FINAL ENVIRONMENTAL IMPACT REPORT FOR THE BAYHILL SPECIFIC PLAN INCLUDING PHASE I DEVELOPMENT

PREPARED FOR:

City of San Bruno
567 El Camino Real
San Bruno, CA 94066
Contact: Matt Neuebaumer
650-616-7042

PREPARED BY:

ICF
201 Mission Street, Suite 1500
San Francisco, CA 94105
Contact: Heidi Mekkelson
415-677-7116

August 2021

ICF. 2021. Final Environmental Impact Report for The Bayhill Specific Plan Including the Phase I Development. August. (ICF 00389.17.) San Francisco, CA. Prepared for City of San Bruno, San Bruno, CA.

Contents

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Chapter 1
Introduction

This document contains comments submitted by agencies, organizations, and individuals concerning the January 2021 Draft Environmental Impact Report (Draft EIR) for the *Bayhill Specific Plan Including the Phase I Development* project, State Clearinghouse #2017112045. The Draft EIR was prepared in accordance with the California Environmental Quality Act (CEQA) and provides a program-level review of potential environmental impacts of the proposed Bayhill Specific Plan (Specific Plan) in the City of San Bruno, and a project-level review of the proposed first phase of development under the Specific Plan (Phase I Development). This document also contains responses to each comment received and resulting revisions to the Draft EIR. The City of San Bruno is the lead agency for the project.

The Draft EIR was made available to the public and regulatory agencies for review and comment during the minimum 45-day comment period between January 14, 2021 and March 1, 2021.

The Guidelines implementing the California Environmental Quality Act (CEQA) require that written responses be prepared for all written comments received on a Draft EIR during the public review period. CEQA Guidelines Section 15132 specifically states:

The Final EIR shall consist of:

1. The Draft EIR or a revision of that draft.
2. Comments and recommendations received on the Draft EIR either verbatim or in a summary.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The response of the Lead Agency to significant environmental points raised in the review and consultation process.
5. Any other information added by the Lead Agency.

This Final EIR has been prepared in compliance with these Guidelines and includes the following:

- Chapter 1, *Introduction*
- Chapter 2, *Comments Received on the Draft EIR*
- Chapter 3, *Responses to Comments*
- Chapter 4, *Revisions to the Draft EIR*
- Appendix A, *Meeting Notes from March 25, 2021 Meeting with the San Francisco Public Utilities Commission (SFPUC)*
- Appendix B, *Water Supply Assessment Addendum (New Draft EIR Appendix 3.11-1b)*

Information provided in the responses to comments and in the revisions to the Draft EIR clarifies and amplifies the analysis presented in the Draft EIR. No significant new information, as defined by CEQA Guidelines Section 15088.5, was added that would trigger recirculation of the Draft EIR. Specifically, there are no new significant environmental impacts, or a substantial increase in the severity of any significant impact, identified in the comments or responses that were not already identified in the Draft EIR.

Chapter 2
Comments Received on the Draft EIR

This chapter includes a list of the agencies, organizations, and individuals who commented on the Draft EIR (Draft EIR) and the actual comment letters submitted on the Draft EIR. The comment letters, which include both letters and emails, have been numbered as shown in Table 2-1. Individual comments within each letter have been delineated and numbered. A response to each comment is provided in Chapter 3, *Responses to Comments*. Each individual response in Chapter 3 is numbered to correspond with the comment to which it responds.

Table 2-1. List of Commenters

Letter #	Commenter	Date Received
Public Agencies		
1	Bay Area Air Quality Management District	February 26, 2021
2	Caltrans (District 4)	March 1, 2021
3	San Francisco International Airport	March 1, 2021
4	San Francisco Public Utilities Commission	March 1, 2021
Organizations		
5	Sierra Club (Loma Prieta Chapter)	February 21, 2021
6	YouTube (Josh Portner)	February 17, 2021
7	YouTube (Josh Portner) – Part 2	March 1, 2021
8	YouTube (Josh Portner) – Part 3[1]	February 16, 2021
Individuals		
9	Alexander Melendrez	February 16, 2021
10	Dean J. Moser (Bayhill Office Partners, LLC)	February 23, 2021
11	Janice Rodondi	March 15, 2021
12	Draft EIR Public Hearing Transcript	March 1, 2021

[1] YouTube submitted comments on the draft Specific Plan on February 16, 2021. These comments included comments on the Draft EIR appendices, which have been extracted from the Specific Plan comment letter and included herein as Comment Letter 8.

Letter 1

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. 1-1

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. 1-2

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. 1-3

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 1-4

overlay zones, keeping in mind proximity to nearby freeways, to allow flexibility for developing or converting office space to residential units in the future. 1-4 (cont.)

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, NOx, PM_{10}, and $PM_{2.5}$ 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. 1-5

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. 1-6

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. 1-7

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 1-8

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.

1-8 (cont.)

1-9

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:

1-10

- 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

1-11

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

1-12

1-13

recommends using a preferential hierarchy that first benefits the community, the City, or the Bay Area region, in that order. 1-13 (Cont.)

Public Outreach on Health Risk Assessments 1-14

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 1-15

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.
- **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 or (415) 940-9641 to discuss permit requirements. 1-16

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, or Areana Flores, Environmental Planner, at (415) 749-4616, or 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

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

March 1, 2021

SCH #: 2017112045
GTS #: 04-SM-2017-00347
GTS ID: 8680
Co/Rt/Pm: SM/380/5.16

Matt Neuebaumer, Associate Planner
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: Bayhill Specific Plan and Phase 1 Development- YouTube Draft Environmental Impact Report (DEIR)

Dear Matt Neuebaumer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Bayhill Specific Plan and Phase 1 Development Project (Project). We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2021 DEIR. 2-1

Project Understanding
The Specific Plan is a proposed land use, transportation, and capital improvements plan that outlines a cohesive, long-term, community-driven vision for the Project site. The Specific Plan would allow for the development of up to 2.46 million net new square feet of office uses on the Project site. The Specific Plan would also establish housing and mixed-use overlay zones on a total of 20.5 acres in the southern portion of the Project site that would allow for the development of up to 573 multi-family residential units.

Travel Demand Analysis and Mitigation Strategies 2-2
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses

Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide. 2-2 (Cont.)

The Project's Vehicle Miles Traveled (VMT) analysis and significance determination presented in the DEIR are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this Project is found to have significant and unavoidable VMT impacts. However, Caltrans acknowledges the current Transportation Demand Management (TDM) measures in place with the Phase I tenant (YouTube) and commends the commitment, year over year, to comply with the Project VMT threshold. 2-3

Caltrans acknowledges the Lead Agency's role in overseeing the TDM programs set forth for future tenants and supports the allocation of impact fees toward multimodal and regional transit improvements with the goal of fully mitigating cumulative impacts to regional transportation. Caltrans also strongly supports measures to increase sustainable mode shares, thereby reducing VMT. 2-4

Multimodal Safety and Planning

Caltrans recommends replacing all standard basic crosswalk markings on El Camino Real (ECR) from San Bruno Avenue to Sneath Lane with one of the higher visibility crosswalk patterns per Caltrans Standard Plan A24F (https://dot.ca.gov/programs/design/ccs-standard-plans-and-standard-specifications). 2-5

The City of San Bruno's Walk 'N Bike Plan calls for intersection improvements along ECR, including adding corner bulb-outs and pedestrian refuge islands which can reduce crossing distance for pedestrians and improve pedestrian visibility at intersections. Caltrans recommends that the intersection improvements on ECR within the Project study area be implemented prior to, or included in, the Project. 2-6

As well, Caltrans encourages the allocation of fair share contributions towards the Walk 'N Bike Plan's recommendations for striping and signage improvements to enhance bicycle access and safety at I-380/I-280/San Bruno Avenue West. Infrastructure connectivity improvements such as ramp and curb repairs in and around the Project area may also encourage mode shift and promote safety amongst all users. 2-7

Right of Way (ROW) Encroachment

The Project applicant will need to reach out to Caltrans' Office of Encroachment Permits (Permits) and Division of ROW as this Project will require permits for both surface and airspace encroachments, per Caltrans and FHWA requirements. The applicant will need to obtain a ROW Use Agreement and pay a fair market rate for the use of Caltrans' Airspace to install tiebacks, as diagrammed in Appendix 5. When plans are submitted to Caltrans for review, the ROW line should be clearly delineated on all diagrams. Please clarify the property lines after page 3 of Appendix 5, as it is not clearly marked where the tiebacks fall within Caltrans' ROW. 2-8

Additionally, as part of the encroachment permit submittal process, the applicant will be asked by Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating the State ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov. 2-9

To download the permit application and to obtain more information on all required documentation, visit https://dot.ca.gov/programs/traffic-operations/ep/applications.

If any Caltrans facilities are impacted by the Project, those facilities must meet American Disabilities Act (ADA) Standards after Project completion. 2-10

Lead Agency

As the Lead Agency, the City of San Bruno is responsible for all Project mitigation, including any needed improvements to the State Transportation Network (STN). The Project's fair share contribution, financing, scheduling, implementation responsibilities should be fully addressed for all proposed mitigation measures. 2-11

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov. 2-11 (cont.)

Sincerely,

MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter 3

San Francisco International Airport

March 1, 2021

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

TRANSMITTED VIA EMAIL
MNeuebaumer@sanbruno.ca.gov

Subject: ***Comment letter to the Draft Environmental Impact Report for the Bayhill Specific Plan, including YouTube Phase 1 Development – City of San Bruno***

Dear Mr. Neuebaumer:

San Francisco International Airport (SFO or the Airport) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Bayhill Specific Plan Area and YouTube Phase I development (the project) in San Bruno (the City). We are happy to coordinate with the City in considering and evaluating potential land use compatibility issues with the Airport for the project. 3-1

The Airport previously provided the City with comment letters, dated December 7, 2017 and August 14, 2019, regarding environmental review of the project under the California Environmental Quality Act. In those letters, the Airport did not identify any inconsistencies between the project and the Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO (ALUCP). 3-2

On January 14, 2021, the City released its DEIR for the project. The Airport understands that the Specific Plan area currently contains 1.8 million square feet of development, which the project would increase to accommodate a further 2.44 million square feet of development, in addition to 573 new residential units. Height limits for all development would remain at a maximum of three stories and 50 feet throughout the Specific Plan area. 3-3

The Airport would like to amend its prior comments to state that the northeastern portions of Parcels 15 and 16 are within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour for SFO (see Figure 1). The Airport understands Parcels 15 and 16 are within the Bayhill Regional Office (BRO) zone and would allow for hotels and ancillary uses, including childcare facilities. Because Parcels 15 and 16 are within the 65 dB CNEL contour, any development of these parcels would be subject to the provisions of ALUCP Policy NP-3 and Table IV-1, which, among other things, limit the types of development allowable and require sound insulation and the grant of an avigation easement for certain types of development. The Bayhill Specific Plan and YouTube Phase I development should include and apply these requirements. 3-4

The Airport also highlights that throughout the project site, any overnight uses could experience noise disturbances from aircraft departures. Any proposed residential or other sensitive uses should therefore meet the interior noise requirements of the California Building Code and San Bruno General Plan. 3-5

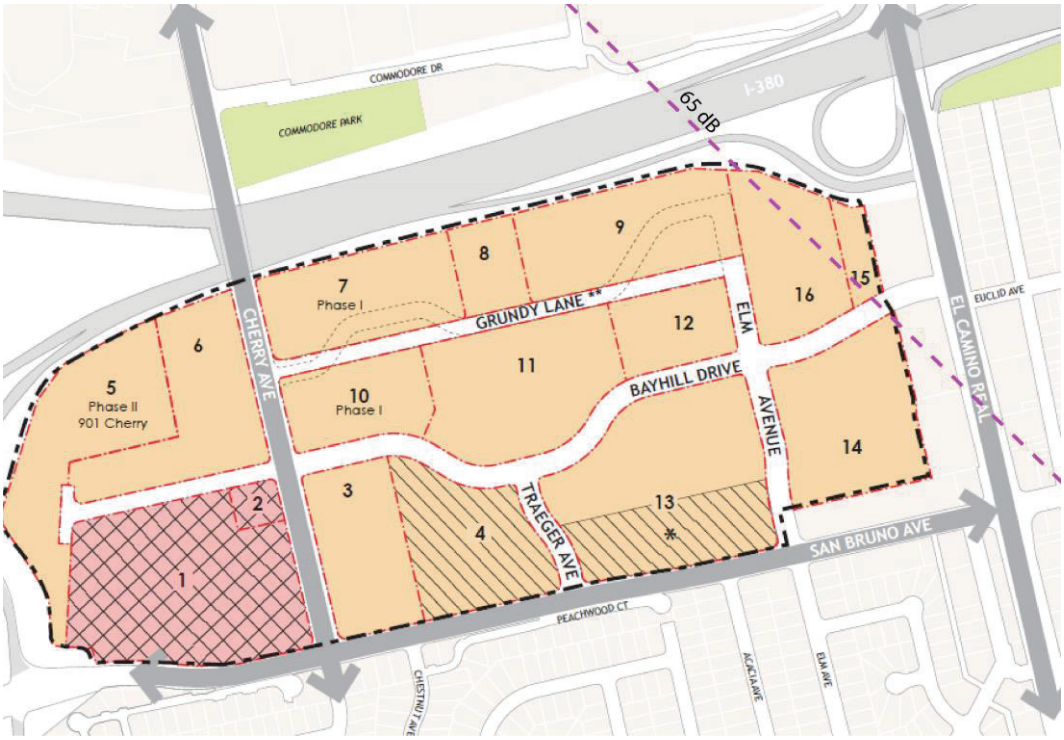


Figure 1: Project Area and SFO 65 dB CNEL contour

3-6

Finally, the Airport was not notified about the issuance of the DEIR, even though the Airport had commented on the Notice of Preparation and Revised Notice of Preparation of an EIR. We would appreciate if the City could double check SFO is on the distribution list for all notices regarding development and land use projects, including general plan, specific plan, and zoning updates, within the City.

3-7

The Airport appreciates your consideration of these comments. Please do not hesitate to contact me at (650) 821-9464 or at nupur.sinha@flysfo.com should there be any questions related to this project.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

Nupur Sinha
Acting Planning Director
Planning and Environmental Affairs

cc: Sandy Wong, C/CAG
Audrey Park, SFO, Acting Environmental Affairs Manager

Letter 4

San Francisco Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.934.5736
F 415.934.5770
TTY 415.554.3488

March 1, 2020

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

Sent Via Email to: MNeuebaumer@sanbruno.ca.gov

Re: Draft Environmental Impact Report for the Bayhill Specific Plan, Including the YouTube Phase I Development (SCH # 2017112045), City of San Bruno

Dear Mr. Neuebaumer:

4-1

Thank you for the opportunity to provide comments on the above-referenced Draft Environmental Impact Report for the Bayhill Specific Plan (DEIR). The City and County of San Francisco, through its San Francisco Public Utilities Commission (SFPUC), is submitting comments to the City of San Bruno so that the SFPUC's right-of-way (ROW) property interests and infrastructure, as well as potential impacts to groundwater resources, are properly described and analyzed in the DEIR.

We greatly appreciate your efforts to incorporate the SFPUC's previous comments on the Revised Notice of Preparation of a Draft Environmental Impact Report for the San Bruno Bayhill Specific Plan and the YouTube Phase I Office Development (dated 7/26/2019) into the DEIR. We also appreciate the Project Sponsor's presentation of preliminary conceptual plans at the SFPUC's 11/20/2019 Project Review Meeting.

Our comments focus on three general areas: Land use and parking (i.e. development of underground parking garages) and groundwater resources and water demand.

Land Use and Parking

4-2

The City and County of San Francisco owns (or holds easements for) a water transmission pipeline right-of-way (ROW) managed by the SFPUC that is part of a regional water system serving 2.7 million customers. In some locations, the SFPUC ROW is located within a public right-of-way.

Under DEIR Sections 2.3.4 (Other Land Use Plans and Regulations) and 3.6 (Land Use Planning), the DEIR correctly describes the locations of two SFPUC ROW easements within the project site and the SFPUC policies that apply to its ROW. The DEIR also describes the SFPUC's vetting process for the proposed use of its ROW (Project Review). 4-2 (Cont.)

In Section 2.6.2.6 (Transportation, Circulation, and Parking), the DEIR describes the development of up to 11 new underground parking garages with depths ranging from 29 feet to 58 feet below ground surface. Phase I of the proposed project (analyzed at the project level in the DEIR) would affect the SFPUC ROW for the Sunset Supply Line and Crystal Springs Pipeline No. 2 with the realignment of Grundy Avenue at Elm Avenue. Future phases of the proposed project (analyzed at the program level in the DEIR) would include underground parking garages on either side of this section of the SFPUC ROW. 4-3

As described by the project sponsor at the 11/20/2019 Project Review meeting, the two underground garages on either side of the SFPUC ROW would be connected by an underground pedestrian tunnel under the SFPUC ROW, and a pedestrian bridge over the SFPUC ROW. The Project Review Committee concurred that further Project Review is necessary once the project sponsor submits plans showing the construction method for protecting SFPUC water transmission pipelines during construction of all proposed project elements within the SFPUC ROW easement and public ROW. In addition, more information is needed regarding how the proposed overhead crossing would allow passage and operation of a crane. A summary of the 11/20/2019 Project Review meeting is attached for your reference. 4-4

In the cumulative analysis, the DEIR describes a proposed office development on a vacant hillside lot on the west side of the project site (adjacent to 901 Cherry Avenue). This project has been approved by the City of San Bruno and is included in the overall development of the project site. Because the SFPUC's San Andreas Pipeline Nos. 2 and 3 extend across this hillside parcel, further review by the SFPUC's Project Review Committee will be necessary as plans are developed by the project sponsor. 4-5

As stated in the DEIR, the project sponsor will continue to work with the SFPUC through its Project Review process to develop plans that are consistent with SFPUC plans and policies. 4-6

Groundwater Resources and Water Demand

SFPUC Water Resources staff have concerns regarding inaccurate descriptions of SFPUC's Regional Groundwater Storage and Recovery Project (RGSR) set forth in the DEIR sections 3.5 Hydrology and Water Quality and 3.11 Utilities and Service Systems. It appears that there is a variance between the development project water supply assessment and the DEIR text with respect to the operation and design of the RGSR project. 4-7

I recommend that the City of San Bruno and the DEIR consultants work with our Water Resources staff to resolve this issue. Please contact Nicholas Johnson, Water Operations Analyst, at NJohnson@sfwater.org or Christopher Lyles, Regulatory Specialist, at clyles@sfwater.org for more information.

Thank you again for this opportunity to comment on the proposed project and its DEIR. If you have any questions or need further information, please contact Joanne Wilson, Senior Planner, at jwilson@sfwater.org. The project sponsor is encouraged to submit updated plans and a project description at various design phases for elements of the proposed project that affect the SFPUC ROW to projectreview@sfwater.org.

4-8

Sincerely,

Steven R. Ritchie

Steven R. Ritchie
Assistant General Manager, Water

Attachment: 11/20/2019 Project Review Meeting Summary

C: SFPUC: Tim Ramirez, Rosanna Russell, Paula Kehoe, Angela Cheung, Ellen Levin, Annie Li, Ellen Natesan, Casey Rando, Joanne Wilson, Christopher Wong, Stacie Feng, Emily Read, Obi Nzewi, Christopher Lyles

San Francisco Office of the City Attorney: Richard Handel

City of San Bruno: Mark Reinhardt, Water System and Conservation Manager

Hetch Hetchy
Regional Water System
Services of the San Francisco Public Utilities Commission
Natural Resources and Lands Management Division

Date: **December 27, 2019**

To: **Project Review Committee:**
Natural Resources and Lands Management Division (NRLMD): Jessica Appel, Carin Apperson, Dave Baker, Anna Fedman, Neal Fujita, Jane Herman, Mia Ingolia, Clayton Koopmann, Jonathan Mendoza, Ellen Natesan, Jonathan Perrin, Emily Read, Brian Sak, Scott Simono, Casey Sondgeroth, Daniel Stewart, Eric Sutera, Kathleen Swanson, Joanne Wilson, Yin Lan Zhang

Water Supply and Treatment Division (WSTD): Annie Li, Colm Conefrey, Stacie Feng, Jim Heppert, Tracy Leung, Colby Lum, Tony Mazzola

Real Estate Services (RES): Tony Bardo, Nicki Bartak, Dina Brasil, Tony Durkee, Bruz Meade, Heather Rodgers, Rosanna Russell, Christopher Wong

Water Quality Bureau (WQB): Suzie Auyeung and Jackie Cho

Bureau of Environmental Management (BEM): Brett Becker, Lindsay Revelli, Matthew Weinand

City Attorney's Office: Shari Geller Diamant, Richard Handel, Catherine Malina

Cc: **SFPUC:** Jim Avant, Jim Barkenhus, Kevin Bolter, Bree Candiloro, Kelley Capone, Manuel Casanova, Kyndra Cox, Debbie Craven-Green, Robin Dakin, Andrew DeGraca, Jane Dhaliwal, Erick Digre, Rick Duffey, Daniel Ficker, Ed Forner, James Forsell, John Fournet, Mae Frantz, Karen Frye, Susan Hou, Alan Johanson, Jowin Jung, Kevin Kasenchak, Patrick Kerrisk, Krysten Laine, Samuel Larano, Sarah Lenz, Jeremy Lukins, Greg Lyman, John Lynch, Scott MacPherson, Miko Nadel, Chris Nelson, Gloria Ng, Tim Ramirez, Ken Salmon, Carla Schultheis, Bles Simon, Damon Spigelman, Kimberly Stern Liddell, Irina Torrey, Rizal Villareal, Derek Wong, Tina Wuslich

San Francisco City Planning (Environmental Planning): Chris Kern (as-needed)

From: **Joanne Wilson / Senior Land and Resources Planner**
jwilson@sfwater.org | (650) 652-3205

Subject: **November 20, 2019 Project Review Committee Meeting**
10:00 a.m. – 1:00 p.m.
1657 Rollins Road, Burlingame, CA 94010 - Medbery (Large) Conference Room

Participants: Dave Baker, Jane Herman, Ellen Natesan, Emily Read, Scott Simono, Joanne Wilson (SFPUC-NRLMD); Bruz Meade, Christopher Wong (SFPUC-RES); Stacie Feng, Tracy Leung (SFPUC-WSTD Land Engineering); David Blackwater; Mitch Lee, Michelle McDermott, Ashley Stanley, Matt Weber (Youtube Representatives); Joanna Kwok, Hae Wen Ritchie (City of San Bruno); Erica Schlemer, Robert Villasenor (PG&E); James Wilson (ACRT); Lynette Curthoys (Foghorn Solutions Inc); and Madeline Green (Blue Rock Services Inc).

Project Review Committee Meeting Schedule for 2019 / 2020

October 2, 2019	January 15, 2020	April 1, 2020	July 1, 2020	October 7, 2020
October 16, 2019	January 29, 2020	April 15, 2020	July 15, 2020	October 21, 2020
November 6, 2019	February 5, 2020	May 6, 2020	August 5, 2020	November 4, 2020
November 20, 2019	February 19, 2020	May 20, 2020	August 19, 2020	November 18, 2020
December 4, 2019	March 4, 2020	June 3, 2020	September 2, 2020	December 2, 2020
December 18, 2019	March 18, 2020	June 17, 2020	September 16, 2020	December 16, 2020

NOTE: *Due to limited resources, the SFPUC must prioritize projects critical to our core mission of providing high quality utility services to our customers. We appreciate your patience in our response to your project application.*

4-9
Cont.

1) Case No.	Project	Applicant/Project Manager
19.11-RW59.00	San Bruno Bayhill Specific Plan/Youtube Development - Bayhill Drive and Elm Avenue, San Bruno	Matthew Webber, Senior Development Manager, Ellis Partners (on behalf of Google/YouTube)

The proposal is to construct an underground pedestrian connection under two SFPUC water transmission pipelines (Sunset Supply Line and Crystal Springs Pipeline No. 2) located in the public right of way (ROW) on Elm Avenue between Bayhill Drive and San Bruno Avenue to connect two new underground parking structures to be constructed on either side of the public ROW. In addition, the proposal is to construct a pedestrian bridge or above-grade crossing over the same section of public ROW. In addition to the Elm Avenue public ROW, the SFPUC water transmission pipelines extend through two, side-by-side, 40-foot wide SFPUC ROW easements located north of Bayhill Drive. Other improvements on the SFPUC ROW include the relocation of a fire hydrant, minor grading and paving, a vacation of a portion of Elm Avenue, a storm drain that would cross the ROW perpendicularly approximately 5 feet north of the existing storm drain crossing on Elm Avenue, and a planter strip with trees.

In addition to the SFPUC ROW easement and the public ROW that includes the SFPUC's water transmission pipelines under Elm Avenue, there is a narrow public utility easement (PUE) parallel, but outside of, the SFPUC ROW easement and public easement. These 5- to 15-foot wide PUEs are located on either side of the 80-foot wide SFPUC ROW easements and public ROW.

These proposed structures are part of YouTube Phase 1 Project of the San Bruno Bayhill Specific Plan, which proposes: 1) The construction of an off-street multi-modal transportation hub on an access way located between Grundy Lane and Bayhill Drive, on the west side of the parcel containing 950 Elm Street; 2) The realignment and straightening of Grundy Lane from Cherry Avenue to Elm Avenue; and 3) the abandonment of the northern portion of Elm Avenue located directly to the north of the realigned Grundy Lane.

SFPUC Real Estate Services' research yielded two easement deeds conveying land rights to the SFPUC (one issued by the U.S. Navy on 6/30/59 and the other recorded on 12/10/55). Copies will be provided to the project sponsor.

The Committee also discuss the proposed planter strip with trees. SFPUC policy generally prohibits trees on the SFPUC ROW, but staff noted that small trees in containers could be considered. In ground root barriers are ineffective over time and tree roots can damage the protective coating of water transmission pipelines that protects them from corrosion. In no case are trees allowed directly over water transmission pipelines because of load considerations and access issues. At a future Project Review meeting, the project sponsor will present a landscape plan.

Regarding the proposed overhead pedestrian crossing, SFPUC staff were concerned that such a structure would inhibit SFPUC access, particularly for pipeline replacement or additions which require aerial clearance for a crane. The SFPUC would need to review a proposal for an overhead crossing that allows the passage and operation of a crane.

The Committee concurred that further Project Review is necessary once the project sponsor submits plans showing the construction method for protecting SFPUC water transmission pipelines during construction of all proposed project elements within the SFPUC ROW easement and public ROW. In addition, more information is needed regarding how the proposed overhead crossing would allow passage and operation of a crane. Since the project sponsor has submitted a request for a potholing consent letter, it would also be helpful if this data were available at a future Project Review meeting.

The project is scheduled to commence in next year (2020) and would take approximately 20 to 24 months to complete the first phase. The proposed project is divided into several phases that would be implemented over the next 20 years as part of the San Bruno Bayhill Specific Plan. A draft environmental impact report (DEIR) is being prepared for the San Bruno Bayhill Specific Plan pursuant to the California Environmental Quality Act (CEQA). The SFPUC provided comments on the revised Notice of Preparation (NOP) of a DEIR on August 23, 2019.

4-9 Cont.

Follow-up Requirements:

Real Estate Services

1) SFPUC Real Estate Services will provide copies of the two easement deeds to the project sponsor (contact Christopher Wong, Principal Administrative Analyst, at cjwong@sfwater.org or (415) 487-5211.

Water Supply and Treatment Division - Land Engineering

2) The project sponsor will obtain a consent letter from SFPUC-WSTD Land Engineering to perform potholing on the SFPUC pipelines at the project site (for more information, contact Tracy Leung, Associate Engineer, at tleung@sfwater.org or (650) 871-3031). [Update: Project sponsor has initiated a request for a consent letter for potholing.]

3) For more information regarding the SFPUC's engineering requirements, the project sponsor may contact Stacie Feng, Associate Engineer, at sfeng@sfwater.org or (650) 871-2037; or Tracy Leung, Associate Engineer at tleung@sfwater.org or (650) 871-3031.

Natural Resources and Lands Management Division

4) Further Project Review is required. The project sponsor will submit conceptual design, including the tunnel diameter and the construction method for protecting SFPUC water transmission pipelines during construction of all proposed project elements within the SFPUC ROW easement and public ROW. In addition, the project sponsor will provide more information regarding how the proposed overhead crossing would allow passage and operation of a crane. Since the project sponsor has submitted a request for a potholing consent letter, it would also be helpful if this data were available at a future Project Review meeting. The project sponsor will also provide more landscaping details showing compliance with the SFPUC's ROW vegetation policy. Contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfwater.org or (650) 652-3205.

5) For more information regarding the SFPUC's ROW vegetation management policy, the project sponsor may contact Emily Read, ROW Manager, at eread@sfwater.org or (650) 652-3204.

2) Case No.	**Project**	**Applicant/Project Manager**
19.11-AL61.00	PG&E Vegetation Management - Tesla-Newark 230kV Transmission Line NERC 2019 - Calaveras Road, Sunol (9 trees and 34 brush units)	Robert Villasenor, Land Planner, Pacific Gas and Electric Company (PG&E)

The proposal is to remove 9 trees and 34 brush units on the Alameda Watershed near Calaveras Road and the quarry ponds, distributed over approximately 1.4 linear miles. This transmission line vegetation management work is required to maintain safe and reliable electric service and mandated clearance to comply with federal and state regulatory requirements for public safety and fire prevention. Affected species include bay, valley oak, coast live oak, elderberry, and sycamore. The work consists of removing trees and branches that could come into contact with power lines and to clear the brush at the base of the towers ("cage clearing").

No ground disturbance is required to complete the work. Vehicles will remain on existing roads and crews will access trees either on foot or by lift truck operated from the existing roads. Equipment may include pick-up trucks, bucket trucks, and tow chippers.

The Committee discussed vegetation debris and SFPUC requirements. When SFPUC requirements allow PG&E to lop and scatter vegetation debris, it will not be scattered in grasslands and will be left within the footprint of the tree to minimize disturbance. Stumps will be treated with an herbicide in compliance with City and County of San Francisco's Integrated Pest Management (IPM) Ordinance (Environment Code Chapter 3). SFPUC staff stated that PG&E must also adhere to SFPUC criteria for vehicle and equipment decontamination, fire prevention, weather conditions, and quarry safety training (where applicable).

4-9 Cont.

The PG&E representative stated that all work would take place within existing PG&E easements.

The PG&E representative also stated that the proposed work and all work locations are covered by PG&E's Bay Area Operations and Maintenance Habitat Conservation Plan (BAHCP). The BAHCP provides PG&E with federal take authorization for specific covered species for all gas and electric operations and maintenance activities in the nine-county San Francisco Bay Area during the 30-year permit term.

The project is scheduled to commence as soon as possible and be completed by December 31, 2019 as required by the North American Electric Reliability Corporation (NERC), or as soon as ground conditions are sufficiently dry to perform the work as determined by SFPUC staff. PG&E staff explained that a list of NERC compliance projects, including vegetation management, is submitted to NERC annually at the beginning of the year.

Project Work Locations:

Note: In the descriptions below, "service road" may be paved, unpaved, rocked or un-rocked, or vegetated.

Vegetation Points (VP) 10, 9, 8 & 2:

Removal activity includes four mature Valley Oak trees with 31- and 33-inch diameter at breast height (DBH) at VP 9 and VP 10; 42-inch DBH at VP 8; and 44-inch DBH at VP 2. The service road is located off Calaveras Road. Crews will access work sites by foot, approximately 150 feet away from the service road. SFPUC prefers extensive trimming of isolated oaks rather than removals because the trees provide valuable shade for cattle. Dave Baker, Alameda Watershed Forester, requested a field visit to confirm whether some portion of the trees could remain and still achieve compliance with the transmission line clearance requirements. There has been no biological survey and the extent of Viola (*Viola pedunculata)*, the larval food plant for the federal endangered callippe silverspot butterfly (*Speyeria callippe callippe*), is unknown. To protect populations of Viola, PG&E will remove limbs and small debris off-site. Remaining bole and large vegetative debris will be placed within the footprint of the tree.

VPs 1 & 7:

Removal activity includes two multi-stemmed trees with a total DBH of 40 inches for the Bay tree at VP 1 and a total 52 inches for the Sycamore tree at VP 7. For multi-stemmed units, SFPUC staff noted that they would like to see individual stem measurements in the future. Service road is located off Calaveras Road. Debris will be hauled off site.

VPs 3, 4, & 11:

Removal activity includes three trees: A multi-stem Coast Live Oak at VP 3 with a total DBH of 56 inches, a multi-stem Coast Live Oak at VP 4 with a total DBH of 30 inches, and a Valley Oak at VP 11 with a 13-inch DBH. Service road is located off Calaveras Road. Debris will be hauled off site. VPs are located within a weedy area and crews should closely follow weed-control protocols including decontamination of equipment before and after performing work at these sites.

VPs 5 & 6:

PG&E will remove approximately 20 elderberry bushes under the towers. For VP 5, SFPUC staff suggested accessing the site directly from the substation perimeter road if possible to minimize the distance required for foot travel. Service road is located off Calaveras Road. Debris will be hauled off site.

VP 12:

PG&E will remove approximately 14 elderberry bushes under the tower. Service road is located off Calaveras Road through the existing quarry, which will require coordination and training as specified below. Debris will be hauled off site.

Follow-up Requirements:

4-9 Cont.

Real Estate Services

1) The project sponsor will work with SFPUC Real Estate Services to obtain a Work Authorization Letter for the proposed project on SFPUC property (for more information, contact Hugh "Bruz" Meade, SFPUC Real Estate Services Consultant, at HAMeade@sfwater.org .

2) The project sponsor will contact SFPUC Real Estate Services to coordinate access through the quarry, and if requested by the SFPUC lessee, arrange for quarry safety training to PG&E crews or contractors for VP 12. Please contact Anthony (Tony) Bardo, Assistant Real Estate Services Director, at ABardo@sfwater.org or (415) 554-1522.

Natural Resources and Lands Management Division

3) The project sponsor and its contractors will each obtain an approved SFPUC-NRLMD Access Permit (and keys, if needed) 30-days prior to entering the SFPUC property to perform work (contact Gloria Ng, NRLMD Secretary, at gng@sfwater.org or (650) 652-3209).

4) Prior to commencing work, the PG&E project manager and/or contractor will arrange a site meeting with the Alameda Watershed Forester to review VPs 10, 9, 8, and 2 to determine whether some portion of the trees may remain. Please contact Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509. [Update: On 11/26/19, the Alameda Watershed Forester met with James Wilson and David Carruth (PG&E) regarding trimming rather than removing mature oak trees. Trees VP 2, VP 8, VP 9, and VP 10 will all be trimmed rather than removed. Debris generated from trees VP 2 and 8 will be lopped and scattered since they are located on a steep hillside, more than 100 feet from an existing road. Debris less than 16 inches in diameter generated from trees VP 9 and 10 will be removed from the site. Any material exceeding 16 inches shall be bucked into segments less than 8 feet in length.]

