanco@sanjoseca.gov.

The public review period for this Public Review Draft EIR begins on **September 20, 2022 and ends on November 4, 2022.** Written comments must be received at the Planning Department by **5:00 p.m. on Friday, November 4, 2022** to be addressed as part of the formal EIR review process. Comments and questions should be referred to Maira Blanco in the Department of Planning, Building and Code Enforcement via e-mail: Maira.Blanco@sanjoseca.gov, or by regular mail to:

Department of Planning, Building, and Code Enforcement
Attn: Maira Blanco
200 East Santa Clara Street, 3rd Floor
San José, CA 95113

For the official record, please your written comment letter and reference **File No. GP19-010.**

Following the close of the public review period, the Director of Planning, Building, and Code Enforcement will prepare a Final Environmental Impact Report that will include responses to comments received during the review period. At least ten days prior to the public hearing on the EIR, the City's responses to comments received during the public review period will be available for review and will be sent to those who have commented in writing on the EIR during the public review period.

Maira Blanco
Planner | Planning, Building & Code Enforcement
City of San José | 200 East Santa Clara Street
Email: Maira.Blanco@sanjoseca.gov | Phone: (408)-535-7837

From: janet laurain
To: Blanco, Maira
Subject: Graniterock Capitol Site Modernization Plan
Date: Tuesday, September 20, 2022 2:11:27 PM

Hi Maira,

Can you tell me how many square feet are involved in the proposed expansion of the Graniterock Capitol Site Modernization Plan? The project calls for the expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations along with the addition of an asphalt plant and cementitious distribution facility. However, square footage is not mentioned.

Thank you.

Janet M. Laurain, Paralegal
Adams Broadwell Joseph & Cardozo
(650) 589-1660
jlaurain@adamsbroadwell.com

From: Antonina Ettare
To: Blanco, Maira
Subject: FW: Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)
Date: Wednesday, September 21, 2022 3:15:38 PM

Hello Ms. Blanco,

Does this CEQA include the expansion to accommodate 55 railcars and run 24 hours per day? This would mean these railcars will be moving into/out of the yard. Is the rail going through neighborhoods?

We had a similar situation here in D3 regarding railcars moving through all hours and blowing their horns at intersections. There are a number of these intersections and the horns were heard all hours of the night throughout our district. It was the Mayor and CM Peralez that had to work with Union Pacific to install quiet zones in a number of intersections. Is this part of this project?

Respectfully,
Antonina

From: webrequests@sanjoseca.gov <webrequests@sanjoseca.gov>
Sent: Tuesday, September 20, 2022 4:32 PM
To: runnershi@hotmail.com
Subject: Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Post Date: 09/20/2022 2:00 PM

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE

GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT AND PUBLIC COMMENT PERIOD

Project Description: The project consists of a General Plan Amendment, Planned Development Rezoning, and Planned Development Permit to facilitate proposed changes in operations at an existing Graniterock recycling, manufacturing, and distribution facility for aggregate, asphalt, concrete, and other construction materials. The project proposes an expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations. The project also includes the addition of an asphalt plant and cementitious distribution facility. The existing equipment storage and maintenance yard would be removed from the site. In addition, the existing rail spur would be extended from a 25-railcar spur to accommodate 55 railcars with an increase in unloading capacity to 2,000 tons per hour. The expanded facility would operate 24 hours per day, seven days per week. Development of the project would also result in the removal of 47 on-site trees, 43 of which are ordinance-size trees.

Location: The approximately 22-acre project site is located at 120 Granite Rock Way in San José.

Council District: 7 **File No.:** GP19-010, PDC20-023, PD20-013

The proposed project will have potentially significant environmental effects on Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Greenhouse Gas Emissions. The California Environmental Quality Act (CEQA) requires this notice to disclose whether any listed toxic sites are present at the project location. The site is listed on the Cortese List as a closed diesel Leaking Underground Storage Tank (LUST) case with a status of "Completed – Case Closed, as of November 8, 1996," confirming the contamination has been adequately remediated.

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The public review period for this Public Review Draft EIR begins on **September 20, 2022 and ends on November 4, 2022.** Written comments must be received at the Planning Department by **5:00 p.m. on Friday, November 4, 2022** to be addressed as part of the formal EIR review process. Comments and questions should be referred to Maira Blanco in the Department of Planning, Building and Code Enforcement via e-mail:

Maira.Blanco@sanjoseca.gov, or by regular mail to:

Department of Planning, Building, and Code Enforcement

Attn: Maira Blanco

200 East Santa Clara Street, 3rd Floor

San José, CA 95113

For the official record, please your written comment letter and reference **File No. GP19-010.**

Following the close of the public review period, the Director of Planning, Building, and Code Enforcement will prepare a Final Environmental Impact Report that will include responses to comments received during the review period. At least ten days prior to the public hearing on the EIR, the City's responses to comments received during the public review period will be available for review and will be sent to those who have commented in writing on the EIR during the public review period.

From: Justin Chongtoua
To: Blanco, Maira
Subject: Comment on File No. GP19-010
Date: Thursday, September 22, 2022 3:02:00 PM

Hello,

I would like to comment on the below notice. I strongly oppose it and hope it does not proceed. It will negatively impact the area. Thank you for considering my comment.

NOTICE OF CEQA POSTING - NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT (GP19-010, PDC20-023, PD20-013)

File No. GP19-010

Justin Chongtoua
254 Agustin Narvaez St #4, San Jose, CA 95136
510-990-2763
justinchongtoua@gmail.com

From: KKLLC Admin
To: Blanco, Maira
Subject: Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)
Date: Thursday, September 22, 2022 3:28:19 PM

[External Email]

miSmin Tuuhis [Good Day]
Kan rakat Kanyon Sayers-Roods. I am writing this on behalf of the Indian Canyon Band of Costanoan Ohlone People as requested, responding to your letter
As this project's Area of Potential Effect (APE) overlaps or is near the management boundary of a potentially eligible cultural site, I am interested in consulting and voicing our concerns. With some instances like this, usually we recommend that a Native American Monitor and an Archaeologist be present on-site at all times during any/all ground disturbing activities. The presence of a Native monitor and archaeologist will help the project minimize potential effects on the cultural site and mitigate inadvertent issues.

Kanyon Konsulting, LLC has numerous Native Monitors available for projects such as this, if applicable, we recommend a Cultural Sensitivity Training at the beginning of each project. This service is offered to aid those involved in the project to become more familiar with the indigenous history of the peoples of this land that is being worked on.

Kanyon Konsulting is a strong proponent of honoring truth in history, when it comes to impacting Cultural Resources and potential ancestral remains, we need to recognise the history of the territory we are impacting. We have seen that projects like these tend to come into an area to consult/mitigate and move on shortly after - barely acknowledging the Cultural Representatives of the territory they steward and are responsible for. Because of these possibilities, we highly recommend that you receive a specialized consultation provided by our company as the project commences, bringing in considerations about the Indigenous peoples and environment of this territory that you work, have settled upon and benefit from.

As previously stated, our goal is to Honor Truth in History. And as such we want to ensure that there is an effort from the project organizer to take strategic steps in ways that #HonorTruthinHistory. This will make all involved aware of the history of the Indigenous communities whom we acknowledge as the first stewards and land managers of these territories.
Potential Approaches to Indigenous Cultural Awareness/History:
↠Signs or messages to the audience or community of the territory being developed. (ex. A commerable plaque, page on the website, mural, display, or an Educational/Cultural Center

with information about the history/ecology/resources of the land)
➳Commitment to consultation with the Native Peoples of the territory in regards to presenting and messaging about the Indigenous history/community of the land (Land Acknowledgement on website, written material about the space/org/building/business/etc, Cultural display of cultural resources/botanical knowledge or Culture sharing of Traditional Ecological Knowledge - Indigenous Science and Technology)
➳Advocation of supporting indigenous lead movements and efforts. (informing one's audience and/or community about local present Indigenous community)

We look forward to working with you.
Tumsan-ak kannis [Thank You]
Kanyon Sayers-Roods
Consultant / Tribal Monitor [ICMBCO]
Kanyon Konsulting, LLC

From: Jelly
To: Blanco, Maira
Subject: Trees
Date: Thursday, September 22, 2022 8:26:28 PM

Please do not move the trees on granite walking way. We need all the trees we can grow
Kelly

Sent from my

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

September 26, 2022

Maira Blanco
City of San Jose
200 East Santa Clara St, 3rd Flr
San Jose, CA 95113

Ref: Gas and Electric Transmission and Distribution

Dear Maira Blanco,

Thank you for submitting the 120 Granite Rock Way plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E’s ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4’) in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

November 1, 2022

Maira Blanco
City of San Jose
200 E Santa Clara Street
San Jose, CA 95113

Re: Granite Rock Capitol Site Modernization
120 Granite Way, San Jose, CA 95133

Dear Maira Blanco,

Thank you for giving us the opportunity to review the subject plans. The proposed Granite Rock Capitol Site Modernization is within the same vicinity of PG&E's existing facilities that impact this property.

PG&E operates existing distribution facilities on this property within multiple easements. Said easements were recorded at Alpha E in Book 529 at Page 547, at Alpha E in Book 943 at Page 584, and at Alpha F in Book 233 at Page 717. Said easements prohibit the erection or construction of any building or other structure or the drilling or operation of any well within the easement strips. The Company intends to keep rights-of-way clear of all buildings and structures that may have an adverse effect on Company's facilities.

The proposed improvements appear to be in conflict and impact the easement areas. The Company requests the above-referenced easements be included in the project plans so that a proper review can be executed.

Please contact the Building and Renovation Center (BRSC) for facility map requests by calling 1-877-743-7782 and PG&E's Service Planning department at www.pge.com/cco for any modification or relocation requests, or for any additional services you may require.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact me at alexa.gardea@pge.com.

Sincerely,

Alexa Gardea
Land Management
916-760-5738

Appendix B: Supplemental Information

From: Blanco, Maira
To: "Janet M. Laurain"
Bcc: Van Der Zweep, Cassandra
Subject: RE: Graniterock Capitol Site Modernization Plan
Date: Wednesday, September 21, 2022 12:23:01 PM
Attachments: image001.png
image002.png

Hi Janet,

The expansion includes a new railcar offloading system and storage and distribution facility, nine 122-foot high silos, a new asphalt plant, a new cementitious distribution facility, and ancillary facilities, including a new one-story 10,000-square foot materials warehouse and storage facility and a new one-story 5,500-square foot quality assurance/quality control facility with office space. The former are measured in terms of throughput/volume/capacity instead of square footage. I'm including the breakdown below.

In addition, the entire site will be paved.

Table 2.2-1: Existing and Proposed Operations

Existing Operations	Proposed Operations
Aggregate Distribution Facility Imported: 25,000 tons/year (rail); 125,000 tons/year (truck) Exported: 35,000 tons/year (truck) Used on-site: 115,000 tons/year 25-railcar spur track Railcar unloading capacity: 400 tons/hour Open truck loading and unloading Open conveyor/front end loader distribution Open bunker storage	**Aggregate Distribution Facility** Imported: 1,300,000 tons/year (rail) Exported: 585,000 tons/year (truck) Used on-site: 715,000 tons/year 55-railcar spur track Enclosed railcar unloading capacity: 2,000 tons/hour Enclosed truck self-loading Nine 5,000-ton enclosed storage silos
Asphalt Plant Not currently present on-site	**Asphalt Plant** Exported: 750,000 tons/year (truck) Two truck lane distribution Six 250-ton enclosed silos Crumb rubber blending capacity Six 75-ton liquid asphalt cement (AC) storage tanks Emulsion manufacturing facility and storage tanks
Cementitious Distribution Facility Not currently present on-site	**Cementitious Distribution Facility** Imported: 100,000 tons/year (truck) Exported: 30,000 tons/year (truck) Used on-site: 70,000 tons/year Enclosed rail unloading and silo storage Two 4,000-ton storage silos and one 200-ton loadout silo
Concrete Plant Exported: 70,000 cubic yards/year (truck) One truck lane distribution Concrete wash out	**Concrete Plant** Exported: 300,000 cubic yards/year (truck) Three truck lane distribution Concrete wash out and concrete reclaiming system[3]

Table 2.2-1: Existing and Proposed Operations	
Existing Operations	**Proposed Operations**
Recycle Yard Materials: asphalt, concrete, blended (asphalt and concrete) Imported: 650,000 tons/year (truck) Exported: 650,000 tons/year (truck) Used on-site: 0 tons/year	**Recycle Yard** Materials: asphalt, concrete, blended (asphalt and concrete) Imported: 650,000 tons/year (truck) Exported: 300,000 tons/year (truck) Used on-site: 350,000 tons/year
Equipment Storage and Maintenance Yard Parts delivery for maintenance mobile mechanics Fuel delivery Mobile service vehicle Mobile equipment transport Asphalt grinders transport Small tools	**Equipment Storage and Maintenance Yard** Not proposed on-site

Thanks,

Maira Blanco
Planner | Planning, Building & Code Enforcement
City of San José | 200 East Santa Clara Street
Email: Maira.Blanco@sanjoseca.gov | Phone: (408)-535-7837

From: Janet M. Laurain <jlaurain@adamsbroadwell.com>
Sent: Tuesday, September 20, 2022 2:11 PM
To: Blanco, Maira <Maira.Blanco@sanjoseca.gov>
Subject: Graniterock Capitol Site Modernization Plan

[External Email]

Hi Maira,

Can you tell me how many square feet are involved in the proposed expansion of the Graniterock Capitol Site Modernization Plan? The project calls for the expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations along with the addition of an asphalt plant and cementitious distribution facility. However, square footage is not mentioned.

