



Memorandum

To: Maira Blanco, Planner
City of San José

From: Michael Lisenbee, Senior Project Manager
David J. Powers & Associates, Inc.

Date: March 17, 2023

Subject: **Graniterock Capitol Site Modernization Plan – Supplemental Air Quality Analysis**

Background

Subsequent to the public circulation period for the Graniterock Capitol Site Modernization Plan Draft EIR, which ended on November 4, 2022, the City of San José received an email on March 6, 2023 from a resident at the Shell Mini Storage facility located at 3616 Hillcap Avenue. The email requested information pertaining to the environmental impacts of the Graniterock Capitol Site Modernization Plan project. After being directed to the Draft EIR materials available on the City's website, the resident expressed concerns regarding potential air quality impacts given the location of the residence in proximity to the project site (refer to Attachment A).

Supplemental Air Quality Analysis

The presence of a residence at the Shell Mini Storage facility was not known at the time the Draft EIR was prepared. In response to the correspondence between the City and the resident, Illingworth & Rodkin, Inc., the air quality consultant for the Draft EIR, completed additional analysis to determine if the presence of a sensitive receptor at the Shell Mini Storage facility would affect the results of the air quality analysis in the Draft EIR. A review of the modeling and meteorological data utilized in the Draft EIR indicates that the residence at the Shell Mini Storage facility (self-storage receptor) would be roughly 1,130 feet south of the approximate centroid of emission sources at the project site compared to a distance of 1,550 feet east for the project's maximally exposed individual (MEI) identified in the Draft EIR. Based on the San José Mineta International Airport wind rose, winds toward the self-storage receptor would occur less than two percent of the time while winds towards the project MEI would occur roughly 37 percent of the time, thus indicating that the health risk impacts at the self-storage receptor would be less than those at the project MEI. To confirm this, Illingworth & Rodkin, Inc. modeled the diesel particulate matter (DPM) and particulate matter (PM_{2.5}) concentrations at the self-storage receptor and compared them to the data for the MEI receptor. These concentrations are summarized below.

DPM and PM_{2.5} Concentration Comparison at Project MEI & Self-Storage Receptor				
Project Phase	Maximum DPM Concentration		Maximum PM_{2.5} Concentration	
	MEI	Self-Storage Receptor	MEI	Self-Storage Receptor
Existing	0.38	0.12	0.90	0.17
Construction	0.014	0.003	0.03	0.01
Operation	0.02	0.01	0.52	0.09

The concentrations at the self-storage receptor would be substantially lower than those at the project MEI. Therefore, there would be lower air quality-related health risk impacts at the self-storage receptor compared to the project MEI disclosed in the Draft EIR. As a result, the analysis of impacts in the Draft EIR does not require revision, and the impact determinations remain unchanged.

Additionally, irrespective of the analysis provided above, it is relevant to note that residential uses are not permitted at the Shell Mini Storage facility. The project applicant owns the property on which the Shell Mini Storage facility is located and leases the property to the facility. The applicant has indicated that the lease does not allow residential uses on the site. The applicant was not aware that the property was being used as a residence and has confirmed that they plan to enforce provisions of the lease that forbid residential uses. Because the current residential uses are unauthorized, and because there will be no future residential uses on the property, the Shell Mini Storage facility is not considered a sensitive receptor for air quality purposes.

Conclusion

For the reasons described above, the comments received from the resident at the Shell Mini Storage facility do not identify new or greater environmental impacts under CEQA; therefore, no recirculation of the Draft EIR is required.

Attachment A
Correspondence Between City of San José and Shell Mini Storage Resident

From: Katie [REDACTED]
Sent: Monday, March 6, 2023 1:22 PM
To: Atienza, Manuel <Alec.Atienza@sanjoseca.gov>
Subject: Re: 120 Granite rock way

You don't often get email from [REDACTED]. [Learn why this is important](#)

[External Email]

I'm quite concerned, as we already have to deal with lots of issues with this facility including, extreme dust on our facility and cars, our house shaking during their business hours, lots of noise and the street concrete always being messed up. Is this purposing that the trucks would be allowed to run around the clock? There is a residence next door, is that permitted?

Sent from my iPhone

On Mar 6, 2023, at 1:10 PM, Atienza, Manuel <Alec.Atienza@sanjoseca.gov> wrote:

Hi Katie,

Sure thing, please see the attached plans. It is a large file, so let me know if you have any issues accessing. Please let me know if you have any questions on the work that Granite Rock is proposing.

Also, please see the link below to the Environmental Impact Report (EIR) that was prepared for the project. If you have any questions on the EIR, please feel free to reach out to Maira Blanco. Her contact info is at the bottom of the webpage.

 [Exhibit F - Planned Development Permit Plan Set 1.pdf](#)

<https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/graniterock-capitol-modernization-project>

Kind Regards,

Manuel (Alec) Atienza

Planner | Planning Division | City of San Jose

200 E. Santa Clara Street, 3rd floor

Phone: (408) 535-7688

Email: alec.atienza@sanjoseca.gov

From: Katie [REDACTED]
Sent: Monday, March 6, 2023 10:40 AM
To: Atienza, Manuel <Alec.Atienza@sanjoseca.gov>
Subject: 120 Granite rock way

You don't often get email from [REDACTED]. [Learn why this is important](#)

[External Email]

Hi there, I share a property line with this project and would like to view the project file to see what is planned. We live on site here so I'm interested in the environmental impact. Thank you
Katie

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Attachment B

Updated Figure 3.1-1 of the Draft EIR Showing Shell Mini Storage Location



LOCATIONS OF OFF-SITE SENSITIVE RECEPTORS AND PROJECT MEI

FIGURE 3.3-1