5) Access to work locations and method of access: Proposed work will be limited to periods of dry conditions to protect habitat for special status species and to avoid damage to SFPUC property unless otherwise approved by the Watershed Forester or Alameda Watershed Manager and then only with the following conditions:

   a) Vehicle access (including truck and UTV/ATV) will be restricted to all-weather (i.e. all-season, rocked or paved) roads for access, staging or parking during wet weather conditions with saturated soils due to increased California tiger salamander (*Ambystoma californiense*) or CTS activity. Access to work sites off-road (including vegetated or unpaved roads or jeep trails) will be allowed only on-foot.

   b) PG&E will implement avoidance and minimization measures (AMMs) to protect CTS and use extra caution when working at sites with CTS habitat/known occurrences (VPs 2, 5, 6, 8, 9, 10, and 12).

   c) Strict adherence to the maximum speed limit of 15 miles per hour is required.

   For more information, please contact Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509; Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516; and Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778.

6) If work is delayed until 2020 because of weather, SFPUC requires PG&E to perform a pre-construction biological survey during the appropriate season to identify special status plants and the host plant for the Callippe silverspot butterfly, in areas of suitable habitat or other special status species within the proposed work sites and access routes. For more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778. [Update: The SFPUC Biologist, Scott Simono, provided the following information: The pre-construction biological survey should include *Viola pedunculate* (Johnny jump-up) unless the analysis PG&E Biological Constraints Report (BCR) for the proposed project indicates other work sites with special status species such as VP 12 which is near a population of *Centromadia parryi* ssp. *Congdonii* (Congdon's tarplant).]

7) If the biological pre-activity survey indicates the presence of special status species, then It is the responsibility of the project sponsor to arrange for a qualified biological monitor on site during the proposed project and activities on SFPUC property. The biological monitor will be present on site for the duration of project activities. Each morning before the start of work, a biological monitor will inspect the project work locations to verify that no special status species are present within designated work areas. The biological monitor will have the authority to stop any action that may result in take of special status species or unanticipated impacts on their habitats. The project sponsor will cover any holes or voids, or provide escape ramps, to prevent special status species from becoming trapped (for more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778. [Update: The SFPUC Biologist, Scott Simono, provided the following information: The biological pre-activity survey should be a general pre-construction biological survey for all relevant species identified in the PG&E BCR. Depending on the season, the biological monitor should check for nesting birds and other wildlife (including during debris removal to ensure that wildlife have not taken up residence). Depending on the location, there may be other species the biological monitor should look for and should refer to the PG&E BCR.] 4-9 Cont.

8) The project sponsor or biologist will hold special status species environmental tailboard trainings for employees and contractors performing construction on SFPUC property. All personnel visiting the job site or performing work on or through SFPUC property will attend an environmental tailboard for the project. No work or access onto SFPUC property (including parking or driving) will be performed by individuals who have not received this training. The training shall include a description of the special status species that have the potential to be impacted by the project; and any SFPUC requirements for the project (for more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778).

9) The project sponsor and its contractors will limit travel speeds on unpaved roads to 15 miles per hour (mph).

10) Before entering SFPUC property:

    a. All equipment, tools, clothing, and personal protective equipment or PPE (including boots and shoes) shall be thoroughly cleaned of all visible dirt and plant material prior to working on SFPUC property. All equipment, tools, and PPE (including boots and shoes) should be decontaminated with a ≥70% Ethyl or isopropyl alcohol by thoroughly wetting the surface and allowing to air dry before entering SFPUC watershed property.

    b. Vehicles and Large Equipment – Before entering SFPUC Watersheds, the exterior and interior of all vehicles and large equipment (including tires, tracks, and undercarriage) must be cleaned and washed such that all debris, organic matter, and soil is removed. In some instances (as designated by NRLMD staff), cleaning and washing must be followed by sanitizing to eliminate pathogens.

    c. Vehicles, equipment, tools and PPE (including boots and shoes) must be inspected by SFPUC NRLMD staff prior to commencing work on SFPUC property. Inspections are performed between 8:00 a.m. and 12:00 noon, and must be scheduled as soon as possible before the start of work. Contact Neal Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516.

    d. After completing work and before moving on to the next site, PG&E crews and contractors will repeat step “a” above to decontaminate equipment, tools, clothing and PPE.

11) The project sponsor will process vegetation debris based on the following conditions below (for more information, please contact Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516:

    a. If vegetation debris is less than 16-inches in diameter and located within 100-feet of a service road, then the debris may be chipped and hauled away and disposed of properly and legally. With review and approval by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations), vegetation debris may be chipped and spread in approved locations. Spread chips shall not exceed a depth of 6-inches and shall not be left piled against tree boles. Chipped vegetation cannot be disposed of on grasslands; or

    b. All vegetation debris (less than 16-inches) not chipped will be hauled away and disposed of properly and legally; or

c. In areas greater than 100-feet from service roads or where removal would be unreasonably difficult, vegetation debris will be lopped and scattered on SFPUC property at locations reviewed and approved by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations). Lopped vegetation debris shall not exceed a height of 18-inches above the ground. Debris in excess of 16-inches in diameter shall be cut into lengths of 8 feet or less.

d. No vegetation debris shall be left on SFPUC property within 100-feet of facility structures, or within 200-feet of structures maintained for human occupancy or daily use.

4-9 Cont.

e. Debris potentially infected by fungal pathogens or insect pests will be processed per the above specifications and hauled away and disposed of properly and legally; or left on SFPUC property to decompose at locations reviewed and approved by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations).

f. Cleared or pruned vegetation and woody debris (including chips) must be disposed of in a manner to ensure that debris does not enter surface waters or watercourses. All cleared vegetation and woody debris (including chips) must be removed from surface waters or watercourses and placed or secured above the high-water line where debris cannot reenter watercourses.

12) Any application of pesticides on property owned by the City and County of San Francisco (including SFPUC property) must comply with the requirements of the City and County of San Francisco's Integrated Pest Management (IPM) Ordinance (Environment Code Chapter 3). The following link is to a checklist that summarizes the requirements of the IPM Ordinance and Policies:

https://sfenvironment.org/sites/default/files/fliers/files/sfe_th_ipm_compliance_checklist_090817.pdf

Also, the City and County of San Francisco publishes its annual Reduced-Risk Pesticide List (RRPL):

https://sfenvironment.org/sites/default/files/fliers/files/sfe-th-2017-reduced-risk-pesticide-list.pdf

You will notice that this document includes the following statement: *This list is only one component of San Francisco's IPM program. Pesticides should be the last resort, when all other tactics have failed. The RRPL represents the outer boundaries of acceptable IPM tactics in S.F.* Exemptions are required for any pesticides (i.e., herbicides, insecticides, fungicides, molluscicides, etc.) used on City property for products that are either are: not listed on the RRPL; or on the RRPL but used differently than described in the RRPL's Pesticide Limitations column.

In addition, the project sponsor will ensure that all pesticide applications comply with the Stipulated Injunction and Order to protect federally threatened California red-legged frog (Rana daytonii). For more information, please see the California Department of Pesticide Regulation website at: http://www.cdpr.ca.gov/docs/endspec/rl_frog/

For more information, please see the San Francisco Department of the Environment website at: http://www.sfenvironment.org/article/city-staff/pest-management.

13) Depending on when the project/work occurs in the Alameda Watershed, the project sponsor will maintain the following fire prevention and extinguishing equipment at the work site:

a. If work occurs from December 1st through May 31st, then the project sponsor will have at least one 300-gallon water buffalo fully filled with water; a minimum of one-inch diameter and 200-foot long water hose; shovels and two fully charged 30 lbs. fire extinguisher on the project site always for fire safety (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925) 862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509). The water buffalo will be moved periodically so that it is located no more than 200 feet from any active project site (or as directed by the NRLMD forester).

b. If work occurs from June 1st through November 30th, then the project sponsor will have at least one 2,000-gallon water truck fully filled with water; a minimum of one-inch diameter and 200-foot long water hose; shovels and two fully charged 30 lbs. fire extinguisher on the project site always for fire safety (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925)

862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509). The water buffalo will be moved periodically so that it is located no more than 200 feet from any active project site (or as directed by the NRLMD forester).

c. If works occurs during December 2019 or January 2020 or in wetted conditions then the project sponsor will have 5-gallon backpack style pump and round point shovel within 25 feet of work location (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925) 862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509). 4-9 Cont.

14) For future tree inventory data, PG&E and its consultants will individually measure and tally all stems greater than 1-inch DBH that are to be treated (removed or pruned). Grouping of a collection of stems from a central location should not be tallied as a single tree. For more information please contact Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509.

Pre-Construction Notification

15) The project sponsor and/or its contractor will notify the Alameda Watershed Manager at least one week prior to commencing the project on SFPUC property and/or pipelines. Please contact Neal Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516

16) The project sponsor and/or its contractors will contact the SFPUC-NRLMD Watershed Manager and/or Forester 24 hours in advance of work to confirm that conditions are suitable for construction. In addition, the project sponsor and/or its contractor will submit fire prevention measures, particularly for any hot work (e.g. welding) to the SFPUC-NRLMD Watershed Manager and/or Forester for review and approval. During construction, the project sponsor and/or its contractor will contact the National Weather Service daily to confirm that local weather conditions are suitable for construction activity. The project sponsor and/or its contractor will cease all construction activities during red flag days (high fire hazard periods) or if directed to do so by the SFPUC-NRLMD Watershed Manager and/or Forester (please contact Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516).

17) The project sponsor and its contractors will notify SFPUC Millbrae Dispatch twice each day, at (650) 872-5900, when entering and leaving SFPUC property.

Post-Construction Notification

18) The project sponsor and/or its contractors will ensure that all construction debris is removed from SFPUC property and disposed of properly and legally. In addition, the project sponsor will restore the project site upon completing its work on SFPUC property and arrange for a post-construction/restoration site inspection by SFPUC staff. Please contact and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509.

3) Case No.	Project	Applicant/Project Manager
19.11-AL62.00	PG&E Vegetation Management - Los Esteros-Metcalf 230kV Transmission Line 2019 - Milpitas and Sunol (46 trees and 22 brush units)	Robert Villasenor, Land Planner, Pacific Gas and Electric Company (PG&E)

The proposal is to remove 44 trees and 22 brush units at 45 work areas on the Alameda Watershed south and east of Calaveras Reservoir and extending north approximately 9 linear miles of the PG&E 230kV electric transmission line to just south of the quarry ponds. This routine transmission vegetation management work is required to maintain safe and reliable electric service and mandated clearance to comply with federal and state regulatory requirements for public safety and fire prevention. Affected species include valley oak, blue oak, coast live oak, California bay, black oak, and blue oak as detailed in the spreadsheet provided with PG&E's project review application. In addition to the tree and brush removal, the work also includes topping two trees.

No ground disturbance is required to complete the work. Vehicles will remain on existing roads and crews will access trees either on foot or by lift truck operated from the existing roads. Equipment may include pick-up trucks, bucket trucks, and tow chippers.

The Committee discussed vegetation debris and SFPUC requirements. When SFPUC requirements allow PG&E to lop and scatter vegetation debris, it will not be scattered in grasslands and will be left within the footprint of the tree to minimize disturbance. Stumps will be treated with an herbicide in compliance with City and County of San Francisco's Integrated Pest Management (IPM) Ordinance (Environment Code Chapter 3). SFPUC staff stated that PG&E must also adhere to SFPUC criteria for vehicle and equipment decontamination, fire prevention, and weather conditions. 4-9 Cont.

The PG&E representative stated that all work would take place within existing PG&E easements.

The PG&E representative also stated that the proposed work and all work locations are covered by PG&E's Bay Area Operations and Maintenance Habitat Conservation Plan (BAHCP). The BAHCP provides PG&E with federal take authorization for specific covered species for all gas and electric operations and maintenance activities in the nine-county San Francisco Bay Area during the 30-year permit term.

The project is scheduled to commence as soon as possible and be completed by December 31, 2019 as required by the North American Electric Reliability Corporation (NERC), or as soon as ground conditions are sufficiently dry to perform the work as determined by SFPUC staff.

Project Work Locations:

Note: In the descriptions below, "service road" may be paved, unpaved, rocked or un-rocked, or vegetated.

Vegetation Points (VP) VP 1:
Removal activity includes one 15-inch DBH Valley Oak tree. Service road is located off Calaveras Road. Debris will be lopped and scattered in wooded areas, avoiding grasslands per SFPUC requirements.

VP 2:
Removal activity includes one 26-inch DBH Blue Oak tree. Service road is located off Calaveras Road. Access route crosses private property where PG&E has an easement (and right of access). Crews will be responsible for contacting the property owner. Debris will be lopped and scattered in wooded areas, avoiding grasslands per SFPUC requirements.

VPs 3, 4, 5, 6, 7, 8, & 9:
Treatment activity includes six trees (see table below).

Tree Species	Diameter at Breast Height (DBH)	Treatment (Prescription)
Coast Live Oak	37	Remove and Treat
Coast Live Oak	32	Top Direct
Coast Live Oak	13	Remove and Treat
Coast Live Oak	5	Remove and Treat
California Bay	33	Remove and Treat
Coast Live Oak	33	Remove and Treat
California Bay	6	Remove and Treat

VP 4 will be topped, not removed. The Committee recommended accessing the site via the service road located off Marsh Road, south of the VPs. Debris will be lopped and scattered in wooded areas avoiding grasslands per SFPUC requirements. SFPUC biologist Scott Simono noted that depending upon the time of year, some of the roads shown

for vehicle access may be vegetated and may have rodent burrows that could provide refuge for California tiger salamander (*Ambystoma californiense*) or CTS. A biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for CTS and burrows to confirm trucks will not collapse burrows.

4-9 Cont.

VP 10:
Removal activity includes ten units of brush. Service road is located off Calaveras Road. Debris will be hauled off-site. A biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for CTS.

VPs 11, 12, & 13:
Removal activity includes two Coast Live Oaks with 10- and 45-inch DBH and a Valley Oak with a 28-inch DBH. VP 12 (Coast Live Oak with 45-inch DBH) will be topped, not removed. VPs are located off Calaveras Road. Debris will be hauled off-site.

VP 14:
Removal activity includes one Valley Oak with a 14-inch DBH. The service road is located off Calaveras Road. Debris will be hauled off-site.

VPs 15 & 16:
Removal activity includes an 18-inch DBH Valley Oak and a 14-inch DBH Coast Live Oak. The service road is located off Calaveras Road. PG&E's proposed plan requires crews to hike into work areas from the road, however from the aerial it appears that closer access via existing roads may allow crews to get close enough to haul out the debris. PG&E will confirm whether an alternative access route is feasible, or whether crews may be limited by steep topography. Per SFPUC requirements, if crews can drive on existing service roads to within 100 feet of the tree, PG&E will haul debris off-site. Otherwise, debris will be lopped and scattered in wooded areas, avoiding grasslands, per SFPUC requirements.

VPs 17 & 18
Removal activity includes a 23-inch DBH Valley Oak and a 28-inch DBH California Bay. The service road is located off Calaveras Road, with crews hiking into work areas. Debris will be lopped and scattered in wooded area, avoiding grasslands, per SFPUC requirements. A biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for CTS and Alameda whipsnake.

VPs 31 & 32:
Removal activity includes 25-inch DBH Black Oak and a 30-inch DBH Coast Live Oak. The service road is located off Calaveras Road. Debris will be hauled off-site. A biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for CTS and Alameda whipsnake.

VPs 33, 34, & 35:
Removal activity includes three Coast Live Oaks with DBH of 24-, 20-, and 33-inches. The service road is located off Calaveras Road. Debris will be hauled off-site. A biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for CTS and Alameda whipsnake. In addition, these VPs cross the lease area for the Sunol-Ohlone Wilderness Trail. Notification prior to work will be required.

VPs 36, 37, 38 & 39:
Removal activity includes 4 Coast Live Oaks with a 3-inch DBH, 3 Coast Live Oaks with a 6-inch DBH, 1 Coast Live Oak with a 23-inch DBH, and 1 California Bay with a 23-inch DBH. The service road is located off Sheridan Road. Debris will be hauled off-site.

VPs 40 & 41:
Removal activity includes 7 Coast Live Oaks with a 6-inch DBH and 7 units of brush. The service road is located off Sheridan Road. There is a stock pond adjacent to the access route. Crews shall not exceed 15 MPH speed limit so

that they can see and avoid harming wildlife including western pond turtle (*Actinemys marmorata*) and CTS. Debris will be hauled off-site.

VPs 42 & 43:
Removal activity includes a Coast Live Oak with a 4-inch DBH and 5 units of brush. The service road is located off Sheridan Road. Debris will be hauled off-site.

VPs 44 & 45:
Removal activity includes a Coast Live Oak with a 15-inch DBH and a Blue Oak with a 13-inch DBH. The service road is located off Andrade Road. There is a stock pond adjacent to the access route. Crews shall not exceed 15 MPH speed limit so that they can see and avoid harming wildlife including western pond turtle (*Actinemys marmorata*) and CTS. Debris will be lopped and scattered in wooded areas per SFPUC requirements.

4-9 Cont.

Follow-up Requirements:

Real Estate Services

1) The project sponsor will work with SFPUC Real Estate Services to obtain a Work Authorization Letter for the proposed project on SFPUC property (for more information, contact Hugh "Bruz" Meade, SFPUC Real Estate Services Consultant, at HAMeade@sfwater.org .

2) The project sponsor will contact SFPUC Real Estate Services to coordinate work around the Ohlone Wilderness Trail with East Bay Regional Parks District. Please contact Neal Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516.

Natural Resources and Lands Management Division

3) Regarding VP 15 and 16, PG&E will confirm via email whether an alternative access route is feasible, or whether crews may be limited by steep topography. Contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfwater.org or (650) 652-3205, Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778, and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509. [Update: On 12/18/19, PG&E provided an updated map (KMZ) showing a feasible alternative access route along the ridge line.]

4) As indicated above for certain VPs, a biological pre-activity survey of any service roads that have vegetation or burrows is required 0-3 weeks prior to work for California tiger salamander (*Ambystoma californiense*) or CTS to confirm vehicles will not collapse burrows. In addition, a biological pre-activity survey of any service roads that have vegetation and suitable habitat is required 0-3 weeks prior to work for Alameda whipsnake (*Masticophis lateralis euryxanthus*) or AWS. For more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778.

5) If work is delayed until 2020 because of weather, SFPUC requires PG&E to perform a pre-construction biological survey during the appropriate season to identify *Viola pedunculata* (Johnny jump-up), the host plant for the Callippe silverspot butterfly, in areas of suitable habitat or other special status species within the proposed work sites and access routes. For more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778. [Update: The SFPUC Biologist, Scott Simono, provided the following information: In addition to *Viola pedunculate*, the pre-construction biological survey should include Diablo helianthella (*Helianthella castanea*), which has a high potential to occur within the project work sites. The pre-construction survey should also include the following potentially-occurring species: Santa Clara thornmint (*Acanthomintha lanceolata*), Chaparral Harebell (*Campanula exigua*), Congdon's tarplant (*Centromadia parryi* subsp. *Congdonii*), and Most beautiful jewelflower (*Streptanthus albidus* ssp. *Peramoenus*).]

6) If the biological pre-activity survey (or 2020 pre-construction biological survey if applicable) indicates the presence of special status species, then It is the responsibility of the project sponsor to arrange for a qualified

biological monitor on site during the proposed project and activities on SFPUC property. The biological monitor will be present on site for the duration of project activities. Each morning before the start of work, a biological monitor will inspect the project work locations to verify that no special status species are present within designated work areas. The biological monitor will have the authority to stop any action that may result in take of special status species or unanticipated impacts on their habitats. The project sponsor will cover any holes or voids, or provide escape ramps, to prevent special status species from becoming trapped (for more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778. . [Update: The SFPUC Biologist, Scott Simono, provided the following information: The biological pre-activity survey should be a general pre-construction biological survey for all relevant species identified in the PG&E BCR including the species identified in the No. 5 above and No. 7 below. Depending on the season, the biological monitor should check for nesting birds and other wildlife (including during debris removal to ensure that wildlife have not taken up residence). Depending on the location, there may be other species the biological monitor should look for and should refer to the PG&E BCR.] 4-9 Cont.

7) The PG&E project manager will provide an electronic copy of the PG&E Biological Constraints Report (BCR) and other relevant watershed resource reports to the SFPUC Project Review coordinator and biologist (contact Joanne Wilson, Senior Land and Resources Planner, at jwilson@sfwater.org or (650) 652-3205 and Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778). [Update: PG&E submitted the BCR and SFPUC Biologist, Scott Simono, provided the following comments:
   a. Please refer to plant species listed above for rare plant survey targets. In the BCR some are not covered or dismissed as not potentially present. It should be easy enough to determine a species isn't present during an actual survey if, for instance, serpentine habitat is not encountered as per *Streptanthus albidus*.
   b. The BCR dismisses the potential for impacts to Callippe silverspot butterfly**: "**Work areas are not in open grassland habitat preferred by this species or its larval host plants". However, this is not totally accurate as the work relies on seldom used access routes that could easily support butterfly host plants.
   c. Townsend's big-eared bat: "Work areas lack large, mature trees with basal hollow cavities, manmade structures, and mines or caves suitable for Townsend's big-eared bat". At least one of the oaks is 45-inch DBH and another is 37-inch DBH. These trees should be examined for cavities.
   d. Burrowing owl: "Work areas are in and adjacent to wooded areas where this species is unlikely to occur". Again, access is through grassland on seldom used routes that could potentially support burrows. While low potential, attention should be paid.]
   e. Also, per the 12/3/19 email from Robert Villasenor "I wanted to capture here that during the project review meeting PG&E agreed to schedule a biological pre-work survey to check for special status species along the access routes/roads and although that is not outlined in the BCR we will still schedule those pre-surveys accordingly".

8) The project sponsor and its contractors will each obtain an approved SFPUC-NRLMD Access Permit (and keys, if needed) 30-days prior to entering the SFPUC property to perform work (contact Gloria Ng, NRLMD Secretary, at gng@sfwater.org or (650) 652-3209).

9) Access to work locations and method of access: Proposed work will be limited to periods of dry conditions to protect habitat for special status species and to avoid damage to SFPUC property unless otherwise approved by the Watershed Forester or Alameda Watershed Manager and then only with the following conditions:

   a) Vehicle access (including truck and UTV/ATV) will be restricted to all-weather (i.e. all-season, rocked or paved) roads for access, staging or parking during wet weather conditions with saturated soils due to increased California tiger salamander (*Ambystoma californiense*) or CTS activity. Access to work sites off-road (including vegetated or unpaved roads or jeep trails) will be allowed only on-foot.

   b) PG&E will implement avoidance and minimization measures (AMMs) to protect CTS and use extra caution when working at sites with CTS habitat/known occurrences (VPs 1, 2, 10-13, 15-18, and 31-45).

   c) Strict adherence to the maximum speed limit of 15 miles per hour is required.

For more information, please contact Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509; Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516; and Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778.

10) Regarding pathogens, the PG&E contractor should work from the least contaminated sites to the most contaminated sites. Work must be performed during dry conditions in contaminated areas to prevent the spread of pathogens. In addition, tools and equipment must be decontaminated before moving from one area of the Watershed to the next (i.e. from one circuit to the next). Vegetation debris collected at one area of the Watershed must be off-hauled for proper and legal disposal before moving on to the next area of the Watershed. For more information, please contact Mia Ingolia, Biologist, at mingolia@sfwater.org or (415) 554-1872. 4-9 Cont.

11) PG&E will implement appropriate AMMs to protect Alameda whipsnake in suitable habitat areas. For more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778.

12) The project sponsor or biologist will hold special status species environmental tailboard trainings for employees and contractors performing construction on SFPUC property. All personnel visiting the job site or performing work on or through SFPUC property will attend an environmental tailboard for the project. No work or access onto SFPUC property (including parking or driving) will be performed by individuals who have not received this training. The training shall include a description of the special status species that have the potential to be impacted by the project; and any SFPUC requirements for the project (for more information, contact Scott Simono, Biologist, at ssimono@sfwater.org or (415) 934-5778).

13) The project sponsor and its contractors will limit travel speeds on unpaved roads to 15 miles per hour (mph).

14) Before entering SFPUC property:

    a. All equipment, tools, clothing, and personal protective equipment or PPE (including boots and shoes) shall be thoroughly cleaned of all visible dirt and plant material prior to working on SFPUC property. All equipment, tools, and PPE (including boots and shoes) should be decontaminated with a ≥70% Ethyl or isopropyl alcohol by thoroughly wetting the surface and allowing to air dry before entering SFPUC watershed property.

    b. Vehicles and Large Equipment – Before entering SFPUC Watersheds, the exterior and interior of all vehicles and large equipment (including tires, tracks, and undercarriage) must be cleaned and washed such that all debris, organic matter, and soil is removed. In some instances (as designated by NRLMD staff), cleaning and washing must be followed by sanitizing to eliminate pathogens.

    c. Vehicles, equipment, tools and PPE (including boots and shoes) must be inspected by SFPUC NRLMD staff prior to commencing work on SFPUC property. Inspections are performed between 8:00 a.m. and 12:00 noon, and must be scheduled as soon as possible before the start of work. Contact Neal Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516.

    d. After completing work and before moving on to the next site, PG&E crews and contractors will repeat step “a” above to decontaminate equipment, tools, clothing and PPE.

15) The project sponsor will process vegetation debris based on the following conditions below (for more information, please contact Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516:

    a. If vegetation debris is less than 16-inches in diameter and located within 100-feet of a service road, then the debris may be chipped and hauled away and disposed of properly and legally. With review and approval by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations), vegetation debris may be chipped and spread in approved locations. Spread chips shall not exceed a depth of 6-inches and shall not be left piled against tree boles. Chipped vegetation cannot be disposed of on grasslands; or

b. All vegetation debris (less than 16-inches) not chipped will be hauled away and disposed of properly and legally; or

c. In areas greater than 100-feet from service roads or where removal would be unreasonably difficult, vegetation debris will be lopped and scattered on SFPUC property at locations reviewed and approved by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations). Lopped vegetation debris shall not exceed a height of 18-inches above the ground. Debris in excess of 16-inches in diameter shall be cut into lengths of 8 feet or less.

4-9 Cont.

d. No vegetation debris shall be left on SFPUC property within 100-feet of facility structures, or within 200-feet of structures maintained for human occupancy or daily use.

e. Debris potentially infected by fungal pathogens or insect pests will be processed per the above specifications and hauled away and disposed of properly and legally; or left on SFPUC property to decompose at locations reviewed and approved by an SFPUC NRLMD Forester, Arborist or Land Manager assigned to the area (prior to vegetation management operations).

f. Cleared or pruned vegetation and woody debris (including chips) must be disposed of in a manner to ensure that debris does not enter surface waters or watercourses. All cleared vegetation and woody debris (including chips) must be removed from surface waters or watercourses and placed or secured above the high-water line where debris cannot reenter watercourses.

16) Any application of pesticides on property owned by the City and County of San Francisco (including SFPUC property) must comply with the requirements of the City and County of San Francisco's Integrated Pest Management (IPM) Ordinance (Environment Code Chapter 3). The following link is to a checklist that summarizes the requirements of the IPM Ordinance and Policies:

https://sfenvironment.org/sites/default/files/fliers/files/sfe_th_ipm_compliance_checklist_090817.pdf

Also, the City and County of San Francisco publishes its annual Reduced-Risk Pesticide List (RRPL):

https://sfenvironment.org/sites/default/files/fliers/files/sfe-th-2017-reduced-risk-pesticide-list.pdf

You will notice that this document includes the following statement: *This list is only one component of San Francisco's IPM program. Pesticides should be the last resort, when all other tactics have failed. The RRPL represents the outer boundaries of acceptable IPM tactics in S.F.* Exemptions are required for any pesticides (i.e., herbicides, insecticides, fungicides, molluscicides, etc.) used on City property for products that are either are: not listed on the RRPL; or on the RRPL but used differently than described in the RRPL's Pesticide Limitations column.

In addition, the project sponsor will ensure that all pesticide applications comply with the Stipulated Injunction and Order to protect federally threatened California red-legged frog (Rana daytonii). For more information, please see the California Department of Pesticide Regulation website at: http://www.cdpr.ca.gov/docs/endspec/rl_frog/

For more information, please see the San Francisco Department of the Environment website at: http://www.sfenvironment.org/article/city-staff/pest-management.

17) Depending on when the project/work occurs in the Alameda Watershed, the project sponsor will maintain the following fire prevention and extinguishing equipment at the work site:

a. If work occurs from December 1st through May 31st, then the project sponsor will have at least one 300-gallon water buffalo fully filled with water; a minimum of one-inch diameter and 200-foot long water hose;

shovels and two fully charged 30 lbs. fire extinguisher on the project site always for fire safety (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925) 862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509). The water buffalo will be moved periodically so that it is located no more than 200 feet from any active project site (or as directed by the NRLMD forester).

b. If work occurs from June 1st through November 30th, then the project sponsor will have at least one 2,000-gallon water truck fully filled with water; a minimum of one-inch diameter and 200-foot long water hose; shovels and two fully charged 30 lbs. fire extinguisher on the project site always for fire safety (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925) 862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509). The water buffalo will be moved periodically so that it is located no more than 200 feet from any active project site (or as directed by the NRLMD forester). 4-9 Cont.

c. If works occurs during December 2019 or January 2020 or in wetted conditions then the project sponsor will have 5-gallon backpack style pump and round point shovel within 25 feet of work location (for more information, please contact Neal Fujita, Alameda Watershed Manager, at NFujita@sfwater.org or (925) 862-5516; and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509).

18) For future tree inventory data, PG&E and its consultants will individually measure and tally all stems greater than 1-inch DBH that are to be treated (removed or pruned). Grouping of a collection of stems from a central location should not be tallied as a single tree. For more information please contact Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509.

Pre-Construction Notification

19) The project sponsor and/or its contractor will notify the Alameda Watershed Manager at least one week prior to commencing the project on SFPUC property and/or pipelines. Please contact Neal Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516

20) The project sponsor and/or its contractors will contact the SFPUC-NRLMD Watershed Manager and/or Forester 24 hours in advance of work to confirm that conditions are suitable for construction. In addition, the project sponsor and/or its contractor will submit fire prevention measures, particularly for any hot work (e.g. welding) to the SFPUC-NRLMD Watershed Manager and/or Forester for review and approval. During construction, the project sponsor and/or its contractor will contact the National Weather Service daily to confirm that local weather conditions are suitable for construction activity. The project sponsor and/or its contractor will cease all construction activities during red flag days (high fire hazard periods) or if directed to do so by the SFPUC-NRLMD Watershed Manager and/or Forester (please contact Neil Fujita, Alameda Watershed Manager, at nfujita@sfwater.org or (925) 862-5516).

21) The project sponsor and its contractors will notify SFPUC Millbrae Dispatch twice each day, at (650) 872-5900, when entering and leaving SFPUC property.

Post-Construction Notification

22) The project sponsor and/or its contractors will ensure that all construction debris is removed from SFPUC property and disposed of properly and legally. In addition, the project sponsor will restore the project site upon completing its work on SFPUC property and arrange for a post-construction/restoration site inspection by SFPUC staff. Please contact and Dave Baker, Alameda Watershed Forester, at DBaker@sfwater.org or (209) 989-2509.

Letter 5

SIERRA CLUB
LOMA PRIETA CHAPTER

San Mateo, Santa Clara, and San Benito Counties

February 21, 2020

San Bruno Planning Commission, City Council, and Staff

City of San Bruno

567 El Camino Real

San Bruno, CA 94066

via email: pwu@sanbruno.ca.gov, mthurman@sanbruno.ca.gov, thamilton@sanbruno.ca.gov, councilsb@sanbruno.ca.gov

Subject: Planning Commission meeting of February 16, 2020, Agenda Item #4A, Environmental Impacts of the Bayhill Specific Plan

5-1

The Sustainable Land Use Committee is the section of the local Sierra Club Chapter devoted to studying issues of land use and planning. As an organization devoted to reducing GHG emissions, overuse of water supplies, and other human impacts on the natural environment, we encourage development of dense, mixed-use development near transit centers.

5-2

Housing not sufficient: We have reviewed documents pertaining to the Bayhill Specific Plan, and while the alternative plans analyzed in the Draft EIR both contain significant improvements over the base design, we believe even the Residential Alternative remains insufficiently ambitious in planning for housing in this area. Community meetings indicated a desire to include housing as part of this Specific Plan. The Peninsula as a whole has been pushed to a state of crisis in regard to its jobs-housing balance. This has led to long commutes, congestion, and large amounts of space being paved over for parking (which on top of consuming space that could otherwise be left green or devoted to some actual productive use, also aggravates urban heat island effects).

5-3

Transit Oriented Development: The eastern section of the area designated in the Bayhill Specific Plan, presently zoned as “Community Office”, is ideally suited for this sort of Transit Oriented Development. It is immediately adjacent to El Camino Real, which is one of the few routes in San Mateo County that is truly

well-served by the SamTrans bus system. It is within a reasonable walking or biking distance of the BART and Caltrain stations, as well as retail and restaurants at Tanforan, and in Downtown San Bruno / San Mateo Avenue, and future retail in the bottom floor of the Mills Park development at the corner of El Camino and San Bruno Ave. The area is far enough inland to be at relatively low risk from sea level rise, as compared to other areas currently considering development such as South San Francisco's Genentech campus. And it is well-separated from other residential areas, minimizing impact on other citizens' current lifestyles.

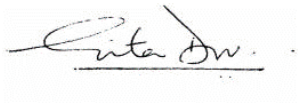
5-3 (Cont.)

Summary: While we understand that employers in this area may prefer a larger amount of office space, it is incumbent on every city to plan for the impacts of these offices on housing demand. In the absence of new housing development, workers at YouTube and other corporate entities will simply bid up the prices of existing housing stock and drive lower income San Bruno workers out of the city, to peripheral exurbs that sprawl further and into the Wildland Urban Interface. The state has recognized this problem through the RHNA / Housing Element process. **San Bruno is far behind on meeting its housing obligations here even for the current cycle, and in the next cycle will be responsible for *at least* twice as many units. We would urge you to consider getting ahead of this issue now, in a very appropriate location, and plan to include a Transit Oriented Development housing segment near El Camino Real.**

5-4

5-5

Respectfully submitted,



Gita Dev and Gladwyn d'Souza

Co-Chairs Sustainable Land Use Committee

Sierra Club Loma Prieta Chapter

Cc: James Eggers, Executive Director, Sierra Club Loma Prieta Chapter

Jovan D. Grogan, City Manager, City of San Bruno

Letter 6

YouTube, LLC
901 Cherry Avenue
San Bruno, CA 94066
USA

Phone +1 650 253.0000
www.youtube.com

February 17, 2020

Pamela Wu
Community and Economic Development Director
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: Bayhill Specific Plan - Draft Environmental Impact Report Comments

Dear Mrs. Wu,

YouTube has been proud to call San Bruno home since 2006 and we acknowledge and appreciate our responsibility as corporate citizens in this community. We believe in the *"City with a Heart"* and for nearly five years have worked to support the City of San Bruno's Bayhill Specific Plan, which we hope will lead to a future where YouTube can continue to call San Bruno home. 6-1

Attached you will find YouTube's comments to the Bayhill Specific Plan Draft Environmental Impact Report (DEIR) issued on January 14, 2021. YouTube respectfully requests that the City of San Bruno review our comments and, where appropriate, incorporate them into the Final Environmental Impact Report (FEIR).

