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Connect with the  
Bay Area Air District:



February 26, 2021

Matt Neuebaumer, Associate Planner  
City of San Bruno  
Community & Economic Development Department  
567 El Camino Real  
San Bruno, CA 94066

RE: Bayhill Specific Plan Including the YouTube Phase 1 Development – Draft Environmental Impact Report

Dear Mr. Neuebaumer,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Bayhill Specific Plan (Plan) including the YouTube Phase 1 Development (Project). The Plan is a proposed land use, transportation, and capital improvements plan for a 92.2-acre site in the City of San Bruno. This Plan would allow for the development of 2.46 million net new square feet of office uses and establish a housing and mixed-use overlay zone that would allow for the development of up to 573 multi-family residential units. The Project would develop Phase 1 of YouTube's 15-year expansion plan, which includes the construction of two new office buildings comprising a total of 440,000 square feet and approximately 1,896 parking spaces.

Air District staff supports the City's efforts to focus on transit-oriented infill development. The Plan and Project site are located in a Priority Development Area as identified by Plan Bay Area 2040, which makes it an ideal location to focus growth and development given its proximity to both the San Bruno Caltrain Station and San Bruno BART Station.

Due to the Plan's significant generation of vehicle miles travelled (VMT) and associated air pollutant and greenhouse gas emissions, Air District staff strongly encourages the City to consider adopting the Residential Alternative. This Plan alternative would allow for the development of up to 1,499 new residential units and would reduce the office development to 1.8 million square feet. This was determined in the DEIR to be the environmentally superior alternative, as it would provide a more balanced jobs/housing ratio and would reduce VMT impacts. The Residential Alternative would also have less impact on air quality and simultaneously help achieve Plan Bay Area's 2040 housing goals.

Moreover, as remote work is likely to continue even as we recover from COVID restrictions and, as such, could result in overabundant office space becoming underutilized, staff recommends that the City consider expanding its residential

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overlay zones, keeping in mind proximity to nearby freeways, to allow flexibility for developing or converting office space to residential units in the future.

Air District staff appreciates the opportunity to work with the City to address the air quality impacts anticipated to result from the Plan and Project. Although the DEIR identified design features and mitigation measures that would substantially lessen local and regional air quality emissions, buildout of the Plan is anticipated to result in significant air quality impacts. Because the timing and intensity of future development projects under the Plan are currently unknown (with the exception of the YouTube Phase 1 Development), the DEIR conservatively assumes that there could be reasonably foreseeable conditions where the Air District's air quality thresholds for ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> could be exceeded during construction and operations. The Air District recommends the following measures that can further reduce air pollution emissions and limit exposure to pollutants for all phases of development.

### **Reduce Construction-Related Emissions**

The DEIR anticipates that the Project would result in significant and unavoidable construction-related air quality emissions. Air District staff appreciates the Project's efforts to address air quality and health impacts by incorporating construction best management practices, including fugitive dust control and requiring Tier 4 engines on equipment. Beyond the proposed mitigation measures, Air District staff recommends the Project incorporate zero-emissions off-road equipment whenever feasible. Staff also recommends establishing a hotline, posting signs around the site with the hotline number, and ensuring the number is given to all nearby residents, schools, and businesses to call and report visible dust problems so the City can promptly fix such problems. This would help reduce the detrimental health impacts from particulate matter to nearby residents during construction.

### **Reduce Operational Emissions**

The DEIR also anticipates that the Plan would result in significant and unavoidable operational air quality emissions, which are primarily due to vehicle trips generated by the proposed land uses. Air District staff appreciates the Plan's efforts to reduce emissions by encouraging transit use, fostering bicycle and pedestrian infrastructure, and supporting sustainable land use patterns through mixed-use design and increased density. However, these policies are framed as voluntary measures. The Air District has found that mandatory measures are usually much more effective at achieving the expected emissions reductions than voluntary measures. Air District staff recommends that the policies include stronger language that affirms the City's intent to implement these measures. For example, Policy 4-5: Encourage First-Last Mile Shuttle Service should be strengthened by stating that the Plan will require implementation of first-last mile shuttle service and other mobility options including e-bikes and e-scooters to connect riders from the nearby Caltrain and BART stations.

