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February 7, 2019

Guido F. Persicone  
Planning and Housing Manager  
City of East Palo Alto  
Community and Economic Development Department  
Planning and Housing Division  
1960 Tate Street  
East Palo Alto, CA 94303

RE: The Draft EIR (DEIR) University Plaza Phase II Project

Dear Mr. Guido F. Persicone:

Bay Area Air Quality Management District (Air District) staff reviewed the Draft EIR (DEIR) for the University Plaza Phase II Project (Project), near the Highway 101/University Avenue interchange. The Project will merge four parcels to one, two existing buildings will be demolished, and an eight-story office building and a five-story parking structure with 773 parking spaces will be constructed. In addition, the project includes the funding or construction of improvements at the intersection of Donohoe Street and the US 101 Northbound offramp, with four through lanes.

Air District staff has the following recommendations regarding the DEIR's air quality and greenhouse gases impact analysis.

1. The air quality analysis does not appear to have included air pollution emission estimates for the roadway improvements at the US 101 Northbound Off-Ramp, Donohoe Street, and University Avenue. The transportation infrastructure modifications are included in the DEIR's project description, but no references or analysis are included in the DEIR or the Air Quality Technical Assessment. The City should disclose the project schedule for the roadway improvements so the potential air quality impacts from the entire project can be estimated to determine whether potentially significant localized impacts will occur if demolition, construction of the office building and parking structure and roadway improvements occur simultaneously.
2. Based on staff's analysis of the Project site and vicinity, this project area has elevated levels of toxic air contaminants (TACs) and fine particulate matter (PM<sub>2.5</sub>) from existing nearby stationary and mobile sources. The Project's contribution to these existing air pollution levels was not identified through a health risk assessment (HRA) or dispersion modeling for the Project's operation; only construction activity was analyzed with an HRA. Staff recommends that an analysis of operational and cumulative PM<sub>2.5</sub> and TAC impacts be prepared for the Project to identify the potential health risks associated with this project on nearby sensitive receptors, including the two roadway improvement scenarios.

3. The Initial Study (Appendix A) and the Focused DEIR do not adequately analyze the potential impacts of greenhouse gases for construction and operation, including the increased roadway capacity to and from US 101. The Project should demonstrate consistency with all the measures identified in the 2017 Scoping Plan needed to meet the State's strategy to achieve Statewide 2030 GHG reduction goals and being on track to meet 2050 climate stabilization goals.

Air District staff recommends the following additional feasible mitigation measures be required of the project to be more consistent with the 2017 Scoping Plan:

- Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code-compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.
- Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Sections A4.106.5 and A5.106.11.2.
- New outdoor parking lots for multi-family and non-residential buildings shall include trees and/or solar canopies designed to result in 50 percent shading of parking lot surface areas. If tree canopy is used, then it shall be sufficient to achieve this 50 percent shading requirement within 15 years of acquisition of the building permit. If a solar canopy system is used, then it must be installed and achieve 50 percent shading prior to issuance of an occupancy permit. Applicable Project Types: Multi-family residential and non-residential buildings with outdoor, on-site parking lots.
- Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.
- Require the project to meet SB 743 derived vehicle miles traveled (VMT) reductions of 15% below the regional average VMT.
- Require 10% of parking spaces to include electric vehicle charging equipment and designated for electric vehicle parking only.

- Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.
- All construction activities shall implement waste reduction, disposal and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen). In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.

Thank you for the opportunity to submit comments. If you have any questions about the Air District's review of this DEIR, please contact Ada Márquez, Principal Environmental Planner, at (415) 749-8673 or [amarquez@baaqmd.gov](mailto:amarquez@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director David Canepa  
BAAQMD Director Carole Groom  
BAAQMD Director Doug Kim