Thank you for all of your work to get the DEIR to this important milestone. Please contact us with any questions.

Sincerely,

DocuSigned by:
Josh Portner
6318CC018BA3438...

Josh Portner, Director Real Estate District Development

Enclosures:
- Draft Environmental Impact Report dated January 14, 2021 Comment Matrix

DEIR Page(s)	Comment/Question City Response	
	2.0 Project Description	
Table 2-5 (2-25 & 26)	• *Parcel 5 parcel size* – correct to 290,634 • *Parcel 7 potential net new dev* – other portions of BHSP note 248,000 even • *Total potential net new dev.* – column sums to 2,255,829; appears to be over by 179,918 sf. • *Total potential total dev.* – column sums to 3,887,028, which appears to be under by 126,846 sf • *FN f* - If BMU is referenced, shouldn't Parcels 1 & 2 be included? Also, basis for different ratios is not explained.	6-2
2-27	***Massing.*** Re: massing, DEIR states: "No more than 75 percent of the length of a building façade would be unbroken by a change in massing." This is using a different metric than the max 100' listed in the zoning ordinance adjacent to streets, as well as the 50% metric illustrated on p. 56 of the Bayhill Specific Plan.	6-3
2-30 & 31; 2-47	***Street & Roadway Improvements.*** Elm Avenue – "Shuttle loading zones would be located on either side of Elm Avenue just north of the Bayhill Drive intersection" – is this being confused with the multi modal hub, to the west of Elm? Generally, street sections show dedication of private property for public uses either (in fee or via easement) and sections are different than previously discussed. Would request opportunity for consultant teams to meet to ensure the final street section is optimized.	6-4
2-31 (¶ 1); Table 2-7; Figure 2-11; *3-8 (¶ 2); 3-8 (¶ 3); 3-10 (¶ 3); 3-11 (last ¶)*	***Measurement of Depth & Related Excavation Quantities.*** Depth measured from what point on surface on sloped site? Below Grade Surface (bgs) metric is not explained and unclear what analysis is using Figure 2-11 excavation depts vs. the NAV88 and excavation quantities provided by YT. YT provided information should govern. Suggest adding this footnote to Table 2-7 (p. 2-37): "Max depth is measured to finished floor of lowest parking garage level. In the event of a conflict between the NAV88 elevations and bgs calculations, the NAV88 elevations control."	6-5

DEIR Page(s)	Comment/Question City Response	
2-34 (last ¶)	Correct text: "However, should this development occur after ~~**February**~~**August 2021**, it would be regulated by the Specific Plan."	6-6
Table 2-7 (2-37)	Table 2-7; Garage No 1,3/Max Depth – Correct: "61" to "59". Typo on phase 1 Nav88 (which should be 59'); excavation quantities of YT parcels match YT's project description, and given sloped sites and City's unknown measurement location; the Nav88 depth should govern to avoid future confusion.	6-7
2-44 (¶ 3)	Correct text: "The Phase I Development (would require the removal of ~~**154**~~**150** trees, including **144**~~**135**~~ classified by the City as heritage trees)." (*See,* p. L-002 of Plans for Phase 1 submitted in response to City comments on the Cherry Plaza design.)	6-8
2-53 *& throughout DEIR*	***Sequence/Schedule.*** As there will no longer be BSDP permit, remove all references to it throughout DEIR.	6-9
	3.0 Environmental Impact Analysis	
3-6 (last ¶)	Correct text: "The Phase I Development would result in the removal of approximately **144**~~**135**~~ heritage trees, as well as street trees." Add: "In accordance with the City's Municipal Code requirements, new trees would be planted in a 1:1 ratio to compensate for the trees to be removed, and the Specific Plan calls for the use of large canopy trees as the predominant plant material."	6-10
3-9 (and BHSP Policies 6-27 through 6-30; Section 6.7)	Need to clarify definition and scope of AMP and process. We understand this to be a one-page fact sheet, together with training and enforcement of the same. Why was the very robust language of Policy 6-27 and related analysis included in the BHSP? This is a disturbed site, so it seems that the risk of an archaeological impact is very low.	6-11
3-12 (¶ 2)	***Asbestos.*** DEIR reflects that the buildings on the P1 site are "unlikely to contain ACM." The pre-demolition ACM surveys of the three Lakes buildings and there is ACM in the buildings. Asbestos and lead are commonly found in existing buildings and should be mitigated in accordance with all applicable regulations (e.g. BAAQMD, etc.) so this impact is LTS with mitigation.	6-12

DEIR Page(s)	Comment/Question City Response	
	3.1 Visual Resources	
3.1-17	Correct text: "The Phase I Development would require the removal of approximately ***144*~~135~~** heritage trees as well as a number of street trees."	6-13
3.1-19	The Phase I Development will not include any illuminated signage (remove from header)	6-14
	3.2 Air Quality	
3.2-10 (3rd full ¶)	Correct text: "San Francisco-Arkansas" to "Arkansas Street" (global change)	6-15
3.2-10 (Table 3.2-2)	Correct header to match dates in table: "Ambient Air Quality Data at the San Francisco-Arkansas Monitoring Station (~~**2015-2017**~~***2016-2018***)"	6-16
3.2-28 to 35 [AQ-2 Project-level impacts analysis]	***AQ-2 Standard and S&U Conclusion.*** *What is the standard that the Project is to be measured against* – net increase of Project compared to existing conditions or BAAQMD standards? *What are the anticipated fees/payments for not complying with BAAQMD standards?*	6-17
3.2-33 (first bullet of MM AQ-5)	***MM AQ-5: Require Fugitive Dust Best Management Practices.*** "All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered ~~**two times per day**~~***as needed***."	6-18
3.2-37	Math in table is incorrect, although the conclusions remain the same. Recalculate and revise table: ROG: Net increase = 25 (not 17) (threshold is 54) NOx: Net increase = 33 (not 4) (threshold is 54) CO: Net increase = 128 (not -4) (no threshold) PM 10: Net increase = 117 (not 125) (threshold is 82) PM 2.5: Net increase = 20 (not 21) (threshold is 54)	6-19

DEIR Page(s)	Comment/Question City Response	
	3.3 Energy Use	
3.3-17 (1st ¶)	Correct text: "These anticipated increases would be countered, in part, by ongoing increases in state and local requirements related to renewable energy ***and*** increased energy efficiency."	6-20
	3.4 Greenhouse Gases	
3.4-3 (last ¶) *and 3.10-5 (in Transp.)*	Removed outdated text regarding pre-2020 opt-in to VMT.	6-21
3.4-21 (2nd ¶)	Revise text, as this statement is true without mitigation: "As discussed in Section 3.10, Transportation, ~~**prior to mitigation,**~~ the Phase I Development would increase per service population VMT, relative to existing conditions in 2022 and would not meet the 14.3 percent VMT per service population reduction target and therefore, therefore, could conflict with the state's long-term emission reduction trajectory."	6-22
	3.5 Hydrology and Water Quality	
2-44 (¶ 2); 3.5-29, 3.11-25 and 3.5-29 [MM HWQ-2]; 3.5-24; 3.11-25; *Appendix 3.5-1, p. 4 (see below)*	***Pervious not current – net zero change in amount of impervious surface area on Phase 1 site; should mean MM HWQ-2 not required for Phase 1.*** DEIR reflects an increase from 76 to 77 percent when it should be a decrease from 75 percent to 70 percent. The two parcels containing Phase 1N and Phase 1S change from 75 percent existing impervious to 70 percent proposed impervious (using the final post LLA square footage as both the existing and proposed lot SF, which is what the City told us to do). The impervious percentage of pre- and post- Phase 1 in its entirety (including not just the YT buildings but also demolition of Lakes, straightening of Grundy, and resulting changes to the 1100 Grundy and 950 Elm parking lots) is net zero; which was required by the City. These percentages can be calculated based on lot & impervious SF values on the Phase 1 plans (both G-002 and EX-6 sheets, current sets dated Jan '20). Given that there is no change in overall imperviousness of P1, MM-HWQ-2 should not be needed for P1.	6-23
3.5-11 (¶ 2)	Conclusion that the groundwater elevation on the western side of the Project site is "approximately 110 ft msl" does not match the findings in the geotechnical report, or the EKI report.	6-24

DEIR Page(s)	Comment/Question City Response	
	3.6 Land Use and Planning	
3.6-17	According to Table 3.6-2, both Phase 1 and the Project require mitigation to be consistent with the General Plan. To be consistent we suggest revising the Project and P1 development conclusions: "less than significant ***with mitigation***~~. No mitigation measures are required~~."	6-25
	3.7 Noise	
3.7-53	Last sentence of last paragraph, revise to reflect: "***less than significant with mitigation***."	6-26
3.7-54	Last sentence of first paragraph, revise to reflect: "***less than significant with mitigation***."	
	3.8 Population and Housing	
	NO COMMENTS	
	3.9 Public Services and Recreation	
3.9-28	Correct text for document consistency: "Impact C-PS-1a. The Project, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to fire protection, police protection, school, park, or library services (Project: ***Less Than Significant***~~**Less Than Cumulatively Considerable**~~**)"**	6-27
	3.10 Transportation	
3.10-25	Correct text: "Although the ***Specific Plan***~~**Project description**~~ includes a TDM requirement, TDM programs are not permanent in the same way as built environment factors and land use diversity and instead are tied to tenants, who often turn over during the life of a project." The Project description states that TDM programs are "not a part of the Project" (p. 2-33), which still doesn't make sense to us since they are required by the Specific Plan and MM TRA 1 and 2.	6-28

DEIR Page(s)	Comment/Question City Response
3.10-29	Remove or revise: "Construction-related activities would typically occur Monday through Friday, with limited construction activities outside of daytime hours or on weekends." DEIR should acknowledge nighttime and weekend construction but still LTS impact. Such construction activity is not "limited" except for compliance with the City's regulations and our CMP. The SBMC includes hours limitations for "outside construction" exceeding certain noise levels in or within 500 feet of a residential zone. *See* SBMC 6.16.070 below. (P1 will be more than 500 feet from any residential zone.) There are no similar regulations for office or commercial zones. As for phases that may be within 500 feet of a residential zone (P3 and P5), as long as the SBMC 6.16.070 noise limitations are observed, night and weekend work is permitted. If they will be exceeded, a permit is required. **6.16.070 Construction of buildings and projects.** No person shall, within any residential zone, or within a radius of five hundred feet therefrom, operate equipment or perform any outside construction or repair work on any building, structure, or other project, or operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction-type device which shall exceed, between the hours of **seven a.m. and ten p.m.,** a noise level of eighty-five decibels as measured at one hundred feet, or exceed between the hours of **ten p.m. and seven a.m.** a noise level of sixty decibels as measured at one hundred feet, unless such person shall have first obtained a permit therefor from the director of public works. No permit shall be required to perform emergency work.
	3.11 Utilities and Service Systems
3.11-20; *Appendices 3.11-2 & 3.11-3 (below re multimodal hub)*	***Table 3.11-5. Proposed Water, Wastewater, and Storm Drain Improvements.*** *Grundy & Elm* – The water line will connect through the multimodal hub from Grundy to Bayhill, not through Elm Avenue. *Grundy Lane* – Extending the SS pipe east past the multimodal hub was studied, but it was agreed that because of the downward slope of the road and required upward slope of the SS pipe (running east), we would end the SS at the multimodal hub.

6-29

6-30

DEIR Page(s)	Comment/Question City Response	
	4.0 Other CEQA Considerations	
4-2	Revise Impact C-AQ-2a conclusion for document consistency with other impacts: "Therefore, it is conservatively assumed that the cumulative health impacts from TAC emissions would be significant and unavoidable ~~**after mitigation**~~, and that the Project's contribution would be cumulatively considerable.	6-31
	5.0 Alternatives Analysis	
5-10	Revise 5.3.2.1: "The Residential Alternative would achieve ***most***~~all~~ of the Project objectives discussed above in Section 5.1.2." Revision suggested because this alternative would not "strengthen its role as the City's premier employment hub" or "recogniz[e] Bayhill's essential nature as a business park/employee center" or "accommodate the expansion needs of existing businesses."	6-32
DEIR APPENDICES		
	Appendix 3.5-1 – Hydrology & Water Quality Evaluation	
Multiple (Hyd. above & App. below)	***Pervious not current (see related comments under Hydrology section above).***	6-33
p. 2, FN 1	Correct: "YouTube Vesting Tentative Map and Phase 1 Entitlement Plans, dated October 2019" – *No longer accurate, see comment at 4.1.2 below.*	6-34
p. 4, § 4.1, ¶ 4	Correct: "Pre-project land use currently consists of a mix of buildings and surface parking lots (impervious surfaces) and areas of landscaping (pervious surface). It is estimated that the landscape areas are approximately <u>20% of the Planning Area and approximately 24% of the Phase I Development</u>." – *BKF calcs (which were included in Entitlements): 22% pre-project (including Grundy and Bayhill areas affected)*	6-35
p. 5, § 4.1.2	Correct: "The information provided for evaluating the Phase 1 Development pre- and post-development impervious areas consisted of a Vesting Tentative Map dated October 4, 2019, Preliminary Design Drawings dated October 4, 2019, 2019 and a memorandum dated August 29, 2019 from BKF titled "YouTube Phase 1 C.3 Narrative" along with the submitted "C.3 and	6-36

DEIR Page(s)	Comment/Question City Response	
	C.6 Development Review Checklist" forms. . . . The estimated percent impermeability is 76% pre-project based on a review of aerial maps of the areas of parking lots, roadways and rooftops compared to the total Phase 1 development. This compares to 77% post-project impervious surfaces as detailed on the Phase 1 documents, therefore the initial review shows a potential increase in surface runoff" – *Based on City feedback, plans and sheets were revised and resubmitted after these dates, so this analysis is no longer accurate.*	6-36 Cont.
p. 6, § 5.1	Correct: "For the Phase 1 Development, land use areas were taken from preliminary design information provided by the City including the C.3 Narrative and Checklist forms dated October 4, 2019 prepared by YouTube for the Phase 1 Development. Based on the compiled Checklist information, the pre-development condition consists of approximately 688,083 square feet of impervious area. Post-development condition (Phase 1 Development) shows an increase in impervious area with approximately 9,000 square feet of pervious paving above the parking structure, which is considered impervious, in addition to the 688,083 square feet of proposed impervious area indicated on the Checklist forms." – *Same comment as section 4.1.2 above. This does not match our final submittal. These are the old numbers, and the new numbers since reconcile this issue."*	6-37
p. 12, § 7.1.1	Correct: "The stormwater runoff calculations for pre-development peak flow and post-development peak flow show an increase in post-development peak flows." – *Same comment; they have been reduced in the current version.*	6-38
p. 16	Correct: Last 4 bullet points – *Same as previous comments.*	6-39
	Appendix 3.10-1 (Transportation Supporting Data); Attachment D to Transportation Appendix – LOS Calculations/BHSP Alternatives Analysis	
p. 6 of 15 (¶ 2)	Correct: "The Phase I Development includes construction of new office uses as well as demolition of existing office uses in the middle north section of the site bound by I-380, Cherry Avenue, and Bayhill Drive. Net new office land use is approximately ***440,000 sf*** ~~301,500 sf~~ under Phase I buildout." – *We note that this is likely at typo as the subsequent analysis appears to be calculated based on the correct 440ksf value.*	6-40

DEIR Page(s)	Comment/Question City Response	
p. 9 of 15 (last ¶)	Clarify text: "Note, that the intersection currently meets the peak hour signal warrant for a traffic signal." – *Since the peak hour signal is already warranted, why should the BHSP have a fair share payment?*	6-41
	Appendix 3.11-2 Water System Hydraulic Evaluation	
p. 2	Correct: "… (Phase I Development), which consists of adding ***440,000***~~301,476~~ square feet (sf) of net new office space to 8.15-acres." – *We note that this is likely at typo as the subsequent analysis appears to be calculated based on the correct 440ksf value.*	6-42
p. 2	Various figures show a water line in Elm where it is to be located in at intermodal station (same comment provided above re: DEIR p. 3.11-20)	6-43
p. 3, Figure 1 (Modeled Sewers Within & in Vicinity of BHSP Area)	Should the 8" lines be shown as 10" since later text suggests that is what was modeled?	6-44
	Appendix 3.11-3 Sanitary Sewer Impact Study	
p. 2	Various figures show a water line in Elm where it is to be located in at intermodal station (same comment provided above re: DEIR p. 3.11-20)	6-45
	Appendix 4 Equivalency Analysis	
p. 1	Correct for consistency: "This appendix contains the Equivalency Program analysis for the Bayhill Specific Plan. As described in Chapter 2, Project Description, <u>180,347</u> square feet of the new office development included in the EIR buildout projections (Tables 2-3 and 2-4) is not allocated to any particular parcel." – *Slightly different values elsewhere in DEIR.*	6-46

BAYHILL SPECIFIC PLAN DEIR COMMENTS – PART II

DEIR Page(s)	Comment/Question City Response/Discussion Notes	
	2.0 Project Description	
2-20 *& throughout DEIR*	Change Phase 1 completion date to 2025 throughout the DEIR (assuming this does not create significant work or impact the analysis of P1). This date was pushed back due to BHSP document timing.	7-1
	3.1 Visual Resources	
3.1-20	To clarify and avoid misunderstanding of the document, YouTube suggests that the City add a summary less than significant finding regarding all the topics covered by Impact AES-2 (similar to overall "Conclusion" for Impact AES-1).	7-2
	3.2 Air Quality	
3.2-14	To clarify and avoid misunderstanding of the document, YouTube suggests that the City revise the header of Table 3.2-3 to read: "***Existing*** Health Risks…"	7-3
	3.10 Transportation	
3.10-11	Pursuant to CEQA Guidelines Section 15064.3(b)(1), projects within a half mile of either an existing major transit stop or a high quality transit corridor stop are presumed to have a less than significant transportation impact. Future project phases 4 and 5 will be within this zone. As such, to clarify and ease future use of the document, YouTube suggests that the City note this presumption in a footnote to the VTM Significance Threshold discussion (3.10-20) as a consideration for future phases.	7-4
3.10-23 & 2-33 and 24 (Project Description)	As written, second sentence ("TDM programs are not permanent. . . .") does not accord with the Project Description, which provides that: "To ensure that all future tenants implement TDM strategies, the Specific Plan includes policies that require applicants of all new development to implement a TDM program or join a transportation management association (TMA) to reduce single occupancy travel to the Plan Area." (pp. 2-33 & 2-34). To clarify and avoid misunderstanding of the document, YouTube suggests that the City note that TDM programs will be implemented "to the extent possible" or "feasible" pursuant to the Specific Plan, which includes such programs as a goal/policy (rather than a mandate).	7-5

Appendix 4
Equivalency Analysis

Introduction to the Equivalency Program Analysis

8-1

slightly different from value elsewhere

This appendix contains the Equivalency Program analysis for the Bayhill Specific Plan. As described in Chapter 2, *Project Description,* 180,347 square feet of the new office development included in the EIR buildout projections (Tables 2-3 and 2-4) is not allocated to any particular parcel. This square footage may be dedicated to regional office use (and is assumed to be regional office use in this EIR analysis). However, to provide flexibility for the expansion of non-office land uses, the Specific Plan allows for the conversion of this unallocated office square footage to non- regional office uses such as hotel or retail commercial uses at the following ratios:

- 190 square feet of retail commercial use per 1,000 square feet of regional office use
- 640 square feet of hotel use per 1,000 square feet of regional office use[1]

By way of example, if all of the unallocated 180,347 square feet were dedicated to retail use, 34,265 square feet of retail use could be developed. If all the unallocated square feet were dedicated to hotel use, 115,422 square feet of hotel use could be developed. This appendix provides an analysis of the equivalency exchanges and demonstrates that the potential environmental impacts of the equivalency exchanges under the Equivalency Program would be within the scope of the analysis included in the EIR.

Analysis

Methodology

Commercial office, retail, and hotel activities present different demands on resources due to different expected populations and activities. This difference in resource demand rates can result in varied impacts to numerous resource areas. This appendix analyzes how the ratios of converted square footage under the Equivalency Program would affect resource demands and potential environmental impacts, comparing conditions under each version of the Equivalency Program (conversion to retail or hotel) to the conclusions reached in the EIR, inclusive of both the Project and the Phase I Development. Resource areas analyzed herein include Air Quality and Greenhouse Gases, Energy, Public Services, Population and Housing, Noise, Transportation, and Utilities. The analyses of potential environmental impacts to the resources areas listed above that would result from Project implementation outside of the Equivalency Program can be found in Chapters 3.2, 3.3, 3.4, 3.7, 3.8, 3.9, 3.10, and 3.11 of the EIR, respectively.

All development within the Project Site, including development that could be pursued as part of the Equivalency Program, would be subject to all applicable regulatory requirements, mitigation measures, and Specific Plan policies described in the EIR. Because it would be speculative to presume construction timeframes and equipment for currently unplanned development within the Project Site under the

[1] Impacts from hotel uses are sometimes evaluated in units of rooms rather than square footage. For these analyses, this Equivalency Analysis assumes a conversation rate of 595.13 square feet per hotel room, based on the ratio of square footage to rooms in the existing Marriot hotel on the Project Site.

of up to 573 multi-family residential units. There are two overlay districts in the Plan Area that would allow for housing development. Office uses would continue to be allowed in the housing overlay zone, and a mix of both use types could be developed as long as the maximum permitted density is not exceeded. To account for the variability resulting from the housing and mixed-use overlay zones, two different buildout scenarios have been developed for purposes of the analysis. The Maximum Office Scenario assumes that no residential construction occurs within the housing and mixed-use overlay zones. The Maximum Housing Scenario assumes that housing is constructed within the furthest range allowable under the Specific Plan, resulting in 573 multi-family residential units. In this scenario, the amount of office development is decreased on the land area within the housing overlay zone where housing is constructed. Additionally, the Specific Plan would also allow for an up to 50,000-sf civic use to be developed on a 2.1 acre parcel bordering San Bruno Avenue West. If the civic use were to be developed, the overall capacity of the Specific Plan area to accommodate office and housing uses would be reduced.

The Phase I Development includes construction of new office uses as well as demolition of existing office uses in the middle north section of the site bound by I-380, Cherry Avenue, and Bayhill Drive. Net new office land use is approximately 301,500 sf under Phase I buildout.

Should be 440ksf, although the analysis on subsequent pages may be calculated at the correct 440ksf value.

Table 3 describes the three land use scenarios.

Table 3: Land Use Scenario

Land Use Category	Phase I (net new)	Max Office Total[1]	Max Housing Total [2]
Office	301.5 ksf	3,881 ksf	3,501 ksf
Commercial/Retail	--	122 ksf	122 ksf
Civic Uses	--	50 ksf	50 ksf
Housing	--	--	489 dwelling units
Hotel	--	147 rooms	147 rooms

Notes:

1. For purposes of this assessment, the land use alternatives are shown with the Civic Uses; however, if civic uses are omitted, the maximum amount of office allowed under the Max Office scenario is 4,018 ksf.
2. For purposes of this assessment, the land use alternatives are shown with the Civic Uses; however, if civic uses are omitted, the maximum amount of housing allowed under the Max Housing scenario is 573 units.

8-3

The two proposed buildings are referred to as the "North Building" and the "South Building" and collectively as the "Phase 1 Buildings". Phase 1 contains a total of approximately 440,000 square feet of office space and three levels of subterranean parking.

The Phase 1 Development project also includes the following: construction of a new private multi-modal center at the 950 Elm Avenue parcel; the realignment of Grundy Lane and the vacation of the north end of Elm Avenue; infrastructure improvements throughout Grundy Lane and Bayhill Drive (between Cherry Avenue and Traeger Avenue); parking improvements at 1100 Grundy Lane and 950 Elm Avenue; and the demolition of the existing buildings located at 1150-1250 Bayhill Drive for temporary parking during Phase 1 construction (and future development of the Phase 2 buildings).

3.0 EXISTING AND PROPOSED DRAINAGE SYSTEM

3.1 EXISTING CONDITIONS

The Planning Area represents approximately 6.5% of the land area in "Watershed A", which is largely made up of fully developed land, and contributes less than 7% of the overall runoff within the Watershed A storm drain trunk system. Stormwater from the Planning Area and vicinity is collected through existing City storm drain networks that connect to a 72-inch main trunk line located on the eastern portion of the Planning Area as shown in Figure 4. This 72-inch main serves as the backbone to the City's 1,415-acre Watershed A pipe network as identified in the City of San Bruno Storm Drain Master Plan, discussed below in Section 3.2. Refer to Figure 5 for a map of the watershed areas studied in the Master Plan. The area west of Cherry Avenue drains to a pipeline in Cherry Avenue which flows to the north and connects to the 72-inch main trunk line. The area between Cherry Avenue and Elm Avenue drains into pipelines in Grundy Lane and Bayhill Drive which flow to the east and connects to the 72-inch main at Elm Avenue. The 72-inch main also collects flows from several pipes east of Elm Avenue and continues easterly and southerly until it exits the Planning Area near El Camino Real. The Phase 1 Development area is currently served by existing pipes ranging from 12-inch to 48-inch located in parking lots and along Grundy Lane and Bayhill Drive between Cherry Avenue and Elm Avenue. Topographic survey[1] prepared by BKF Engineers shows pipe collection systems that increase to 24 inches and 48 inches in Grundy Lane and Bayhill Drive, respectively, at their connections to the 72-inch main, however detailed pipe information (e.g. pipe size, slope, capacity, condition, etc.) are not available for all storm drain pipes within the Planning Area.

Pipeline capacity deficiencies in the 72-inch diameter trunk line that runs through the Planning Area were noted in the Master Plan. Additional downstream deficiencies, easterly of the Planning Area were also noted as part of this pipeline network for Watershed A. To date, no improvements have been constructed to address these deficiencies and funding has not been identified.

3.2 CITY OF SAN BRUNO STORM DRAIN MASTER PLAN

The City of San Bruno Storm Drain Master Plan, dated June 2014, was prepared specifically to address localized flooding throughout the City and to determine proposed improvements and construction costs for inclusion in a Stormwater Capital Improvement Plan (CIP). Figure 6 shows the proposed improvement projects from the Storm Drain Master Plan. Multiple options were identified in the Master Plan to address the capacity deficiencies in Watershed A described above. One proposed option identified in the Master Plan is to construct an enlarged detention basin (62.5 acre- feet of storage) located within the Crestmoor Canyon, located northwest and upstream

Same comment as in section 4.1.2 below.

[1] YouTube Vesting Tentative Map and Phase 1 Entitlement Plans, dated October 2019

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pipe alignment as it generally follows the property line. In addition, the Master Plan recommends installing a parallel 72" diameter pipeline as part of the CIP improvements identified in the 2014 SDMP. Constructing a larger, single conveyance structure to carry the 25-year storm peak flows as an alternative to the two parallel 72-inch pipelines could be an option if timing, funding and agreements between the developer and the City are in place. An updated hydraulic study and design evaluation shall be conducted to analyze the performance and confirm the feasibility of the proposed storm drain improvements to address existing capacity deficiencies.

Other improvements will include stormwater management facilities for each development to meet local, state and federal requirements for water quality treatment as well as flood control. While the specific improvements for future development are not known at this time, they are anticipated to be similar to the "C.3" post-construction water quality treatment measures that are planned for the Phase 1 Development, such as bioretention areas, flow-through planters, green-roofs and pervious pavements that drain to native soil. Stormwater runoff would be captured in drainage facilities or infiltrated into native soil to recharge groundwater. All drainage facilities would be designed to meet City of San Bruno Standards and drain to the existing public storm drain system.

4.0 HYDROLOGY AND LAND USE

4.1 IMPERVIOUS AND PERVIOUS SURFACES

The permeability of the ground surface is a key factor in quantifying the amount of stormwater runoff that can be expected from a contributing area. The change in the permeability of the ground surface in land development has a direct impact to the quantity of runoff. An increase in impervious surfaces can increase runoff resulting in increased peak flows to the storm drain system. A reduction in impervious surfaces can decrease the peak flows generated by surface water as more water drains into the soil or landscaping. Therefore, a comparison of pre-development impervious areas and post-development impervious areas is used to determine the project's impact on the storm drainage system.

Impervious (impermeable) surfaces are mainly artificial structures—such as buildings and pavements (roads, sidewalks, driveways and parking lots), that are covered by impenetrable materials such as asphalt and concrete.

Pervious (permeable) surfaces are mainly grass or soil surfaces that allow runoff to percolate into the ground relatively easily. This includes permeable paving which is a type of paving for vehicle and pedestrian pathways that allows for infiltration into infinite soil below.

Pre-project land use currently consists of a mix of buildings and surface parking lots (impervious surfaces) and areas of landscaping (pervious surface). It is estimated that the landscape areas are approximately 20% of the Planning Area and approximately 24% of the Phase I Development.

The proposed YouTube expansion project within the Bayhill Specific Plan Area development proposes larger buildings with extensive subsurface parking structures which limits opportunities for stormwater reduction from infiltration through pervious surfaces. For the purposes of addressing site hydrology and the comparison of pre-and post-project drainage evaluation, all surfaces above the parking substructure are considered impervious. State Water Board has provided feedback to the City staff that pervious pavement over any underground structure (impervious facility) is considered impervious; however, the gravel layer, depending on the depth, can be considered storage.

BKF calcs (which were included in Entitlements): 22% pre-project (including Grundy and Bayhill areas affected

Kimley»Horn

4.1.1 Specific Plan Area Development

The percent impermeability comparison presented in this report is based on ground level surfaces only and provides a means to estimate the likely change in stormwater quantity without introducing other measures to limit runoff. The existing conditions were based on an aerial image.

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Figure 8 shows the general outline of existing and proposed development landscape areas (e.g. planting, green roof, pervious pavement that drain to native soil, etc.) which were used to quantify and compare pervious and impervious areas and relative impact to stormwater runoff. The existing percent impermeability of the Planning Area was estimated at approximately 80%. Based on a review of the planned open space, and greenway landscaped areas it is estimated that the percent impermeability of the Planning Area after Specific Plan buildout would be approximately 85%. This increase in impervious area is primarily due to the potential development of the currently undeveloped parcel adjacent to Highway 280 at the western end of the Planning Area.

4.1.2 Phase 1 Development

The Phase 1 development proposes the construction of two new buildings in the location of existing surface parking lots. Subterranean parking structures will be constructed to replace the surface lots. The new parking structures are more expansive than the building footprint and restrict areas for stormwater infiltration. The information provided for evaluating the Phase 1 Development pre- and post-development impervious areas consisted of a Vesting Tentative Map dated October 4, 2019, Preliminary Design Drawings dated October 4, 2019, 2019 and a memorandum dated August 29, 2019 from BKF titled "YouTube Phase 1 C.3 Narrative" along with the submitted "C.3 and C.6 Development Review Checklist" forms. A C.3 Checklist enumerating the pre-and post-construction impervious and pervious areas was submitted for each parcel affected by the Phase 1 Development. The C.3 Narrative and Checklists were provided to the City as part of the YouTube Vesting Tentative Map and Phase 1 plan submittal. The information provided on the Checklists was reviewed for consistency with the pervious and impervious areas identified on the design drawings. The Narrative and compiled data from the C.3 Checklists which describe the change in impervious areas, show that there is no increase. However, the preliminary design plans show that a portion of the proposed pervious pavement area is above the parking structure and therefore this area cannot be considered pervious as infiltration to native soils is limited. The estimated percent impermeability is 76% pre-project based on a review of aerial maps of the areas of parking lots, roadways and rooftops compared to the total Phase 1 development. This compares to 77% post-project impervious surfaces as detailed on the Phase 1 documents, therefore the initial review shows a potential increase in surface runoff.

Based on City feedback, plans and sheets were revised and resubmitted after these dates, so this analysis is no longer accurate

5.0 STORMWATER RUNOFF CALCULATIONS

The evaluation of stormwater impacts is based on the change in impervious and pervious surfaces of the development. Calculations provided are for comparison of pre-development and post-development flows. The rational method was used to calculate the flow, Q, from Q=CiA. Where C is the drainage runoff coefficient, "i" is the intensity for the given design storm frequency and storm duration, and "A" is the drainage area.

5.1 PARAMETERS AND ASSUMPTIONS

The parameters used in the stormwater runoff calculations are summarized in the following tables and based on the assumptions as follows:

- Land Use and Impervious Areas: Based on the information available for the entire Specific Plan Area, primarily the allowable footprint of the subterranean parking structures, (Figure 3), which limits infiltration, and open space greenway plans (Figure 9), the impervious area increases from approximately 80% to 85%

8-6

percent of the total area. The project site percent imperviousness is closely related to the runoff coefficient "C" factor in the rational method calculation. The lower the "C" coefficient, the greater the site's infiltration capability. The high "C" factor areas such as rooftops and pavements have low infiltration and more surface runoff is generated. The runoff coefficients used in the calculations are in accordance with the City of San Bruno's Municipal Code for hydrology calculations and are based on the type of development. Parks and Open Areas have a "C" coefficient of 0.35 and Commercial and Paved Areas have a "C" of 0.95.

Same comment as section 4.1.2 above. This does not match our final submittal. These are the old numbers, and the new numbers since reconcile this issue.

For the Phase 1 Development, land use areas were taken from preliminary design information provided by the City including the C.3 Narrative and Checklist forms dated October 4, 2019 prepared by YouTube for the Phase 1 Development. Based on the compiled Checklist information, the pre-development condition consists of approximately 688,083 square feet of impervious area. Post-development condition (Phase 1 Development) shows an increase in impervious area with approximately 9,000 square feet of pervious paving above the parking structure, which is considered impervious, in addition to the 688,083 square feet of proposed impervious area indicated on the Checklist forms. As a result, additional pervious area shall be allocated into the project to maintain the pre-project impervious surfaces. The calculations presented below reflect the increase of impervious areas based on the review of the preliminary design information.

- Design Storm: The 25-year and 100-year storm events were selected for consistency with the City's municipal code requirements for hydrology evaluation. (Per municipal code section 12.44.090, the 25-year storm is used for pipe sizing for the street storm drain system. Pipes shall be designed with the hydraulic grade line six inches below the flow line of the curb to avoid damage from a 50-year storm and the 100-year design storm shall be contained in the street right of way.)

- Rainfall Intensity: The rainfall intensity was obtained from the NOAA Atlas 14 precipitation frequency estimates. See attached Figure 10. A "Duration" of 10 minutes is used to be consistent with the City of San Bruno's municipal code for storm drainage calculations.

