



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

May 31, 2019

Ryan Kuchenig, Senior Planner
City of Sunnyvale
P.O. Box 3707
Sunnyvale, CA 94087-3707

RE: Google Caribbean Campus Project – Notice of Preparation

Dear Mr. Kuchenig,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for a draft Focused Environmental Impact Report (Focused EIR) for the proposed Google Caribbean Campus Project (Project). This Project would demolish 13 existing office and manufacturing buildings to develop two five-story office buildings, a parking structure, surface parking, and a central utility plant on a 40.5-acre site in the City of Sunnyvale. The office buildings would total 1,041,890 square feet and include office space, meeting rooms, and amenities such as food and fitness centers.

Air District staff recommends the Focused EIR include the following information and analysis regarding potential regional and local air quality impacts and greenhouse gas (GHG) emissions in the San Francisco Bay Area Air Basin:

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
Karen Mitchoff
Mark Ross

MARIN COUNTY
Katie Rice
(Chair)

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Gordon Mar
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY
David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY
Margaret Abe-Koga
Cindy Chavez
(Secretary)
Liz Kniss
Rod G. Sinks
(Vice Chair)

SOLANO COUNTY
James Spering
Lori Wilson

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

- **The Focused EIR should evaluate the Project's impacts on Air Quality and Greenhouse Gas Emissions.** The NOP states that the Project's impacts to Air Quality and Greenhouse Gas Emissions are anticipated to be Less Than Significant or Less Than Significant with Mitigation. However, the NOP states that Transportation is expected to be potentially affected by the Project. The total number of parking spaces would be 2,198 spaces. Although the Air District supports the Project's inclusion of a Transportation Demand Management trip reduction plan, because the project includes over one million square feet of commercial space and no housing, it is quite likely that increases in vehicle trips will impact air quality and GHG emissions. The Air District urges the City to evaluate Air Quality and Greenhouse Gas Emissions as key environmental issues in the Focused EIR.
- **The Project Description and Project Location should include the 1362 Borregas Avenue site.** The NOP states that the Project would also demolish a single-story industrial/R&D building at 1362 Borregas Avenue to accommodate temporary construction parking for 745 cars in lieu of onsite construction parking. This site and its associated transportation impacts should be added to the Project Description and Project Location and be included in the air quality and GHG analysis.
- **The Air District recommends that a significance determination be based on an evaluation of the Project's consistency with the most recent draft of the SB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's CEQA Guidelines are based on the State's 2020 greenhouse gas targets, which are now superseded by the 2030 targets for greenhouse gases established in SB 32.

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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