Thank you.

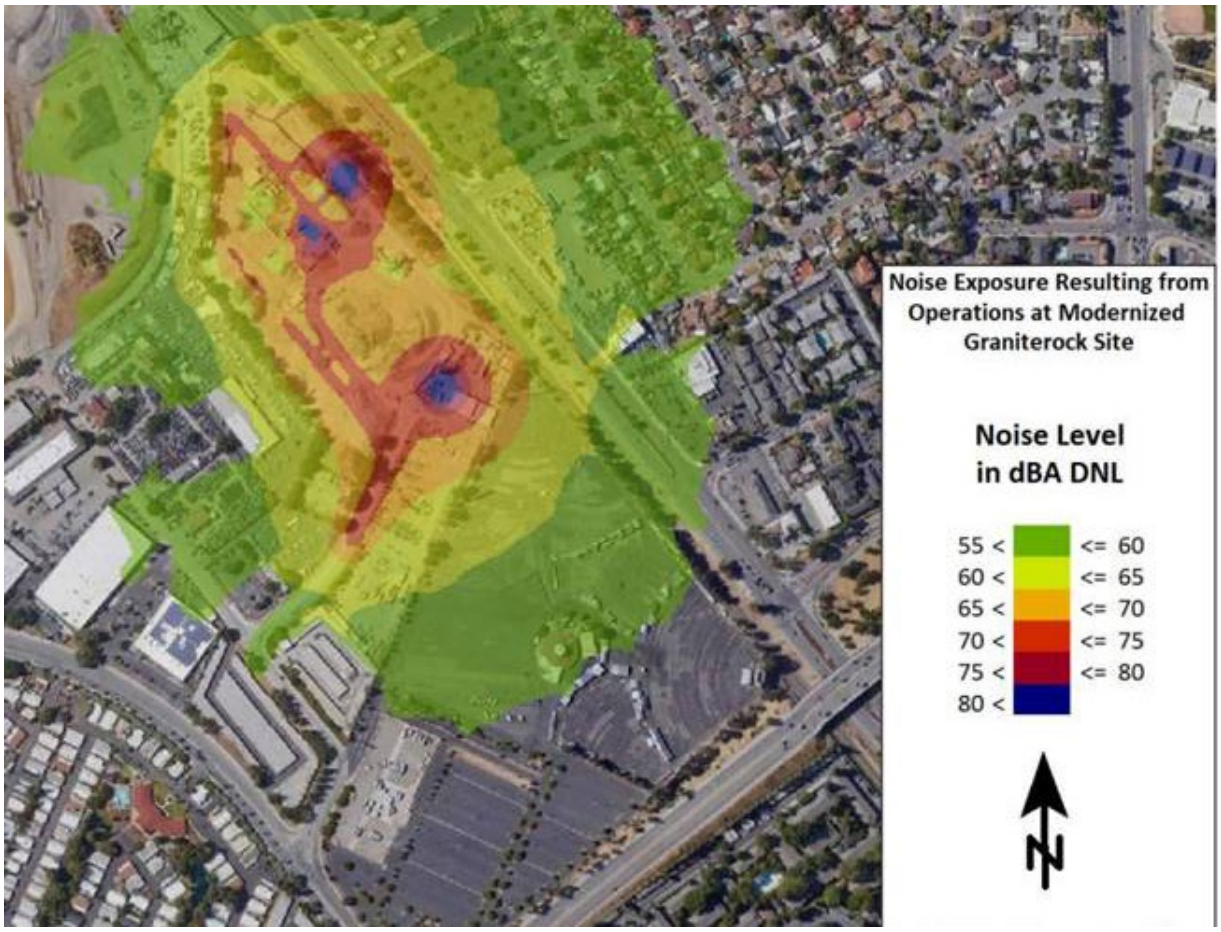
Janet M. Laurain, Paralegal
Adams Broadwell Joseph & Cardozo
(650) 589-1660
jlaurain@adamsbroadwell.com

From:	Blanco, Maira
To:	"Antonina Ettare"
Subject:	RE: Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)
Date:	Thursday, September 22, 2022 8:35:40 AM

Good morning Antonina,

Thanks for your email. The project is located in an industrial zoning district, but the existing Union Pacific Railroad tracks are adjacent to residential areas along the Aromas to Monterey Road route. Currently there is a single railcar unloading operation capable of unloading a railcar at the rate of 400 tons/hour. In order to increase the unloading rate and efficiency of the facility, a double railcar unloading operation would take its place capable of unloading at a combined rate of 2,000 tons/hour. The on-site spur track would be expanded to the eastern portion of the site to accommodate up to 55 railcars. Graniterock would move the railcars within the site with its own private locomotive to position the cars over the unloading pit and then move them out of the way for the next set of railcars. This operation is anticipated to happen continuously between the hours of 3:00 AM to 7:30 PM; railcars would be delivered by the Union Pacific Railroad between the hours of 12:00 AM and 5:00 AM (the same as under existing conditions). I have not heard of any noise complaints from the community regarding existing conditions.

The EIR included a noise study which factored in the construction and operation expansion and specifically analyzed the noise associated with the rail use at and near the project site. Existing noise levels at noise sensitive uses in the site vicinity are above 60 dBA DNL and calculations indicate that the project would result in an increase of 0 to 2 dBA DNL at nearby noise sensitive uses. A significant impact would occur if site operations would permanently increase noise levels by 3 dBA DNL. Therefore, project generated noise levels would be in compliance with the General Plan noise limits and noise increases at all receptors would be below the noise threshold.



Let me know if you have other questions.

Thanks,

Maira Blanco
Planner | Planning, Building & Code Enforcement
City of San José | 200 East Santa Clara Street
Email: Maira.Blanco@sanjoseca.gov | Phone: (408)-535-7837

From: Antonina Ettare <runnershi@hotmail.com>
Sent: Wednesday, September 21, 2022 3:16 PM
To: Blanco, Maira <Maira.Blanco@sanjoseca.gov>
Subject: FW: Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Hello Ms. Blanco,

Does this CEQA include the expansion to accommodate 55 railcars and run 24 hours per day? This would mean these railcars will be moving into/out of the yard. Is the rail going through neighborhoods?

We had a similar situation here in D3 regar

ding railcars moving through all hours and blowing their horns at intersections. There are a number of these intersections and the horns were heard all hours of the night throughout our district. It was the Mayor and CM Peralez that had to work with Union Pacific to install quiet zones in a number of intersections. Is this part of this project?

Respectfully,
Antonina

From: webrequests@sanjoseca.gov <webrequests@sanjoseca.gov>
Sent: Tuesday, September 20, 2022 4:32 PM
To: runnershi@hotmail.com
Subject: Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Notice of CEQA Posting - Notice of Availability of a Draft Environmental Impact Report (DEIR) for the Graniterock Capitol Site Modernization Plan Project (GP19-010, PDC20-023, PD20-013)

Post Date: 09/20/2022 2:00 PM

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE

GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT AND PUBLIC COMMENT PERIOD

Project Description: The project consists of a General Plan Amendment, Planned Development Rezoning, and Planned Development Permit to facilitate proposed changes in operations at an existing Graniterock recycling, manufacturing, and distribution facility for aggregate, asphalt, concrete, and other construction materials. The project proposes an expansion of the current concrete plant, aggregate and other construction materials distribution facility, and recycle yard operations. The project also includes the addition of an asphalt plant and cementitious distribution facility. The existing equipment storage and maintenance yard would be removed from the site. In addition, the existing rail spur would be extended from a 25-railcar spur to accommodate 55 railcars with an increase in unloading capacity to 2,000 tons per hour. The expanded facility would operate 24 hours per day, seven days per week. Development of the project would also result in the removal of 47 on-site trees, 43 of which are ordinance-size trees.

Location: The approximately 22-acre project site is located at 120 Granite Rock Way in San José.

Council District: 7 **File No.:** GP19-010, PDC20-023,

PD20-013

The proposed project will have potentially significant environmental effects on Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Greenhouse Gas Emissions. The California Environmental Quality Act (CEQA) requires this notice to disclose whether any listed toxic sites are present at the project location. The site is listed on the Cortese List as a closed diesel Leaking Underground Storage Tank (LUST) case with a status of "Completed – Case Closed, as of November 8, 1996," confirming the contamination has been adequately remediated.

The Draft EIR and documents referenced in the Draft EIR are available for review online at the City of San José's "Active EIRs" website at www.sanjoseca.gov/activeeirs.

A hard copy of the of EIR is available for viewing at the Dr. Martin Luther King Jr. Library located at 150 E. San Fernando Street, San Jose, CA 95112 or by appointment at the San José City Hall Permit Center located at 200 E Santa Clara St, San José, CA 95113. Should you wish to review a hard copy, please contact by email Maira.Blanco@sanjoseca.gov.

The public review period for this Public Review Draft EIR begins on **September 20, 2022 and ends on November 4, 2022.** Written comments must be received at the Planning Department by **5:00 p.m. on Friday, November 4, 2022** to be addressed as part of the formal EIR review process. Comments and questions should be referred to Maira Blanco in the Department of Planning, Building and Code Enforcement via e-mail: Maira.Blanco@sanjoseca.gov, or by regular mail to:

Department of Planning, Building, and Code Enforcement

Attn: Maira Blanco

200 East Santa Clara Street, 3rd Floor

San José, CA 95113

For the official record, please your written comment letter and reference **File No. GP19-010.**

Following the close of the public review period, the Director of Planning, Building, and Code Enforcement will prepare a Final Environmental Impact Report that will include responses to comments received during the review period. At least ten days prior to the public hearing on the EIR, the City's responses to comments received during the public review period will be available for review and will be sent to those who have commented in writing on the EIR during the public review period.

From: Blanco, Maira
To: "Justin Chongtoua"
Cc: Atienza, Manuel
Subject: RE: Comment on File No. GP19-010
Date: Thursday, September 22, 2022 3:07:49 PM

Mr. Chongtoua,

Thanks for your comment. I will forward it to the Project Manager, Alec Atienza. Should you have additional comments on the draft environmental document (EIR), please email me.

Sincerely,

Maira Blanco
Planner | Planning, Building & Code Enforcement
City of San José | 200 East Santa Clara Street
Email: Maira.Blanco@sanjoseca.gov | Phone: (408)-535-7837

From: Justin Chongtoua <justinchongtoua@gmail.com>
Sent: Thursday, September 22, 2022 3:02 PM
To: Blanco, Maira <Maira.Blanco@sanjoseca.gov>
Subject: Comment on File No. GP19-010

Hello,

I would like to comment on the below notice. I strongly oppose it and hope it does not proceed. It will negatively impact the area. Thank you for considering my comment.

NOTICE OF CEQA POSTING - NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE GRANITEROCK CAPITOL SITE MODERNIZATION PLAN PROJECT (GP19-010, PDC20-023, PD20-013)

File No. GP19-010

Justin Chongtoua
254 Agustin Narvaez St #4, San Jose, CA 95136
510-990-2763
justinchongtoua@gmail.com

From: Blanco, Maira
To: "Jelly"
Cc: Atienza, Manuel
Subject: RE: Trees
Date: Friday, September 23, 2022 10:45:39 AM

Hi Kelly,

Thanks for your comment. I'm copying the project manager, Alec Atienza, to further review. It is my understanding that development of the project includes the removal of 47 on-site trees, 43 of which are ordinance-size trees. All removed trees will have to be replaced; street tree removal/replacement is coordinated with the City's Department of Transportation (DOT).

Thanks,

Maira Blanco
Planner | Planning, Building & Code Enforcement
City of San José | 200 East Santa Clara Street
Email: Maira.Blanco@sanjoseca.gov | Phone: (408)-535-7837

From: Jelly <kekajo04@yahoo.com>
Sent: Thursday, September 22, 2022 8:26 PM
To: Blanco, Maira <Maira.Blanco@sanjoseca.gov>
Subject: Trees

Please do not move the trees on granite walking way. We need all the trees we can grow
Kelly

Sent from my

sources.

Appendix C: Long-Range Transportation Analysis 2021 (Appendix G to the EIR)

HEXAGON TRANSPORTATION CONSULTANTS, INC.