- Drainage Patterns: The drainage patterns are generally maintained from the pre-development condition. The Planning Area slopes from west to east, toward the San Francisco Bay. Runoff is collected in a conventional storm drain system that conveys storm water to a 72" diameter trunk line on the eastern portion of the site near Elm Avenue.

5.2 CALCULATIONS – SPECIFIC PLAN AREA

Hydrologic calculations to compare flow rates in the pre-project and post-project Planning Area conditions were prepared based on the standard Rational Method which utilizes several variables to estimate peak runoff flow rates for various storm events:

$Q = C_w iA$
Q = Flow rate [cfs]
C_w = Weighted Rational Runoff Coefficient
i = Rainfall Intensity [in/hr]
A = Area [acres]

A weighted C was calculated for both pre and post conditions. The National Oceanic and Atmospheric Administration's (NOAA) Precipitation Frequency Data Server was used to determine rainfall intensity for both the 25 and 100-year storm events. Based on a time of concentration of 10 minutes, rainfall intensity values for the 25 and 100-year storm event were 2.43 inches/hour and 3.08 inches/hour respectively per Figure 10.

8-7

Roadway runoff from the realignment of Grundy Lane (Part 1 and 3) would be directed to bioretention areas located in the street planter strip for compliance with C.3 regulations. The reduced pavement area within the right of way in Grundy Lane (Part 2) replaces impervious pavement areas with a linear landscape strip with new trees located between the street curb and sidewalk. This new streetscape would reduce surface water flows and promote infiltration through the landscaping into the underlying soil.

6.2.2 Specific Plan Area

Subsequent phases of development will likely utilize similar LID treatment methods as used in Phase 1 and will be required to follow the guidelines of the GI Plan for public area improvements as well as meet current regulatory requirements, at the time of each development, for stormwater managment. In addition to the bioretention planters, green roofs and permeable pavement used in Phase 1, other potential LID measures for future phases of the development may include rainwater harvesting and re-use for non-potable water uses, including irrigation. Given the site constraints of the subterreanan parking structures, it is expected that an increased use of green roofs or detention facilities will be necessary. These treatment measures are required to be included in the preliminary design phases of specific development proposals as part of the site design approval.

6.3 HYDROMODIFICATION

The Bayhill Specific Plan area adds or replaces more than 1 acre of impervious area but is in an Exempt Area per the Hydromodification Control Areas Map from Appendix H of the SMCWPPP C.3 Stormwater Technical Guidance. See Figure 11. Because the Planning Area is not located within a Hydromodification applicability area, it is not subject to Hydromodification requirements, which are intended to minimize downstream erosion in receiving waters.

7.0 CONCLUSIONS AND RECOMMENDATIONS

As discussed above, existing capacity deficiencies have been identified in the 72-inch diameter trunk line that runs through the Planning Area as well as storm drain infrastructure further downstream. The City's Storm Drain Master Plan concludes that upsizing the existing 72-inch pipeline within the Planning Area will not completely address the storm drain capacity deficiencies that are outside the Planning Area. Therefore, any increase in discharge flows from the Planning Area, including the Phase I Site, would exceed the downstream system capacity. Furthermore, the sizes and capacities of the existing stormwater collection system in Bayhill Drive and Cherry Avenue are unknown and require further study as part of future development.

7.1 IMPACTS

7.1.1 Hydrology and Storm Drain Impacts – Phase 1

The stormwater runoff calculations for pre-development peak flow and post-development peak flow show an increase in post-development peak flows. The recommended mitigations will require that the Phase 1 Development be designed to maintain or reduce stormwater discharge into the existing storm drain infrastructure. The increase in peak flow is a consequence of an increase in impervious surface areas. If maintaining or decreasing the amount of impervious area is not possible, then any increase in ground level impervious areas, can be offset by further increasing the amount of vegetated green roof areas (as shown on Phase 1 buildings) or by implementing on-site detention to maintain or decrease peak flows from pre-development conditions. There can be no net increase to peak flows given the current capacity constraint of the existing storm system. The project applicant, YouTube, has stated that they plan to provide additional pervious areas in the final design documents or otherwise demonstrate in a drainage analysis study that the final design will not increase flows from pre-project levels.

Same comment as prior - they have been reduced in the current version.

Figure 3 Potential Subterranean Parking Areas ←let's discuss live

City of San Bruno Bayhill Specific Plan

Kimley»Horn

8-9

Ramp/Sneath Lane intersections. The Cherry Avenue/San Bruno Avenue intersection operates above the LOS standard under No Project and Plus Phase I conditions; however, worsens to LOS E with the addition of the Max Office scenario. To improve conditions, a potential improvement would include modifying the signal cycle length to accommodate the additional vehicular traffic. The I-280 Southbound Ramp/Sneath Lane intersection operates under the LOS D standard under existing conditions. The addition of the Phase I and Max Office Project would worsen conditions; however, optimizing signal timing plans would result in improved intersection operations that operate at the LOS D standard.

PM Peak Hour

As shown in **Table 6**, all intersections perform at the LOS standard under No Project and Plus Project conditions with exception to the following intersections:

- Cherry Avenue/San Bruno Avenue
- Traeger Avenue/San Bruno Avenue
- El Camino Real/San Bruno Avenue
- I-380 Westbound/El Camino Real

The Cherry Avenue/San Bruno Avenue, El Camino Real/San Bruno Avenue, and I-380 Westbound/El Camino Real intersections would operate at the LOS standard (LOS D) or better by modifying signal timings. The Traeger Avenue/San Bruno Avenue operates acceptable under No Project condition; however, the addition of the Phase I and Max Office Project would worsen the side street stop-controlled approach, such that the intersection would operate under the LOS D standard. To improve operations, the Traeger Avenue/San Bruno Avenue intersection should be signalized. Note, that the intersection currently meets the peak hour signal warrant for a traffic signal.

Since the peak hour signal is already warranted, why should the BHSP have a fair share payment?

8-10

These Drainage Report(s) shall contain the following:

- Verification of existing pipe network including pipe size, elevation, material and condition including determination of the size and capacity of all elements of the existing stormwater collection system in Bayhill Drive and Cherry Avenue.
- Hydrologic analysis of construction period conditions and implementation of all temporary facilities necessary during construction to avoid increases in peak flows.
- Hydrologic analysis of existing and proposed peak flows that accounts for all areas that will be disturbed by the new development.
- Hydraulic analysis for evaluating pipe capacity and sizing of new pipes. The capacity of existing pipes that are proposed for re-use and new pipes shall be sized in accordance with the City's methodology, as noted in the municipal code or otherwise approved by the City Engineer. New pipes in the public right of way, if required, shall be RCP and have a minimum size of 15 inches. Applicants shall implement all permanent facilities necessary to avoid increases in operational peak flows.

Mitigation Measure Hydro 1B – Dedicate Storm Drain easements for Public Infrastructure

All storm drain pipes and related structures constructed as part of the City of San Bruno's stormwater conveyance system shall be contained within an easement dedicated to the City of San Bruno if the storm drain improvements are located outside of the public right of way. Storm Drain easements shall have a minimum width in accordance with the following:

- Minimum clearance between Outside Diameter (O.D.) of pipe to easement line shall be five (5) feet.
- Minimum clearance between pipes (O.D. to O.D) shall be five (5) feet.
- Minimum clearance between outside of structure to easement line shall be four (4) feet.
- Easement width must meet above requirements but shall not be narrower than fifteen (15) feet.

Same as previous comment.

Should be 440ksf. It appears SF may be correct in calculation, however.

Also, various figures show a water line in Elm where it is to be located in at intermodal station.

8-11

(Phase I Development), which consists of adding 301,476 square feet (sf) of net new office space to 8.15-acres. The Phase I Development is expected to be completed by 2022. Attachment A includes the proposed utility plans for the Phase I Development, prepared by the developer's engineer, that were used for this evaluation.

Four buildout scenarios of varying housing and office densities were evaluated in the Bayhill Specific Plan Development Project Water Supply Assessment (Project WSA) to capture the highest demand future scenario that would be permitted under the proposed Bayhill Specific Plan. Full buildout of the proposed Project is assumed to occur by 2040. The buildout scenarios included the following:

- Maximum Office Scenario
- Maximum Housing Scenario (Project)
- Increased Height Alternative – Maximum Office Scenario
- Increased Height Alternative – Maximum Housing Scenario (Project Alternative)

The proposed land use plans for each scenario is provided in Attachment B for reference.[2] The Maximum Housing Scenario resulted in higher water demands than the Maximum Office Scenario and was selected for this hydraulic evaluation. However, the Increased Height Alternative – Maximum Housing Scenario resulted in the highest buildout water demand and was therefore evaluated as a possible project alternative for this hydraulic evaluation to determine if additional water system improvements may be needed. Attachment C presents the Project Alternative Buildout evaluation findings and conclusions.

The selected Project Buildout scenario includes 3,500,743 sf of office buildings, 121,846 sf of retail buildings, a 133-room hotel, and 573 dwelling units (du) of multi-family residential housing (these totals include existing buildings that would remain). Proposed utility plans for buildout of the Project have not been prepared, and existing pipelines were assumed to serve the Project Buildout scenario. However, City staff identified that a new 10-inch diameter pipeline will be installed in Elm Avenue to connect Grundy Lane to Bayhill Drive at buildout.

The Project is located in Pressure Zone 3/5 of the City's water system. It is assumed that the Project will be served primarily from SFPUC supply (from the Rollingwood - C3 and Bayhill - C4 Turnouts) and that the City's groundwater wells would be offline under the City's current operations as a participant in the Regional Groundwater Storage and Recovery project. The preliminary Phase I Development utility plans provided to West Yost propose to abandon the existing 8-inch pipeline in Elm Avenue (north of Bayhill Drive), abandon and replace the existing 8-inch pipeline in Grundy Lane, and abandon and replace a section of the existing 10-inch pipeline in Bayhill Drive. The proposed pipelines would tie into the existing water system at four connections: one connection to the existing 8-inch diameter water main at the intersection of Grundy Lane and Cherry Avenue; a second connection to the existing 8-inch diameter water main that runs between Bayhill Drive and Grundy Lane (at a point approximately 1,230 ft northeast of the first connection); a third connection to the existing 10-inch diameter pipeline in Bayhill Drive, approximately 150 feet from the

[2] Provided to West Yost by ICF on March 29, 2019.

Appendix 3.10-1
Transportation Supporting Data

To facilitate review of the Draft EIR, could you kindly provide the traffic analysis supporting documentation (including Synchro intersection analysis outputs) for all study intersections and scenarios analyzed in the EIR? (This would include cumulative 2040 traffic volumes with and without the proposed project.)

Also, could you kindly provide a project trips summary by study intersection?

How is this calculated - can the math be shown?

Table 6: VMT per Service Population

Scenario	Project Site Total VMT per Service Population			Project VMT Threshold	Project Added Total VMT per Service Population[1]	
	No Project[2]	Plus Project[3]	Plus Phase I Development		Project	Phase I Development
Existing Conditions	37.5	29.9	35.2	21.7	**27.8**	**31.8**
Cumulative Conditions	36.2	28.3	34.0	21.7	**26.1**	**30.7**

Notes:
Bold: Project VMT per Service Population exceeds the VMT per Service Population threshold
1. The Project Added Total VMT per Service Population is the change in VMT as a result of the Project over the change in Service Population.
2. The analysis assumes the existing land use program Under No Project conditions.
3. The Project is defined as the Max Office alternative.

Source: C/CAG-VTA Travel Model, 2019.

As shown, the Project would increase VMT, but decrease the VMT per service population compared to No Project conditions. However, the Project VMT per service population would still exceed the 21.7 VMT per service population threshold[1]. The Project would require a 22 percent and 17 percent reduction in VMT per service population to meet the threshold under Existing Plus Project and Cumulative Plus Project scenarios, respectively. And the Phase I Development would require a 32 percent and 29 percent reduction in VMT per service population to meet the threshold under Existing Plus Project and Cumulative Plus Project scenarios, respectively.

As described in the EIR, Mitigation Measure TRA-1 was proposed, which would require property owners of new developments within the Specific Plan to prepare and implement a TDM program that would achieve the 21.7 VMT per Capita threshold. The VMT per Capita threshold equates to no more than 43-percent of trips occurring by single occupancy vehicles (SOV). The 43-percent SOV target was calculated based on the reduction of the Project VMT and "target" VMT. The "target" VMT was calculated by multiplying the change in population by the 21.7 VMT per service population threshold. A summary of the calculations is included in **Table 7**.

[1] See section 3.10 of the EIR for a detailed narrative of the VMT methodology and significant threshold.

How is this calculated - can the math be shown?

Table 7: Cumulative Plus Project VMT and Mode Split Target

Total VMT	Target VMT	Delta (Total – Target)	Percent Reduction	SOV Mode Split	SOV Target Mode Split with Reduction
243,943	202,678	41,265	17%	53%	**43%**

Source: Fehr & Peers, 2019.

As shown in **Table 7**, the Project would require a VMT reduction 17 percent. The VMT reduction would correspond to the same SOV target reduction, resulting in a maximum SOV mode of 43 percent. The applicant or building owners can shift SOV users to other modes through implementation of a TDM program,– described in greater detail below.

Transportation Demand Management (TDM)

The Specific Plan provides a list of TDM programs and services, but developers and property managers may tailor their own list of measures to fit their unique workforce culture and schedule.

Project Scenario

In the near term, before buildout of the Transit Corridors Plan, it may be challenging to reliably achieve a SOV percentage of no more than 43 percent. Even with TDM implementation, a standard employer or property manager may struggle to consistently reduce the Project's effect on VMT per service population to a less-than-significant level. As such, the EIR notes that the TDM Program will strive for the VMT per Capita threshold but acknowledge reasonable limitations on TDM program success due to surrounding transportation and land use context in the near-term. Program expectations may be less stringent for an initial occupancy period but will become more stringent over time and will ultimately require each employer or property manager to meet the VMT per Capita threshold or associated drive-alone goal.

Based on guidance provided by the California Air Pollution Control Officers Association (CAPCOA), the maximum vehicle trip reduction for urban low-transit[2] areas such as the proposed Project is generally accepted to be 15-percent. Thus, it is expected that even with implementation of the

[2] Urban low transit areas refer to somewhat dense urban areas with good accessibility but lower levels of transit use compared to core and high transit areas like Downtown San Francisco.

8-15

comprehensive TDM program as described in the Specific Plan, the VMT reduction would not reduce by more than 15-percent. However, Fehr & Peers prepared a quantitative assessment of the TDM strategies proposed in the Specific Plan, included in Attachment C, using their TDM+ tool[3]. As shown, implementation of the program is expected to result in a VMT reduction ranging from 15 percent to 20 percent. As described in the EIR, the Project requires a reduction of 23 percent under current conditions; therefore, implementation of a TDM program would not result in a significant reduction that would meet the VMT per Capita threshold. However, under Cumulative conditions, the Project would require a reduction of 17 percent, which falls within the expected range of VMT reduction with implementation of a TDM program.

Is a 17% reduction, 22% reduction or 23% reduction required?

Therefore, it is unlikely that implementation of a TDM program would result in meeting the VMT per Capita threshold under Existing Plus Project conditions; however, would meet the threshold under Cumulative Plus Project conditions.

Phase I

Phase I Development is composed entirely of YouTube-owned parcels, and all- trip generation associated with Phase I Development would be YouTube generated. YouTube operates a robust TDM program today that, if continued is expected to meet or perform below the 21.7 VMT per service population threshold. A summary of the YouTube travel surveys is included in **Table 8.**

Table 8: YouTube Employee Mode Split

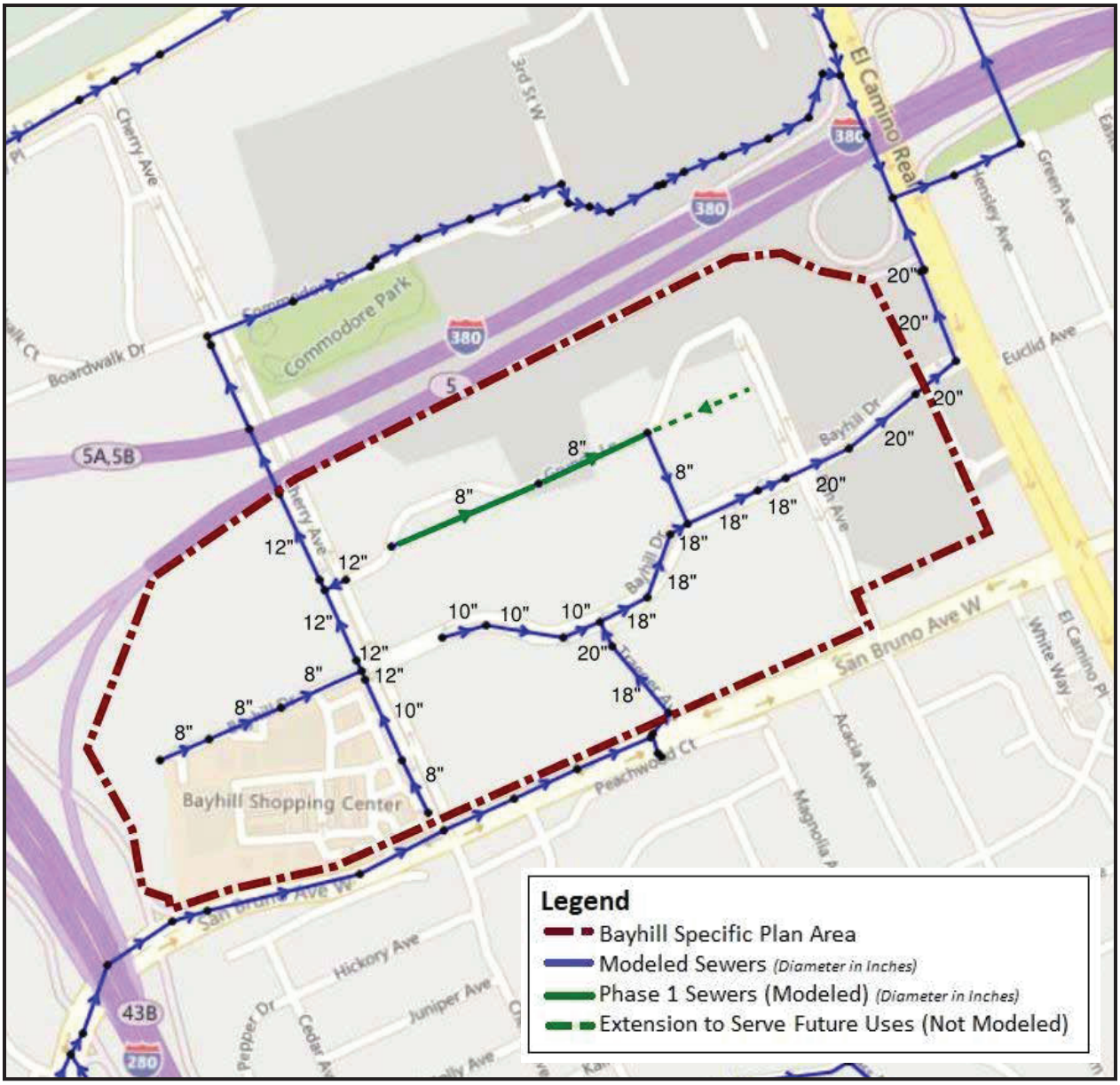
Mode	2017	2018
Drive Alone (SOVs)	42.4%	42.7%
Carpool, Vanpool, TNCs, Drop-off (2+ passengers)	4.1%	4.0%
G-Shuttle	40.3%	39.1%
Transit	5.0%	3.5%
Bike	1.6%	1.2%
Walk	1.9%	2.5%
Other (Work from home, different office, etc.)	4.7%	7.0%

Source: YouTube Employee Travel Survey Data

[3] TDM+ is based on CAPCOA VMT reduction strategy research in *Quantifying Greenhouse Gas Mitigation Measures* (2010).

Should the 8" lines be shown as 10" since later text suggests that is what was modeled?

Figure 1: Modeled Sewers Within and in Vicinity of Bayhill Specific Plan Area



Appendix 3.11-3
Sanitary Sewer Impact Study

Letter 9

From: Alexander Melendrez <alexander.melendrez.140@gmail.com>
Sent: Tuesday, February 16, 2021 6:22 PM
To: Pamela Wu <PWu@sanbruno.ca.gov>
Cc: Melissa Thurman <MThurman@sanbruno.ca.gov>; CouncilSB <councilsb@sanbruno.ca.gov>
Subject: Item 4 - EIR for Bayhill Specific Plan

Dear San Bruno Planning Commission,

My name is Alex Melendrez and I am a 27 year resident of San Bruno. I am speaking only for myself. Thank you for taking the time to hear my comments on the EIR for the Bayhill Specific Plan. I really wish I could make my comments short. 9-1

I appreciate the work the Planning Commission is doing in review of the Specific Plan and Youtube Phase 1 Development Plan. There is urgency to address our growing jobs-housing imbalance and planning for more housing in the Bayhill Specific Plan is the way to do it. It's an affordability issue, it's a climate change issue and equity issue. In a recent City Council meeting and Daily Journal article, the City Council expressed concern (that I admittedly disagreed with) about our upcoming RHNA allotment. Well THIS is the perfect opportunity to meet that allotment ahead of time!

To quote a recent SPUR panel "Zoning is a community adopted system". We should choose a zone for more people. We can allow for more affordable housing. It's a policy choice. Developers, even those with the best intentions, only build what is allowed. We are choosing to limit ourselves and expanding Bayhill's housing allotment is one of the most crucial first steps to addressing our housing needs. **It really does start right here at this moment.** While we have our future RHNA allotment (and the likelihood of us retaining the number), the pressing needs of the actual humans these numbers represent is the moral argument for why we need to allow for more homes for people. Our teachers, our unhoused populations, our low-income workers, our middle income workers and more. The inclusion of more housing overlay zones are great additions. This is the time, the moment with the urgency all in alignment. 9-2

In the manner you can tonight, please support the "Residential Alternative" to allow for near 1500 homes within the proposed Specific Plan. Additionally, please support more housing in the eastern section of the Specific Plan (close to El Camino in areas 14, 15 and 16 on the parcel map) IN ADDITION to existing planned Southern sites (San Bruno Avenue) for housing as well. In alignment with an environmental review, the eastern area is transit rich, close to amenities and ripe for incentives to build (both market-rate and affordable) homes**. We cannot afford to waste this opportunity to build a brighter future for San Bruno.** 9-3

Thank you for your service to the Planning Commission. I truly appreciate you volunteering your time to our community.

Alex Melendrez

--
Alexander Melendrez
Lead, Peninsula For Everyone
Alternate & State Party Delegate, San Mateo County Democratic Central Committee
Member, Peninsula Clean Energy's Citizen Advisory Committee

For work/housing related emails please email: amelendrez@hlcsmc.org

Former:
Commissioner, San Bruno Parks and Recreations, San Mateo County Commission on Aging
Board Member, Peninsula Young Democrats, Peninsula Democratic Coalition
Committee Co-Chair, San Mateo County Democratic Central Committee Endorsement Committee, Programs Committee

Letter 10

HCA PROPERTY MANAGEMENT, INC.

P.O. BOX 7, NOVATO, CA 94948
deanm@hcamgmt.com * 415-892-4795 x 217**

February 23, 2021

Re: BAYHILL PARTNERS
801-851 TRAEGER AVENUE
SAN BRUNO, CA

Members of the San Bruno City Council
Members of the San Bruno Planning Commission
Via email: Melissa Thurman <mthurman@sanbruno.ca.gov> City Clerk
Pamela Wu <PWu@sanbruno.ca.gov> Community and Economic Development Director

In furtherance of the discussion regarding the Specific Plan EIR workshop of February 16, 2021, I (as part owner) thought it might help to put my comments in writing.

The questions I had posed that evening were as follows:

1) If an owner in the Bayhill project area makes no use of any increase in either office or residential will that owner be subject to any increase in fees or taxes (ie: Mello Roos or Community Benefit fees)? 10-1
2) If Bayhill 1111 doesn't use any of it's 158 residential units can another parcel allowed residential improvements be allowed to use those units? 10-2
3) I think it is obvious but 801-851 Traeger can use **either** the 125,000 office **or** the 205 residential units -- correct? 10-3
4) In Table 5-4 where the height limit is increased to 5 stories the number of residential units would increase to 1,070; first, the reference is to sq.ft. and should be "du" dwelling units; second, which parcels are they allocated to? 10-4

It is interesting that there were many comments about the need for residential units. Thus, I would like to make some additional comments concerning the cost of such units. 10-5

First, it is important to take into consideration the fact that each area allowed residential will have to provide underground parking if the residential is in addition to the current office use since the residential units will be built on existing parking spaces. Not counting the cost of the land, it is estimated that each underground parking space has a cost of $40,000 and each residential unit requires per code 1.5 to 2 spaces. Some consideration would have to be given to park-sharing and a variance to achieve a 1.5 per unit requirement.

Second, our preliminary feasibility study indicates that 289 units is the economic breakeven. Thus, the 205 allocated in the EIR would not provide the necessary 10-6

economics. If it is not economic for 801-851 Traeger, 158 units will not work for 1111 Bayhill Drive either.

10-6
(Cont.)

Third, Just to give you an idea of the costs of a residential project of 289 units: 58 Jr 1-bed at 570 sq.ft., 101 1-bed at 750 sq.ft. and 130 2-bed at 1,050 sq ft. at an average cost of $540,547 per unit equals $156,205,000. Projected rents are from $2,800 to $3,800 based on these projections.

Obviously, these are very rough estimates and it is difficult to narrow these estimates without significant refinement of the parameters. Other than answers to the questions above and some consideration to additional units being allowed it is too early to anticipate what else might be required. It is pretty certain, however, that the number of units provided will not be economically viable.

Please forward this to all members of the City Council and the Planning Commission.

Respectfully submitted,

Dean J. Moser for
Bayhill Office Partners, LLC

Letter 11

-----Original Message-----
From: Janice Rodondi <janicerodondi@yahoo.com>
Sent: Monday, March 15, 2021 12:35 PM
To: Matthew Neuebaumer <MNeuebaumer@sanbruno.ca.gov>
Subject: Bay hill complex

Dear Mr. Neuebaumer,

I apologize for sending this after the March 1st, deadline. I hope you are open to answering my question. 11-1

My name is Janice Rodondi , my address is 782 Magnolia ave. and have been a resident of San Bruno for 45 years. I was here when the existing Bayhill couplex was constructed. And as alway with construction such as this there were issues to deal with. In my case and several other people in my immediate vicinity , we experienced several areas of damage to our homes, after constant pile driving for several weeks.

Bathroom tile and garage floors cracking. This was examined after the fact so no liability was issued.

My concern of course is where will the liability lie and who do I contact if something like this was to occur again. With what is anticipated to be a very long and extensive process, and many different companies involved, this would be rather confusing.

My hope is to NOT experience what happened last time, but our homes are older and open to damage. The impact on our neighborhoods will be constant for many years and will look forward to the this being accomplished with the least impact as possible.

Thank you for your time and I look forward to hearing back from you.

Regards,

Janice Rodondi
782 Magnolia ave.
SB,CA.

650 589 2333

March 1, 2021

Pamela Wu
Community and Economic Development Director
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

VIA EMAIL: pwu@sanbruno.ca.gov

Re: Public Comments on Draft Environmental Impact Report (EIR) for the Bayhill Specific Plan including the YouTube Phase I Development 12-1

Dear Pamela Wu,

Below is a transcription of public comments received at the February 16, 2021 San Bruno Planning Commission hearing on the Bayhill Specific Plan Draft EIR.

Commenter 1: Dean Moser

Thank you, my name is Dean Moser. I'm the representative for 801-851 Traeger. I have a couple of questions. If an owner in the Bayhill project doesn't make any changes whatsoever to their property, are they subject to any fees or taxes such as the Mello-Roos or community benefit fees? That's number one. 12-2

Number two, if Bayhill 1111 doesn't use any of its 158 residential units, can another parcel use those units? 12-3

And then next item, if the height limit is increased due to an election, of course, or a vote, Table 5-4 where the height limit is increased to five stories, the number of residential units would increase to 1,070, first the references to square feet and should be to building units, and second which parcels are they allocated to? 12-4

I would like to make a comment too. We've done a feasibility study on residential homes, and the allocation of 205 homes doesn't make it economic. We had the economic break even at 305 homes, that's just a point of interest. 12-5

And I've gotta tell you, I think you guys have done a great job on the planning commission and the city council, this is a fantastic project and I look forward to it moving ahead. Thank you. 12-6

Commenter 2: Phuong Le

My name is Phuong Le and I'm a resident in San Bruno. I believe that the Bayhill project site is located at a very strategic location adjacent to Bayhill Shopping Center, within walking distance to Tanforan Mall, Caltrans, and BART. This site has the potential to address not only YouTube's office space need, but also San Bruno's housing crisis. I'm here to support the residential alternative, which allows up to 1,500 new residential units. This is almost half of the targeted RHNA numbers for next cycle. This residential alternative not only achieves all of the current project objectives, but also provides 12 percent more impervious areas. This means more green open space going back to the community, this means better. Even though there's less office area provided with this alternative, I believe this is justified. As you can see, what this pandemic has shown us is that we don't need that much office space. We're moving toward a new working style where it's mostly remote and we don't need that much space. This is more sustainable. We need to focus more on housing. Also, integrating more residential and open space at Bayhill would activate this area not only as a major business location during daytime, but also as a friendly and charming urban area that's full of activities for families at night. This is exactly the goal of San Bruno, as mentioned in the general plan and the specific plan. Therefore, I strongly urge you to support and approve the residential alternative, which increases up to 1,500 new residential units on the Bayhill project site. Thank you. 12-7

Commenter 3: Jules Brouillet

My names in Jules Brouillet. I live in the Rollingwood neighborhood here in San Bruno. I work here as a teacher. We very much need to house workers, both public servants, the growing number of YouTube employees, and the service workers and other people who work here in San Bruno. The housing shortage and high housing prices are keeping many of my colleagues far away. One of my colleagues at the local school district has to commute here from Brentwood, when she is not distance working. And that's a lot of traffic and air pollution happening to the city of San Bruno and the Bay Area. For both residents and out of town workers, about 7 out of 10 or more drive single occupancy vehicles coming in when they work. So, with that in mind, and the importance of reducing vehicle miles traveled in our environment, with sea level rise, air quality problems, climate change, forest fires, other threats, San Bruno needs to be a part of the solution to this climate crisis by also addressing the housing crisis. And it can do that through constructing housing here, at to not increasing the imbalance by just building more office space without building very much housing. 12-8

So with that in mind, I think the Bayhill specific plan is a choice spot for constructing housing because it is urbanized and it's an ideal place for high-density development that fits into the community character of that part of town. And we also have a RHNA allocation of 2,000 new units plus a backlog of 600 of the 1,100 from the old RHNA. So for all these reasons I think we should more strongly consider the residential plan of around 1,500 units to meet the housing needs of our community. It also only reduces the housing capacity in this draft report by 700,000 square feet to 1.7 million square feet, so it has almost as much office space as that. We could also consider the height density alternative if voters modify ordinance 1284, but in the meantime, I think we should most strongly consider the residential alternative here. I also encourage you to locate the housing towards the east side of the project, so that residents can access transit more easily, and that 12-9

convenience increases ridership and reduces driving. So thank you for considering the residential alternative, and take a bite out of the housing crisis and our RHNA goals. 12-9 (Cont.)

Commenter 4: Plymouth Ansbergs

This is Plymouth Ansbergs, I live in San Bruno, I've lived here almost 4 years now. I work for Google, I usually work at our campus down in Mountain View, but I do occasionally work out of YouTube's offices in San Bruno, which is convenient because it's part of the same company, so I have some familiarity with usage of that space. My experience with working there is that traffic is really not a problem, and this is an area that can absorb a lot more housing, especially if some of that housing is able to be used by employees who actually work, you know people who are able to live and work there. I know a couple of YouTube folks who live in the Shelter Creek apartments and are able to walk to work, and that's great, and I would just like to really encourage there to be more thought to increasing the amount of housing there. Thank you. 12-10

Commenter 5: Doug (last name not provided)

Thank you for your support on this matter. We are the owners of 801 Traeger and 851 Traeger, and I support everybody on the line tonight in regard to the residential housing. We are very, very, we are a strong proponent of the additional housing on our site. Obviously, there's going to be ways that you adjust the housing and the percentages and everything else. It sounds like a lot of the callers like Jules, and we have Alexandra presenting the East side of the project, but we're on the west side, and we're willing to support the housing needs of the community, and I just want to present that to all of you, that there is a need and a crisis out there for San Bruno, and we're in support of the higher density, the increase in the height limit, and from the initial 573 multi-family, to now 1,500, I think that's a good start. I think the community itself needs that, especially in the pandemic, where we're finding, as owners of offices and office buildings that yes people are staying at home, and yes people are looking for the additional residential sites where they can work close to their jobs. So I just want to present this to you, and we're very, very happy with what you're doing. We've been part of this project since 2017, and we've been following the group, and we support everything you're doing, so thank you very much. 12-11

Commenter 6: Robert Entsminger

My name is Robert Entsminger, I live at 712 Hensley Avenue and I'm not sure….(microphone cuts out)…income people who want to live here. It might work well for the people who work for YouTube, and by extension Google, but I don't think this housing is going to be particularly inexpensive, which is the main problem that people have with money here. 12-12

I do have one question additionally about it, and that is, since it's recently come up that they'd like to add an additional tax or fee on homeowners to help rebuild the stormwater system in San Bruno, 12-13

will this fee also apply to this development? And I think that's pretty much what I have to say tonight. Thank you for listening. 12-13 (Cont.)

Chapter 3
Responses to Comments

Introduction

This chapter includes responses for each of the numbered comments identified in the comment letters in Chapter 2, *Comments Received on the Draft EIR*, of this Final EIR. Each response begins with a summary of the comment, responds to the comment, and then identifies if revisions to the Draft EIR are required. Revisions to the Draft EIR are noted in the responses to the comments, and are included in full in Chapter 4, *Revisions to the Draft EIR,* of this Final EIR.

In responding to comments, CEQA does not require a Lead Agency to conduct every test or perform all research, study, or experimentation recommended or demanded by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines secs. 15088, 15204).

Responses to Comment Letter 1 (Bay Area Air Quality Management District)

Response to Comment 1-1

The comment correctly summarizes the main features of the project.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-2

The comment expresses support for the City's efforts to focus on transit-oriented infill development and notes that the Project Site is located in a Priority Development Area (PDA) as identified by Plan Bay Area 2040, with proximity to the San Bruno Caltrain Station and the San Bruno BART Station.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-3

The comment encourages the City to adopt the Residential Alternative, stating that the increase in allowable new residential units and the reduction in office development square footage would provide a more balanced job/housing ratio and would reduce vehicle miles traveled (VMT) impacts, therefore resulting in a lesser impact on air quality while helping to achieve Plan Bay Area's 2040 housing goals.

