



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

February 2, 2012

Rachel Grossman
Planning Division
Community Development Department
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Subject: Facebook Campus Project Draft Environmental Impact Report (DEIR)

Dear Ms. Grossman:

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the Facebook Campus Project (Project). The proposed Project would include approximately 1.4 million square feet on an "East Campus" at 1601 Willow Road and a "West Campus" at 312 and 313 Constitution Drive. The land uses include office, meeting rooms, a conference center, small cafeterias, coffee shops, a fitness center, and other retail to serve employees, such as a pharmacy, convenience store, post office, bicycle repair, and a hair salon.

District staff supports the Project's strong Transportation Demand Management (TDM) program. The TDM program includes a commute assistance center, on-site amenities to prevent the need for mid-day trips, shuttle service to and from Caltrain stations and long-distance shuttles, preferential carpool and vanpool parking, a guaranteed ride home program, subsidized public transit passes and subsidies for employees who walk or bike to work, secure bicycle parking, showers and changing rooms, and flexible work schedules.

However, even with the above referenced TDM program, the DEIR concludes that the Project has significant unavoidable impacts to local and regional air quality. Specifically, Air Quality-2 Violation of any Air Quality Standard (p. 3.6-30) concludes that operations emissions exceed the District's significance thresholds for reactive organic gases (ROG), oxides of nitrogen (NOx), and particulate matter (PM10), and that the primary source of these emissions is vehicle trips. The DEIR concludes that there are no additional mitigation measures to reduce these emissions to less than significant. The District has the following comments on the DEIR.

1. Consider further refinement of the trip cap to require a lower drive alone mode split. As part of the project, the applicant seeks to replace the existing East Campus employee cap of 3,600 employees with a vehicular trip cap, in order to allow more employees onsite. This vehicular trip cap is based on surveys completed at the applicant's current site in Palo Alto. At the East Campus the trip cap would allow for a maximum of 2,600 vehicle trips during the AM peak period and the PM peak period, and a total of 15,000 daily vehicle trips.

In Appendix 3.5-E (p. 449) a memo from Fehr and Peers Transportation Consultants

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Jennifer Hosterman
Nate Miley
(Secretary)

CONTRA COSTA COUNTY
John Gioia
(Chairperson)
David Hudson
Mary Piepho
Mark Ross

MARIN COUNTY
Katie Rice

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
John Avalos
Edwin M. Lee
Eric Mar

SAN MATEO COUNTY
Carole Groom
Carol Klatt

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Vice-Chair)
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Susan Gorin
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Spare the Air

The Air District is a Certified Green Business

Page 1 of 2

Printed using soy-based inks on 100% post-consumer recycled content paper



shows that the existing percent drive alone mode split is 59 percent. District staff recommends that the City consider a lower vehicle cap to reduce this mode split (and vehicle emissions) further. While the TDM program is extensive, further pricing adjustments are possible, either by charging for parking or providing additional incentives to employees who do not drive alone to work.

In addition, the District recommends that the City require a similar vehicle cap for the West Campus as a condition of development.

2. Provide shaded parking to reduce ROG emissions. Parked vehicles emit ROG due to evaporation of fuels, especially on hot days. These emissions can be reduced by parking in areas shaded by trees or carports. The District recommends that the Project be required to provide trees or structures to shade parked cars. These structures could also include solar panels to charge electric vehicles and provide electricity to the site.

3. Clarify the number of electric and hybrid low-emissions vehicle preferred parking spaces and recharging stations to be built and quantify the emission reductions from these facilities. Replacing gasoline vehicle trips with electric and low-emission vehicle trips would reduce ROG, NOx, and PM10 emissions from vehicle trips. District staff recommends that the DEIR state the number of preferred parking spaces and recharging stations to be built and then estimate the emission reductions gained from replacing higher emission gasoline vehicle trips with zero- and low- emission vehicle trips.

4. Replace existing Tier 0 and Tier 1 diesel generator engines on the East Campus with Tier 4 Interim/Final diesel engines. The East Campus includes nine existing diesel generators permitted by the District. However, these are older diesel generators and do not reflect the cleanest available technology. According to District records, the majority of these generators have been in operation at the East Campus since 1993. Thus, these engines are Tier 0 and Tier 1 engines. As an example of the emissions difference, the Tier 1 diesel generator engines with horse power between 175 and 750 produce 0.40 grams of particulate matter per brake horse power per hour (g/bhp-hr), compared with Tier 4 Interim engines in this horse power range, which only produce 0.015 g/bhp-hr of particulate matter. District staff recommends that the City require the replacement of these older generators with the cleanest available engines to reduce the Project's NOx and PM emissions impacts. These cleaner generators will also protect public health by reducing diesel particulate matter emissions, a known carcinogen.

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



for
Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom
BAAQMD Director Carol Klatt