City of San José 2021 General Plan Amendments

Long-Range Transportation Analysis

Prepared for:

City of San José

August 27, 2021

Hexagon Transportation Consultants, Inc.
Hexagon Office: 8070 Santa Teresa Boulevard, Suite 230
Gilroy, CA 95020
Hexagon Job Number: 21RD07
Phone: 408.846.7410
Client Name: City of San José

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1. Introduction

This report presents the results of the long-range transportation impact analysis completed for the proposed City of San José 2021 General Plan Amendments (project). The project consists of amending the current adopted land use designations of the Envision San José 2040 General Plan (GP) for seven sites within the City of San José. The purpose of the General Plan Amendments (GPAs) transportation analysis (TA) is to assess the long-range impacts of the amendments on the citywide transportation system. The potential transportation impacts of the project were evaluated in accordance with the guidelines set forth by the City of San José for GPA TA.

The GPA TA provides an evaluation of the changed circumstances of future conditions in the currently adopted Envision San José 2040 General Plan due to the proposed 2021 General Plan amendments. The adopted GP identifies long-range planned land uses and transportation system within the City projected to the Year 2040, and serves as the baseline for the evaluation of transportation impacts of the GPAs. The results of the analysis for the proposed land use adjustments are compared to the results of the adopted GP to determine if the proposed 2021 General Plan amendments would result in any new or substantially more severe transportation impacts than those impacts that were already analyzed for the adopted GP.

After General Plan amendments to the Land Use/Transportation Diagram become effective, which is generally 30 days after Council approval, these General Plan amendments are incorporated into the updated General Plan Land Use/Transportation Diagram. This process may occur up to four times a year under State law. Therefore, the current General Plan includes all amendments that are currently effective as of the end of Year 2020.

The Envision San José 2040 General Plan Land Use/Transportation Diagram designates the type, intensity, and general distribution of planned land uses within San José. Because the 2021 General Plan amendments propose changes to sites' land use designations, this TA evaluates the incremental changes from uses and intensities allowed under the sites' current land use designations to the uses and intensities proposed under the proposed General Plan land use designations for each site. The baseline of the current land use designation is used (as opposed to the existing physical condition) because the General Plan EIR and subsequent reviews have already evaluated the potential transportation CEQA impacts of building out the adopted General Plan using an existing condition baseline in 2015. The existing condition baseline was reviewed, analyzed, and updated again as part of this study, and it was determined based on substantial evidence that the proposed 2021 General Plan amendments would not result in any new or substantially more severe transportation impacts than those impacts that were already analyzed for the General Plan.

Further, the Build-out of the General Plan and related environmental analysis under CEQA assumes development overall in the City will occur at the middle range of the General Plan land use designations or be consistent with surrounding development intensities. The reason why the middle or typical range

is used as opposed to the maximum intensities potentially allowed under various General Plan land use designations is because building out under the maximum intensities for all General Plan land designation would exceed the total planned growth capacity allocated in the General Plan, and this maximum amount of build-out does not represent typical development patterns or the average amount of development built on each site. General Plan land use designations allow a wide range of development intensities and types of land uses to accommodate growth; however, development projects are not typically proposed at the maximum densities due to existing development patterns, site and parking constraints, Federal Aviation Administration regulations, maximum allowable height provisions and other development regulations in the San José Municipal Code in Title 20 (Zoning), market conditions, and other factors.

For example, several General Plan land use designations include a maximum intensity for each use allowed under a land use designation and also allow a mix of land uses. On a site where development is mixed-use, or there is a height limit, or there is a minimum required setback, achieving the maximum allowable intensities for each land use in the development is often physically infeasible. To evaluate the incremental changes of the proposed General Plan land use amendments, average residential and commercial densities for development under these land use designations and in the planning areas of the proposed General Plan amendments for San José are assumed for the current and proposed land use designations on each site. Individual development projects would be required to complete a near-term transportation analysis in conjunction with any future development permit applications.

Proposed 2021 GPA Site Descriptions

The project consists of amending the current adopted land use designations of the Envision San José 2040 General Plan (GP) for seven sites within the City of San José (see Figure 1). The GPA sites, described in detail in the following chapter, include the following:

Site 1 – GP19-010/C19-041 (120 Granite Rock Way)
Site 2 – GP21-003/C21-007 (3354 Keaton Loop)
Site 3 – GP21-004/C21-009 (7246 Sharon Drive #J)
Site 4 – GP21-006 (1271 &1279 Julian Street)
Site 5 – GP21-007 (2905 Senter Road)
Site 6 – GP21-008 (1654 Burdette Drive)
Site 7 – GP21-009/C21-008 (1500 Berger Drive)

The Airport/Guadalupe Gardens GPA is not part of the proposed 2021 GPA sites, however, it is included in the cumulative GPA analysis for this project because it is not yet approved and its status will be decided by Council at a later date. Each of the proposed land use amendments and resulting changes in households and employment for each of the proposed GPA sites are described in detail within the following chapters.

GPA Analysis Exemption

The City of San José Travel Demand Forecasting (TDF) model, which is described in detail in Chapter 3, was developed to help the City project peak-hour transportation impacts attributable to proposed amendments to the City's General Plan. The model is used to estimate the net change in peak-hour trips that are attributable to a proposed amendment. The City has established peak-hour trip thresholds for GP land use amendments that require a site-specific GPA analysis. It is presumed that amendments that result in trips less than the trip thresholds would not create significant long-term impacts by themselves. The City's trip thresholds for requiring a site-specific GPA transportation analysis are presented in the City of San José *Transportation Analysis Handbook*, April 2018 and are shown in Table 1 below.

Figure 1
Proposed GPA Site Locations

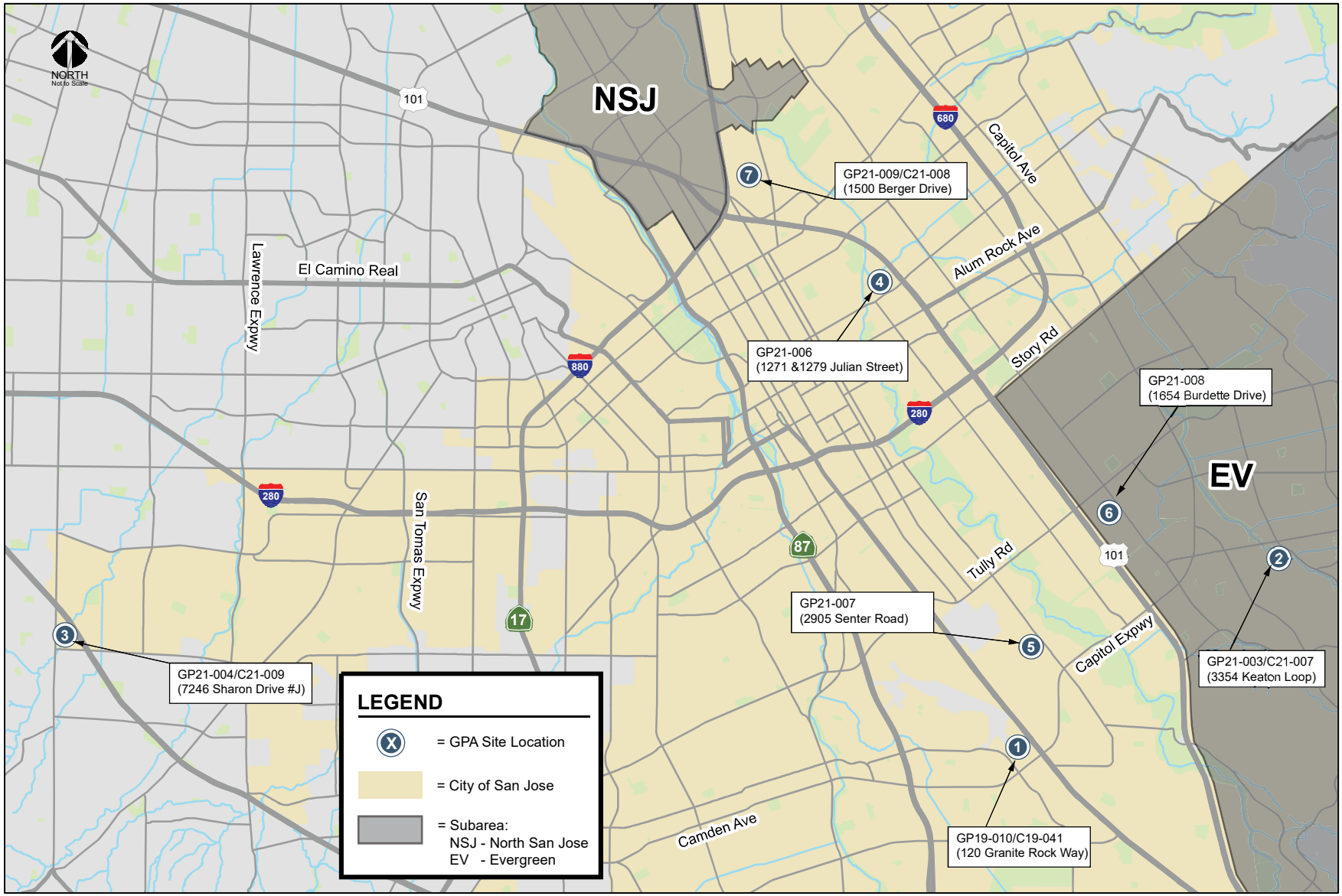


Table 1
Site-Specific Long-Range Transportation Analysis Screening Criteria for Land Use Amendments

Location of Amendment	Maximum Allowable PM Peak Hour Vehicle-Trips			
	Expansion of Residential Use[1]	Conversion from Residential to Non-Residential Use[2]	Conversion from Non-Residential to Residential Use[2]	Expansion of Non-Residential Use[1]
North San Jose	1,000	0	500	50
Evergreen	15	600	0	300
South San Jose	50	600	0	300
Remainder of City	250	250	250	250

Notes:
[1] The screening criteria for a proposed expansion of the same land use are measured in net new PM peak hour vehicle trips.
[2] The screening criteria for a proposed land use conversion are measured in total PM peak hour vehicle-trips generated by the proposed use.
Source: City of San Jose *Transportation Analysis Handbook*, April 2018.

With the exception of GPA sites located within the identified North San José, Evergreen, and South San José special subareas, a proposed land use amendment that would result in an increase of more than 250 PM peak-hour trips to be generated by the subject site would be required to prepare a site-specific GPA transportation analysis.

Two of the seven subject GPA sites (#2 – GP21-003/C21-007 and #6 – GP21-008) are located inside the special Evergreen subarea. Site #2 proposes a conversion from residential to non-residential land uses and is subject to the 600 PM peak-hour trip threshold. Site #6 proposes an expansion of non-residential uses and is subject to the 300 PM peak-hour trip threshold. However, neither of these two proposed land use amendments would result in a net increase of more than the identified thresholds and therefore would not require a site-specific GPA transportation analysis.

The remaining five GPA sites are located outside the special subareas and are subject to the 250 PM peak-hour trip threshold. The proposed land use amendments at the remaining five sites would not result in a net increase of more than 250 PM peak-hour trips and therefore would not require a site-specific GPA transportation analysis.

Table 3 in the next chapter shows the net increase in trips due to the proposed land use amendments.

Scope of Study

The purpose of the GPAs TA is to assess the long-range impacts of the proposed amendments on the citywide transportation system. This study includes an evaluation of the cumulative impacts of all seven GPA sites with the proposed land use amendments. Individual development projects also will be required to complete a near-term transportation analysis in conjunction with any future development permit applications consistent with the Envision San José 2040 GP. The potential transportation impacts of the project were evaluated in accordance with the guidelines set forth by the City of San José for GPA transportation analysis.

The project consists of land use changes to the current adopted GP land uses. The project does not propose any changes to the citywide transportation system. The GPA long-range analysis focuses on the potential changes on the citywide transportation system in the horizon year of the GP (2040) when the GP capacities for housing and jobs are fully developed. The analysis includes evaluation of the effects on vehicle miles traveled, mode-share of travel, impacts to travel speeds on transit priority corridors, and impacts to pedestrian, bicycle, and transit facilities. Impacts are evaluated based on the same Measures of Effectiveness (MOEs) and significance criteria utilized in the Envision San José 2040 GP TIA. Traffic conditions were evaluated for the following traffic scenarios using the City's TDF model:

- **Projected Year 2015 Conditions:** The Projected Year 2015 Conditions represent a projection of transportation conditions in 2015 using the City's GP TDF model. The roadway network also reflects the Year 2015 roadway network and transportation system.
- **Current 2040 General Plan Conditions:** Future traffic due to the current GP land uses (i.e., including the adopted GP Four-Year Review Land Use adjustments and adopted 2020 GP Amendments) is added to regional growth that can be reasonably expected to occur by 2040. Current 2040 GP conditions include the current roadway network as well as all transportation system improvements as identified in the current GP.
- **Cumulative 2040 General Plan Amendment Conditions:** Current 2040 GP conditions with the proposed land use amendments at all seven proposed GPA sites. Transportation conditions for the Cumulative 2040 GPA conditions were evaluated relative to the currently adopted 2040 GP Conditions to determine any long-range transportation impacts.