The comment's summary of the potential VMT impacts associated with the Residential Alternative is consistent with the analysis in Chapter 5, *Analysis of Alternatives*, of the Draft EIR. As stated on Draft EIR pages 5-25 through 5-26, impacts on VMT under the Residential Alternative would be less than significant with mitigation under both Existing Plus Residential Alternative and Cumulative conditions. As such, the Residential Alternative would avoid the Project's significant impact on VMT. However, the analysis of air quality impacts under the Residential Alternative on Draft EIR pages 5-16 and 5-17 concluded that the Residential Alternative would result in greater cumulative and health risk impacts during construction and similar cumulative and health risk impacts during operation relative to the Project. Regarding construction emissions, the additional residential units allowed under the Residential Alternative are anticipated to increase construction activities and associated criteria air pollutant emissions compared to the Project. Regarding operational emissions, while the reduction in VMT would reduce mobile source emissions compared to the Project, emissions would still be expected to exceed BAAQMD's daily criteria pollutant emission thresholds. Because it cannot be concluded that offset programs (Mitigation Measure AQ-7) would be available in the future at the time and in the amount needed for any given future development, this alternative would not avoid the Project's significant and unavoidable criteria air pollutant emissions impact during operation, and impacts would be similar to those of the Project. The comment does not contain questions or concerns regarding the adequacy of this analysis.

The commenter's support for the Residential Alternative is noted and will be considered by the decision makers as part of the full record available in deciding on the merits of the project. Per Public Resources Code Sections 21002-21002.1 and 21004, the lead agency has the authority to

adopt a project alternative rather than the proposed project, particularly if the agency finds that the alternative will be less environmentally damaging than the project as proposed. Per CEQA Guidelines Section 15126.6, an alternative must be capable of feasibly attaining most of the basic project objectives.

Response to Comment 1-4

The comment recommends the City consider expanding its residential overlay zones to provide flexibility for developing or converting office space to residential use in the future. The comment notes that remote work is likely to continue even as COVID restrictions are lifted, which could result in underutilized and overabundant office space.

As described in Chapter 2, *Project Description*, of the Draft EIR, the Project would establish new housing and mixed-use overlay zones in a 20.5-acre portion of the Project Site. As stated in Section 2.5, *Project Objectives*, the Project aims to "[p]rovide a cohesive vision for future development within the Project Site, recognizing Bayhill's essential nature as a business park/employment center while allowing for residential development in appropriate locations, thereby helping to serve the city and region's housing needs." Therefore, in determining the placement of the residential overlay zone, the City balanced the need for residential development with the need to preserve Bayhill's essential nature as a business park/employment center. However, the City notes the commenter's concern about underutilized and overabundant office space as a result of remote working. The decision makers will consider this comment as part of the full record available in deciding on the merits of the project. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-5

The comment expresses appreciation for the City's work in addressing air quality impacts anticipated as a result of the Project. The comment notes that because the timing and intensity of development under future phases is unknown, there could be reasonably foreseeable conditions where air quality thresholds for reactive organic gasses (ROG), nitrogen oxides (NOx), particulate matter 10 microns smaller in diameter (PM_{10}), and particulate matter 2.5 microns smaller in diameter ($PM_{2.5}$) could be exceeded during construction and operations. The comment notes that the Draft EIR identified design features and mitigation measures that would substantially lessen local and regional air quality emissions, and suggests additional measures to reduce air pollution emissions and limit exposure to pollutants. The comment's summary of the Project's air quality impacts is consistent with the analysis presented in Section 3.2, *Air Quality*, of the Draft EIR. A response to each of the additional reduction measures proposed by the commenter is provided in the following responses.

Response to Comment 1-6

The comment correctly notes that the Draft EIR concludes that the Project would result in significant and unavoidable air quality impacts during construction (refer to Draft EIR Section 3.2, *Air Quality*). The comment expresses appreciation for the Project's efforts to address air quality and health impacts by incorporating best management practices, including fugitive dust control measures and requiring Tier 4 engines on equipment. The commenter recommends the Project incorporate zero-emission off-road equipment whenever feasible and establish a hotline where visible dust problems

can be reported to the City. The commenter recommends the hotline number be posted around the site and be given to all nearby residents, schools, and businesses.

In response to the comment, Policy 6-9 in the Specific Plan has been revised to encourage the use of zero-emissions equipment wherever feasible:

"6-9: Reduce construction-related emissions.* All applicants proposing development of projects within the Plan Area shall reduce construction related emissions by requiring contractors (as a contract condition) to implement the following requirements, unless an analysis conducted by a qualified consultant demonstrates that a particular measure is not required to meet air quality standards:

a. Use Tier 4 final engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities.*

b. Use diesel trucks with 2010 or later compliant model year engines during construction.(*)

c. Use renewable diesel during construction.(*)

d. Use low-VOC coatings during construction. (*)

e. Implement fugitive dust best management practices.*

f. Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) use of portable extension lines is practicable given construction safety and operational limitations; and (4) use of electrical grid power does not compromise construction schedules."

The comment also recommends posting a hotline number to report visible dust problems and ensuring that the number is given to all nearby residents, schools, and businesses. Mitigation Measure AQ-5: Require Fugitive Dust Best Management Practices, on page 3.2-33 of the Draft EIR includes the following language: "Post a publicly visible sign with the telephone number and the name of the person to contact at the lead agency regarding dust complaints. This person will respond and take corrective action within 48 hours. The phone number of the BAAQMD will also be visible to ensure compliance." This measure is based on BAAQMD's 2017 CEQA Guidelines.[1] The BAAQMD's CEQA Guidelines do not include additional measures to ensure that the number is given to all nearby residents, schools, and businesses, nor does the comment provide evidence to support that such a measure would further reduce the Project's construction air emissions. No revisions to the Draft EIR are required.

Response to Comment 1-7

The comment correctly notes that the Draft EIR concludes that the Project would result in significant and unavoidable air quality impacts during operation, and that the significant impacts are primarily due to vehicle trips that would be generated by the proposed land uses (refer to Draft EIR Section 3.2, *Air Quality*). The comment expresses appreciation for the Specific Plan's efforts to reduce

[1] Bay Area Air Quality Management District. 2017. California Environmental Quality Act Air Quality Guidelines. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 27, 2021.

emissions by encouraging transit use, fostering bicycle and pedestrian infrastructure, and supporting sustainable land use patterns through mixed-use design and increased density. The comment further recommends that the Specific Plan's voluntary transit policies be revised to include stronger language that affirms the City's intent to implement these measures. The commenter provides Policy 4-5, Encourage First-Last Mile Shuttle Service, as an example, where they recommend "encourage" be revised to "require."

The Specific Plan requires numerous multi-modal infrastructure improvements, including upgrades to all sidewalks and bicycle facilities within the Specific Plan area. The Specific Plan policies also require that development pays its fair share to add separated bicycle lanes on San Bruno Avenue West and pedestrian crossing enhancements at the two adjacent El Camino Real cross-streets (Policy 4-3). These crossings provide access to bus routes along El Camino Real and are the first/last leg of travel to the Caltrain and Bart stations. The Specific Plan also requires that the City and property owners work together to enhance transit stops within the Specific Plan area (Policy 4-6). The Specific Plan also requires that new land use applicants develop transportation demand management (TDM) programs and appoint TDM coordinators (Policies 4-9, 4-10, and 4-11). If property managers do not achieve their TDM goals, they are required to make mitigation payments as outlined in the Bayhill Monitoring and Mitigation Plan. These non-voluntary requirements are described on pages 2-28 through 2-34 in Chapter 2, *Project Description*, of the Draft EIR, and in Chapter 4, *Access and Connectivity*, of the Specific Plan (Appendix 2 of the Draft EIR).

Policy 4-5, Encourage First-Last Mile Shuttle Service, includes a requirement to prepare a first/last mile study for travel between the Specific Plan Area and Bay Area Rapid Transit (BART) and Caltrain stations. Funding for this study is included in the areawide impact fee, which affirms the City's intent to implement this measure. Once the study is complete, the City and Specific Plan area employers can decide whether shuttle service is the best approach to closing the gap between the Project Site and the regional rail stations. The Specific Plan would allow for a variety of different commercial uses, and what may be a feasible and effective first/last mile strategy for one employer may not be feasible or effective for another. For example, some employers may elect to provide e-bikes and e-scooters as part of their TDM programs. Therefore, the City's intent is to provide for an appropriate level of flexibility in Policy 4-5. No revisions to the Specific Plan or Draft EIR are required.

It should also be noted that YouTube and Walmart operate private, long-haul commuter shuttles to and from the Specific Plan Area. Walmart, in partnership with Commute.org, also provides a publicly accessible shuttle service connecting the Project Site to the BART and Caltrain stations. YouTube employees can use this shuttle service. Existing shuttle service at the time the EIR analysis commenced is described on page 66 of the Specific Plan and page 3.10-11 of the Draft EIR.

Response to Comment 1-8

The comment recommends the City decrease the amount of parking spaces and implement best practice parking strategies to discourage single-occupancy vehicle (SOV) travel, such as parking cash-out, reduced parking requirements, shared parking, paid parking, and car-share parking.

Per Specific Plan Policy 4-4, Provide Appropriate Parking Supply, the number of parking spaces are required to comply with all required regulations, including the San Bruno Municipal Code Chapter 12.100 (Off-Streeting Parking and Loading) and Parking Design Standards Resolution. The San Bruno Municipal Code includes several options that would potentially allow for a reduction of required parking spaces. Chapter 12.100.040(H)(2) allows for a phased development to reduce its

parking supply based on the results of a parking occupancy study, at the discretion of the community and economic development director or approving body. Additionally, Chapter 12.100.040(I) specifies that the number of required off-street parking spaces may be reduced by up to 30 percent for nonresidential land uses within a specific plan area. A 10 percent reduction in required parking spaces already has been applied to YouTube's proposed Phase I Development, consistent with this provision. Pursuant to Specific Plan Policy 4-4, parking studies are required to be prepared periodically and prior to each phase of development; the results will be used to re-evaluate parking supply. Parking discouragement strategies could be components of an individual project's TDM program pursuant to Specific Plan Policy 4-9.

As discussed on page 5-5 in Chapter 5, *Analysis of Alternatives*, of the Draft EIR, the City considered a Reduced Parking Alternative in developing alternatives to evaluate in the Draft EIR. Under the Reduced Parking Alternative, base parking standards would be reduced even further (up to 30 percent) from the parking reductions already allowed under the San Bruno Municipal Code (described above). However, in this case, a reduced parking supply would be expected to result in parking spillover into adjacent neighborhoods rather than reduced VMT. That is, reducing the Project's parking supply would most likely result in drivers parking along nearby residential streets rather than utilizing alternative modes of transportation instead of driving. This is a consequence of the vicinity's suburban setting and abundant supply of free, unrestricted parking immediately adjacent to the Project Site. Even with a robust TDM program such as the one required by Mitigation Measure TRA-1, it is likely that a 30 percent decrease in parking supply would still result in spillover parking with potential adverse effects on surrounding neighborhoods (including environmental effects, such as noise, and non-environmental effects, such as reduced parking supply). Mitigation Measure TRA-1 assumes a wide range of incentive programs and services and already assumes the maximum auto mode share reduction possible given the Project's suburban setting. Layering additional parking reductions onto the TDM reductions assumed in Mitigation Measure TRA-1 is not expected to result in additional mode shift or VMT reduction. Therefore, while reduced parking supply can be used as an ad hoc TDM strategy, in this case, a Reduced Parking Alternative likely would not result in reduced VMT. Therefore, the Reduced Parking Alternative was rejected from further consideration due to its inability to reduce or avoid the significant impacts of the Project. No revisions to the Specific Plan or Draft EIR are required.

Response to Comment 1-9

The comment cites Executive Order (EO) N-79-20 and recommends the City incorporate electric vehicle (EV) charging stations for at least 15 percent of the parking spaces and EV ready spaces for at least 50 percent of parking spaces included in the Project to align with this EO.

Executive orders are binding on state government agencies but are not legally binding on cities and counties or on private development. As such, there is no requirement that the Project comply with EO N-79-20. Nonetheless, individual projects under the Specific Plan would be required to comply with the requirements of the California Green Building Standards Code, which requires new construction to include a certain amount of "EV Capable" parking spaces.[2] These requirements in the current (2019) version of the California Green Building Standards Code generally range from 6 to 10 percent of total parking spaces, depending on the land use type. Currently there are no mandatory

[2] "EV Capable" includes installation of "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s).

requirements for "EV Ready"[3] or "EV Installed"[4] spaces, although the provision of such spaces is encouraged. As stated on page 2-50 in Chapter 2, *Project Description*, of the Draft EIR, the Phase I Development would include parking spaces with EV charging stations (i.e., "EV Installed"). Page 2-50 has been revised to clarify the amount of Phase I Development parking spaces that would include EV charging stations:

"Consistent with the Specific Plan and the San Bruno Municipal Code, the Phase I Development would maintain a parking ratio at a minimum of 3 spaces per 1,000 square feet of development. At least 6 percent of the ~~The~~ Phase I Development's ~~would also include~~ parking spaces ~~with~~ would include EV charging stations ~~capabilities~~. On-street parking would also be located along the north side of Grundy Lane, except for portions intended for white curb loading zones."

Response to Comment 1-10

The commenter recommends the project:

- 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;
- Install all-electric appliances; and
- Eliminate the use of natural gas.

Responses to these specific recommendations are provided below in a parallel bullet list form (all-electric appliances and elimination of natural gas use are both covered under the final bullet).

- As described on pages 2-28 through 2-30 in Chapter 2, *Project Description*, of the Draft EIR, the Project proposes numerous improvements to the bicycle circulation system including new Class II striping bicycle lanes along portions of Cherry Avenue, Bayhill Drive, and San Bruno Avenue. In addition, the Project proposes to include a new Class III bicycle facility along portions of Cherry Avenue, Elm Avenue, and along all of Grundy Lane. The proposed bikeway network is designed to be consistent with the intent of the City's Walk 'n Bike Plan, providing direct and efficient access within and to the Project Site. The proposed facilities on Bayhill Drive/Euclid Avenue would connect to a Walk 'n Bike Plan-proposed facility that would then connect to both the Caltrain and BART stations. The comment does not provide evidence to support a determination that extending the proposed bicycle lanes to BART or Caltrain would reduce or avoid the Project's significant impact on VMT. Therefore, this revision to the Specific Plan and Draft EIR is not required. However, Policy 4-5 in the Specific Plan has been revised to the first/last mile study to study bicycle connections:

  "4-5: Encourage first-last mile shuttle service. Prepare a first/last mile study for travel between the Planning Area and BART and Caltrain Stations that includes a study of bicycle

[3] "EV Ready" includes "EV Capable" plus installation of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations.

[4] "EV Installed" includes "EV Ready" plus installation of a minimum number of Level 2 electric vehicle supply equipment (EV chargers).

connections. Encourage TDM programs to support high-frequency, reliable, all-day shuttle to BART and Caltrain stations and Downtown San Bruno; consider consolidating the two existing shuttle services, providing bidirectional service, and reducing headways."

- All development within the Bayhill Specific Plan, including the Phase I Development, would be subject to the bicycle parking standards established in San Bruno Municipal Code Chapter 12.100.050 (Bicycle Parking). Additional bicycle parking could be a component of an individual project's TDM program pursuant to Specific Plan Policy 4-9. The comment does not provide evidence to support a determination that providing bicycle parking in excess of San Bruno Municipal Code standards would reduce or avoid the Project's significant impact on VMT. Therefore, this revision to the Specific Plan and Draft EIR is not required. However, Policy 4-4 in the Specific Plan has been revised to encourage projects to provide bicycle parking in excess of City code standards:

  "4-4: Provide appropriate parking supply. Proposed off-street vehicle and bicycle parking and loading supply shall comply with San Bruno Municipal Code Chapter 12.100 (Off-Street Parking and Loading) and Parking Design Standards Resolution. Public parking and curbside loading surveys shall be prepared periodically and prior to each phase of development and the results used to re-evaluate parking supply and configuration. Projects are encouraged to provide bicycle parking in excess of the standards shown in Table 12.100-3 Required Bicycle Parking Spaces, of the San Bruno Municipal Code."

- Projects under the Specific Plan would be required to comply with Chapter 12.100.050(L) of the San Bruno Municipal Code, which requires nonresidential facilities that have a long-term bicycle parking requirement of thirty or more spaces to provide shower facilities for employees. Further, as stated on page 2-33 in Chapter 2, Project Description, of the Draft EIR, the largest employers at Bayhill, including YouTube and Walmart, have robust TDM programs that include showers for bicycle commuters. The Phase I Development would be subject to YouTube's existing TDM program. No revisions to the Specific Plan or Draft EIR are required.

- Specific Plan Policy 3-25 requires all new construction to include all-electric space and water heating. YouTube, the primary tenant in the Specific Plan Area, provides large commercial kitchens/cafeterias which require the use of natural gas for cooking. Therefore, it is not feasible for the City to require electric ranges for cooking, or to eliminate the use of natural gas altogether. The Specific Plan's approach for reducing natural gas usage is consistent with adopted building electrification ordinances throughout the Bay Area, many of which include exemptions for gas-powered cooking appliances and/or commercial kitchens (e.g., Brisbane, Burlingame, Menlo Park, East Palo Alto, Sunnyvale, and Los Altos). Furthermore, as discussed on pages 3.4-13 through 3.4-18 in Section 3.4, *Greenhouse Gases*, of the Draft EIR, the Project's significant and unavoidable greenhouse gas (GHG) impact is related to mobile-source emissions, not energy emissions. Impacts from energy emissions were determined to be less than significant because the Specific Plan includes policies and requirements that would ensure that future development would be consistent with the California Air Resources Board's (CARB) 2017 Scoping Plan's overall goal of reducing building energy emissions to meet the state's 2030 GHG reduction target. Therefore, requiring all-electric appliances and eliminating the use of natural gas would not reduce or avoid the Project's significant GHG impact. No revisions to the Specific Plan or Draft EIR are required. Please note that the reference to "Chapter 7, *Environmental Quality*, Policy 7-16," in Policy 3-25 of the draft Specific Plan was a typographical error, and has been corrected to refer to "Chapter 6, *Environmental Quality*, Policy 6-15."

Response to Comment 1-11

The comment correctly describes the impact analysis and mitigation measures in Section 3.2, *Air Quality*, of the Draft EIR.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 1-12

The commenter recommends that specific references in the Draft EIR to BAAQMD as the party that would oversee the project's offset emissions pursuant to Mitigation Measure AQ-6 and Mitigation Measure AQ-7 be revised to "an independent third-party approved by the City, such as the Bay Area Clean Air Foundation." The comment requests these revisions because BAAQMD does not currently have a fee program for offsetting emissions.

The text on page 3.2-29 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to reflect the requested change:

"Pursuant to **Mitigation Measure AQ-6**, applicants would be required to track all land use development construction activities occurring within the Project Site, assess and determine the estimated total emissions for all construction activities that would be concurrently ongoing (subject to City review and approval), and coordinate with an independent third-party approved by the City, such as the Bay Area Clean Air Foundation ~~BAAQMD to determine the mitigation fees for each development project's applicant to pay on a pro rata basis to BAAQMD~~ to offset their pollutant emissions as necessary such that BAAQMD's daily pollutant thresholds would not be exceeded."

The text on pages 3.2-31 and 3.2-32 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to reflect the requested change:

"Through implementation of **Mitigation Measures AQ-7**, applicants would determine the estimated total emissions for operational activities and ~~BAAQMD would determine the mitigation fees for each development project's applicant to pay on a pro rata basis to BAAQMD~~ coordinate with an independent third-party approved by the City, such as the Bay Area Clean Air Foundation to offset their pollutant emissions as necessary such that BAAQMD's daily pollutant thresholds would not be exceeded. Offsetting emissions below BAAQMD's threshold levels would ensure future development under the Specific Plan would not contribute a significant level of air pollution such that regional air quality within the SFBAAB would be degraded."

Response to Comment 1-13

The commenter recommends that offset emission purchases for air quality and GHGs use a preferential hierarchy that first benefits the community, the City, or the Bay Area region, in that order. The comment is in reference to Mitigation Measures AQ-6 and AQ-7 in Section 3.2, *Air Quality*, of the Draft EIR, which require mitigation credits to be purchased to offset construction and operational air pollutant emissions (respectively) if thresholds are exceeded, and Mitigation Measure GHG-3 in Section 3.4, *Greenhouse Gases*, of the Draft EIR, which requires mitigation credits to be purchased to offset GHG emissions if thresholds are exceeded.

Mitigation Measure GHG-3 includes language to this effect (refer to page 3.4-26 of the Draft EIR): "Applicants shall identify GHG credits in geographies closest to San Mateo County first and only go to

larger geographies (i.e., California, United States, global) if adequate credits cannot be found in closer geographies, or the procurement of such credits would create an undue financial burden." This language is appropriate for GHG emissions, which are global impacts. Therefore, no revisions to Mitigation Measure GHG-3 are required.

The text of Mitigation Measure AQ-6 on page 3.2-34 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to reflect the requested change:

"For proposed developments that are estimated to result in exceedances of thresholds, the applicants shall coordinate with a third-party or governmental entity to pay for criteria pollutant offsets for every year in which construction emissions are estimated to exceed the BAAQMD thresholds. If the estimate shows exceedances of multiple criteria pollutants above the BAAQMD thresholds, then offsets must be obtained to address each pollutant above the thresholds. Emission reduction projects and fees will be determined in consultation between the applicant and the third-party or governmental entity and will include offset provider administrative costs. Applicants shall identify credits within the San Francisco Bay Area Air Basin, and shall prioritize programs that benefit the Bayhill community, the City, or the Bay Area region, in that order. The agreement that specifies fees and timing of payment shall be provided to the City for review and signed by the applicant and the third-party or governmental entity. The emission reductions shall be secured prior to any year in which construction activity is estimated to result in an exceedance. The payment for the emissions can either be on an annual basis or done once upfront prior to construction."

The text of Mitigation Measure AQ-7 on pages 3.2-34 through 3.2.-35 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to reflect the requested change:

"For proposed developments that are estimated to result in exceedances of thresholds during any year of the project's life, the applicants shall coordinate with a third-party or governmental entity to pay for criteria pollutant offsets for every year in which operational emissions are estimated to exceed the BAAQMD thresholds. If the estimate shows exceedances of multiple criteria pollutants above the BAAQMD thresholds, then offsets must be obtained to address each pollutant above the thresholds. Emission reduction projects and fees will be determined in consultation between the applicant and the third-party or governmental entity and will include offset provider administrative costs. Applicants shall identify credits within the San Francisco Bay Area Air Basin, and shall prioritize programs that benefit the Bayhill community, the City, or the Bay Area region, in that order. The agreement that specifies fees and timing of payment shall be provided to the City for review and signed by the applicant and the third-party or governmental entity. The emission reductions shall be secured prior to any year in which operational activity is estimated to result in an exceedance. The payment for the emissions can either be on an annual basis or done once upfront prior to operation."

Response to Comment 1-14

The comment recommends that as part of Mitigation Measure AQ-8, Require Future Projects Located within 1,000 Feet of Sensitive Receptors to Perform a Health Risk Assessment, the City communicate its findings to the public for full disclosure prior to approving a project for which a health risk assessment is required. Future health risk assessments prepared under Mitigation Measure AQ-8 would be made publicly available as part of the case files for the subject projects. No revisions to the Draft EIR are required.

Response to Comment 1-15

The commenter advises the City to comply with Air District Regulation 6, Rule 6.

The text on page 3.2-5 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to clarify that the Project is subject to this requirement:

"In addition to air quality plans, BAAQMD also adopts rules and regulations to improve existing and future air quality. The Project may be subject to the following district rules.

- **Regulation 2, Rule 2 (New Source Review)**—This regulation contains requirements for Best Available Control Technology and emission offsets.
- **Regulation 2, Rule 5 (New Source Review of Toxic Air Contaminates)**—This regulation outlines guidance for evaluating TAC emissions and their potential health risks.
- **Regulation 6, Rule 1 (Particulate Matter)**—This regulation restricts emissions of particulate matter (PM) darker than No. 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.
- **Regulation 6, Rule 6 (Prohibition of Trackout)**—This regulation prohibits 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."

Response to Comment 1-16

The commenter advises the City to comply with Air District's Authority to Construct/Permit to operate for stationary equipment.

The text on page 3.2-5 in Section 3.2, *Air Quality*, of the Draft EIR has been revised to clarify that the Project is subject to this requirement:

"In addition to BAAQMD rules and regulations, BAAQMD is also responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. The Project may require the following permit(s).

- **Apply for an Authority to Construct / Permit to Operate**—Air quality permits are required by law as a part of doing business in the Bay Area. As the Project includes two emergency generators, the Project applicant will need to apply for an Air District Authority to Construct/Permit to Operate."

Responses to Comment Letter 2 (Caltrans – District 4)

Response to Comment 2-1

The comment includes introductory remarks and correctly summarizes the Project.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-2

The comment introduces Caltrans' approach to their review in light of Senate Bill 743.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-3

The comment states that the Draft EIR's analysis of transportation impacts is consistent with the Office of Planning and Research's (OPR) Technical Advisory on evaluating VMT impacts. The comment also acknowledges the Draft EIR's conclusion regarding the Project's significant and unavoidable VMT impacts, and the existing TDM program implemented by YouTube.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-4

The comment acknowledges the City's role in overseeing TDM programs and expresses supports for measures to increase sustainable mode shares.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-5

The comment recommends replacing all standard basic crosswalk markings on El Camino Real from San Bruno Avenue to Sneath Lane with a higher visibility crosswalk pattern.

The Specific Plan calls for the replacement of all crossings at Bayhill Drive and El Camino Real (Specific Plan Figure A-28) and at San Bruno Avenue and El Camino Real (Specific Plan Figure A-30) with high-visibility crosswalks. The Specific Plan would also add corner bulb outs and pedestrian refuges on the El Camino Real legs at these intersections. The Specific Plan is not expected to generate much pedestrian traffic north of Bayhill Drive/Euclid Avenue on El Camino Real since Bayhill Drive is the northernmost pedestrian entrance to the Project Site. For this reason, the crosswalks north of Bayhill Drive/Euclid Avenue are not planned for enhancement under the Specific Plan, nor are such improvements required under CEQA. These crossing and pedestrian routes are required to be studied, however, as part of Specific Plan Policy 4-5, which includes a requirement to study bicycle and pedestrian connections between the Specific Plan area and BART and Caltrain stations. This study is suggested to begin after the Phase I Development is complete and travel patterns and desire lines can be studied in more detail. If pedestrian demand at those crossings exceeds expected demand, the City would re-evaluate high visibility crossings at those intersections along El Camino Real. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-6

The comment notes that the Walk 'n Bike Plan calls for intersection improvements along El Camino Real and recommends that these improvements be implemented by the Project within the Project study area. The area that is comprises the "Project study area" is unclear.

The Project Site does not include any El Camino Real intersections; however, given the expected increase in Project-related pedestrian volumes between Bayhill Drive and San Bruno Avenue, the Specific Plan calls for pedestrian improvements at these intersections. The Specific Plan requires

replacement of all crossings at Bayhill Drive and El Camino Real (Specific Plan Figure A-28) and at San Bruno Avenue and El Camino Real (Specific Figure A-30) with high-visibility crosswalks. The Specific Plan also requires corner bulb outs and pedestrian refuges on the El Camino Real legs at these intersections. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-7

The comment encourages fair share contributions towards Walk 'N Bike Plan recommendations for striping and signage bicycle improvements at I-380/I-280/San Bruno Avenue West. The comment also recommends curb ramp and other connectivity improvements around the Project area.

The Project includes connectivity improvements within the Project Site as well as along El Camino Real and San Bruno Avenue West. As recommended by the comment, the Project includes fair share contributions towards the buffered Class II bicycle facilities on San Bruno Avenue West. The Project includes an opportunity, pending further study, to extend the San Bruno Avenue bicycle lines west from Cherry Avenue to the I-280 ramps and overpass as proposed in the Walk 'N Bike Plan. San Bruno Avenue West does not intersect I-380.

Response to Comment 2-8

The comment notes that the Phase I Development will require encroachment permits for both surface and airspace to install tiebacks as diagrammed in Appendix 5 of the Draft EIR. The comment also requests that property lines be clarified after page 3 of Appendix 5, stating that it is not clearly marked where the tiebacks fall within Caltrans' right-of-way.

The comment is acknowledged and has been conveyed to the Phase I Development applicant. When the Phase I Development applicant submits revised plans to Caltrans for review, property lines and the location of all tiebacks within Caltrans' right-of-way will be clearly delineated.

In addition, the text on page 2-51 in Chapter 2, *Project Description*, of the Draft EIR has been revised to refer to the airspace lease agreement:

"Construction of the Phase I Development subterranean parking structure would require installation of a temporary shoring system to ensure soil stability during construction. The temporary shoring system would consist of soldier pile walls with tiebacks along the excavation perimeter. Approximately 140 tiebacks and appurtenances along the northern boundary of the Project Site would be located within State highway right-of-way (Interstate 380) and would require an encroachment permit and airspace use agreement from the California Department of Transportation (Caltrans) for tieback supports. The Phase I Development temporary shoring plan, and an exhibit showing encroachment into Caltrans' right-of-way, is provided in Appendix 5 of this Draft EIR."

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis.

Response to Comment 2-9

The comment provides additional information on what is required as part of the encroachment permit application process.

The comment is acknowledged, and the information has been conveyed to the Phase I Development applicant. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-10

The comment notes that any Caltrans facilities impacted by the Project must meet American Disabilities Act (ADA) Standards.

The comment is acknowledged. The Project would comply with all applicable ADA standards. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 2-11

The comment notes that the City of San Bruno is responsible for all Project mitigation including fair share contribution, financing, scheduling, implementation for needed improvements to the State Transportation Network (STN).

The comment is acknowledged. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 3 (San Francisco International Airport)

Response to Comment 3-1

The commenter expresses appreciation for the opportunity to comment on the Draft EIR and coordinate with the City.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 3-2

The commenter references past comment letters on the project, dated December 7, 2017 and August 14, 2019, and confirms that those letters did not identify any inconsistencies between the Project and the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO) (ALUCP).

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 3-3

The commenter correctly summarizes the main features of the Project.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 3-4

The comment amends remarks in past comment letters to correctly state that the northeastern portion of the Bayhill Specific Plan Area is within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour for SFO and that development within this contour would be subject to the provision of Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO (ALUCP) Policy NP-3 and Table IV-1, which limit the types of allowable development and require sound insulation and the grant of an avigation easement for types of development. The comment requests that the Specific Plan and YouTube Phase I Development include and apply these requirements.

The comment is consistent with the analysis of the Project's noise impacts presented in Section 3.7, *Noise*, of the Draft EIR. Pages 3.7-10 through 3.7-12 of the Draft EIR, including Figure 3.7-1, Year 2020 Airport Noise Contours, describe the 2012 ALUCP 65 dB CNEL noise contour in relation to the Project Site, noting that the 65 dB CNEL noise contour crosses the northeast corner of the Project Site. Page 3.7-45 of the Draft EIR states that residential land uses would not be permitted in this portion of the Project Site, and that the types of uses that are permitted are consistent with the uses allowed under the ALUCP for the 65 dB CNEL noise contour. The Specific Plan, as revised, also includes policies to ensure compliance with the ALUCP. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 3-5

The commenter states that overnight uses could experience noise disturbance from aircraft departures and recommends that any proposed residential or other sensitive uses should meet the interior noise requirements of the California Building Code and San Bruno General Plan.

Section 3.6, *Land Use and Planning,* of the Draft EIR addresses the issue of noise disturbance to overnight uses. Page 3.6-14 of the Draft EIR states "Overnight uses such as hotels and residential uses could experience some noise disturbances from aircraft departure. However, these noise disturbances would be mitigated by interior noise requirements as stipulated by the 2019 California Building Code and San Bruno General Plan. In addition, Section 11010 of the California Business and Professions Code requires individuals offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within 2 miles of the property or within an established AIA. Given the Project Site's proximity to SFO and location within an AIA, real estate disclosure notices are required in any notice of intention to offer the properties for sale within the Project Site." No revisions are required to the Draft EIR.

Response to Comment 3-6

The commenter includes a figure that correctly depicts the location of the 65 dB CNEL contour in relation to the Project Site. The 65 dB CNEL contour is also shown in Figure 3.7-1, Year 2020 Airport Noise Contours, in Section 3.7, *Noise*, of the Draft EIR.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 3-7

The comment states that SFO was not notified of the issuance of the Draft EIR and requests the City confirm that SFO is included on the distribution list for all notices regarding development and land use projects, including general plan, specific plan, and zoning updates, within the City.

A Notice of Availability (NOA) for the Draft EIR was sent to the following addresses via United States Postal Service (USPS) certified mail on January 12, 2021:

San Francisco International Airport
Airport Land Use Commission
Attn: Suzy Kalkin
555 County Center, 5th Floor
Redwood City, CA 94063
USPS tracking number: 70202450000145152358

San Francisco International Airport - Bureau of Planning and Environmental Affairs
Attn: John Bergener
P.O. Box 8097
San Francisco, CA 94128
USPS tracking number: 70202450000145152754

The certified mail receipts confirm that each notice was delivered on January 14, 2021. The City will coordinate with SFO to ensure that contact information and delivery methods for future CEQA notices are correct. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 4 (San Francisco Public Utilities Commission)

Response to Comment 4-1

The comment expresses appreciation for the opportunity to comment on the Draft EIR and thanks the City for its efforts to incorporate previous San Francisco Public Utilities Commission (SFPUC) comments on the revised NOP, dated July, 26, 2019. The commenter also thanks the project sponsor for the presentation of the preliminary conceptual plans on November 20, 2019. The commenter introduces the subject areas they intend to comment on: land use and parking, groundwater resources, and water demand. Responses to individual comments on these subject areas are provided below.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-2

The comment notes that the Draft EIR correctly describes the locations of two SFPUC right-of-way (ROW) easements within the Project Site and identifies applicable SFPUC policies. The comment also notes that the Draft EIR describes SFPUC's vetting process for the proposed use of its ROW.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-3

The comment states that the Phase I Development would affect the SFPUC ROW for the Sunset Supply Line and the Crystal Springs Pipeline No. 2 with the realignment of Grundy Avenue and Elm Avenue. The comment states that the two underground garages on either side of the SFPUC ROW would be connected by an underground pedestrian tunnel and a pedestrian bridge and reiterates that further project review is necessary once the project sponsor submits plans showing the construction method for protecting the SFPUC water transmission pipelines during construction of all the proposed elements within the SFPUC ROW easement and public ROW.

Comment noted. The Phase I Development applicant and applicants of future projects affecting SFPUC ROW easements will be required to consult with SFPUC and obtain consistency determinations from SFPUC prior to construction and operation of the subject projects. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-4

The comment notes that more information is needed regarding the overhead crossing and how it would allow for the passage and operation of a crane. The commenter includes a summary of the November 20, 2019 Project Review meeting for reference.

