



**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

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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- **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.

- **The Focused EIR should evaluate the Project's consistency with the City of Sunnyvale Climate Action Plan.** The City adopted its Climate Action Plan in 2014 and is working on an updated plan called the Climate Action Playbook, which is expected to be released in Summer 2019. The Focused EIR should evaluate the Project's consistency with the City's most recently adopted Climate Action Plan.
- **The Focused EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
- **The Focused EIR should quantify the Project's potential construction and operational impacts to local and regional air quality.** The Air District's CEQA Guidelines provide guidance on how to evaluate a project's or plan's construction, operational, and cumulative air quality and GHG impacts. The CEQA Guidelines can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **The Focused EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the project's construction and operation.** Air District staff recommends that the Focused EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on nearby sensitive receptors.
- **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: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
- **If any aspects of the Project may require a permit from the Air District (for example, back-up diesel generators), then the Air District may be a responsible agency for California Environmental Quality Act (CEQA) purposes.** Please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

We encourage the City 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 Josephine Fong, Environmental Planner, at (415) 749-8637, or jfong@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga
BAAQMD Director Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Director Rod G. Sinks