Report Organization

The remainder of this report is divided into the following chapters; Chapter 2 presents a detailed description of each of the proposed GPA sites included in the analysis. Chapter 3 describes analysis methodology, including the City's TDF model, and the MOEs and significance thresholds used in the analysis. Chapter 4 presents the results of the cumulative analysis based on the TDF modeling and citywide MOEs for the proposed GPAs. Chapter 5 presents the conclusions of the long-range cumulative GPA analysis.

2. General Plan Amendment Site Descriptions

The proposed project consists of amending land uses currently adopted in the Envision San José 2040 General Plan on seven sites. The amendment sites are described in more detail below along with peak-hour trip generation estimates for each of the proposed GPA sites.

Envision San José 2040 General Plan

The City of San José *Envision San José 2040 General Plan* was adopted in 2011 and was based on planned land uses within the City projected to the Year 2035. Subsequent reviews in 2010, 2011, 2016, and 2020 resulted in the currently adopted General Plan, which includes the base year of 2015 and horizon year of the planned land uses to the Year 2040. Thus, the adopted General Plan TA provides a comprehensive evaluation of the effects of planned land use as identified in the current GP on the citywide transportation system and is used as the baseline from which impacts due to land use amendments such as the proposed project are evaluated.

Land use data consisting of households and employment growth for each of the proposed GPA sites as reflected in the adopted GP and the proposed land use amendments were prepared by the Department of Planning, Building, and Code Enforcement and provided to Hexagon for use in this analysis.

Amendment Sites

The project includes seven proposed GPA sites: GP19-010/C19-041, GP21-003/C21-007, GP21-004/C21-009, GP21-006, GP21-007, GP21-008, and GP21-009/C21-008. Two of the proposed GPAs (GP19-010/C19-041 and GP21-009/C21-008) would not result in changes to the number of households and jobs on each site when compared to those adopted per the Envision San José 2040 GP for each site. However, the proposed GPAs will not change the total number of jobs and households citywide. The TDF model is used to rebalance the number of jobs and households citywide to maintain the General Plan Goal of 751,650 jobs and 429,350 households.

Table 2 summarizes the land uses and density for each proposed site under the current 2040 GP and the proposed GPAs. Table 3 summarizes the changes in households and jobs for each site and the resulting increases in peak-hour trips. The peak-hour trips for each site were estimated using the City of San José's TDF model. The TDF modeling is described in Chapter 3.

Table 2
Existing General Plan and Proposed GPA Land Uses

Site Number	Project Name	Location	APN	Size (acres)	2040 General Plan (Baseline)		Proposed General Plan Amendment	
					Land Use	Density	Land Use	Density
1	GP19-010/C19-041 (120 Granite Rock Way)	120 Granite Rock Way	462-17-024	22.18	Light Industrial	FAR up to 1.5	Heavy Industrial	FAR up to 1.5
2	GP21-003/C21-007 (3354 Keaton Loop)	3354 Keaton Loop	659-05-021, 659-05-039	0.66	Residential Neighborhood	8 DU/AC; FAR up to 0.7	Neighborhood Community/Commercial	FAR up to 3.5
3	GP21-004/C21-009 (7246 Sharon Drive #J)	7246 Sharon Drive	372-21-003	0.60	Neighborhood Community/Commercial	FAR up to 3.5	Mixed-Use Neighborhood	up to 30 DU/AC; FAR 0.25 to 2.0
4	GP21-006 (1271 &1279 Julian Street)	1271 & 1279 Julian Street	249-66-010	0.97	Mixed-Use Neighborhood	up to 30 DU/AC; FAR 0.25 to 2.0	Urban Residential	30-95 DU/AC; FAR 1.0 to 4.0
5	GP21-007 (2905 Senter Road)	2905 Senter Road	497-27-110, 497-27-111	1.09	Neighborhood Community/Commercial	FAR up to 3.5	Mixed-Use Commercial	up to 50 DU/AC; FAR 0.5 to 4.5 for Residential/Commercial; Mixed-Use Commercial FAR 0.25 to 4.5
6	GP21-008 (1654 Burdette Drive)	1654 Burdette Drive	670-02-024	2.00	Neighborhood Community/Commercial	FAR up to 3.5	Mixed-Use Commercial	up to 50 DU/AC; FAR 0.5 to 4.5 for Residential/Commercial; Mixed-Use Commercial FAR 0.25 to 4.5
7	GP21-009/C21-008 (1500 Berger Drive)	1500 Berger Drive	237-04-024	0.68	Heavy Industrial	FAR up to 1.5	Light Industrial	FAR up to 1.5

Notes: FAR = floor-to-area ratio; DU = dwelling units; AC = acre; APN = assessor's parcel number
Source: City of San Jose Planning Department (July and August 2021).

Table 3
Changes in Households, Jobs, and Peak-Hour Trips Due to Proposed GPAs

Site Number	Site Name	2040 General Plan (Baseline)[1]		Proposed GPAs[2]		Net Land Use Change		Net Peak-Hour Trip Change	
		TOTHH	TEMP	TOTHH	TEMP	TOTHH	TEMP	AM	PM
1	GP19-010/C19-041 (120 Granite Rock Way)	14	906	14	906	0	0	0	0
2	GP21-003/C21-007 (3354 Keaton Loop)	1,405	393	1,405	427	0	34	24	36
3	GP21-004/C21-009 (7246 Sharon Drive #J)	363	524	372	524	9	0	5	5
4	GP21-006 (1271 &1279 Julian Street)	652	550	698	550	46	0	24	29
5	GP21-007 (2905 Senter Road)	1,363	1,122	1,390	1,146	27	24	19	30
6	GP21-008 (1654 Burdette Drive)	1,643	1,400	1,693	1,443	50	43	56	77
7	GP21-009/C21-008 (1500 Berger Drive)	743	1,358	743	1,358	0	0	0	0

Notes: TOTHH = total number of households; TEMP = total number of jobs.
[1]Total number of households and jobs under the adopted Envision San Jose 2040 General Plan (GP). The buildout of the 2040 GP represents baseline conditions.
[2]Total number of households and jobs as proposed by the GP Amendments.
Source: City of San Jose Planning Department, July and August 2021.
City of San Jose Travel Forecasting Model runs completed August 2020 by Hexagon Transportation Consultants, Inc.

Proposed land use changes for each of the GPA sites are described below.

- **Site 1 – GP19-010/C19-041 (120 Granite Rock Way):** The 22.18-acre site is located generally bounded by Hillsdale Avenue to the north, Monterey Road to the east, Granite Rock Way to the south, and Hillcap Avenue to the west. Figure 2 shows the location of the site. The adopted GP land use designation for the site is *Light Industrial,* and the proposed amendment involves changing the adopted land use to *Heavy Industrial*. The proposed amendment would not result in a change of households and jobs on the site. Based on the TDF modeling results, the proposed amendment would not result in a net increase of peak-hour trips generated by GP19-010/C19-041, and a site-specific GPA TA is not required.
- **Site 2 – GP21-003/C21-007 (3354 Keaton Loop):** The 0.66-acre site is located on the southwest corner of the San Felipe Road/Keeton Loop intersection. Figure 3 shows the location of the site. The adopted GP land use designation for the site is *Residential Neighborhood,* and the proposed amendment involves changing the adopted land use to *Neighborhood Community/Commercial*. The proposed amendment would result in 34 additional jobs on the site. Based on the TDF modeling results, the proposed amendment would not result in a substantial net increase of peak-hour trips generated by GP21-003/C21-007, and a site-specific GPA TA is not required.
- **Site 3 – GP21-004/C21-009 (7246 Sharon Drive #J):** The 0.6-acre site is located along Sharon Drive, just east of De Anza Boulevard. Figure 4 shows the location of the site. The adopted GP land use designation for the site is *Neighborhood Community/Commercial,* and the proposed amendment involves changing the adopted land use to *Mixed Use Neighborhood*. The proposed amendment would result in 9 additional households on the site. Based on the TDF modeling results, the proposed amendment would not result in a substantial net increase of peak-hour trips generated by GP21-004/C21-009, and a site-specific GPA TA is not required.
- **Site 4 – GP21-006 (1271 &1279 Julian Street):** The 0.97-acre site is located along the north side of Julian Street, between Permata Court and Wooster Avenue. Figure 5 shows the location of the site. The adopted GP land use designation for the site is *Mixed Use Neighborhood,* and the proposed amendment involves changing the adopted land use to *Urban Residential*. The proposed amendment would result in 46 additional households on the site. Based on the TDF modeling results, the proposed amendment would not result in a substantial net increase of peak-hour trips generated by GP21-006, and a site-specific GPA TA is not required.
- **Site 5 – GP21-007 (2905 Senter Road):** The 1.09-acre site is located on the southwest corner of the Senter Road/Lewis Road intersection. Figure 6 shows the location of the site. The adopted GP land use designation for the site is *Neighborhood Community/Commercial,* and the proposed amendment involves changing the adopted land use to *Mixed-Use Commercial*. The proposed amendment would result in 27 additional households and 24 additional jobs on the site. Based on the TDF modeling results, the proposed amendment would not result in a substantial net increase of peak-hour trips generated by GP21-007, and a site-specific GPA TA is not required.
- **Site 6 – GP21-008 (1654 Burdette Drive):** The 2.00-acre site is located along the south side of Burdette Drive, between Alvin Avenue and King Road. Figure 7 shows the location of the site. The adopted GP land use designation for the site is *Neighborhood Community/Commercial,* and the proposed amendment involves changing the adopted land use to *Mixed-Use Commercial*. The proposed amendment would result in 50 additional households and 43 additional jobs on the site. Based on the TDF modeling results, the proposed amendment would not result in a substantial net increase of peak-hour trips generated by GP21-008, and a site-specific GPA TA is not required.

- **Site 7 – GP21-009/C21-008 (1500 Berger Drive):** The 0.68-acre site is located along Berger Drive, north of Gish Road. Figure 8 shows the location of the site. The adopted GP land use designation for the site is *Heavy Industrial,* and the proposed amendment involves changing the adopted land use to *Light Industrial*. The proposed amendment would not result in a change of households and jobs on the site. Based on the TDF modeling results, the proposed amendment would not result in a net increase of peak-hour trips generated by GP21-009/C21-008, and a site-specific GPA TA is not required.

Figure 2
Location of GPA Site 1: GP19-010/C19-041 (120 Granite Rock Way)

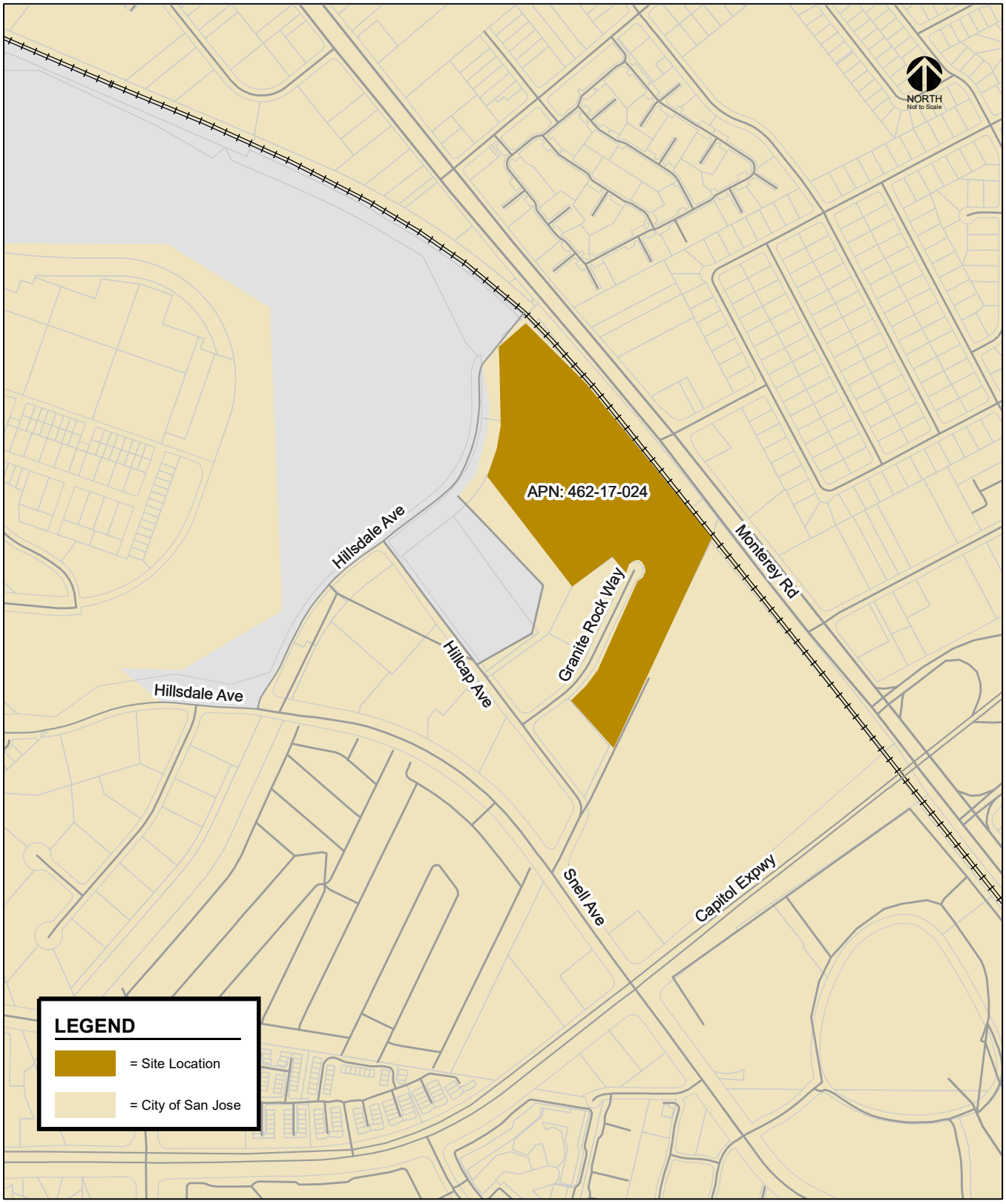


Figure 3
Location of GPA Site 2: GP21-003/C21-007 (3354 Keaton Loop)