The comment is acknowledged, has been conveyed to the Phase I Development applicant, and will be conveyed to applicants of future development projects. The requested information is needed for SFPUC's Project Review process and is not relevant to the Draft EIR's analysis of the Project's potential impacts on the environment. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-5

The comment states that the proposed office development on the vacant hillside lot adjacent to 901 Cherry Avenue is located near SFPUC's San Andreas Pipeline Nos. 2 and 3, and further project review by the SFPUC's Project Review Committee will be necessary as plans are developed.

The comment refers to a cumulative project described on page 2-34 of the Draft EIR. This project is not part of the proposed Project that is the subject of the Draft EIR analysis. It is a cumulative project identified for purposes of the Draft EIR's cumulative impact analysis (refer to Table 3.0-1 in Chapter 3, *Environmental Impact Analysis*, of the Draft EIR). The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-6

The comment states that the project sponsor will continue to work with the SFPUC through its Project Review process to develop plans consistent with SFPUC plans and policies.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-7

The comment states that the Draft EIR's description of the Regional Groundwater Storage and Recovery Project (RGSR), as it appears in Section 3.5, *Hydrology and Water Quality* and Section 3.11, *Utilities and Services Systems*, is inaccurate. The commenter recommends that the City and EIR consultant meet with SFPUC staff to further discuss the matter. The comment states that the description of the RGSR in the Draft EIR is different than the description of the RGSR in the Project's Water Supply Assessment (WSA), which is included in Appendix 3.11-1 of the Draft EIR.

City staff, the EIR consultant, and the WSA consultant met with representatives from SFPUC via videoconference on March 25, 2021 to discuss this comment. Notes from the meeting are included in Appendix A of this Final EIR. At the meeting, SFPUC staff stated that text describing the RGSR in Section 3.5, *Hydrology and Water Quality,* and Section 3.11, *Utilities and Services Systems*, of the Draft EIR is inaccurate. SFPUC staff stated that text describing the RGSR in in the WSA (Draft EIR Appendix 3.11-1) is accurate. SFPUC staff requested that the City revise the Draft EIR's discussion of the RGSR to be consistent with the WSA's discussion of the RGSR in the Final EIR. The requested revisions to Section 3.5, *Hydrology and Water Quality,* and Section 3.11, *Utilities and Services Systems*, of the Draft EIR have been made and are shown in Chapter 4, *Revisions to the Draft EIR,* of this Final EIR. Due to the volume of revisions, they are not shown here in Chapter 3. The revisions to these sections do not affect the analysis or conclusions of the Draft EIR.

Response to Comment 4-8

The comment thanks the City for the opportunity to comment on the Draft EIR and provides additional contact information.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 4-9

The comment is an attachment of the November 20, 2019 Project Review Meeting Summary.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 5 (Sierra Club – Loma Prieta Chapter)

Response to Comment 5-1

The commenter provides a statement of introduction to the Sustainable Land Use Committee section of the Sierra Club (Loma Prieta Chapter) and expresses the committee's interest in issues related to GHG emissions, overuse of water supplies, and other impacts to the natural environment.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 5-2

The commenter asserts that while the alternatives are an improvement over the proposed Bayhill Specific Plan, even the Residential Alternative is insufficiently ambitious to address the housing needs of the area. The commenter asserts that the Peninsula has been pushed to a state of housing crisis due to the jobs-housing imbalance, resulting in longer commutes, congestion, and further paving of space for parking, which aggravates the urban heat island effect.

Under CEQA Guidelines Section 15131, economic or social effects are not considered significant effects on the environment. Rather, these effects are considered in the context of their potential linkage or indirect connections between the project and physical environmental effects. While inherently a social issue, the Bay Area's regional housing shortage can also result in secondary effects on the environment, as noted in the comment. Section 3.8, *Population and Housing* of Draft EIR, pages 3.8-18 through 3.8-20, discusses the Project's impacts related to secondary environmental impacts from regional jobs-housing imbalance. The analysis acknowledges that current housing shortages relative to a mismatch between housing demand and housing supply are resulting in some Bay Area employees choosing to live in areas on the edge of or outside the Bay Area because of housing affordability issues. Meeting the Bay Area's cumulative housing demand in outlying areas can result in secondary environmental impacts similar to those associated with housing development in Bay Area cities but can also result in the conversion of agricultural land and open space, in addition to additional vehicle miles traveled, greenhouse gas emissions, and air pollution associated with long commutes into and out of the Bay Area and/or the need to construct additional transit or roadway improvements. The Project would contribute to this effect. However, it is difficult to identify the specific nature, extent, and significance of secondary physical impacts on the environment due to the Project because it would require a regional determination of the precise location of additional growth in the myriad locations across the Bay Area and beyond. CEQA requires significance determinations to be made on the basis of substantial evidence, not speculation. As such, although a conclusion can be made that the Project would result in unplanned population and housing growth outside the city of San Bruno, a significance determination concerning the specific secondary physical impacts on the environment due to unplanned growth outside of San Bruno is not possible.

With regard to the Project's urban heat island effects, as discussed in Chapter 2, *Project Description*, the proposed project incorporates landscape design elements which would reduce the heat-island effect by requiring low-reflectance paving.

The commenter's opinion that the Residential Alternative is "insufficiently ambitious" is noted. Under CEQA Guidelines Section 15126.6, an alternative must be capable of feasibly attaining most of the basic project objectives and avoiding or lessening the significant environmental effects of the project. The Residential Alternative would increase the amount of allowable housing units on the Project Site by approximately 162 percent compared to the Project (1,499 dwelling units compared to 573 dwelling units), necessitating a decrease in the amount of allowable office space. As discussed in Chapter 5, *Analysis of Alternatives*, in the Draft EIR, numerous Project objectives relate to recognizing and enhancing Bayhill's essential nature as a business park/employment center and its role as a premier employment hub in the City. The Residential Alternative provides a feasible amount of housing that would still allow the City to meet the fundamental objectives of the Project. While the comment expresses a general preference for more housing, it does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3.

Response to Comment 5-3

The commenter asserts that the eastern area of the Project Site, which is currently zoned as "Community Office," is well suited for Transit Oriented Development due to its proximity to public transit and nearby commercial uses. The commenter further notes that this area is at low risk from sea level rise and is well-separated from other residential areas.

The comment refers to Parcels 14, 15, and 16. These parcels are currently used for hotel, office, and parking uses, and portions of the parcels are within the 65 db CNEL airport noise contour. Therefore, these parcels are unlikely to provide opportunities for future housing development. The Housing Overlay Zone includes parcels 4 and 13 because of their distance from the airport noise contour and their proximity to other residential uses. As shown in Specific Plan Table 2-2, the Specific Plan would allow for a total of 336,245 square feet of net new development on these parcels. It should be noted that the comment's statement that these parcels are located immediately adjacent to El Camino Real is incorrect. Rather, they abut other parcels that are immediately adjacent to El Camino Real and are part of the City's Transit Corridors Plan (TCP); these other parcels are not part the Specific Plan area and are subject to the policies and land use controls established in the TCP.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 5-4

The commenter states that it is the responsibility of every city to plan for the impact of increased office space on housing demand, and further asserts that the absence of new housing will drive up the cost of existing housing stock forcing lower income residents out of the city and into exurbs, driving sprawl.

See Response to Comment 5-2.

Response to Comment 5-5

The comment states that San Bruno is far behind on meeting its Regional Housing Need Allocation (RHNA) housing obligation for the current cycle and notes that in the next cycle the city will be responsible for twice as many units. The commenter urges the City to allow Transit Oriented Development housing near El Camino Real.

See Response to Comment 5-2 and Response to Comment 5-3.

Responses to Comment Letter 6 (YouTube (Josh Portner), Part 1)

Response to Comment 6-1

The commenter provides a statement of introduction, noting that they have been established in San Bruno since 2006, and expresses appreciation for their role as a corporate citizen of the community. The comment introduces the following comments on the Draft EIR, which are responded to below.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-2

The comment requests corrections to Table 2-5, *Proposed Development Allocations by Parcel*, on pages 2-25 to 2-26 of the Draft EIR, which shows proposed development allocations by parcel.

The proposed development allocations by parcel shown in Table 2-5 of the Draft EIR have been refined since initiating preparation for the Draft EIR. The correct allocations are shown in Table 2-2, *Potential Development Allocation of the Bayhill Specific Plan*, of the Specific Plan, which is included as Appendix 2 of the Draft EIR. For ease of reference, the Draft EIR has been revised to eliminate Draft EIR Table 2-5 and instead refer to Specific Plan Table 2-2. The Draft EIR evaluates the impacts of the Project at a program level based on the total buildout of the Project. Therefore, the minor revisions to the development allocations by parcel would not change the conclusions of the Draft EIR analysis.

The text on page vi of the Draft EIR has been revised as follows:

~~"2-5 Proposed Development Allocations by Parcel 2-25~~

2-~~5~~6 Buildings Proposed to be Demolished 2-36

2-~~6~~7 Cubic Yards of Excavated Soil by Phase 2-37

2-~~7~~8 Phase I Development Project Building Design Parameters 2-41

2-~~8~~9 Phase I Development Project Employee Generation 2-50"

The text on page 2-25 of the Draft EIR has been revised as follows:

"**Development Intensity and Allocation**

The Specific Plan regulates density across the Project Site by allocating additional allowed square footage to the 16 individual parcels that comprise the Project Site, shown in Figure 2-9. The specific parcel allocations are shown ~~in Table 2-5~~ in Table 2-2, Potential Development Allocation of the Bayhill Specific Plan, in the Specific Plan included in Appendix 2 of this EIR."

~~**Table 2-5. Proposed Development Allocations by Parcel**~~

~~Parcel No.~~	~~Address(es)~~	~~Parcel Size (sf)[a]~~	~~Existing Development (sf)~~	~~Proposed Land Use District~~	~~Potential Net New Development (sf)~~	~~Potential Total Development (sf)~~	~~Potential Residential (Units)~~
~~1~~	~~851 Cherry Ave.~~	~~432,420~~	~~117,843~~	~~BNC[b] / BMU[c]~~	~~5,000~~	~~126,848~~	~~210~~
~~2~~	~~899 Cherry Ave.~~	~~26,396~~	~~4,003~~	~~BNC / BMU~~			
~~3~~	~~850 Cherry Ave.~~	~~145,708~~	~~270,980~~	~~BRO[d]~~	~~5,000~~	~~275,980~~	
~~4~~	~~801-851 Traeger Ave.~~	~~264,366~~	~~134,712~~	~~BRO / BR[e]~~	~~125,000[f]~~	~~259,712~~	~~205~~
~~5~~	~~APN[i] 020-012-160~~	~~290,545~~ 290,634	~~0~~	~~BRO~~	~~287,000~~	~~287,000[g]~~	
~~6~~	~~901 Cherry Ave.~~	~~240,277~~	~~195,000~~	~~BRO~~	~~5,000~~	~~200,000~~	
~~7[h]~~	~~1000 Cherry Ave.~~	~~213,626~~	~~94,465~~	~~BRO~~	~~248,800~~	~~342,465~~	
~~8~~	~~1250 Grundy Ln.~~	~~75,233~~	~~67,586~~	~~BRO~~	~~5,000~~	~~72,586~~	
~~9~~	~~1100 Grundy Ln.~~	~~271,353~~	~~101,123~~	~~BRO~~	~~328,877~~	~~430,000~~	
~~10[h]~~	~~900 Cherry Ave.~~	~~151,869~~	~~102,252~~	~~BRO~~	~~192,000~~	~~294,252~~	
~~11~~	~~1150-1250 Bayhill Dr.~~	~~283,070~~	~~138,524~~	~~BRO~~	~~301,476~~	~~440,000~~	

12	950 Elm Ave.	117,852	106,099	BRO	52,568	158,667	
13[i]	1111 Bayhill Dr.	426,711	206,137	BRO / BR	363,863[f]	570,000	158
14	999-1001 Bayhill Dr.	263,835	140,969	BRO	290,735	431,704	
15	APN[j] 020-011-370	37,873	0	BRO	40,510	40,510	
16	1050 Bayhill Dr.	196,978	79,152	BRO	5,000	84,152	
Total		**3,438,112**	**1,758,845**	-	**2,435,747[k]**	**4,013,874**	**573**

[a] sf = square feet

[b] BNC = Bayhill Neighborhood Commercial

[c] BMU = Bayhill Mixed-Use Overlay

[d] BRO = Bayhill Regional Office

[e] BR = Bayhill Residential Overlay

[f] If residential uses are developed in the BMU or BR, office allocations would be reduced on these parcels by a ratio of 1,267 office sf per dwelling unit in Parcel 4 and 1,454 office sf per dwelling unit in Parcel 13.

[g] As stipulated by Policy 2-3 in the Specific Plan, if the Project is developed under the existing Development Agreement, the net new square footage allowed on Parcel 5 would be reduced from 287,000 square feet by the number of square feet developed under the Development Agreement.

[h] Part of Phase I Site.

[i] A civic use of up to 50,000 sf would be permitted on a 2.1-acre area in this parcel. If a civic use is developed, the corresponding area allocated to regional office use would be reduced at a ratio of 1:1.

[j] APN = assessor's parcel number

[k] Does not include unallocated square footage. EIR analysis is conservatively based on totals shown in Tables 2-3 and 2-4, which include unallocated square footage.

The text on page 3.1-10 of the Draft EIR has been revised as follows:

"As seen in Table 2-5 of the Specific Plan, in Under this scenario, the amount of office development is decreased on the land area within the housing overlay zone where housing is constructed."

The text on page 2-36 of the Draft EIR has been revised as follows:

"Table 2-56. Buildings Proposed to be Demolished."

The text on page 2-36 of the Draft EIR has been revised as follows:

"**Demolition**

It is anticipated that Project buildout would result in the demolition of seven existing buildings on the Project Site, comprising between 692,852–827,564 square feet of office space, depending on the development scenario. Table 2-56 lists the buildings that would be demolished under the Project. The three buildings located on the "Lakes" parcel (APN 020-015-030) would be demolished as part of the Phase I Development described below in Section 2.6.3.

Table 2-56. Buildings Proposed to be Demolished."

The text on page 2-36 of the Draft EIR has been revised as follows:

"An estimated total of 4,880,616 cubic yards of soil could be exported from the Project Site throughout the 20-year construction period, as shown in Table 2-67."

The text on page 2-37 of the Draft EIR has been revised as follows:

"Table 2-6~~7~~. Cubic Yards of Excavated Soil by Phase."

The text on page 2-41 of the Draft EIR has been revised as follows:

"Table 2-7~~8~~ below details the design parameters for each of the Phase I Development buildings. Conceptual renderings of the Phase I Development are included in Figure 2-16.

Table 2-7~~8~~. Phase I Development Project Building Design Parameters."

The text on page 2-50 has been revised as follows:

"As shown in Table 2-8~~9~~, based on the average of 1 job per 250 square feet for office, the proposed project would generate up to 1,760 employees.

Table 2-8~~9~~. Phase I Development Project Employee Generation."

Response to Comment 6-3

The comment notes that page 2-27 of the Draft EIR states that, "no more than 75 percent of the length of a building façade would be unbroken by a change in massing," and asserts that this is a different standard than what is included in the proposed zoning ordinance and Specific Plan.

The comment correctly identifies a typographical error on page 2-27 in Chapter 2, *Project Description*, of the Draft EIR. The text on page 2-27 of the Draft EIR has been revised as follows:

"No more than ~~75~~ 50 percent of the length of a building façade would be unbroken by a change in massing."

Response to Comment 6-4

The comment asserts that the Draft EIR incorrectly describes the proposed Elm Avenue shuttle loading zones on pages 2-30, 2-31, and 2-47 in Chapter 2, *Project Description*. The comment also requests a meeting with City staff to further discuss street sections.

There are two existing shuttle loading zones located on either side of Elm Avenue, just north of Bayhill Drive: one loading zone is located on the west side of Elm Avenue adjacent to 950 Elm Avenue and the other loading zone is located on the east side of Elm Avenue adjacent to the Marriott Hotel. The loading zone on the west side of Elm would be maintained under the Project, as shown in Specific Plan Figure A-14 (Appendix 2 of the Draft EIR) and accurately described on page 2-30 of the Draft EIR. The loading zone on the east side would be removed when the private multi-modal transportation hub is operational. Specific Plan Figure A-14 has been revised to show this.

The text on page 2-30 of Chapter 2, *Project Description*, of the Draft EIR has been revised as follows:

"**Elm Avenue**~~.~~ Elm Avenue, north of Bayhill Drive, would remain one lane in each direction and would terminate at Grundy Lane. A shuttle loading zone~~s~~ would be located on ~~either~~ the west side

of Elm Avenue just north of the Bayhill Drive intersection. Elm Avenue, south of Bayhill Drive, would be reduced to one lane in each direction with left turn pockets at the San Bruno Avenue and Bayhill Drive intersections."

There is no description of shuttle loading zones on page 2-31 of the Draft EIR. Page 2-47 of the Draft EIR describes the proposed shuttle bus pullout and loading zones on Cherry Avenue.

The comments regarding street sections and property dedications are not questions or concerns regarding the adequacy of the Draft EIR analysis. These comments are noted. No revisions to the Draft EIR are required.

Response to Comment 6-5

The comment requests clarification regarding how the below grade surface (bgs) excavation depths shown in Table 2-7 and Figure 2-11 in Chapter 2, *Project Description*, of the Draft EIR were derived from the NAVD88[5] excavation depths provided by YouTube. The comment requests a footnote be added to Table 2-7 on page 2-37 of the Draft EIR.

YouTube provided excavation depths for Phases I-V in NAVD88 feet. The Draft EIR presents excavation depths in NAVD88 feet and in bgs feet, since bgs is generally a more understandable metric to the layperson. To calculate bgs excavation depths, the EIR geographic information system (GIS) specialist began by identifying the NAVD88 elevation of each phase site using United States Geological Survey (USGS) Digital Elevation Model (DEM) data and comparing each elevation to the proposed NAVD88 excavation elevation to determine the depth of digging. A polygon was created around each parking garage and DEM data were extracted for the areas within each polygon to identify the different elevations across the polygon. The GIS specialist used 1/3 Arc second (10 meter) pixel data, the best resolution data available for the area. The GIS specialist used zonal statistics to identify the average ground elevation across each polygon and subtracted the elevation of the maximum excavation to arrive at the bgs depth of excavation. Excavation depths and quantities for parking garages outside of Phases I-V (i.e., garages, 6, 10, and 11) were estimated for purposes of the EIR analysis based on the garage footprint and number of parking spaces anticipated to be included in each garage.

Table 2-7 on page 2-37 of the Draft EIR has been revised as follows:

"[c] Max depth is measured to finished floor of lowest parking garage level. In the event of a conflict between the NAV88 elevations and bgs calculations, the NAV88 elevations control."

Response to Comment 6-6

The comment notes that the February 2021 date on page 2-34 of the Draft EIR should be changed to August 2021.

The comment correctly identifies a typographical error on page 2-34 in Chapter 2, *Project Description*, of the Draft EIR. The text on page 2-34 has been revised as follows:

[5] The North American Vertical Datum of 1988 (NAVD 88) is the vertical datum for orthometric heights established for vertical control surveying in the United States of America based upon the General Adjustment of the North American Datum of 1988.

"However, should this development occur after ~~February~~ August 2021, it would be regulated by the Specific Plan. Accordingly, the Specific Plan incorporates this amount of development in its policy framework, and the development is also reflected in the buildout projections in this EIR (see Tables 2-3 and 2-4). YouTube has not submitted a phasing plan for this site if development occurs after ~~February~~ August 2021. Should development proceed prior to expiration of the Development Agreement in ~~February~~ August 2021, the regulations of the Specific Plan and mitigations included in this EIR would not apply and the maximum remaining permitted density on Parcel 5 would be reduced from 287,000 square feet by the number of square feet developed under the Development Agreement."

Response to Comment 6-7

The comment states that the NAVD88 excavation depth for Phase I shown in Table 2-7 on page 2-37 in Chapter 2, *Project Description*, of the Draft EIR should be revised from 61 feet to 59 feet.

Table 2-7 is consistent with the August 2019 *YouTube Campus Phase I, San Bruno, California, Preliminary Geotechnical Report* prepared for the Phase I Development by ENGEO Incorporated, which is included as Appendix 3.0-2 of the Draft EIR. Page 2 of the Phase I Preliminary Geotechnical Report states: "Currently, the Phase 1 basement depths are anticipated to be at an elevation of 61 feet (NAVD88), approximately 45 to 55 feet from top of Sub-level 03 slab (the lowest basement level) to top of ground-level slab." No revisions to the Draft EIR are required.

See also Response to Comment 6-5.

Response to Comment 6-8

The comment states that the number of proposed tree removals for the Phase I Development cited on page 2-44 in Chapter 2, *Project Description*, of the Draft EIR is incorrect and should be revised.

The number of proposed tree removals for the Phase I Development cited in the Draft EIR is consistent with Sheet L-000 of the January 2020 YouTube Vesting Tentative Map and Phase 1 Entitlement Plans, the most recent plans that have been deemed complete by the City. These plans show 154 proposed tree removals including 135 heritage trees. No revisions to the Draft EIR are required.

Response to Comment 6-9

The commenter notes that page 2-53 in Chapter 2, *Project Description*, of the Draft EIR should be revised to remove the reference to the Bayhill Specific Plan Development Permit as a discretionary approval required for the Phase I Development.

The comment is correct. The text on page 2-17 of the Draft EIR has been revised as follows:

"Future actions that would be reviewed in this context may include, but are not limited to, the following:

- Discretionary development plan approvals, such as tentative maps, conditional use permits, architectural review permits, ~~Bayhill Specific Plan Development Permits,~~ and other land use permits."

The text on page 2-53 of the Draft EIR has been revised as follows:

"The project applicant anticipates the following discretionary entitlements will be required from the City of San Bruno to implement the Phase I Development:

- Development Agreement
- Vesting Tentative Map, including related street vacations and dedications, and street and utility easements
- ~~Bayhill Specific Plan Development Permit (proposed new permit type created in the Specific Plan)"~~

Response to Comment 6-10

The comment states that the number of proposed tree removals for the Phase I Development cited on page 3-6 of the Draft EIR is incorrect and should be revised. The comment also requests additional language related to the tree replacement requirements be added.

See Response to Comment 6-8 regarding tree removals.

Specific Plan Policy 3-2 requires removed trees to be replaced at a 1:1 ratio, as noted on page 3.4-17 in Section 3.4, *Greenhouse Gases*, of the Draft EIR. In response to the comment, the text on page 3-6 of the Draft EIR has been revised as follows:

"The Phase I Development would result in the removal of approximately 135 heritage trees, as well as street trees. Additional heritage and street tree removals would occur with implementation of the Project. The Project, including the Phase I Development, would be required to comply with all applicable Municipal Code requirements related to the removal and replacement of heritage trees and street trees, including securing all necessary permits. <u>In accordance with Specific Plan Policy 3-2, new trees would be planted in a 1:1 ratio to compensate for the trees to be removed, and the Specific Plan calls for the use of large canopy trees as the predominant plant material.</u> Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, such as trees. This impact would be ***less than significant*** for the Project and the Phase I Development."

Response to Comment 6-11

The comment requests clarification regarding the scope of and process involved in the Archaeological Monitoring Plan (AMP), which is included in Policy 6-27 of the Specific Plan and is referenced on page 3-9 of the Draft EIR. The commenter expresses the belief that the AMP should be a "one-page fact sheet" and questions the robustness of the policy language, asserting that the Project Site is disturbed and the risk for encountering an archaeological resource is "very low."

The Project's potential impacts to cultural resources, including archaeological resources, are evaluated on pages 3-7 through 3-9 of the Draft EIR. As discussed, while there are no known archaeological resources on the Project Site, the archaeological sensitivity of the Project Site is considered high based on the historical presence of the San Bruno Creek, which used to flow through the Project Site. Furthermore, as discussed on page 3-8 of the Draft EIR, a cultural records search conducted for the Project yielded four archaeological resources within a 0.5-mile radius of the Project Site. As Project excavations are expected to reach a depth of 55 feet bgs, and the geotechnical investigation reported pre-engineered fill in only in the first 20 feet (and as shallow as 2-5 feet in places), excavation would extend into native soils, increasing the likelihood that a previously unknown resource could be encountered. Therefore, the Draft EIR's conclusion that the Project Site has an increased sensitivity for encountering archaeological resources is supported by

substantial evidence, and the detailed performance standards stipulated in Policy 6-27 of the Specific Plan are appropriate. No revisions to the Specific Plan or Draft EIR are required.

An AMP is a standard tool designed to establish a defensible framework for how archaeological work would be implemented, and to expedite the process if cultural resources are encountered. The purpose of an AMP is to provide a framework to guide archaeological monitoring for a project, detail the procedures that would be followed if potential significant archaeological resources or human remains are encountered during project-related ground disturbance, and summarize the post-monitoring reporting requirements. There is no universal standard that guides the scope, contents, or length of an AMP. The City expects the AMP for the proposed project to describe monitoring areas, ground-disturbing activities, monitoring procedures, protocol for unanticipated discoveries, and reporting requirements.

Response to Comment 6-12

The comment asserts that page 3-12 of the Draft EIR incorrectly states that the buildings that would be demolished as part of the Phase I Development are unlikely to contain Asbestos Containing Material (ACM), and states that pre-demolition surveys of these buildings found ACM. The comment further asserts that asbestos and lead are commonly found in existing buildings and should be mitigated in accordance with all applicable regulations, making this impact less-than-significant with mitigation.

The pre-demolition surveys referenced in the comment have been added to the Draft EIR administrative record and the Draft EIR has been revised accordingly, as indicated below. Because the impact would be avoided through compliance with existing regulations and legal requirements, mitigation is not required, and the impact would be less than significant.

The text on page 3-12 of the Draft EIR has been revised as follows:

"Buildings and structures built prior to 1977 could potentially contain asbestos-containing materials (ACMs), and buildings and structures built prior to 1972 could potentially contain lead-based paint (LBP). ~~The buildings on the Phase I Site were constructed in 1978 and are unlikely to contain ACM or LBP.~~ The three buildings at 1150-1250 Bayhill Drive that would be demolished as part of the Phase I Development were constructed in 1976. According to the pre-demolition ACM surveys conducted for the buildings (FACS 2019a, 2019b, 2019c, 2019d, 2019e, 2019f), ACM and lead are known to be present. As shown in Table 2-2 in Chapter 2, Project Description, other buildings on the Project Site appear to have been constructed sometime after 1972, and as such could contain ACM but would be unlikely to contain LBP. If ACM or LBP are encountered during building demolition, suspect materials would be removed by a certified abatement contractor in accordance with applicable regulations, including Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, Asbestos, Demolition, Renovation and Manufacturing. In addition, the San Bruno General Plan Health and Safety Element includes Policies HS-28 and HS-29 regarding the siting of new uses in areas which contain ACM and LBP that would minimize the risk from upset and accident conditions involving these materials. For the above reasons, impacts associated with risk of upset from ACM and LBP would be less than significant under the Project and Phase I Development."

Response to Comment 6-13

The commenter states that the number of proposed heritage tree removals for the Phase I Development cited on page 3.1-17 the Draft EIR is incorrect and should be revised.

See Response to Comment 6-8.

Response to Comment 6-14

The commenter states that the Phase I Development would not include any illuminated signage and requests that the header on page 3.1-19 of the Draft EIR, which reads "Vehicle Headlights and Illuminated Signage," be revised to reflect that fact.

The City has not received a signage plan for the Phase I Development. In the absence of a signage plan, the City has exercised its discretion in evaluating the potential environmental impacts that could result from illuminated signage in the Draft EIR. Including this analysis in the Draft EIR does not obligate the Phase I Development applicant to construct illuminated signage. No revisions to the Draft EIR are required.

Response to Comment 6-15

The commenter requests that "San Francisco-Arkansas" be changed to "Arkansas Street" on page 3.2-10 and globally.

This text is referring to the ambient air quality monitoring station commonly referred to by the BAAQMD as the "San Francisco-Arkansas" station. It is not referring to Arkansas Street, as the commenter may have assumed. No revisions to the Draft EIR are required.

Response to Comment 6-16

The commenter requests revisions to Table 3.2-2 in Section 3.2, Air Quality, of the Draft EIR.

The comment correctly identifies a typographical error on page 3.2-10 of the Draft EIR. The text has been revised as follows:

"Table 3.2-2. Ambient Air Quality Data at the San Francisco-Arkansas Monitoring Station (~~2015-2017~~ 2016-2018)."

Response to Comment 6-17

The comment asks what standard the Project is measured against in the Draft EIR's evaluation of potential air quality impacts. The comment also inquires about anticipated fees/payments for exceeding BAAQMD standards.

BAAQMD establishes daily criteria pollutant emission thresholds that apply to both construction and operation impacts. These thresholds, which are shown in Table 3.2-5 on page 3.2-17 of the Draft EIR, are measured in terms of lbs/day (e.g., 54 lbs/day of NOx). Daily net emissions (i.e., daily emissions from proposed uses – daily emissions from existing uses) are compared to the BAAQMD's daily emissions thresholds to determine impact significance. This methodology is described in Section 3.2.2.2, *Methodology and Approach*, in Section 3.2, *Air Quality*, of the Draft EIR.

The comment's question about fees is assumed to refer to Mitigation Measure AQ-6 and Mitigation Measure AQ-7 in Section 3.2, *Air Quality*, of the Draft EIR, which require the purchase of mitigation credits for construction and operational impacts that exceed BAAQMD's criteria pollutant emission thresholds. The cost of mitigation credits to offset criteria pollutant emissions is dependent on: 1) the types of pollutants being offset; 2) the quantity of pollutants being offset; and, 3) the offset

program being used. Because the exact amounts and types of development that would occur under the Specific Plan are not known, an estimate of fees cannot be provided at this time.

No revisions to the Draft EIR are required.

Response to Comment 6-18

The commenter requests that Mitigation Measure AQ-5, Require Fugitive Dust Best Management Practices, in Section 3.2, *Air Quality*, of the Draft EIR be revised to require exposed surfaces to be watered "as needed" rather than two times per day.

Mitigation Measure AQ-5 is consistent with BAAQMD's "Basic Construction Mitigation Measures Recommended for ALL Proposed Projects" in its 2017 *CEQA Guidelines*, which state that "[a]ll exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day."[6] This is a standard construction best management practice for all projects in BAAQMD's jurisdiction. No revisions to the Draft EIR are required.

Response to Comment 6-19

The comment requests revisions to Table 3.2-9, Estimated Maximum Daily Unmitigated Operational Emissions for the Phase I Development (pounds/day), on page 3.2-37 of the Draft EIR.

The analysis in Section 3.2, *Air Quality*, and Section 3.4, *Greenhouse Gasses*, of the Draft EIR, evaluates Project impacts on air quality and greenhouse gas emission be comparing Project and Phase I Development emissions to existing baseline conditions. The requested revisions suggest that Project and Phase I Development impacts should be determined based on a comparison to future baseline conditions, rather than existing baseline conditions. While CEQA states that baseline conditions normally constitute existing conditions at the time of the NOP (CEQA Guidelines Section 15125), CEQA allows for the application of an adjusted baseline if there is substantial evidence to suggest that the use of an existing baseline would result in a misleading conclusion or an unrealistic depiction of project impacts. The City agrees with the comment, and has determined that there is substantial evidence to support the use of a future baseline in the Draft EIR's evaluation of operational air quality and GHG impacts for the following reasons:

1. The vehicle fleet mix in San Mateo County will be different by Phase I Development buildout in 2025 and Project buildout in 2040, as the percentage of truck traffic to all vehicle traffic changes. According to Caltrans' CT-EMFAC2017 emissions model (version 1.0.2.27401), in 2018, 5.4 percent of the San Mateo County fleet mix was made up of trucks, while the fleet mix will increase to 6.5 percent in 2025 and 7.7 percent in 2040. Trucks have different emission profiles and are generally more emission-intensive than passenger vehicles. Quantifying emissions under existing conditions could misrepresent vehicle emissions associated with the vehicle fleet that will be in place once the Project is fully operational.

2. On-road vehicle emission rates are anticipated to lessen in the future due to continuing engine advancements and more stringent air quality regulations. Analyzing existing conditions (2018) and quantifying emissions utilizing 2018 vehicle emissions rates instead of the reduced 2025

[6] Bay Area Air Quality Management District, CEQA Guidelines, Table 8-2, p. 8-4. May 2017. Available online: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed April 30, 2021.

and 2030 vehicle emission rates could misrepresent the net impact of the Project and Phase I Development, and could also overestimate emissions reductions and potential air quality benefits achieved by the Project and Phase I Development (i.e., the Project/Phase I Development would appear to "take credit" for emission efficiencies that are actually attributable to more stringent regulations).

Accordingly, the analyses of operational air quality and GHG impacts in Section 3.2, *Air Quality*, and Section 3.4, *Greenhouse Gasses*, of the Draft EIR have been revised to provide a comparison of Project and Phase I Development impacts to future baseline conditions. Parallel revisions were also made to the alternatives analysis in Chapter 5, *Analysis of Alternatives*, in the Draft EIR. The revisions are shown in Chapter 4, *Revisions to the Draft EIR*, of this Final EIR. Due to the volume of revisions, they are not shown here in Chapter 3. While some of the Project and Phase I Development's net emissions would increase, no new significant impacts would occur that were not already identified in the Draft EIR. Therefore, the revisions do not constitute substantial new information pursuant to CEQA Guidelines Section 15088.5, and recirculation of the Draft EIR is not required.

Response to Comment 6-20

The commenter identifies a typographical error of page 3.3-17 of the Draft EIR.

The text on page 3.3-17 has been revised as follows:

"These anticipated increases would be countered, in part, by ongoing increases in state and local requirements related to renewable energy and increased energy efficiency.''

Response to Comment 6-21

The comment requests revisions to pages 3.4-3 and 3.10-5 in the Draft EIR related to discussions of VMT.

The text on page 3.4-3 of the Draft EIR has been revised as follows:

"CEQA Requirements to Assess Vehicle Miles ~~Travelled~~ Traveled

As discussed in Section 3.10, *Transportation*, SB 743 (2013) requires revisions to the CEQA Guidelines that establish new impact analysis criteria for the assessment of a project's transportation impacts. The intent behind SB 743 and revising the CEQA Guidelines is to integrate and better balance the needs of congestion management, infill development, active transportation, and GHG emissions reduction. ~~The Office of Planning and Research (OPR) recommends that vehicle miles traveled (VMT) serve as the primary analysis metric, replacing the existing criteria of delay and level of service. In 2018, OPR released a technical advisory outlining potential VMT significance thresholds for different project types.~~ The new vehicle miles traveled (VMT) methodology is required as of July 1, 2020~~, though it can be used earlier~~. The ~~City chose to base its~~ impact analysis for this EIR is based on VMT (see Section 3.10, Transportation)."

