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July 6, 2020

Adena Friedman, Senior Planner  
City of South San Francisco  
Economic and Community Development  
315 Maple St.  
South San Francisco, CA 94080

RE: Southline Specific Plan – Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Friedman,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Southline Specific Plan (Plan). The DEIR will provide a plan-level analysis of the potential effects on the environment that could occur from implementation of the proposed Plan. The DEIR will also provide a project-level analysis of an initial development phase (Project), which is a component of the proposed Plan.

The proposed Plan includes a new office/research and development (R&D) campus with a maximum anticipated building area of up to 2.8 million square feet. The proposed Plan would demolish all existing on-site uses and construct seven office buildings, an amenities building, approximately 3,075 underground parking spaces throughout the site, a 9-story parking structure with approximately 2,000 parking spaces, a new east-west connection road, and approximately 369,000 square feet of open space. Building heights would range from four to seven stories.

The proposed Project would include construction of the new connection road, three buildings totaling approximately 613,800 square feet of office space, four-story supportive amenity building totaling approximately 88,200 square feet, approximately 2,800 parking spaces in a combination of below-grade parking and the eastern portion of the 9-story parking structure, and landscaping and open space amenities.

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Air District staff recommends the DEIR include the following information and analysis:

- **Provide a detailed analysis of the Plan/Project's potential effects on local and regional air quality.** The DEIR should include a discussion of the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. The Air District's CEQA Air Quality Guidelines, which provide guidance on how to evaluate a Plan's construction, operational, and cumulative air quality impacts, can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **The GHG impact analysis should include an evaluation of the Plan/Project's consistency with the most recent edition of the California Air Resources Board's AB 32 Scoping Plan and with the State's 2030 and 2050 climate goals outlined in SB 32, as well as the State's Carbon Neutrality by 2045 goals, SB 100, the 100 Percent Clean Energy Act of 2018, and Executive Order B-55-18.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32. The DEIR should demonstrate how the Plan will be consistent with the Scoping Plan, SB 32, SB 100 and Executive Order B-55-18.
- **Evaluate the Plan/Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The DEIR should discuss 2017 CAP measures relevant to the Plan and show the Plan/Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
- **Estimate and evaluate the potential health risk to sensitive populations within and near the Project area from toxic air contaminants (TACs) and fine particulate matter (PM2.5) as a result of the Project's construction and operations.** Air District staff recommends that the DEIR evaluate potential cumulative health risk impacts of TAC and PM2.5 emissions on sensitive receptors within and near the Project area.
- **The DEIR should identify and evaluate all Plan-level and Project-level design features and mitigation measures that reduce criteria pollutants, TACs, and GHGs to lessen potential impacts.** Chapter 9, Section 6, of the Air District's CEQA Air Quality Guidelines provides recommended mitigation measures and policies for general plans. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
  - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>),
  - Require construction vehicles to operate with Tier 4 or the highest tier engines commercially available,

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- Based on the proximity to BART and Caltrain, implement a program that incentivizes construction workers and building tenants to use public transit to commute to and from the site. The program may include the following features, as feasible:
    - a. Schedule work shifts to be compatible with the schedules of local transit services;
    - b. Install bicycle racks and lockers;
    - c. Provide comprehensive and safe bicycle and pedestrian routes within the Plan area and connecting the Plan area to nearby land uses, especially BART and Caltrain stations;
    - d. Work with businesses to encourage employee transit subsidies or other transit benefits.
  - The NOP indicates that the Plan may include over 5,000 parking spaces. Abundant parking encourages auto use. Implement parking strategies to discourage solo occupancy vehicle travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and related strategies,
  - Install electric vehicle charging infrastructure and provide preferential parking to EVs, carpool vehicles and vanpool vehicles,
  - Install outdoor electrical receptacles for charging or powering of electric landscape equipment,
  - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity,
  - Eliminate the use of natural gas, a high global warming potential greenhouse gas, and
  - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.
- Plan build-out could result in nearly three million square feet of office and R&D space, with no additional housing. Such large-scale commercial development with no corresponding housing will exacerbate the current severe shortage of housing for Bay Area workers. This jobs/housing imbalance results in long-distance commutes and increased auto use and emissions, among other impacts. The DEIR should discuss the Plan's impact on housing demand and associated auto use and emissions.
  - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov) to discuss permit requirements. Any applicable permit requirements should be discussed in the DEIR.

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- **The Air District’s CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District’s website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Plan/Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.

We encourage the City staff to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Areana Flores, Environmental Planner, at (415) 610-1684 or [aflores@baaqmd.gov](mailto:aflores@baaqmd.gov)

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

Cc: BAAQMD Director David J. Canepa  
BAAQMD Director Carole Groom  
BAAQMD Director Davina Hurt