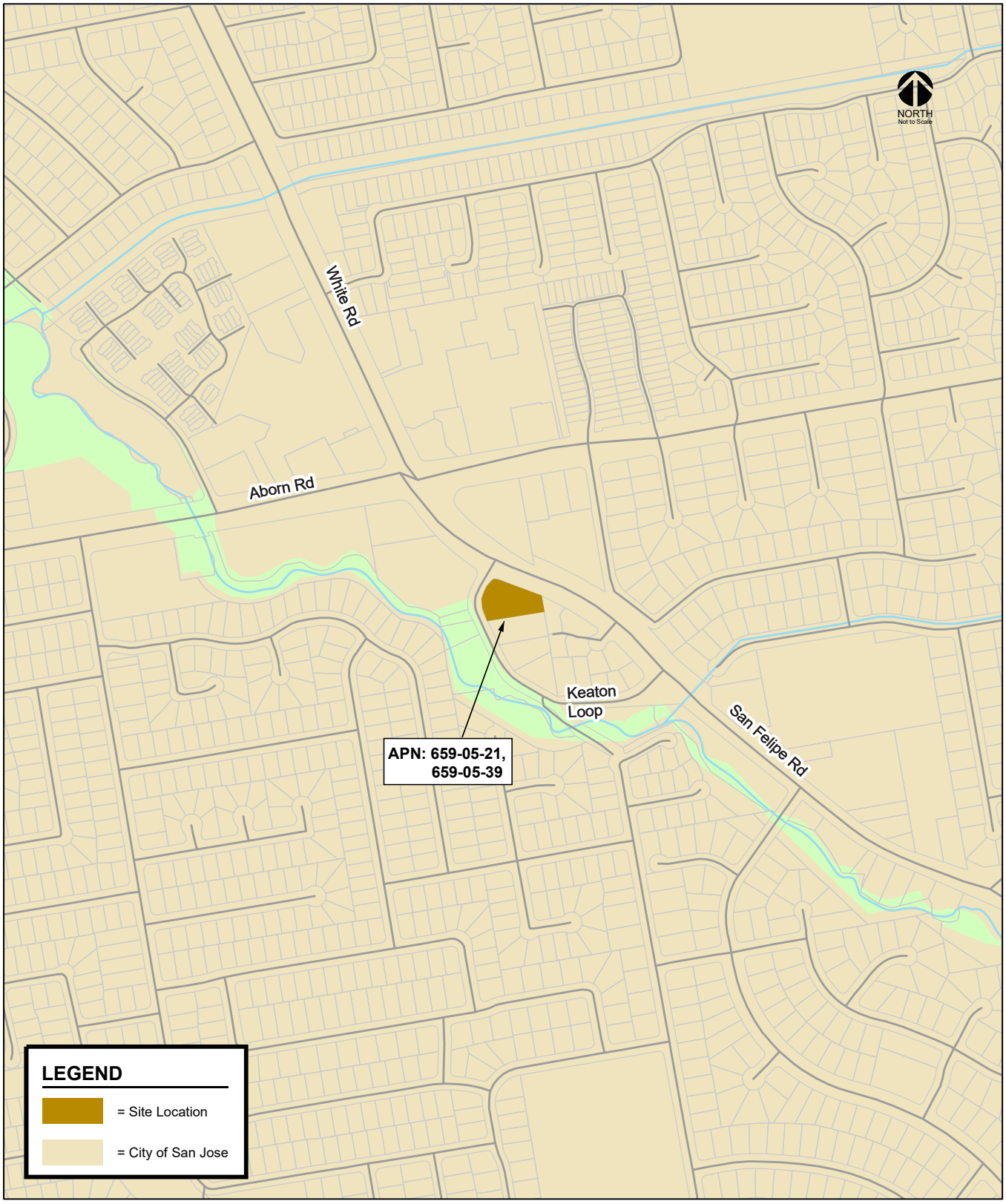


Figure 4
Location of GPA Site 3: GP21-004/C21-009 (7246 Sharon Drive #J)

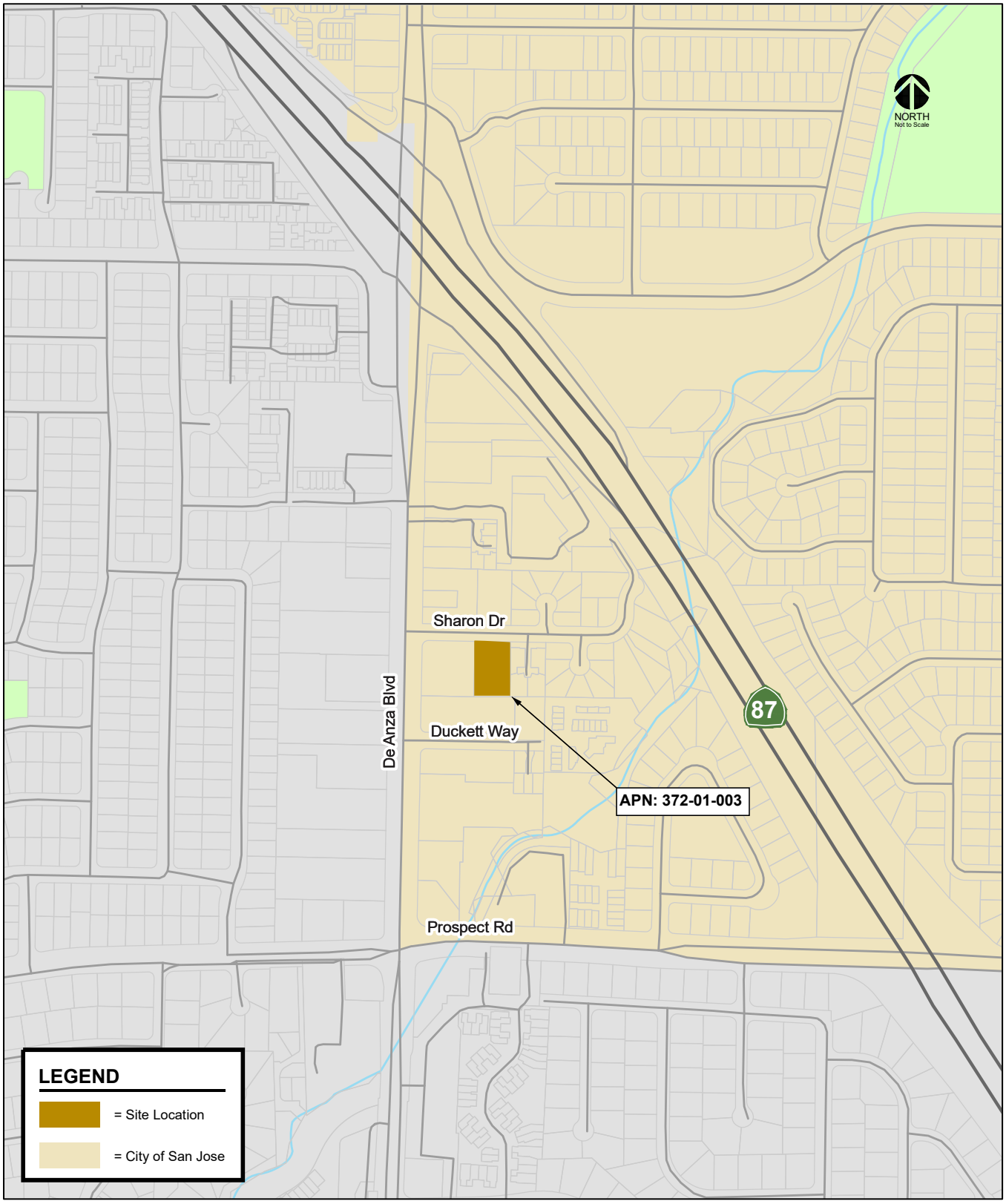


Figure 5
Location of GPA Site 4: GP21-006 (1271 &1279 Julian Street)

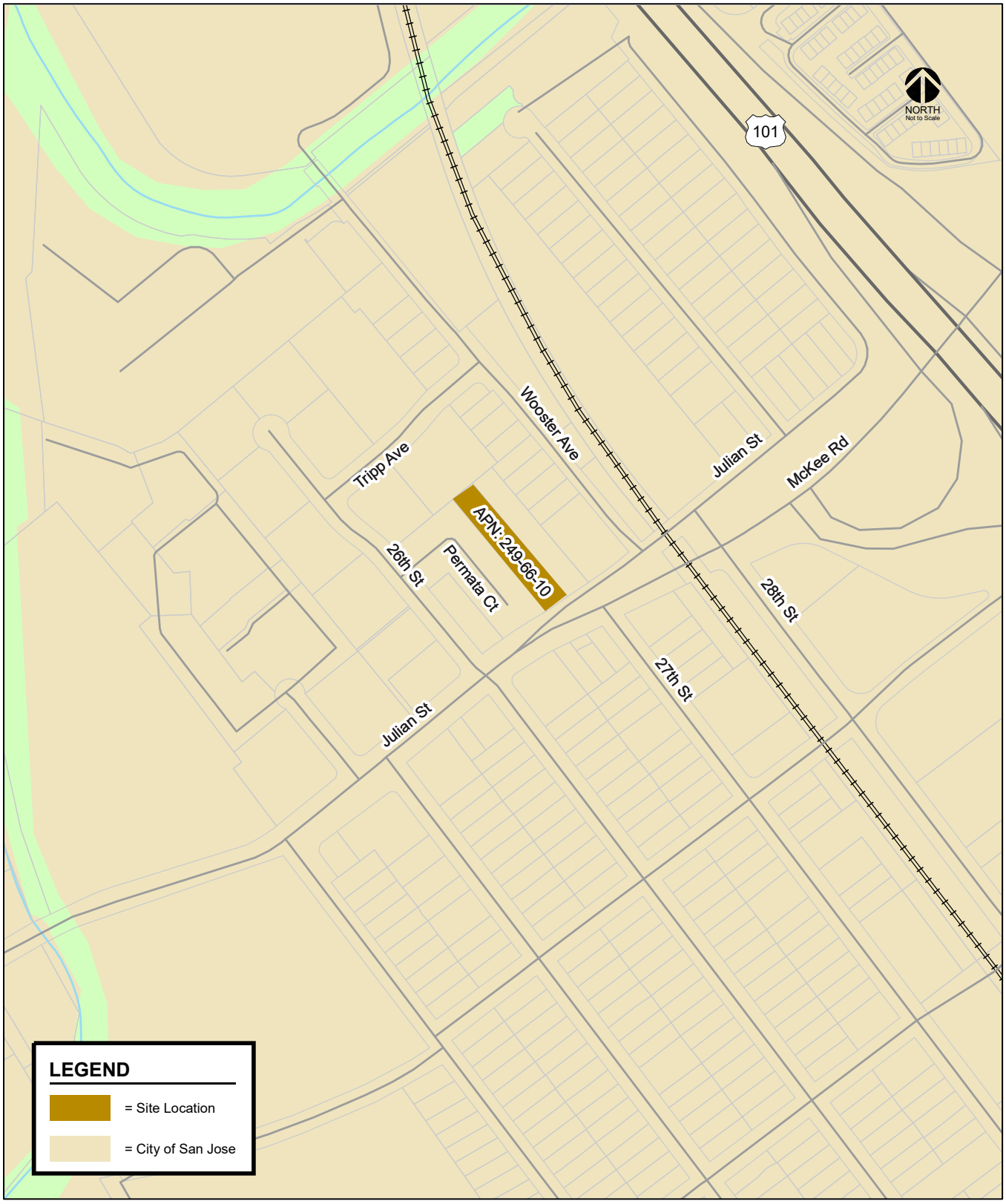


Figure 6
Location of GPA Site 5: GP21-007 (2905 Senter Road)