The text on page 3.10-5 of the Draft EIR has been revised as follows:

"This shift in transportation impact criteria is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. The new vehicle miles traveled (VMT) methodology is required as of July 1, 2020. ~~Specific to SB 743, Section 15064.3(c) of~~

~~the revised CEQA Guidelines states that, "a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide." However, CEQA Statute Section 21099(b)(2) states that, "upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the Guidelines."~~

~~Although the Governor's Office of Planning and Research (OPR) provides recommendations for adopting new VMT analysis guidelines, lead agencies have the final say in designing their methodology. Lead agencies must select their preferred method of estimating and forecasting VMT, their preferred significance thresholds for baseline and cumulative conditions, and the mitigation strategies they consider feasible. Lead agencies must prove that their selected analysis methodology aligns with SB 743's goals to promote infill development, reduce GHGs, and reduce VMT~~."

Response to Comment 6-22

The comment requests a minor editorial change to the text on page 3.4-21 of the Draft EIR.

The text on page 3.4-21 has been revised as follows:

"As discussed in Section 3.10, *Transportation*, ~~prior to mitigation~~, the Phase I Development would increase per service population VMT, relative to existing conditions in 2022 and would not meet the 14.3 percent VMT per service population reduction target and therefore, could conflict with the state's long-term emission reduction trajectory.''

Response to Comment 6-23

The comment asserts that the Draft EIR's analysis of the Phase I Development incorrectly reflects an increase in impervious surface area on the Phase I Site from 75 to 77 percent, and that the analysis should instead be based on a decrease in impervious surface area from 75 percent to 70 percent. The comment further asserts that because there would be no increase in impervious surface area on the Phase I Site, Mitigation Measure HWQ-2 should not be required for the Phase I Development.

The analysis of the Phase I Development's impacts to hydrology and water quality in Section 3.5, *Hydrology and Water Quality*, of the Draft EIR is based on the March 2020 *Hydrology and Water Quality Evaluation for the Bayhill Specific Plan and the YouTube Phase 1 Office Development* (HWQE) prepared by Kimley-Horn, which is included in Appendix 3.5-1 of the Draft EIR. The HWQE analysis is based on the October 2019 YouTube Vesting Tentative Map and Phase 1 Entitlement Plans, the plans that were available at the time the HWQE was prepared. The October 2019 plans showed an increase in impervious surface area and a corresponding increase in post-project runoff volumes for the Phase I Development. Accordingly, the Draft EIR (Impact HWQ-1b, pages 3.5-23 through 3.5-24) concluded that potential impacts to hydrology and water quality under the Phase I Development would be significant and mitigation is required. The Phase I Development applicant has since revised the Phase I Development site plans. The comment indicates that the revised site plans show a decrease in impervious area compared to existing conditions, which would result in decreased stormwater runoff volumes and a less-than-significant impact on surface water hydrology. Therefore, the Draft EIR analysis is conservative, and revisions are not required. The Phase I Development, as redesigned, still would be required to comply with Mitigation Measure HWQ-2

even with a decrease in impervious area, to demonstrate that there would be no increase in operational peak flows and to verify downstream pipe capacity.

Response to Comment 6-24

The comment asserts that the Draft EIR's statement regarding the groundwater elevation on the western side of the Project Site being "approximately 110 ft msl" does not match the findings in the geotechnical report or the EKI report.

The comment is incorrect. Page 7 of EKI's March 13, 2020 *Revised Groundwater Assessment in Support of Bayhill Specific Plan Environmental Impact Report,* included in Appendix 3.5-2 of the Draft EIR, states: "[T]he groundwater elevation is the greatest on the western side of the Specific Plan Area (~110 ft msl) and gradually gets shallower on the eastern side of the Bayhill Specific Plan Site (~8 ft msl) as seen in Figure 2. The inferred groundwater elevation was based on the most recent existing data from the 2018 *ENGEO Preliminary Geotechnical Report for Environmental Impact Report Review* and wells at four Geotracker Sites (T0608100660, T0608100126, T0608100147, and T0608100537)." No revisions to the Draft EIR required.

Response to Comment 6-25

The comment identifies a typographical error on page 3.6-17 of the Draft EIR.

The text on page 3.6-17 has been revised as follows:

"Table 3.6-2 shows some inconsistencies with the General Plan. However, these inconsistencies are either not associated with any negative environmental impact under CEQA or would be resolved with appropriate mitigation measures. The Project would thus be consistent with the majority of applicable goals, policies, and actions, resulting in ***an impact that is less than significant with mitigation*** ~~a ***less-than-significant impact***~~. ~~No mitigation measures are required.~~

Phase I Development

The Phase I Development was found to be consistent with the Land Use and Urban Design, Economic Development, Open Space and Recreation, Health and Safety, Public Facilities and Services, and Housing Elements of the General Plan. Using the same rationale for the consistency analysis of the Project, the Phase I Development's compatibility with the Transportation Element is classified as inconsistent with LOS policies set forth in the General Plan. However, while the City includes this question of vehicle delay and the General Plan's LOS policies in the Project in its planning considerations, vehicle delay is not considered to be an environmental impact under CEQA (see Section 3.10, *Transportation*, for further discussion). The Phase I Development's compatibility with the Environmental Resources and Conservation Element was found to be consistent with mitigation.

Given that the Project is consistent with the San Bruno General Plan's applicable goals, policies, and actions (with the exception regarding LOS policy discussed above), Phase I Development impacts due to conflicts with the General Plan would be ***less than significant with mitigation***. ~~No mitigation measures are required.~~"

Response to Comment 6-26

The comment requests two textural changes to Section 3.7, *Noise,* in the Draft EIR. The comment requests that the last sentence of page 3.7-53 be revised to read "less than significant with

mitigation." The comment also requests that the first sentence of the first paragraph on page 3.7-54 be revised to read "less than significant with mitigation."

On page 3.7-53 of the Draft EIR, the word "significant" was mistakenly bolded and italicized, the format used throughout the Draft EIR for the final impact conclusion of each impact analysis. The final impact conclusion for the analysis of the Phase I Development's construction-related noise impacts is actually on page 3.7-54, which states that the "impact would be considered ***less than significant with mitigation***."

The text on page 3.7-53 of the Draft EIR has been revised as follows:

"Since the Phase I Development's contribution could be up to 2 dB based on the direct impact analysis presented previously, the Phase I Development's contribution to this potential cumulative impact would be cumulatively considerable. This impact would be considered ~~***significant***~~ significant, and mitigation is required."

The first paragraph on page 3.7-54 of the Draft EIR describes the impact prior to mitigation, which is significant. The final impact conclusion is stated further down the page, in the first full paragraph after mitigation measure NOI-4, which states the "impact would be considered ***less than significant with mitigation.***"

To clarify the discussion, the text on page 3.7-54 of the Draft EIR has been revised by inserting and deleting text as follows:

"With implementation of the mitigation measures below, Phase I Development impacts would be reduced to less-than-significant levels, and the contribution of Phase I Development construction to the potential cumulative impact would not be cumulatively considerable. This impact would be considered ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure NOI-1, described previously, would reduce construction noise impacts from construction of the Phase I Development during nighttime hours to less-than-significant levels by ensuring that noise at a distance of 100 feet during nighttime hours would be below 60 dBA L_{eq}, unless a permit is first obtained from the director of the City Public Works Department or his/her designee).

Implementation of **Mitigation Measure NOI-4** would reduce the potential cumulative impact related to construction-related haul truck noise for the Phase I Development to a less-than-significant level.

> **Mitigation Measure NOI-4: Coordination of Phase I Development Haul Truck Routes with 901 Cherry Avenue (only required for Phase I Development).**
>
> Prior to the issuance of a grading permit, the City shall determine whether hauling activities associated with the Phase I Development could occur simultaneously with hauling activities associated with the 901 Cherry Avenue development. If it is determined that hauling activities for both projects could occur simultaneously, the applicant shall consult with the City to coordinate the appropriate haul route(s) so that both projects are not conducting hauling activities at the same time and along the same route. The final haul route shall be subject to City approval.

~~With implementation of these mitigation measures, Phase I Development impacts would be reduced to less-than-significant levels, and the contribution of Phase I Development construction to the potential cumulative impact would be not cumulatively considerable. This impact would be considered ***less than significant with mitigation.***~~"

Response to Comment 6-27

The comment requests the cumulative impact conclusion for public services on page 3.9-28 in Section 3.9, *Public Services and Recreation*, of the Draft EIR be revised from "less than cumulatively considerable" to "less than significant."

As discussed in the analysis of cumulative impacts on public services on Draft EIR pages 3.9-28 through 3.9-29, the Project, in combination with other past, present, and reasonably foreseeable projects, would increase the cumulative demand for fire protection, police protection, school, park, and library services, and a significant cumulative impact would occur. The analysis determines that the Project's contribution to the significant cumulative impact would be less than cumulatively considerable with the payment of development impact fees (DIF). Therefore, the Draft EIR text is correct, and no revisions are necessary.

Response to Comment 6-28

The comment requests a minor editorial change to the text in Section 3.10, *Transportation*, on page 3.10-25 of the Draft EIR. The comment also expresses confusion regarding TDM requirements, noting that the EIR Project Description states that TDM programs are "not a part of the Project" even though TDM programs are required by the Specific Plan and EIR Mitigation Measures.

The text on page 3.10-25 of the Draft EIR has been revised as follows:

"Although the Specific Plan ~~Project description~~ includes a TDM requirement, tenant-specific TDM strategies ~~TDM programs~~ are not permanent in the same way as built environment factors and land use diversity and ~~instead are tied to tenants, who often~~ their effectiveness can vary as tenants turn over during the life of a project."

YouTube's TDM program is included as a component of the Phase I Development project description, as described on pages 2-50 and 2-51 in Chapter 2, *Project Description*, of the Draft EIR. However, no single TDM program can be incorporated into the EIR Project Description for the entire Project since TDM programs are tenant-specific, and Specific Plan tenants would change over time. Therefore, Mitigation Measure TRA-1 in Section 3.10, *Transportation*, of the Draft EIR requires other Specific Plan tenants to implement TDM programs and establishes performance standards for those programs. Mitigation Measure TRA-1 is not applicable to the Phase I Development. The Specific Plan expands upon and memorializes the TDM requirement established in Mitigation Measure TRA-1. No further revisions to the Draft EIR are required.

Response to Comment 6-29

The comment requests text revisions to page 3.10-29 of the Draft EIR to clarify that construction of the Project would occur in accordance with Section 6.16.070 of the San Bruno Municipal Code, which allows for nighttime construction if a permit from the Director of Public Works is obtained.

The text on page 3.10-29 of the Draft EIR has been revised as follows:

"Potential construction impacts were assessed qualitatively, based upon preliminary construction information for the Project. Construction-related activities ~~would typically occur Monday through Friday, with limited construction activities outside of daytime hours or on weekends~~ would be subject to Section 6.16.070 of the San Bruno Municipal Code, subject to time of day and other restrictions pursuant to Mitigation Measure NOI-1 and project-specific conditions the City might require. Construction staging would typically occur within individual sites and outside of the public right-of-way."

This revision does not change the Draft EIR's conclusion that Project construction-related transportation impacts would be less than significant because the analysis is based on a threshold of whether the Project would result in inadequate access during construction. It is also noted that potential noise impacts associated with nighttime construction are evaluated in Section 3.7, *Noise*, of the Draft EIR on pages 3.7-23 through 3.7-24 (Project) and pages 3.7-34 through 3.7-36 (Phase I Development).

Response to Comment 6-30

The comment asserts that Table 3.11-5, *Proposed Water, Wastewater, and Storm Drain Improvements*, on page 3.11-20 of the Draft EIR (as well as Appendices 3.11-2 and 3.11-3) incorrectly describe the water line connection at Grundy Lane and Elm Avenue, and states that the water line will connect through the multimodal hub from Grundy Lane to Bayhill Drive (not Elm Avenue). The comment asserts that extending the sanitary sewer pipe east, past the multimodal hub, was studied but rejected due to the downward slope of the road and the upward slope required by the sanitary sewer pipe running east.

Figure 3.11-1 in Section 3.11, *Utilities and Service Systems*, of the Draft EIR has been revised to adjust the location of the existing water main in Elm Avenue, which was incorrectly shown. The revised figure is included in Chapter 4 of this Final EIR.

The City has the authority to determine the types and locations of public infrastructure improvements for all projects in the City's jurisdiction. The water line along Elm Avenue between Grundy Lane and Bayhill Drive is needed and should be within the public utility easement, not within the SFPUC easement. Dead ends in water systems reduce fire flow and lead to the deterioration of water quality. The comment regarding the sanitary sewer pipe on Grundy Lane relates to design-level specifics, and is not a question or concern regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-31

The commenter requests a minor editorial change to the text on page 4-2 in Chapter 4, *Other CEQA Considerations*, of the Draft EIR.

The text on page 4-2 of the Draft EIR has been revised as follows:

"Therefore, it is conservatively assumed that the cumulative health impacts from TAC emissions would be ***significant and unavoidable*** ~~after mitigation~~, and that the Project's contribution would be cumulatively considerable."

Response to Comment 6-32

The comment requests the text on page 5-10 in Chapter 5, *Analysis of Alternatives*, of the Draft EIR be revised to state that the Residential Alternative would achieve most, rather than all, of the Project objectives. The commenter asserts this change is justified because the Residential Alternative would not "strengthen its role as the City's premier employment hub" or "recogniz[e] Bayhill's essential nature as a business park/employee center" or "accommodate the expansion needs of existing businesses."

The Residential Alternative would allow for the construction of 1,773,636 square feet of net new office uses; therefore, as the discussion on page 5-10 of the Draft EIR explains, the Residential Alternative would still achieve the above stated goals, but to a lesser extent than the Project. No revisions to the Draft EIR are required.

Response to Comment 6-33

The comment asserts that the pervious surface calculations in Appendix 3.5-1, *Hydrology and Water Quality Evaluation*, are not current.

See Response to Comment 6-23.

Response to Comment 6-34

The comment asserts that the YouTube Vesting Tentative Map and Phase 1 Entitlement Plans dated October 2019, which evaluated in Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR, are no longer accurate.

See Response to Comment 6-23.

Response to Comment 6-35

The comment requests changes to the *Hydrology and Water Quality Evaluation for the Bayhill Specific Plan and the YouTube Phase 1 Office Development* included in Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR. The requested changes relate to the percentage of pervious surface area in the Project Site and Phase I Development Site.

See Response to Comment 6-23.

Response to Comment 6-36

The comment notes that the plan sheets were revised and resubmitted after the *Hydrology and Water Quality Evaluation for the Bayhill Specific Plan and the YouTube Phase 1 Office Development* (Appendix 3.5-1 of the Draft EIR) was prepared, and therefore the analysis is no longer accurate.

See Response to Comment 6-23.

Response to Comment 6-37

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 6-38

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 6-39

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 6-40

The comment describes an alleged error on page 6 of *Attachment D to Transportation Appendix – LOS Calculations/BHSP Alternatives Analysis* in Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR. The comment states that the net new office development associated with the Phase I Development should be 440,000 square feet, not 301,500 square feet as cited in the text.

The comment appears to confuse net new development with total development. As shown in Tables 2-3 and 2-4 in Chapter 2, *Project Description*, of the Draft EIR, the Phase I Development would demolish 138,524 square feet of existing offices use and construct 440,000 square feet of new office use. Therefore, the Phase I Development would result in 301,476 net new square feet of office use (rounded to approximately 301,500 square feet in the text referenced in the comment). No revisions to the Draft EIR or appendices are required.

Response to Comment 6-41

The comment contains a question on a traffic signal improvement required under the Specific Plan to address vehicular level of service (LOS) impacts.

Pursuant to CEQA Guidelines Section 15064.3, LOS impacts are not impacts on the environment. The improvement referenced in the comment has been identified for planning purposes, along with other vehicle delay-related improvements shown in Table 4-3 of the Specific Plan. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 6-42

The comment requests a change to page 2 of Appendix 3.11-2, *Water System Hydraulic Evaluation*, of the Draft EIR, replacing the 301,476 square feet of offices space with 400,000 square feet of office space.

As described in Response to Comment 6-40, the comment appears to confuse net new development with total development. The net new office square footage cited in the text is correct. However, to clarify that the demolished office uses are located outside the 8.15-acre Phase I Site, the text on page 2 of Appendix 3.11-2, *Water System Hydraulic Evaluation*, of the Draft EIR has been revised as follows:

"The first phase of the Project is YouTube's campus expansion plan (Phase I Development), which consists of adding 301,476 square feet (sf) of net new office space to <u>the Project Site</u> <u>by building</u>

440,000 square feet of new space while demolishing 138,524 square feet of office space on an adjacent property that will be the site of future phase development ~~8.15 acres~~."

Response to Comment 6-43

The comment asserts that various figures included in Appendix 3.11-2, *Water System Hydraulic Evaluation*, of the Draft EIR incorrectly show a water line in Elm Avenue.

See Response to Comment 6-30.

Response to Comment 6-44

The comment asks if the 8-inch lines appearing on Figure 1 of Appendix 3.11-3, *Sanitary Sewer Impact Study*, of the Draft EIR should be shown as 10-inch lines since the text suggests that 10-inch lines were modeled.

The model is based on the nominal diameter of the pipe, which is less than 10 inches. The 10-inch high-density polyethylene (HDPE) pipe is recommended to satisfy a minimum inner diameter of 8 inches. No revisions to Drat EIR Appendix 3.11-3 are necessary.

Response to Comment 6-45

The comment asserts that various figures included in Appendix 3.11-3, Sanitary Sewer Impact Study, of the Draft EIR, incorrectly show a water line in Elm Avenue, whereas it should be located at the intermodal station.

See Response to Comment 6-30.

Response to Comment 6-46

The comment states that the amount of unallocated square footage evaluated in Appendix 4, *Equivalency Analysis,* of the Draft EIR – 180,347 square feet – is slightly different than the amount of unallocated square footage cited elsewhere in the Draft EIR.

At the time the Equivalency Analysis was prepared, the Specific Plan included a total of 180,347 square feet of unallocated regional office space. Subsequent to the preparation of the Equivalency Analysis, the unallocated square footage in the Specific Plan was adjusted to 180,718 square feet, a difference of 371 square feet (equal to a square measuring 19 by 19 feet). This nominal difference would not change the conclusions of the Equivalency Analysis, which demonstrates that the potential environmental impacts of the equivalency exchanges under the Equivalency Program would be within the scope of the analysis included in the Draft EIR. While no revisions to the analysis in Appendix 4, *Equivalency Analysis,* of the Draft EIR are required, a footnote has been added to page 1 of Appendix 4 to clarify this difference.

The text on page 1 of Appendix 4, *Equivalency Analysis*, of the Draft EIR has been revised as follows:

"This appendix provides an analysis of the equivalency exchanges and demonstrates that the potential environmental impacts of the equivalency exchanges under the Equivalency Program would be within the scope of the analysis included in the EIR.~~2~~

[2] Subsequent to the preparation of this analysis, the unallocated square footage in the Specific Plan was adjusted from 180,347 square feet to 180,718 square feet, a difference of 371 square feet (equal to a square measuring 19 by 19 feet). This nominal difference would not change the conclusions of this analysis."

Responses to Comment Letter 7 (YouTube [Josh Portner], Part 2)

Response to Comment 7-1

The comment requests that the Phase I Development completion date be changed from 2022 to 2025 throughout the Draft EIR, noting that the Phase I Development schedule has been extended since preparation of the Draft EIR.

Revisions have been made throughout the Draft EIR to update the Phase I Development buildout year to 2025, as shown in Chapter 4, *Revisions to the Draft EIR,* of this Final EIR. The quantitative analyses affected by this change are the analyses in Section 3.2, *Air Quality*, Section 3.3, *Energy Use*, and Section 3.4, *Greenhouse Gases*, which are modeled based on 2022 emission factors. In each case, the analysis presented in the Draft EIR is more conservative since equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards, and since energy efficiency standards will become increasingly stringent over time. Therefore, the revisions do not constitute substantial new information requiring recirculation under CEQA Guidelines Section 15088.5.

Response to Comment 7-2

The comment requests that a summary of the less-than-significant finding all the topics covered by Impact AES-2 be added to page 3.1-20 in Section 3.1, *Visual Resources,* of the Draft EIR.

The text on page 3.1-20 of the Draft EIR has been revised as follows:

"Therefore, impacts related to vehicle headlights and illuminated signage would be ***less than significant***. No mitigation measures are required.

Conclusion

Project

As described above, the Project would not generate excessive light levels from interior and exterior lighting, vehicle headlights, or illuminated signage. Project buildings would not generate excessive glare. Therefore, light and glare impacts associated with the Project would be ***less than significant***. No mitigation measures are required.

Phase I Development

As described above, the Phase I Development would not generate excessive light levels from interior and exterior lighting, vehicle headlights, or illuminated signage. Phase I Development buildings would not generate excessive glare. Therefore, light and glare impacts associated with the Phase I Development would be ***less than significant***. No mitigation measures are required."

Response to Comment 7-3

The comment requests that the title of Table 3.2-14 in Section 3.2, Air Quality, of the Draft EIR be revised to reflect that the table refers to existing health risks.

The text on page 3.2-14 of the Draft EIR has been revised as follows:

"Table 3.2-3. Existing Health Risks within 1,000 feet of the Project Site."

Response to Comment 7-4

The comment requests that a footnote be added to page 3.10-11 in Section 3.10, *Transportation*, of the Draft EIR. The requested footnote includes text from CEQA Guidelines Section 15064.3(b)(1), which provides for a presumption of less-than-significant VMT impacts for projects within a half mile of either an existing major transit stop or a high-quality transit corridor stop. The comment notes that projects in Phase IV and Phase V would meet these criteria.

The City could choose to screen future phases from quantitative VMT analysis based on distance to the BART and/or Caltrain station. The El Camino SamTrans routes are not frequent enough to meet the definition of "high-quality" transit per Section 21155 of the Public Resources Code. Without more information on how the City would measure distance, it is too speculative to say which phases or parcels would be eligible under this criterion.

Further, the City notes that the use of the VMT screening criteria provided in CEQA Guidelines Section 15064.3(b)(1) is not mandatory, but is at the discretion of the lead agency. A project's proximity to high-quality transit is one of many considerations in assessing potential VMT impacts. The City does not have adopted VMT guidelines and could choose to apply different screening criteria in the future.

See Response to Comment 6-21 for further discussion of Draft EIR revisions made in response to this comment.

Response to Comment 7-5

The comment asserts that the second sentence on page 3.10-23 in Section 3.10, *Transportation*, of the Draft EIR is inconsistent with the description of the TDM requirements in Chapter 2, *Project Description*.

See Response to Comment 6-28.

Responses to Comment Letter 8 (YouTube [Josh Portner], Part 3)

On February 16, 2021, the commenter submitted a comment letter entitled "Draft Bayhill Specific Plan Comments." Although the letter was submitted as comments on the Specific Plan, it included several comments on the Draft EIR appendices. The comments on the Draft EIR appendices have been extracted into a separate document and are included herein as Comment Letter 8.

Response to Comment 8-1

The comment states that the amount of unallocated square footage evaluated in Appendix 4, *Equivalency Analysis,* of the Draft EIR – 180,347 square feet – is slightly different than the amount of unallocated square footage cited elsewhere in the Draft EIR.

See Response to Comment 6-46.

Response to Comment 8-2

The comment points to an alleged error on page 6 of *Attachment D to Transportation Appendix – LOS Calculations/BHSP Alternatives Analysis* in Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR. The comment states that the net new office development associated with the Phase I Development should be 440,000 square feet, not 301,500 square feet as cited in the text.

See Response to Comment 6-40.

Response to Comment 8-3

The comment infers that the YouTube Vesting Tentative Map and Phase 1 Entitlement Plans dated October 2019, which evaluated in Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR, are no longer accurate.

See Response to Comment 6-23.

Response to Comment 8-4

The comment asserts that the percentages of pervious and impervious surface cited on page 4 of Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR, are incorrect.

See Response to Comment 6-23.

Response to Comment 8-5

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 8-6

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 8-7

The comment is similar to the immediately preceding comments.

See Response to Comment 6-23.

Response to Comment 8-8

The comment requests a discussion regarding Figure 3 in Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR.

It is assumed that the comment refers to similar comments made by the commenter regarding the estimated depths of the proposed parking garages. See Response to Comment 6-5.

Response to Comment 8-9

The comment contains a question on a traffic signal improvement required under the Specific Plan to address vehicular LOS impacts.

See Response to Comment 6-41.

Response to Comment 8-10

The comment states "same as previous comment," referring to easement width requirements cited in Mitigation Measure Hydro 1B – Dedicate Storm Drain easements for Public Infrastructure, included in Appendix 3.5-1, *Hydrology and Water Quality Evaluation,* of the Draft EIR.

Based on the commenter's same comments on the Specific Plan, General Plan amendment, and zone change, the comment is understood to refer to funding requirements for upsizing easements, which is not a comment or question on the Draft EIR analysis. It is noted that the text cited in Appendix 3.5-1 is not included in an EIR mitigation measure. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-11

The comment states that the net new office development associated with the Phase I Development should be 440,000 square feet, not 301,476 square feet as cited in the text. The comment also states that the location of the proposed water line in Elm Avenue is incorrect.

See Response to Comment 6-42 regarding net new office square footage and Response to Comment 6-30 regarding the Elm Avenue water line.

Response to Comment 8-12

The comment requests that all traffic analysis supporting documentation (including Synchro intersection analysis outputs and cumulative 2040 traffic volumes with and without the proposed project) for all study intersections and scenarios analyzed in the Draft EIR be provided. The comment also requests a trips summary by intersection.

All of the requested materials have been provided to the commenter and are included in the Project's administrative record. The requested materials consist of spreadsheets and data files that are not suitable for inclusion in the EIR appendices; however, all files can be reviewed at the Community and Economic Development Department upon request. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-13

The comment refers to page 8 of the Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR and asks how certain values were calculated.

The requested calculations have been provided to the commenter and are included in the Project's administrative record. The requested materials consist of spreadsheets and data files that are not suitable for inclusion in the EIR appendices; however, all files can be reviewed at the Community and Economic Development Department upon request. The comment does not contain questions or

concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-14

The comment refers to page 8 of the Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR and asks how certain values were calculated.

The requested calculations have been provided to the commenter and are included in the Project's administrative record. The requested materials consist of spreadsheets and data files that are not suitable for inclusion in the EIR appendices; however, all files can be reviewed at the Community and Economic Development Department upon request. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 8-15

The comment requests clarification of the required VMT reduction percentage on page 10 of Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR.

The comment correctly identifies a typographical error on page 10 of Appendix 3.10-1, *Transportation Supporting Data*, of the Draft EIR. The text has been revised as follows:

"As described in the EIR, the Project requires a reduction of ~~23 percent~~ 22 percent under current conditions; therefore, implementation of a TDM program would not result in a significant reduction that would meet the VMT per Capita threshold."

Response to Comment 8-16

The comment asks if the 8-inch lines appearing on Figure 1 of Appendix 3.11-3, *Sanitary Sewer Impact Study*, of the Draft EIR should be shown as 10-inch lines since the text suggests that 10-inch lines were modeled.

See Response to Comment 6-44.

Responses to Comment Letter 9 (Alexander Melendrez)

Response to Comment 9-1

The comment provides an introduction and thanks the City for the opportunity to comment on the Draft EIR. The comment stresses that urgency is required in addressing the jobs-housing imbalance and asserts that the Bayhill Specific Plan provides an opportunity to address it. The comment asserts that the jobs-housing imbalance is an affordability, climate change, and equity issue and suggests that the Project is an opportunity to meet the City's RHNA allotment.

See Response to Comment 5-2.

Response to Comment 9-2

The comment expresses support for the Project's proposed housing overlay zone.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 9-3

The comment correctly summarizes and expresses support for the Residential Alternative evaluated in Chapter 5, *Analysis of Alternatives*, in the Draft EIR. The comment also expresses support for extending the proposed housing overlay zone into Parcels 14, 15, and 16, as the area is transit rich, close to amenities, and available for incentives to build market rate and affordable housing.

See Response to Comment 1-3, Response to Comment 5-2, and Response to Comment 5-3.

Responses to Comment Letter 10 (Dean J. Moser – Bayhill Office Partners, LLC)

Response to Comment 10-1

The comment asks if a property owner would be subject to any fees or taxes such as Mello-Roos or Community Benefit Fees if the property owner makes no increased use of their property.

Property owners within the Specific Plan area who do not redevelop their property would not be subject to development impact fees or community benefit contributions. There are a variety of other City fees that may apply, depending on property owner activities and/or future City actions (e.g., fees for service, inspections for minor improvements, etc.); however, these fees are not directly related to approval of the Specific Plan. There may also be existing or future fees or taxes that are not under the City's jurisdiction that may apply (e.g., those under jurisdiction of the County or State); however, these non-City fees or taxes are not directly related to approval of the Specific Plan. With regard to a Mello-Roos Community Facilities District (CFD), this mechanism requires approval by two-thirds of registered voters located in the district (or a two-thirds property owner vote based on acreage). The Specific Plan references a Mello-Roos CFD as one potential funding mechanism but does not recommend or authorize its approval. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 10-2

The comment asks if the 158 residential units allocated to the parcel containing 1111 Bayhill Drive can be used by another parcel.

The residential units permitted on a particular parcel are not transferable to another parcel because the Specific Plan does not have a policy for transfer of residential development (e.g., another parcel-specific equivalency ratio would need to be determined). The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 10-3

The commenter asks for confirmation that the parcel containing 801 – 851 Traeger Avenue can use either the 125,000 square feet of office space or the 205 residential units allocated to that parcel.

All office uses on the parcel would need to be removed for the development of the full 205 dwelling units. The property owner at 801-851 Traeger Avenue could build a combination of residential units and office. The 125, 000 square feet of office would be reduced by 1,267 square feet for each unit of residential use constructed, per Policy 2.8 and Table 2-3 in the Specific Plan. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 10-4

The commenter asks to which parcels the 1,070 dwelling units available under the Increased Height Alternative Maximum Housing Scenario would be allocated. The commenter also identifies a typographical error in Table 5-4 on page 5-13 the Draft EIR in the "Residential (DU)" column.

As stated on page 5-11 in Chapter 5, *Analysis of Alternatives*, in the Draft EIR, the 1,070 dwelling units under the Increased Height Alternative Maximum Housing Scenario would be located within the housing and mixed-use overlay zones, similar to the Project. The housing units are not allocated to particular parcels. The Increased Height Alternative is evaluated in the EIR as an alternative to the Project, pursuant to the requirements of CEQA. CEQA establishes that an alternative does not need to be discussed at the same level of detail as a project; rather, an alternative should be described with sufficient information to allow a fact-based comparison of the alternative with the project (CEQA Guidelines Section 15126.6). Because impacts are evaluated at a program level, specifying the parcel-level allocation of housing units under the Increased Height Alternative is not required to provide an adequate alternatives evaluation under CEQA. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR's alternatives analysis.

The text on page 5-13 in Chapter 5, *Analysis of Alternatives*, has been revised to remove a superscript letter typo attached to the number of dwelling units in Table 5-4. The text has been revised as follows:

"1,070[a]"

Response to Comment 10-5

The commenter asks if each area which is allowed residential development will have to provide underground parking since construction will occur on existing parking spaces. The commenter further asserts that each underground parking space has a cost of $40,000 and each residential unit requires 1.5 to 2 spaces.

As discussed on page 3.6-8 in Section 3.6, *Land Use and Planning*, of the Draft EIR, City Ordinance No. 1284 places height restrictions and limitations on above-ground parking structures. No above-ground parking structures are permitted as part of the Project. Therefore, potential future residential development would need to provide surface level/underground parking. The commenter's estimated per-unit cost for the construction of underground parking is noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 10-6

The commenter asserts that the 205 units allocated to Parcel 4 in the Specific Plan would not be economically feasible, nor would 158 units be feasible for Parcel 13. The comment provides estimates for the cost of a 289-unit residential project.

Comment noted. The commenter offers an opinion related to the cost of future housing development. The cost of any individual development project varies based on current market conditions, financing mechanisms, and other factors. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 11 (Janice Rodondi)

Response to Comment 11-1

The comment describes previous construction on the project site, and notes that damage to the commenter's home and other homes in the area was experienced due to the use of pile drivers. The comment also requests information about who to contact should damage-related effects occur at the commenter's home during Project construction.

The City acknowledges the commenter's concerns. While unknown, the type of pile driving used during construction of the existing on-site uses may have included impact pile driving, which is the most vibration intensive equipment used for construction projects. Impact pile driving can result in vibration levels of approximately 0.3 peak particle velocity (PPV) inches per second (in/sec) at distances of approximately 70 to 75 feet. As described on page 3.7-44 in Section 3.7, *Noise*, of the Draft EIR, the Project, including the Phase I Development, does not propose the use of impact pile driving; rather, all piles would be installed via auger drill. An auger drill can result in vibration levels of 0.3 PPV in/sec at distances of approximately 11 to 12 feet, and is much less impactful to adjacent properties than an impact pile driver.

Section 3.7, *Noise*, of the Draft EIR, includes an analysis of the potential for building damage to occur as a result of vibration generated by Project construction. See Impact NOI-2a and Impact NOI-2b on pages 3.7-43 through 3.7-45 of the Draft EIR. The analysis is based on Caltrans' vibration criteria for human annoyance and building damage. Based on the human annoyance criteria, vibration levels at the nearest residential use to the Project Site, located approximately 80 feet from Project construction areas, would be below the "distinctly perceptible" level. Based on Caltrans' criteria for building damage, vibration levels would not cause building damage at distances greater than 8 feet from the equipment. Therefore, the Draft EIR analysis concludes that impacts from construction-related vibration would be less than significant. The commenter's residence is located approximately 150 feet from the southern boundary of the San Bruno Avenue right-of-way. Based on the results of the Draft EIR's construction vibration analysis, vibration effects would not be felt at the commenter's residence.

However, should concerns arise during construction, affected neighbors should contact the City. Mitigation Measure AQ-5 in Section 3.2, *Air Quality*, of the Draft EIR, requires that a publicly visible sign be posted with the telephone number and name of the person to contact for construction-related complaints.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Responses to Comment Letter 12 (February 16, 2021 San Bruno Planning Commission Draft EIR Hearing Transcript)

Response to Comment 12-1

The comment provides an introductory statement, indicating that the following comments represent a transcription of public comments received at the February 16, 2021 San Bruno Planning Commission hearing on the Bayhill Specific Plan Draft EIR.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 12-2

The commenter is a property owner within the Bayhill Specific Plan area and asks if a property owner would be subject to fees or taxes (Mello-Roos or Community Benefit Fees) if no changes are made to the property.

The same commenter provided a similar comment in Comment Letter 10. See Response to Comment 10-1.

Response to Comment 12-3

The commenter asks if the 158 residential units allocated to the parcel containing 1111 Bayhill can be used by another parcel.

The same commenter provided a similar comment in Comment Letter 10. See Response to Comment 10-2.

Response to Comment 12-4

The commenter asks to which parcels the additional units available under the Increased Height Alternative Maximum Housing Scenario are allocated.

The same commenter provided a similar comment in Comment Letter 10. See Response to Comment 10-4.

Response to Comment 12-5

The commenter asserts that a recent feasibility study on the construction of residential units puts the number of units at 305 (rather than 205) as the point at which it becomes economically feasible.