In addition, the Plan proposes up to 11 new subterranean parking garages, and the Project would include approximately 1,896 parking spaces. Because the Plan and Project are near two major

fixed rail transit stations and numerous bus routes, Air District staff recommends that the City decrease the amount of parking spaces and implement best practice parking strategies to discourage single occupancy vehicle travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and car-share parking. Moreover, the Plan does not specify strategies to encourage electric vehicle use or construct electric vehicle charging infrastructure. Given the recent Executive Order N-79-20 to phase out gasoline cars and mandate 100 percent sales of new passenger vehicles to be zero-emission by 2035, as well as 100 percent of medium- and heavy-duty vehicles by 2045, it is critical that the Plan and Project accommodate the electric vehicle charging infrastructure necessary to reduce emissions from the transportation sector and accelerate zero-emission technology. To align with this new Executive Order and to be able to support increased use of electric vehicles, Air District staff recommends incorporating electric vehicle charging stations for at least 15 percent of the parking spaces and EV ready spaces for at least 50 percent of parking spaces.

Air District staff also recommends incorporating all feasible policies identified in the Specific Plan as well as the following measures to further reduce operational impacts:

- Install fully protected bicycle lanes to and from San Bruno Caltrain and BART stations and other nearby activity centers;
- Exceed the City's current bike parking ratio;
- Install an adequate number of showers and locker room facilities to further encourage tenants to use bicycling as a safe and reliable transportation mode;
- Install all-electric appliances; and
- Eliminate the use of natural gas, a high global warming potential greenhouse gas.

### **Revise Offset Mitigation Language**

Even with the design features and on-site mitigation measures, the DEIR anticipates that buildout of the Plan could result in significant and unavoidable air quality impact during both construction and operations. Because the timing and intensity of future development projects under the Plan are currently unknown (with the exception of the YouTube Phase 1 Development), Mitigation Measures AQ-6 and AQ-7 would require any future project estimated to result in the exceedance of any air quality threshold to mitigate its impacts by purchasing offsets.

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted by the Air District's support foundation, the Bay Area Clean Air Foundation, on a case-by-case basis based on available projects. We recommend that references to BAAQMD on page 3.2-29 ["... coordinate with BAAQMD to determine the mitigation fees ... to pay on a pro rata basis to BAAQMD ..."] and page 3.2-32 ["... BAAQMD would determine the mitigation fees for each development project's applicant to pay on a pro rata basis to BAAQMD ..."] be replaced with "an independent third-party approved by the City, such as the Bay Area Clean Air Foundation." This will clarify that Project applicants may seek additional options if the Bay Area Clean Air Foundation has no available projects at the time. In addition, when considering offset emission purchases for air quality and GHGs, staff

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recommends using a preferential hierarchy that first benefits the community, the City, or the Bay Area region, in that order.

### **Public Outreach on Health Risk Assessments**

Staff supports the Plan's requirement of having future projects, located within 1,000 feet of sensitive receptors, perform health risk assessments. Staff recommends that the City communicate its findings to the public for full disclosure prior to approval of the projects.

### **Ensure Compliance with Air District Regulations and Permitting Requirements**

Air District staff advises the City to comply with the following:

- **Trackout Requirement.** The Project requires compliance with Air District Regulation 6, Rule 6: Prohibition of Trackout for construction sites where the total land area covered by construction activities and/or disturbed surfaces at the site are one acre or larger. Because the Project site is 92.2 acres, the DEIR should discuss Regulation 6, Rule 6 as it applies to the Project. To review the regulation, please visit <https://www.baaqmd.gov/rules-and-compliance/rules/regulation-6-rule-6-prohibition-of-trackout> and consult with staff from the Air District's Compliance and Enforcement Division at (415) 749-4795 or [compliance@baaqmd.gov](mailto:compliance@baaqmd.gov).
- **Authority to Construct/Permit to Operate.** The Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Because the Project includes two emergency generators, the Project applicant will need to apply for an Air District Authority to Construct/Permit to Operate. If you have any questions regarding the Air District's permits, please contact Barry Young, Senior Advanced Projects Advisor, at [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov) or (415) 940-9641 to discuss permit requirements.

Air District staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or [jfong@baaqmd.gov](mailto:jfong@baaqmd.gov), or Areana Flores, Environmental Planner, at (415) 749-4616, 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