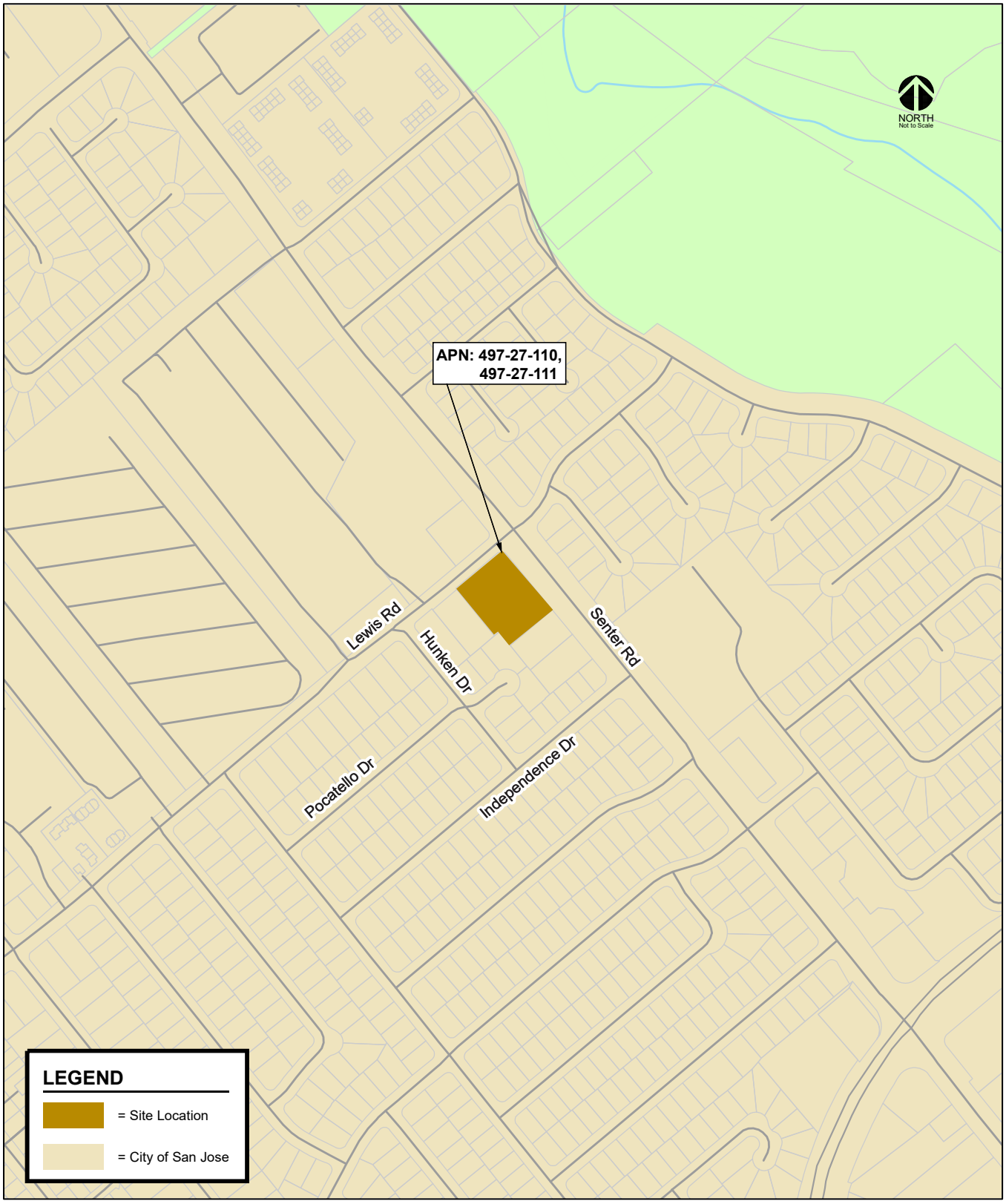


Figure 7
Location of GPA Site 6: GP21-008 (1654 Burdette Drive)

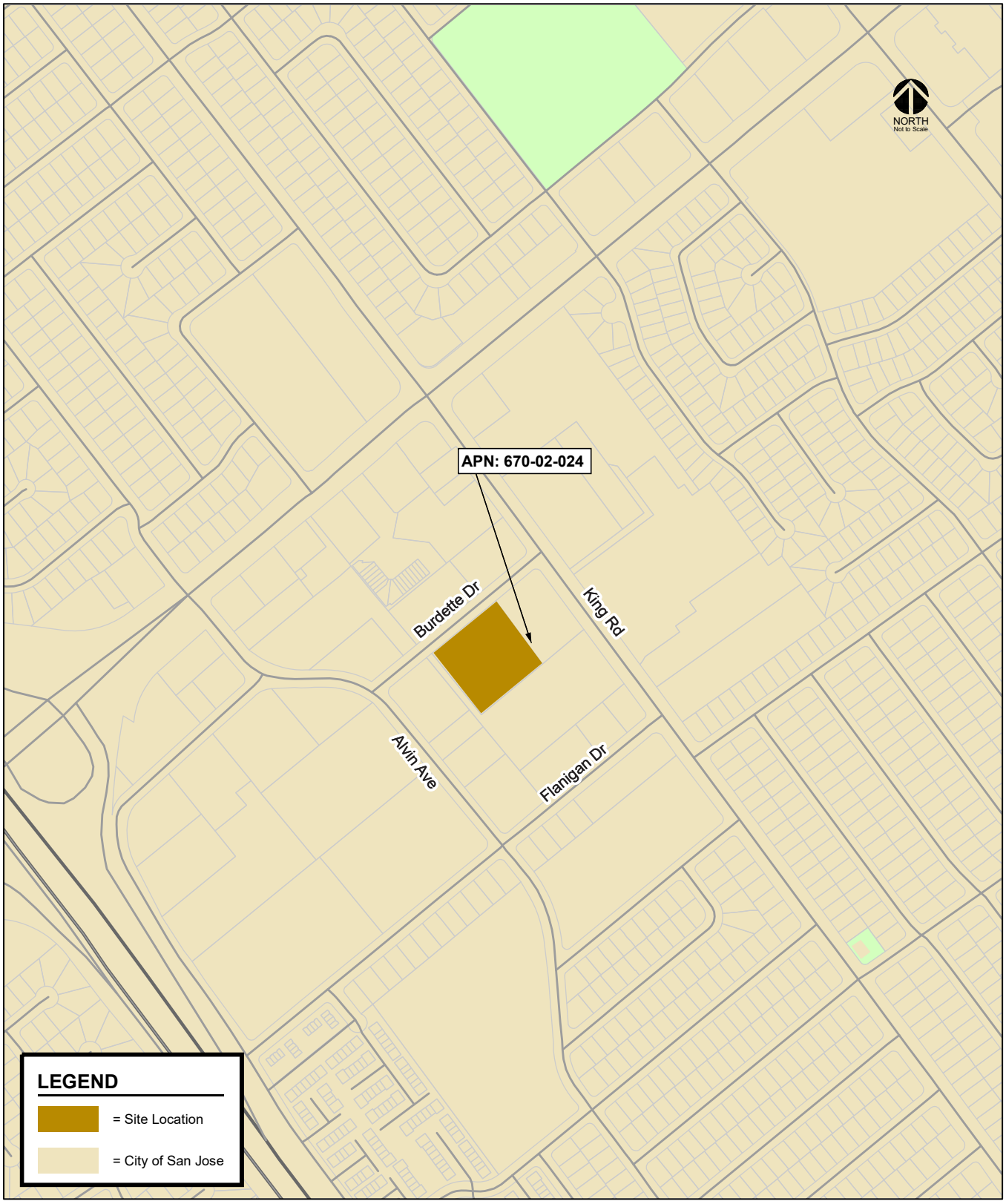
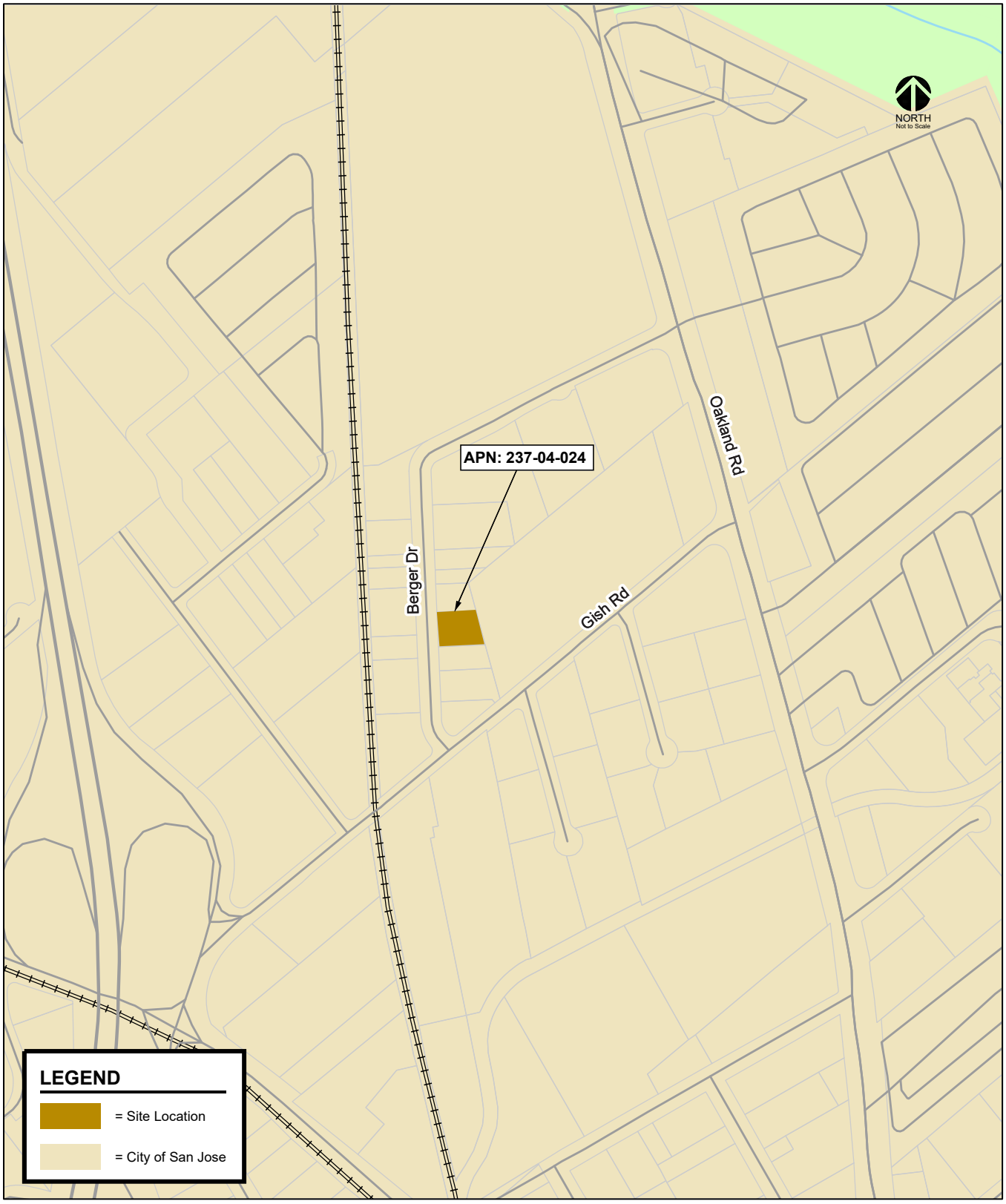


Figure 8
Location of GPA Site 7: GP21-009/C21-008 (1500 Berger Drive)



3. Analysis Methodology and Impact Criteria

This chapter describes the travel demand forecasting modeling methodology used for the analysis and the methods used to determine the traffic conditions for the study scenarios described in the previous chapter. It includes descriptions of the measures of effectiveness (MOE) and the applicable impact criteria for GP transportation analysis.

Travel Demand Forecasting Model

The citywide travel demand forecasting (TDF) model was prepared as part of the Envision San José 2040 GP. The TDF model was developed to provide improved citywide travel demand forecasting as part of continued planning efforts to address transportation infrastructure needs and to assist in the update of the City's GP. The model was developed from the VTA's countywide travel demand model, based on Metropolitan Transportation Commission (MTC's) BAYCAST trip-based regional model. The VTA model contains all cities and counties within the model's extents roughly bounded by southern Monterey County, eastern San Joaquin County, northern Sonoma County, and the Pacific Ocean. The San José model is a sub-area model of the VTA model – it maintains the general inputs (roadway network, land use, trip generation rates, etc.), structure, and process as the VTA model, but with refinement within the City of San José. This allows regional travel patterns and behavior to be accounted for in the focused area of San José, which will become more important with the recent legislative requirements associated with greenhouse gas quantification and impacts.

The VTA and San José models both include four elements traditionally associated with models of this kind. These elements include trip generation, trip distribution, mode choice, and traffic assignment.

- **Trip Generation.** Trip generation involves estimating the number of trips that would occur with the proposed GP land uses. The City's TDF model includes trip generation formulas based on the MTC regional travel demand model. Trip generation is estimated based on the type and amount of specific land uses within each traffic analysis zone (TAZ). The TDF model produces trip estimates in person trips (as opposed to vehicle trips, which are typically used in near-term transportation analyses).
- **Trip Distribution.** Trip distribution involves distributing the trips to various internal destinations and external gateways. The model pairs trip origins and trip destinations (starting and ending points) for each person trip based on the type of trip (e.g., home-to-work, home-to-school, etc.) and the distance a person is willing to travel for that purpose. The distance a person is willing to travel is determined by a gravity model, which is analogous to Newton's law of gravity. In a gravity model, estimates are made about how many trips occur between two locations where

the interaction between those two locations diminishes with increasing distance, time, and cost between them.

- **Mode Choice.** Mode choice, as assigned by the model, determines which mode of transport a person will choose for each trip, based on the availability of a vehicle, the trip distance, and the trip purpose.
- **Traffic Assignment.** Traffic assignment involves determining which route to take to travel between the trip origin and destination. The model assigns the trips to the roadway network to minimize travel time between the start and endpoints.

Subsequent trip distribution, assignment, and mode choice iterations are completed by the model to account for roadway congestion. These iterations continue under equilibrium traffic conditions until the optimal trip assignment is reached.

Transportation Network and Traffic Analysis Zones (TAZs)

The fundamental structure of the model includes a computer-readable representation of the roadway system (highway network) that defines roadway segments (links) identified by endpoints (nodes). Each roadway link is further represented by key characteristics (link attributes) that describe the length, travel speeds, and vehicular capacity of the roadway segment. Small geographic areas (TAZs) are used to quantify the planned land use activity throughout the City's planning area. The boundaries of these small geographic areas are typically defined by the modeled roadway system, as well as natural and man-made barriers that have an effect on traffic access to the modeled network. Transit systems are represented in the model by transit networks that are also identifiable by links and nodes. Unlike the roadway network, the key link attributes of a transit link are operating speed and headways – elapsed time between successive transit services. Transit stops and "dwelling times" (the time allowed for passengers embarking and disembarking transit vehicles) are described as transit node attributes. Transit networks are further grouped by type of transit (rail versus bus) and operator (VTA bus versus AC Transit bus). Transit accessibility for each TAZ is evaluated by proximity to transit stops or stations, and the connectivity of transit lines to destinations.

The socio-economic data for each TAZ in the model includes information about the number of households (stratified by household income and structure type), population, average income, population age distribution, and employment (stratified by groupings of Standard Industrial Codes). The worker per household ratios and auto ownership within a TAZ are calculated based on these factors and the types and densities of residences. The model projects trip generation rates and the traffic attributable to residents and resident workers, categorized by trip purposes, using set trip generation formulas that are based on the MTC regional travel demand model. The land use data and roadway network used for the GP base year reflect land use development and roadway projects completed as of approximately mid-2015.

Traffic Assignment

Travel times within and between TAZs (intra-zonal, inter-zonal and terminal times) are developed from the network being modeled. Travel times within zones (intra-zonal travel times) are derived for each zone based on half its average travel time to the nearest three adjacent zones. Time to walk to and from the trip maker's car (terminal times) are also added. The projected daily trips are distributed using a standard gravity model and friction factors calibrated for the modeling region, which presently consists of 13 counties.

The City of San José TDF model can estimate up to 7 modes of transportation:

- auto drive alone
- auto carpool with two persons
- auto carpool with three+ persons
- rail transit
- bus transit
- bicycle
- walk

Before the traffic is assigned to the roadway networks, time-of-day factors and directionality factors are applied to automobile trips occurring during:

- AM peak hour
- AM 4-hour peak
- PM peak hour
- PM 4-hour peak
- mid-day 6-hour
- mid-night 10-hour periods

The assignment of the trip tables to the roadway network uses a route selection procedure based on minimum travel time paths (as opposed to minimum travel distance paths) between TAZs and is done using a capacity-constrained user equilibrium-seeking process. This capacity-constrained traffic assignment process enables the model to reflect the diversion of traffic around congested areas of the overall street system. High Occupancy Vehicle (HOV) lanes on freeways, expressways, and on-ramps are specifically dealt with in the model network, with access restricted to auto-shared-ride mode trips only, similar to real-world operations of roadway facilities with HOV lanes.

Transit Mode Share

Transit use is modeled for peak and non-peak periods based on computed transit levels of services (speeds and wait times). Based on the conditions that influence transit speeds and wait times (such as traffic congestion), transit use numbers are modified to reflect the likelihood of transit use, based on the constraints to the system. This feedback loop is a modern enhancement in the model to address the dynamics of transit ridership related to the expansion or contraction of roadway capacities.

In addition to providing projected peak hour and peak period volumes and ratios comparing projected traffic volume to available roadway capacity (V/C ratios) on each roadway segment, the model provides information on vehicle miles and vehicle hours of travel by facility type (freeway, expressways, arterial streets, etc.). These informational reports can be used to compare projected conditions under the adopted GP with the impacts of proposed land use amendments. The City's TDF model is intended for use as a "macro analysis tool" to project probable future conditions. Therefore, the TDF model is best used when comparing alternative future scenarios and is not designed to answer "microanalysis level" operational questions typically address in detailed project-specific TAs.

General Plan Transportation Network

The GP TDF model includes all major transportation infrastructure identified in the Envision San José 2040 *Land Use/Transportation Diagram*, including planned infrastructure that is not yet built and/or funded.

Measures of Effectiveness

This analysis addresses the long-range impacts of the proposed GP land use adjustments on the citywide transportation system by applying measures of effectiveness (MOEs) developed for the Envision San José 2040 GP. The results of the analysis for the proposed land use adjustments are compared to the current GP to determine if the proposed adjustments would result in any new or substantially more severe transportation impacts. The long-range analysis includes analysis of the following MOEs:

- **Vehicle Miles Traveled (VMT) per Service Population.** VMT per service population is a measure of the daily vehicle miles traveled divided by the number of residents and employees within the City of San José. VMT per service population (residents + employees) is used for the analysis as opposed to VMT per capita (residents only), since per service population more accurately captures the effects of land use on VMT. The City not only has residents that travel to and from jobs but also attracts regional employees. VMT is calculated based on the number of vehicles multiplied by the distance traveled by each vehicle in miles.
- **Journey-to-Work Mode Share (Drive Alone %).** Mode share is the distribution of all daily work trips by travel mode, including the following categories: drive alone, carpool with two persons, carpool with three persons or more, transit (rail and bus), bike, and walk trips.
- **Average Travel Speeds within the City's Transit Priority Corridors.** Average travel speed for all vehicles (transit and non-transit vehicles) in the City's 14 transit corridors is calculated for the AM peak hour based on the segment distance dividing the vehicle travel time. A transit corridor is a segment of roadway identified as a Grand Boulevard in the Envision San José 2040 GP Land Use/Transportation Diagram. Grand Boulevards serve as major transportation corridors and, in most cases, are primary routes for Valley Transportation Authority (VTA) light-rail transit (LRT), bus rapid transit (BRT), local buses, and other public transit vehicles. Although transit services are found on other street types throughout the City, transit has the utmost priority on Grand Boulevards.

Significance Impact Criteria

The City of San José adopted policies and goals in Envision San José 2040 to reduce the drive-alone mode share to no more than 40 percent of all daily commute trips and to reduce the VMT per service population by 40 percent from existing (year 2015) conditions. To meet these goals by the GP horizon year and to satisfy CEQA requirements, the City developed a set of MOEs and associated significance thresholds to evaluate long-range transportation impacts resulting from land use adjustments. Table 4 summarizes the significance thresholds associated with vehicular modes of transportation as defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11) for the evaluation of long-range transportation impacts resulting from proposed land use adjustments and used in this analysis.

In addition to the MOEs described above, the effects of the proposed land use adjustments on transit, bicycle, and pedestrian facilities were evaluated. A significant long-range transportation impact would occur if the adjustments would:

- Disrupt existing, or interfere with, planned transit services or facilities;
- Disrupt existing, or interfere with, planned bicycle facilities;
- Conflict or create inconsistencies with adopted bicycle plans, guidelines, policies, or standards;
- Not provide secure and safe bicycle parking in adequate proportion to anticipated demand;

Table 4
MOE Significance Thresholds

MOE	Citywide Threshold
VMT/Service Population	Any increase over current 2040 General Plan conditions
Mode Share (Drive Alone %)	Any increase in journey-to-work drive alone mode share over current 2040 General Plan conditions
Transit Corridor Travel Speeds	Decrease in average travel speed on a transit corridor below current 2040 General Plan conditions in the AM peak one-hour period when: 1. The average speed drops below 15 mph or decreases by 25% or more, or 2. The average speed drops by one mph or more for a transit corridor with average speed below 15 mph under current 2040 General Plan conditions.
Source: City of San Jose Transportation Analysis Handbook, April 2018.	

- Disrupt existing, or interfere with, planned pedestrian facilities;
- Not provide accessible pedestrian facilities that meet current ADA best practices; or
- Create inconsistencies with adopted pedestrian plans, guidelines, policies, or standards.

4. Cumulative General Plan Long-Range Analysis

The long-range cumulative transportation impacts resulting from the proposed 2021 GPAs were determined based on the MOEs significance thresholds for vehicle modes of travel and the impact criteria for transit, bicycle, and pedestrian described in Chapter 3. The results of the GPA long-range analysis are described below.

Vehicle Miles Traveled Per Service Population

The San José GP TDF model was used to project daily vehicle miles traveled (VMT) per service population, where service population is defined as the number of residents plus the number of employees citywide. This approach focuses on the VMT generated by the new population and employment growth. VMT is calculated as the number of vehicle trips multiplied by the length of the trips in miles.

Since the City of San José not only has residents that travel to and from jobs within the City but also attracts regional employees, the daily VMT includes some trips traveling outside of the City limits but with origins or destinations within San José. For this reason, the following trip types were included in the VMT calculation:

- Internal-Internal – All daily trips are made entirely within the San José City limits.
- One-half of Internal-External – One-half of the daily trips with an origin located within the San José City limits and a destination located outside of San José.
- One-half of External-Internal – One-half of the daily trips with an origin located outside the San José City limits and a destination located within San José.

Trips that travel through San José to and from other locations (External-External) are not included in the calculation of VMT. As defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11), any increase in VMT per service population over the current GP conditions due to the proposed land use amendments is considered a significant impact.

As shown in Table 5, the citywide daily VMT would decrease slightly but the VMT per service population would remain unchanged due to the proposed land use amendments when compared to the current GP. The reduction in citywide daily VMT is due to (1) the total number of jobs and households would not change citywide as a result of the GPAs (only shifting of households and jobs would occur) and (2) the addition of households to areas with more jobs and transit options. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on citywide daily VMT per service population.

Findings: Compared to the current GP, the proposed land use adjustments would not result in an increase in citywide VMT per service population. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on citywide daily VMT per service population. It is important to note that the VMT per service population is based on raw model output and does not reflect the implementation of adopted GP policies and goals that would further reduce VMT by increased use of non-auto modes of travel.

Table 5
Daily Vehicle Miles Traveled Per Service Population

	Base Year (2015)	2040 General Plan (Baseline)	2040 General Plan Plus Cumulative GPAs
Citywide Daily VMT	17,505,088	27,984,522	27,978,033
Citywide Service Population	1,392,946	2,054,758	2,054,758
- Total Households	319,870	429,350	429,350
- Total Residents	1,016,043	1,303,108	1,303,108
- Total Jobs	376,903	751,650	751,650
Daily VMT Per Service Population	12.57	13.62	13.62
Increase in VMT/Service Population over General Plan Conditions			***0.00***
Significant Impact?			**No**

Notes:
2040 General Plan (Baseline) = Buildout conditions of the adopted Envision San Jose 2040 General Plan (GP).
GPA = General Plan Amendment
Service Population = Residents + Jobs
Source: City of San Jose Travel Forecasting Model runs completed August 2021
by Hexagon Transportation Consultants, Inc.

Journey-to-Work Mode Share

The San José GP TDF model was used to calculate citywide journey-to-work mode share percentages. Journey-to-work mode share is the distribution of all daily work trips by travel mode, including drive alone, carpool with two persons, carpool with three persons or more, transit (rail and bus), bike, and walk trips. Although work trips may occur at any time of the day, most of the work trips occur during typical peak commute periods (6:00 – 10:00 AM and 3:00 – 7:00 PM). As defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11), any increase in the journey-to-work drive alone mode share percentage over the current GP conditions due to the proposed land use amendments is considered a significant impact.

Table 6 summarizes the citywide journey-to-work mode share analysis results. When compared to the current Envision San José 2040 GP, the number of journey-to-work drive alone trips would decrease slightly as a result of the proposed GPAs. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on citywide journey-to-work drive alone mode share.

Findings: The proposed land use adjustments will not result in an increase in drive-alone percentage when compared to the current GP conditions. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on citywide journey-to-work mode share.

Table 6
Journey-to-Work Mode Share

Mode	Base Year (2015)		2040 General Plan (Baseline)		2040 General Plan Plus Cumulative GPAs	
	Trips	%	Trips	%	Trips	%
Drive Alone	753,264	79.69%	1,089,830	71.55%	1,089,733	71.54%
Carpool 2	85,496	9.04%	137,919	9.05%	138,013	9.06%
Carpool 3+	28,526	3.02%	54,929	3.61%	54,941	3.61%
Transit	48,181	5.10%	184,648	12.12%	184,594	12.12%
Bicycle	14,120	1.49%	26,394	1.73%	26,385	1.73%
Walk	15,666	1.66%	29,514	1.94%	29,515	1.94%
Increase in Drive Alone Percentage over General Plan Conditions						-0.01%
Significant Impact?						**No**

Notes:
2040 General Plan (Baseline) = Buildout conditions of the adopted Envision San Jose 2040 General Plan (GP).
GPA = General Plan Amendment
Source: City of San Jose Travel Forecasting Model runs completed August 2021
by Hexagon Transportation Consultants, Inc.

Average Vehicle Speeds in Transit Priority Corridors

The San José GP TDF model was used to calculate the average vehicle travel speeds during the AM peak hour for the City's 14 transit corridors that were evaluated in the Envision San José 2040 GP TIA. A transit corridor is a segment of roadway identified as a Grand Boulevard in the Envision San José 2040 GP Land Use/Transportation Diagram. Grand Boulevards serve as major transportation corridors and, in most cases, are primary routes for VTA's LRT, BRT, local buses, and other public transit vehicles. The travel speeds are calculated by dividing the segment distance by the vehicle travel time. As defined in the City of San José *Transportation Analysis Handbook* (Thresholds of Significance for General Plan Amendments, Table 11), land use amendments that result in a decrease in average travel speed on a transit corridor in the AM peak one-hour period when the average speed drops below 15 miles per hour (mph) or decreases by 25 percent (%) or more, or the average speed drops by one mph or more for a transit corridor with an average speed below 15 mph when compared to the current GP conditions is considered a significant impact.

Table 7 presents the average vehicle speeds on the City's 14 transit priority corridors (i.e., Grand Boulevard segments) during the AM peak hour of traffic. When compared to travel speeds under current GP conditions, the change in traffic resulting from the proposed land use amendments would have minimal effect on the travel speeds in the transit corridors. The TDF model estimates decreases in travel speed of 0.3 mph or less (or a change of 2.1% or less) on three corridors due to the proposed

GPAs. Travel speeds on the remaining corridors would improve slightly or remain unchanged when compared to the current GP. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on the AM peak-hour average vehicle speeds on the transit priority corridors.

Findings: The proposed land use adjustments would not result in a decrease in travel speeds greater than one mph or 25 percent on any of the 14 transit priority corridors when compared to current GP conditions. Therefore, cumulatively, the proposed 2021 GPAs would result in a *less than significant* impact on the AM peak-hour average vehicle speeds on the transit priority corridors.

Table 7
AM Peak-Hour Vehicle Speeds (mph) for San José Transit Priority Corridors

Transit Priority Corridor	Base Year (2015)	2040 General Plan (Baseline)	2040 General Plan Plus Cumulative GPAs		
	Speed (mph)	Speed (mph)	Speed (mph)	% Change (GPplusCumGPAs - GP) / GP	Change (GPplusCumGPAs - GP)
2nd Street from San Carlos Street to St. James Street	16.6	15.1	15.3	1.3%	0.2
Alum Rock Avenue from Capitol Avenue to US 101	21.3	16.6	16.7	0.6%	0.1
Camden Avenue from SR 17 to Meridian Avenue	23.1	16.5	16.5	0.0%	0.0
Capitol Avenue from South Milpitas Boulevard to Capitol Expressway	27.1	22.6	22.7	0.4%	0.1
Capitol Expressway from Capitol Avenue to Meridian Avenue	33.0	26.6	26.6	0.0%	0.0
East Santa Clara Street from US 101 to Delmas Avenue	20.4	15.8	15.8	0.0%	0.0
Meridian Avenue from Park Avenue to Blossom Hill Road	24.9	20.0	20.0	0.0%	0.0
Monterey Road from Keyes Street to Metcalf Road	27.4	19.3	19.4	0.5%	0.1
North 1st Street from SR 237 to Keyes Street	21.3	13.8	13.7	-0.7%	-0.1
San Carlos Street from Bascom Avenue to SR 87	24.8	19.9	19.9	0.0%	0.0
Stevens Creek Boulevard from Bascom Avenue to Tantau Avenue	24.3	18.9	18.9	0.0%	0.0
Tasman Drive from Lick Mill Boulevard to McCarthy Boulevard	22.7	14.0	13.7	-2.1%	-0.3
The Alameda from Alameda Way to Delmas Avenue	20.5	14.0	14.0	0.0%	0.0
West San Carlos Street from SR 87 to 2nd Street	20.0	18.8	18.7	-0.5%	-0.1

Notes:
2040 General Plan (Baseline) = Buildout conditions of the adopted Envision San Jose 2040 General Plan (GP).
GPA = G indicates significant impacts.
Source: City of San Jose Travel Forecasting Model runs completed August 2021 by Hexagon Transportation Consultants, Inc.

Impacts on Transit, Bicycle, and Pedestrian Circulation

Transit Services or Facilities

Planned transit services and facilities include additional rail service via the future Bay Area Rapid Transit (BART) extension, light rail transit (LRT) extensions, new bus rapid transit (BRT) services, and the proposed California High-Speed Rail (HSR) project. The proposed GPAs land use adjustments would not result in a change to the existing and planned roadway network that would result in an adverse effect on existing or planned transit facilities. Therefore, the proposed 2021 GPA's land use

adjustments would not substantially disrupt existing or interfere with planned transit services or facilities.

Bicycle Facilities

The adopted Envision San José 2040 GP supports the goals outlined in the City's Better Bike Plan 2025 and contains policies to encourage bicycle trips (Policies TR-1.1, TR-1.2, TR-1.4 through TR-1.9, TR 2.1 through TR 2.11, TR-7.1, TN-1.1 through TN-1.5, TN-2.1 through TN-2.7, and TN-3.1 through 3.6; Implementing Actions TR-1.12 through TR-1.15, TR-2.12 through TR-2.21, TR-7.2, TR-7.3, TN-1.6, TN-2.8 through 2.10, and TN-3.7; Performance Measures TN-2.11, TN-2.12). The proposed GPA land use adjustments would not result in a change to the existing and planned roadway network that would affect existing or planned bicycle facilities. Therefore, the proposed 2021 GPA land use adjustments would not substantially disrupt existing or interfere with planned bicycle facilities; conflict or create inconsistencies with adopted bicycle plans, guidelines, policies, or standards; and provide insecure and unsafe bicycle parking in adequate proportion to anticipated demand.

Pedestrian Facilities

The adopted Envision San José 2040 GP contains goals and policies (Policies TR-1.1, TR-1.2, TR-1.4 through TR-1.9, TR-2.1 through TR-2.11, TR-7.1, TN-1.1 through TN-1.5, TN-2.1 through TN-2.7, and TN-3.1 through 3.6; Implementing Actions TR-1.12 through TR-1.15, TR-2.12 through TR-2.21, TR-7.2, TR-7.3, TN-1.6, TN-2.8 through 2.10, and TN-3.7; Performance Measures TN-2.11, TN-2.12) to improve the pedestrian walking environment, increase pedestrian safety, and create a land use context to support non-motorized travel. The proposed GPAs land use adjustments would not result in a change to the existing and planned roadway network that would affect existing or planned pedestrian facilities. Therefore, the proposed 2021 GPAs land use adjustments would not substantially disrupt existing or interfere with planned pedestrian facilities; create inconsistencies with adopted pedestrian plans, guidelines, policies, or standards; and provide accessible pedestrian facilities that would not meet current ADA best practices.

6. Conclusions

This report presents the results of the long-range transportation impact analysis for the proposed City of San José 2021 General Plan Amendments (project). The project consists of amending the current adopted land use designations of the Envision San José 2040 GP for seven sites within the City of San José. The purpose of the GPAs TA is to assess the long-range impacts of the amendments on the citywide transportation system. The analysis includes evaluation of changes to vehicle miles traveled, changes to the journey-to-work mode share, impacts to travel speeds on transit priority corridors, and impacts to pedestrian, bicycle, and transit facilities. Impacts were evaluated based on the same measures of effectiveness (MOEs) and significance criteria utilized in the Envision San José 2040 GPA TIA.

This study includes an evaluation of the cumulative impacts of all seven GPA sites. Individual development projects also will be required to complete a near-term transportation analysis in conjunction with any future development permit applications consistent with the Envision San José 2040 GP once a development application is submitted to the City.

Cumulative GPA Long-Range Transportation Impacts

Vehicle Miles Traveled Per Service Population

When compared to the current GP, the proposed land use adjustments would not result in an increase in citywide VMT per service population. Therefore, cumulatively, the 2021 GPAs would result in a less than significant impact on citywide daily VMT per service population. It is important to note that the VMT per service population is based on raw model output and does not reflect the implementation of adopted GP policies and goals that would further reduce VMT by increased use of non-auto modes of travel.

Journey-to-Work Mode Share

The proposed land use adjustments will not result in an increase in drive-alone trips when compared to the current GP conditions. Therefore, cumulatively, the 2021 GPAs would result in a *less than significant* impact on citywide journey-to-work mode share.

Average Vehicle Speeds in Transit Priority Corridors

The proposed land use adjustments will not result in a decrease in travel speeds of greater than one mph or 25 percent on any of the 14 transit priority corridors when compared to current GP conditions.

Therefore, cumulatively, the 2021 GPAs would result in a *less than significant* impact on the AM peak-hour average vehicle speeds on the transit priority corridors.

Impacts on Transit, Bicycle, and Pedestrian Circulation

Transit Services or Facilities

The proposed GPAs land use adjustments would not result in a change to the existing and planned roadway network that would have an adverse effect on existing or planned transit facilities. Therefore, the proposed 2021 GPAs land use adjustments would not substantially disrupt existing or interfere with planned transit services or facilities.

Bicycle Facilities

The proposed GPAs land use adjustments would not result in a change to the existing and planned roadway network that would affect existing or planned bicycle facilities. Therefore, the proposed 2021 GPA land use adjustments would not substantially disrupt existing or interfere with planned bicycle facilities; conflict or create inconsistencies with adopted bicycle plans, guidelines, policies, or standards; and provide insecure and unsafe bicycle parking in adequate proportion to anticipated demand.

Pedestrian Facilities

The proposed GPAs land use adjustments would not result in a change to the existing and planned roadway network that would affect existing or planned pedestrian facilities. Therefore, the proposed 2021 GPA land use adjustments would not substantially disrupt existing or interfere with planned pedestrian facilities; create inconsistencies with adopted pedestrian plans, guidelines, policies, or standards; and provide accessible pedestrian facilities that would not meet current ADA best practices.

Consistency with General Plan Polices

The City of San José's Transportation Policies contained in the General Plan are intended to do the following:

1. Establish circulation policies that increase bicycle, pedestrian, and transit travel, while reducing motor vehicle trips, to increase the City's share of travel by alternative transportation modes; and
2. Promote San José as a walking- and bicycling-first city by providing and prioritizing funding for projects that enhance and improve bicycle and pedestrian facilities.

Implementation of the General Plan Transportation Policies can help to promote a multi-modal transportation system and stimulate the use of transit, bicycle, and walk as practical modes of transportation in the City, which ultimately will improve operating speeds in the City's 14 transit priority corridors. An enhanced multi-modal transportation system can reduce reliance on the automobile and decreasing the amount of vehicle travel, specifically journey-to-work drive-alone trips.

Based on the result of the analysis, the 2021 GPAs are consistent with the City of San José GP transportation policies, as they are projected to increase transit travel, while slightly reducing motor vehicle (drive alone) trips and slightly improving operating speeds along some of the City's 14 transit priority corridors when compared to the current GP conditions.