The same commenter provided a similar comment in Comment Letter 10. See Response to Comment 10-6.

Response to Comment 12-6

The commenter expresses appreciation for the work of the Planning Commission and the City Council.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 12-7

The commenter provides a statement of support for the Residential Alternative, asserting that this alternative would provide for half of the targeted RHNA allocated units for the next cycle, and noting that it would provide for less impervious surface. The commenter expresses an opinion that with the increase in remote working, less office space will be needed in the future and emphasizes the benefits of having the area function as a family-friendly area at night.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3 and Response to Comment 5-2.

Response to Comment 12-8

The commenter provides background information related to the difficulties caused by the housing shortage and high housing prices in San Bruno. The commenter expresses concern regarding the amount of single-occupancy vehicle trips this shortage generates, and relates it to the climate crisis, sea level rise, air quality problems, and forest fires. The commenter asserts that building more office space without building housing will increase the jobs-housing imbalance and urges the construction of more housing.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3 and Response to Comment 5-2.

Response to Comment 12-9

The commenter expresses support for the Residential Alternative in order to increase housing at the project site and satisfy a larger portion of the RHNA allocation. The commenter notes that the alternative would construct almost as much office space and the proposed project. The commenter also supports increasing housing on the eastern side of the Project Site where it would be closer to transit uses.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3 and Response to Comment 5-2.

Response to Comment 12-10

The commenter expresses an opinion that the traffic is not a particular problem in the area and expresses support for increasing the amount of housing, particularly for YouTube employees.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3 and Response to Comment 5-2.

Response to Comment 12-11

The commenter is a property owner within the San Bruno Specific Plan area and offers support for the project as well as support for additional housing. The commenter stresses the need for additional housing in the area and expresses for an increased height limit, increased density, and for up to 1,500 units of housing at the Project Site.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

See also Response to Comment 1-3 and Response to Comment 5-2.

Response to Comment 12-12

The commenter expresses concern about the cost of the potential housing constructed.

Comment noted. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Response to Comment 12-13

The commenter asks if the recently proposed additional tax or fee on homeowners to pay for the stormwater system improvements will be applied to properties within the Bayhill Specific Plan area.

The City's proposed storm drainage and flood protection fee is a Citywide fee proposed under a separate resolution (Resolution No. 2021-04). It will be applied to all property owners in the City, including properties within the Bayhill Specific Plan area. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No revisions to the Draft EIR are required.

Chapter 4
Revisions to the Draft EIR

This chapter includes revisions to the Draft EIR by errata as allowed by CEQA. The revisions are presented in the order they appear in the Draft EIR, with the relevant page number indicated with italicized print. New or revised text is shown with underline for additions and ~~strike-out~~ for deletions.

All text revisions are to provide clarification or additional detail. The changes do not result in a need to recirculate the Draft EIR. Under the CEQA Guidelines Section 15088.5, recirculation is required when new significant information identifies:

- A significant new environmental impact resulting from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- Feasible project alternative or mitigation measure, considerably different from others previously analyzed, that clearly would lessen the environmental impacts of the project but the project's proponents decline to adopt it; or
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (Guidelines sec. 15088.5[a]).

Recirculation of a Draft EIR is not required where the new information merely clarifies, amplifies or makes minor modifications to an adequate EIR, which is the case for the revisions presented below.

Executive Summary

In the Executive Summary, the text on page ES-5 has been revised to correct a misspelling of the word "traveled," as follows:

"Impact TRA-5a: Project-Generated Vehicle Miles Travel~~l~~ed (VMT)."

Table of Contents

In the Table of Contents, p. v has been revised as follows:

"Appendix 3.11-1a – Water Supply Assessment (WSA), September 3, 2019

Appendix 3.11-1b – Water Supply Assessment Addendum (WSA Addendum), July 13, 2021"

In the Table of Contents, p. vi has been revised as follows:

The text on page vi has been revised as follows:

~~"2-5 Proposed Development Allocations by Parcel 2-25~~

2-5~~6~~ Buildings Proposed to be Demolished 2-36

2-6~~7~~ Cubic Yards of Excavated Soil by Phase 2-37

2-7~~8~~ Phase I Development Project Building Design Parameters 2-41

2-8~~9~~ Phase I Development Project Employee Generation 2-50

In the Table of Contents, p. viii has been revised as follows:

"3.11-1a Historical and Future/Projected Water Demands Across Land Uses in the City of San Bruno for Normal Years (MGD) 3.11-7

3.11-1b, Projected City of San Bruno Future Water Demand During Varying Hydrologic Conditions (MGD) ..... 3.11-11"

In the Table of Contents, p. viii has been revised as follows:

"3.11-6a Anticipated Water Demand for the Project (Maximum Housing Scenario) and Phase I Development ..... 3.11-~~28~~30

3.11 6b Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – Without Bay-Delta Plan Amendment..... 3.11-31

3.11 6c. Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – With Bay-Delta Plan Amendment..... 3.11-32

Chapter 1 – Introduction

In Chapter 1, p. 1-6 has been revised as follows:

"Appendix 3.11-1a – Water Supply Assessment (WSA), September 3, 2019

Appendix 3.11-1b – Water Supply Assessment Addendum (WSA Addendum), July 13, 2021"

Chapter 2 – Project Description

In Chapter 2, p. 2-17 has been revised as follows:

"Discretionary development plan approvals, such as tentative maps, conditional use permits, architectural review permits, ~~Bayhill Specific Plan Development Permits,~~ and other land use permits."

In Chapter 2, p. 2-20 the text in Table 2-3. Projected 2040 Development under the Maximum Office Scenario page 2-20 has been revised as follows:

"Phase I Development ~~(2022)~~"

In Chapter 2, p. 2-20 the text in Table 2-4. Pr. Projected 2040 Development under the Maximum Housing Scenario page 2-20 has been revised as follows:

"Phase I Development ~~(2022)~~"

In Chapter 2, p. 2-21 the text in Table 2-4. Pr. Projected 2040 Development under the Maximum Housing Scenario page 2-20 has been revised as follows:

"Phase I Development ~~(2022)~~"

In Chapter 2, the text on p. 2-25 has been revised as follows:

"**Development Intensity and Allocation**

The Specific Plan regulates density across the Project Site by allocating additional allowed square footage to the 16 individual parcels that comprise the Project Site, shown in Figure 2-9. The specific parcel allocations are shown ~~in Table 2-5~~ in Table 2-2, Potential Development Allocation of the Bayhill Specific Plan, in the Specific Plan included in Appendix 2 of this EIR."

~~Table 2-5. Proposed Development Allocations by Parcel~~

~~Parcel No.~~	~~Address(es)~~	~~Parcel Size (sf)[a]~~	~~Existing Development (sf)~~	~~Proposed Land Use District~~	~~Potential Net New Development (sf)~~	~~Potential Total Development (sf)~~	~~Potential Residential (Units)~~
~~1~~	~~851 Cherry Ave.~~	~~432,420~~	~~117,843~~	~~BNC[b] / BMU[c]~~	~~5,000~~	~~126,848~~	~~210~~
~~2~~	~~899 Cherry Ave.~~	~~26,396~~	~~4,003~~	~~BNC / BMU~~			
~~3~~	~~850 Cherry Ave.~~	~~145,708~~	~~270,980~~	~~BRO[d]~~	~~5,000~~	~~275,980~~	
~~4~~	~~801-851 Traeger Ave.~~	~~264,366~~	~~134,712~~	~~BRO / BR[e]~~	~~125,000[f]~~	~~259,712~~	~~205~~
~~5~~	~~APN[j] 020-012-160~~	~~290,545~~ 290,634	~~0~~	~~BRO~~	~~287,000~~	~~287,000[g]~~	

6	901 Cherry Ave.	240,277	195,000	BRO	5,000	200,000	
7[h]	1000 Cherry Ave.	213,626	94,465	BRO	248,800	342,465	
8	1250 Grundy Ln.	75,233	67,586	BRO	5,000	72,586	
9	1100 Grundy Ln.	271,353	101,123	BRO	328,877	430,000	
10[h]	900 Cherry Ave.	151,869	102,252	BRO	192,000	294,252	
11	1150-1250 Bayhill Dr.	283,070	138,524	BRO	301,476	440,000	
12	950 Elm Ave.	117,852	106,099	BRO	52,568	158,667	
13[i]	1111 Bayhill Dr.	426,711	206,137	BRO / BR	363,863[f]	570,000	158
14	999-1001 Bayhill Dr.	263,835	140,969	BRO	290,735	431,704	
15	APN[j] 020-011-370	37,873	0	BRO	40,510	40,510	
16	1050 Bayhill Dr.	196,978	79,152	BRO	5,000	84,152	
Total		**3,438,112**	**1,758,845**	-	**2,435,747[k]**	**4,013,874**	**573**

[a] sf = square feet

[b] BNC = Bayhill Neighborhood Commercial

[c] BMU = Bayhill Mixed-Use Overlay

[d] BRO = Bayhill Regional Office

[e] BR = Bayhill Residential Overlay

[f] If residential uses are developed in the BMU or BR, office allocations would be reduced on these parcels by a ratio of 1,267 office sf per dwelling unit in Parcel 4 and 1,454 office sf per dwelling unit in Parcel 13.

[g] As stipulated by Policy 2-3 in the Specific Plan, if the Project is developed under the existing Development Agreement, the net new square footage allowed on Parcel 5 would be reduced from 287,000 square feet by the number of square feet developed under the Development Agreement.

[h] Part of Phase I Site.

[i] A civic use of up to 50,000 sf would be permitted on a 2.1-acre area in this parcel. If a civic use is developed, the corresponding area allocated to regional office use would be reduced at a ratio of 1:1.

[j] APN = assessor's parcel number

[k] Does not include unallocated square footage. EIR analysis is conservatively based on totals shown in Tables 2-3 and 2-4, which include unallocated square footage.

In Chapter 2, p. 2-27 has been revised as follows:

"No more than ~~75~~ 50 percent of the length of a building façade would be unbroken by a change in massing."

In Chapter 2, p. 2-30 has been revised as follows:

"Elm Avenue~~.~~. Elm Avenue, north of Bayhill Drive, would remain one lane in each direction and would terminate at Grundy Lane. A shuttle loading zone~~s~~ would be located on ~~either~~ the west side of Elm Avenue just north of the Bayhill Drive intersection. Elm Avenue, south of Bayhill Drive, would be reduced to one lane in each direction with left turn pockets at the San Bruno Avenue and Bayhill Drive intersections."

In Chapter 2, p. 2-34 has been revised as follows:

"However, should this development occur after ~~February~~ August 2021, it would be regulated by the Specific Plan. Accordingly, the Specific Plan incorporates this amount of development in its policy framework, and the development is also reflected in the buildout projections in this EIR (see Tables 2-3 and 2-4). YouTube has not submitted a phasing plan for this site if development occurs after ~~February~~ August 2021. Should development proceed prior to expiration of the Development Agreement in ~~February~~ August 2021, the regulations of the Specific Plan and mitigations included in

this EIR would not apply and the maximum remaining permitted density on Parcel 5 would be reduced from 287,000 square feet by the number of square feet developed under the Development Agreement."

In Chapter 2, p. 2-34 has been revised as follows:

"Most of the buildout under the Specific Plan would consist of YouTube's long-term expansion plan, which is anticipated to occur in five phases as described below and shown in Figure 2-12. As described below, the anticipated buildout date for the Phase I Development is 2025. Phases II through V would be constructed after the Phase I Development and could be constructed in any order and in subparts (i.e., Phases 5N, 5S, 5E, etc.). Full buildout of the project is anticipated to occur by 2040.

- **Phase I**. The Phase I Development is analyzed at a project level in this EIR. Refer to Section 2.6.3, *Phase I Development Characteristics,* for a detailed explanation. The anticipated buildout date for the Phase I Development is in ~~2022~~ 2025.
- **Phase II**. Phase II would occur on the center most parcel in the Project Site, directly south of Grundy Lane and north of Traeger Avenue. ~~Phase II has an anticipated buildout date of 2025.~~ The three buildings on this parcel would be demolished as a part of the Phase I Development.
- **Phase III**. Phase III would occur on the parcel west of Elm Avenue, south of Bayhill Drive, north of San Bruno Avenue West, and East of Traeger Avenue. It is expected that the building at 1111 Bayhill Drive would be demolished during this phase. ~~Phase III has an anticipated buildout date of 2027.~~
- **Phase IV**. Phase IV would occur on the parcel north of Grundy Lane and west of Elm Avenue. It is expected that the building at 1100 Grundy Lane would be demolished during this phase. ~~Phase IV has an anticipated buildout date of 2032.~~
- **Phase V**. Phase V would occur on three separate parcels: one directly east of the existing hotel and west of the parcels bordering El Camino Real; one at the southeastern most corner of the Project Site; and one bordering Elm Avenue on the west and directly north of Bayhill Drive. It is expected that the buildings at 999-1001 Bayhill Drive and 950 Elm would be demolished during this phase. ~~The anticipated buildout date for Phase V is 2035.~~"

In Chapter 2, p. 2-36 has been revised as follows:

"**Demolition**

It is anticipated that Project buildout would result in the demolition of seven existing buildings on the Project Site, comprising between 692,852–827,564 square feet of office space, depending on the development scenario. Table 2-~~5~~6 lists the buildings that would be demolished under the Project. The three buildings located on the "Lakes" parcel (APN 020-015-030) would be demolished as part of the Phase I Development described below in Section 2.6.3.

Table 2-~~5~~6. Buildings Proposed to be Demolished."

In Chapter 2, p. 2-36 has been revised as follows:

"An estimated total of 4,880,616 cubic yards of soil could be exported from the Project Site throughout the 20-year construction period, as shown in Table 2-~~6~~7."

In Chapter 2, the text and Table 2-7. Cubic Yards of Excavated Soil by Phase on p. 2-37 has been revised as follows:

Table 2-6~~7~~. Cubic Yards of Excavated Soil by Phase

Garage No.[a]	Phase	Total Cubic Yards for Disposal (cy)	Max Depth NAVD88[b,c] (feet)	Max Depth Below Grade (bgs)
1, 3	I	935,395	59~~61~~	55
4	II	581,741	37	43
7	III	712,807	21	49
2	IV	684,793	21	50
5, 8, 9	V	856,693	5	58
6	n/a	238,946	n/a	29
10	n/a	453,436	n/a	58
11	n/a	416,805	n/a	58
Total		**4,880,616**		

[a] See Figure 2-11 for subterranean garage locations.
[b] The North American Vertical Datum of 1988 (NAVD 88) is the vertical datum for orthometric heights established for vertical control surveying in the United States of America based upon the General Adjustment of the North American Datum of 1988.
[c] Max depth is measured to finished floor of lowest parking garage level. In the event of a conflict between the NAV88 elevations and bgs calculations, the NAV88 elevations control.

In Chapter 2, the text on p. 2-41 has been revised as follows:

"Table 2-7~~8~~ below details the design parameters for each of the Phase I Development buildings. Conceptual renderings of the Phase I Development are included in Figure 2-16.

Table 2-7~~8~~. Phase I Development Project Building Design Parameters."

In Chapter 2, the text on p. 2-50 been revised as follows:

"As shown in Table 2-8~~9~~, based on the average of 1 job per 250 square feet for office, the proposed project would generate up to 1,760 employees.

Table 2-8~~9~~. Phase I Development Project Employee Generation."

In Chapter 2, the text on p. 2-50 has been revised as follows:

"Consistent with the Specific Plan, and the San Bruno Municipal Code, the Phase I Development would maintain a parking ratio at a minimum of 3 spaces per 1,000 square feet of development. At least 6 percent of the ~~The~~ Phase I Development's ~~would also include~~ parking spaces ~~with~~ would include EV charging stations ~~capabilities~~. On-street parking would also be located along the north side of Grundy Lane, except for portions intended for white curb loading zones."

In Chapter 2, the text on p. 2-51 has been revised as follows:

"Construction of the Phase I Development subterranean parking structure would require installation of a temporary shoring system to ensure soil stability during construction. The temporary shoring system would consist of soldier pile walls with tiebacks along the excavation perimeter.

Approximately 140 tiebacks and appurtenances along the northern boundary of the Project Site would be located within State highway right-of-way (Interstate 380) and would require an encroachment permit and airspace use agreement from the California Department of Transportation (Caltrans) for tieback supports. The Phase I Development temporary shoring plan, and an exhibit showing encroachment into Caltrans' right-of-way, is provided in Appendix 5 of this Draft EIR."

In Chapter 2, the text on p. 2-52 has been revised as follows:

"Overall, construction of the Phase I Development is anticipated to take approximately 2 years and 3 months with an anticipated completion in ~~2022~~ 2025. The following assumptions apply to construction activities for the Phase I Development, with a potential for activities to overlap."

In Chapter 2, p. 2-53 has been revised as follows:

"The project applicant anticipates the following discretionary entitlements will be required from the City of San Bruno to implement the Phase I Development:

- Development Agreement
- Vesting Tentative Map, including related street vacations and dedications, and street and utility easements
- Certain Encroachment Permits
- ~~Bayhill Specific Plan Development Permit (proposed new permit type created in the Specific Plan)"~~
- Architectural Review Permit
- City Council Resolution authorizing the following changes to the Public Right-of-Way:
  - Elimination of special curbing (red, yellow/and or white) on public streets; and
  - Establishment of special curbing (red, yellow, and/or white) on public streets adjacent to this development site

Chapter 3 – Environmental Impact Analysis

In Chapter 3, p. 3-6 has been revised as follows:

"The Phase I Development would result in the removal of approximately 135 heritage trees, as well as street trees. Additional heritage and street tree removals would occur with implementation of the Project. The Project, including the Phase I Development, would be required to comply with all applicable Municipal Code requirements related to the removal and replacement of heritage trees and street trees, including securing all necessary permits. In accordance with Specific Plan Policy 3-2, new trees would be planted in a 1:1 ratio to compensate for the trees to be removed, and the Specific Plan calls for the use of large canopy trees as the predominant plant material. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, such as trees. This impact would be ***less than significant*** for the Project and the Phase I Development."

In Chapter 3, p. 3-12 has been revised as follows:

"Buildings and structures built prior to 1977 could potentially contain asbestos-containing materials (ACMs), and buildings and structures built prior to 1972 could potentially contain lead-based paint

(LBP). ~~The buildings on the Phase I Site were constructed in 1978 and are unlikely to contain ACM or LBP.~~ The three buildings at 1150-1250 Bayhill Drive that would be demolished as part of the Phase I Development were constructed in 1976. According to the pre-demolition ACM surveys conducted for the buildings (FACS 2019a, 2019b, 2019c, 2019d, 2019e, 2019f), ACM and lead are known to be present. As shown in Table 2-2 in Chapter 2, Project Description, other buildings on the Project Site appear to have been constructed sometime after 1972, and as such could contain ACM and possibly LBP. If ACM or LBP are encountered during building demolition, suspect materials would be removed by a certified abatement contractor in accordance with applicable regulations, including Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, Asbestos, Demolition, Renovation and Manufacturing. In addition, the San Bruno General Plan Health and Safety Element includes Policies HS-28 and HS-29 regarding the siting of new uses in areas which contain ACM and LBP that would minimize the risk from upset and accident conditions involving these materials. For the above reasons, impacts associated with risk of upset from ACM and LBP would be less than significant under the Project and Phase I Development."

In Chapter 3, p. 3-19 has been revised as follows:

"Forensic Analytical Consulting Services (FACS). 2019a. Pre-Demolition PCB Testing Report, Google LLC, 1150 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19.

Forensic Analytical Consulting Services (FACS). 2019b. Asbestos & Lead Survey Report, Google LLC, 1150 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19.

Forensic Analytical Consulting Services (FACS). 2019c. Pre-Demolition PCB Testing Report, Google LLC, 1200 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19.

Forensic Analytical Consulting Services (FACS). 2019d. Asbestos & Lead Survey Report, Google LLC, 1200 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19.

Forensic Analytical Consulting Services (FACS). 2019e. Pre-Demolition PCB Testing Report, Google LLC, 1250 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19.

Forensic Analytical Consulting Services (FACS). 2019f. Asbestos & Lead Survey Report, Google LLC, 1250 Bayhill Drives, San Bruno, California, 94066. FACS Project # PJ44150. November 19."

3.1 Visual Resources

In Section 3.1, p. 3.1-10 has been revised as follows:

"~~As seen in Table 2-5 of the Specific Plan, in~~ Under this scenario, the amount of office development is decreased on the land area within the housing overlay zone where housing is constructed."

In Section 3.1, p. 3.1-20 has been revised as follows:

"Therefore, impacts related to vehicle headlights and illuminated signage would be ***less than significant***. No mitigation measures are required.

Conclusion

Project

As described above, the Project would not generate excessive light levels from interior and exterior lighting, vehicle headlights, or illuminated signage. Project buildings would not generate excessive

glare. Therefore, light and glare impacts associated with the Project would be ***less than significant***. No mitigation measures are required.

Phase I Development

As described above, the Phase I Development would not generate excessive light levels from interior and exterior lighting, vehicle headlights, or illuminated signage. Phase I Development buildings would not generate excessive glare. Therefore, light and glare impacts associated with the Phase I Development would be ***less than significant***. No mitigation measures are required."

3.2 Air Quality

In Section 3.2, the text on pp. 3.2-5—3.2-6 has been revised as follows:

"In addition to air quality plans, BAAQMD also adopts rules and regulations to improve existing and future air quality. The Project may be subject to the following district rules.

- **Regulation 2, Rule 2 (New Source Review)**—This regulation contains requirements for Best Available Control Technology and emission offsets.
- **Regulation 2, Rule 5 (New Source Review of Toxic Air Contaminates)**—This regulation outlines guidance for evaluating TAC emissions and their potential health risks.
- **Regulation 6, Rule 1 (Particulate Matter)**—This regulation restricts emissions of particulate matter (PM) darker than No. 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.
- **Regulation 6, Rule 6 (Prohibition of Trackout)**— This regulation prohibits 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."
- **Regulation 7 (Odorous Substances)**—This regulation establishes general odor limitations on odorous substances and specific emission limitations on certain odorous compounds.
- **Regulation 8, Rule 3 (Architectural Coatings)**—This regulation limits the quantity of reactive organic gases (ROG) in architectural coatings.
- **Regulation 9, Rule 6 (Nitrogen Oxides Emission from Natural Gas–Fired Boilers and Water Heaters)**—This regulation limits emissions of nitrogen oxides (NO_X) generated by natural gas–fired boilers.
- **Regulation 9, Rule 8 (Stationary Internal Combustion Engines)—**This regulation limits emissions of NO_X and carbon monoxide (CO) from stationary internal combustion engines of more than 50 horsepower.
- **Regulation 11, Rule 2 (Hazardous Pollutants – Asbestos Demolition, Renovation, and Manufacturing)—**This regulation, which incorporates EPA's asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations, controls emissions of asbestos to the atmosphere during demolition, renovation, and transport activities.

In addition to BAAQMD rules and regulations, BAAQMD is also responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. The Project may require the following permit(s).

- **Apply for an Authority to Construct / Permit to Operate** — Like building permits, air quality permits are required by law as a part of doing business in the Bay Area. As the Project includes two emergency generators, the Project applicant will need to apply for an Air District Authority to Construct/Permit to Operate."

In Section 3.2, the Table 3.2-2 title on p. 3.2-10 has been revised as follows:

"**Table 3.2-2. Ambient Air Quality Data at the San Francisco-Arkansas Monitoring Station (~~2015-2017~~ 2016-2018).**"

In Section 3.2, the Table 3.2-3 title on p. 3.2-14 has been revised as follows:

"**Table 3.2-3. Existing Health Risks within 1,000 feet of the Project Site.**"

In Section 3.2, the text on page 3.2-21 has been revised as follows:

"**Operational Area, Energy, and Stationary Source Emissions**

Area, energy, and stationary emissions were estimated using CalEEMod, version 2016.3.2. The primary area source of criteria pollutants is hearth (e.g., natural gas fireplaces) usage, but emissions are also generated by landscape maintenance equipment and the repainting of buildings. Energy sources include the combustion of natural gas for building heating and hot water. Stationary sources include emergency back-up generators. Emissions were quantified for existing (2017) and buildout (2040) conditions with and without the Specific Plan for the Maximum Office Scenario.[8] CalEEMod defaults were assumed based on the anticipated land uses in the Maximum Office Scenario. Please refer to Appendix 3.2-1 for the CalEEMod output files.

Selection of Future Year Baseline Conditions

The CEQA Guidelines provide that existing conditions at the time a Notice of Preparation is released or when environmental review begins "normally" constitute the baseline for environmental analysis. (Guidelines Section 15125). In 2010, the California Supreme Court issued an opinion holding that while lead agencies have some flexibility in determining what constitutes the baseline, relying on "hypothetical allowable conditions" when those conditions are not a realistic description of the conditions without the project would be an illusory basis for a finding of no significant impact from the project and, therefore, a violation of CEQA (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310).

On August 5, 2013, the California Supreme Court issued another baseline decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (57 Cal.4th 439). This latest decision has clarified that, under certain circumstances, a baseline may reflect future, rather than existing, conditions. The rule specifies that factual circumstances can justify an agency departing from that norm in the following circumstances, when such reasons are supported by substantial evidence:

- When necessary to prevent misinforming or misleading the public and decision makers; and
- When their use in place of existing conditions is justified by unusual aspects of the project or surrounding conditions.

With respect to the Project, utilizing existing conditions to evaluate criteria pollutant impacts would potentially misrepresent and mislead the public and decision makers with respect to potential air quality and impacts for two reasons: 1) natural vehicle fleet mix turnover, and 2) changes in on-road emission factors, each as described below.

1. The fleet mix in San Mateo County will be different by the time the Project is fully implemented in 2040, as the percentage of truck traffic to all vehicle traffic changes. Per CT-EMFAC 2017, in 2017, 5.1 percent of the San Mateo County fleet mix was made up of trucks, while in 2040 it is forecasted to increase to 7.7 percent (California Department of Transportation 2017). Trucks have different emission profiles and are generally more emission-intensive than passenger vehicles. Quantifying emissions under existing conditions would therefore misrepresent vehicle emissions associated with the vehicle fleet that will be in place once the Project is fully operational.
2. On-road vehicle emissions rates are anticipated to lessen in the future due to continuing engine advancements and more stringent air quality regulations. Analyzing existing conditions (2017) and quantifying emissions utilizing 2017 vehicle emissions rates instead of the reduced 2040 vehicle emission rates would not only represent a factitious scenario but would also overestimate emissions reductions and potential air quality benefits achieved by the Project.

Accordingly, the CEQA baseline for the purposes of the Project's air quality analysis is defined as buildout year (2040) conditions. Evaluating 2040-With-Project conditions against 2040-Without Project conditions ensures that future fleet changes and engine exhaust emission factors are appropriately attributed to baseline conditions and not misrepresented as a project-related effect. Utilizing the Project buildout year conditions as the CEQA baseline is most appropriate to inform the public and decision makers with respect to air quality impacts, consistent with current CEQA case law. Where appropriate, emissions under existing conditions (2017) are also presented for informational purposes."

In Section 3.2, the text on page 3.2-23 has been revised as follows:

"**Operational Area, Energy, and Stationary Source Emissions**

Air quality impacts from other operational sources associated with the buildout of the Phase I Development were evaluated using the same methods and models (e.g., CalEEMod) as described above for the proposed Specific Plan. Quantifiable features that are part of the project design, including exceedance of Title 24 energy standards and water reduction goals, were incorporated into the CalEEMod model. Please refer to Appendix 3.2-1 for modeling assumptions and CalEEMod output files.

Selection of Future Year Baseline Conditions

Similar to the Project air quality analysis, utilizing existing conditions to evaluate criteria pollutant impacts of Phase I Development would potentially misrepresent and mislead the public and decision makers with respect to potential air quality impacts for two reasons: 1) natural vehicle fleet mix turnover, and 2) changes in on-road emission factors (detailed further above for the Project). Accordingly, the CEQA baseline for the purposes of this air quality analysis is defined as Phase I Development buildout year (2022)[11] conditions. Where appropriate, emissions under existing conditions (2017) are also presented for informational purposes."

[11] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025.

In Section 3.2, the text on page 3.2-29 has been revised as follows:

"Pursuant to Mitigation Measure AQ-6, applicants would be required to track all land use development construction activities occurring within the Project Site, assess and determine the estimated total emissions for all construction activities that would be concurrently ongoing (subject to City review and approval), and coordinate with an independent third-party approved by the City, such as the Bay Area Clean Air Foundation ~~BAAQMD to determine the mitigation fees for each development project's applicant to pay on a pro rata basis to BAAQMD~~ to offset their pollutant emissions as necessary such that BAAQMD's daily pollutant thresholds would not be exceeded."

In Section 3.2, the text on page 3.2-32 has been revised as follows:

"Through implementation of **Mitigation Measures AQ-7**, applicants would determine the estimated total emissions for operational activities and ~~BAAQMD would determine the mitigation fees for each development project's applicant to pay on a pro rata basis to BAAQMD~~ coordinate with an independent third-party approved by the City, such as the Bay Area Clean Air Foundation to offset their pollutant emissions as necessary such that BAAQMD's daily pollutant thresholds would not be exceeded. Offsetting emissions below BAAQMD's threshold levels would ensure future development under the Specific Plan would not contribute a significant level of air pollution such that regional air quality within the SFBAAB would be degraded."

In Section 3.2, the text on pp. 3.2-30—3.2-31 has been revised as follows:

"Table 3.2-6 summarizes daily area, energy, mobile, and stationary source emissions generated under existing conditions (2017) and 2040 conditions with and without the Specific Plan. To evaluate the magnitude of the change in the air quality environment due to implementation of the Specific Plan, the emissions under the Specific Plan buildout in 2040 are compared to 2040 ~~the~~ emissions without the Project ~~under existing conditions~~.

Table 3.2-6. Estimated Maximum Daily Unmitigated Emissions from the Specific Plan (pounds/day)

Condition/Source	ROG	NOx	CO	PM10	PM2.5
Existing (2017)					
Area Sources	43	0	0	0	0
Energy Sources	1	9	7	1	1
Mobile Sources	23	61	322	188	32
Stationary Sources	4	17	10	1	1
Total Existing [a]	**71**	**87**	**339**	**190**	**33**
2040 Without Specific Plan					
Area Sources	43	0	0	0	0
Energy Sources	1	9	7	1	1
Mobile Sources	9	18	127	206	34
Stationary Sources	4	17	10	1	1
Total 2040 Without Specific Plan [a]	**56**	**44**	**144**	**207**	**35**
2040 With Specific Plan					
Area Sources	97	0	0	0	0
Energy Sources	2	21	18	2	2
Mobile Sources	32	65	454	739	121

Stationary Sources	6	28	16	1	1
Total 2040 With Specific Plan [a]	**137**	**114**	**488**	**741**	**123**
Net Increase with Specific Plan					
2040 With Specific Plan v. 2040 Without Specific Plan ~~Existing~~ [a]	80~~66~~	~~2~~770	~~149~~344	~~552~~534	~~90~~88

Source: CalEEMOD and CT-EMFAC. See Appendix 3.2-1.

Notes:

For the 2040 With Specific Plan condition, the daily emissions presented are maximums anticipated under the Maximum Office Scenario. If the allowable land use exchange to hotel or retail under the equivalency program would result in higher emissions than the base office use, those emissions are shown here. Therefore, the total emissions represent the worst-case scenario.

[a] See note above. Values may not add up due to rounding.

As shown in Table 3.2-6, buildout of the Specific Plan (assuming the worst-case Maximum Office Scenario) would result in a net increase of approximately 80~~66~~ pounds of ROG, 344 pounds of CO, 70~~27~~ pounds of NOx, 53~~452~~ pounds of PM10, and 88~~90~~ pounds of PM2.5 per day compared to 2040 without the Specific Plan ~~existing conditions~~. These emissions could contribute to ozone formation and other air pollution in the SFBAAB, which at certain concentrations, can contribute to short- and long-term human health effects, if left unmitigated."

In Section 3.2, the text of Mitigation Measure AQ-1 on p. 3.2-32 has been revised as follows:

"Mitigation Measure AQ-1: Require At Least Tier 4 Final Engines on Construction Equipment.

All applicants proposing development of projects within the Project Site shall require their contractors, as a condition of contract, to further reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 4 Final or newer engine. The Community & Economic Development Director may consider requests for e~~E~~xemptions ~~can be made~~ for specialized equipment where a contractor documents that Tier 4 engines are not commercially available within 200 miles of the Project Site. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 3 engine."

In Section 3.2, the text of Mitigation Measure AQ-5 on p. 3.2-33 has been revised as follows:

"Mitigation Measure AQ-5: Require Fugitive Dust Best Management Practices.

All applicants proposing development of projects within the Project Site shall require their contractors, as a condition of contract, to reduce construction-related fugitive dust by implementing BAAQMD's basic control measures in effect at that time of construction at all construction and staging areas. The following measures are based on BAAQMD's current CEQA guidelines."

In Section 3.2, the text of Mitigation Measure AQ-6 on page 3.2-34 has been revised as follows:

"For proposed developments that are estimated to result in exceedances of thresholds, the applicants shall coordinate with a third-party or governmental entity to pay for criteria pollutant offsets for every year in which construction emissions are estimated to exceed the BAAQMD thresholds. If the estimate shows exceedances of multiple criteria pollutants above the BAAQMD thresholds, then offsets must be obtained to address each pollutant above the thresholds. Emission reduction projects and fees will be determined in consultation between the applicant and the third-

party or governmental entity and will include offset provider administrative costs. Applicants shall identify credits within the San Francisco Bay Area Air Basin, and shall prioritize programs that benefit the Bayhill community, the City, or the Bay Area region, in that order. The agreement that specifies fees and timing of payment shall be provided to the City for review and signed by the applicant and the third-party or governmental entity. The emission reductions shall be secured prior to any year in which construction activity is estimated to result in an exceedance. The payment for the emissions can either be on an annual basis or done once upfront prior to construction."

In Section 3.2, the footnote in Table 3.2-7 on page 3.2-35 has been revised as follows:

"[a] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development ~~is 2022~~ was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, ~~if construction of the Phase I Development were to extend to 2023,~~ this analysis ~~would be~~ is conservative, as actual emissions ~~may~~ would be expected to be lower in ~~2023~~ 2025."

In Section 3.2, the footnote in Table 3.2-8 on page 3.2-36 has been revised as follows:

"[a] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development ~~is 2022~~ was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, ~~if construction of the Phase I Development were to extend to 2023~~, this analysis ~~would be~~ is conservative, as actual emissions ~~may~~ would be expected to be lower in ~~2023~~ 2025."

In Section 3.2, pp. 3.2-36—3.2-37 have been revised as follows:

"Operation

The types of operational criteria pollutants emissions for the Phase I Development would be similar to those described above for the Specific Plan. Operational criteria pollutant emissions were evaluated under existing conditions ~~year~~ (2017) and 2022 conditions with and without the Phase I Development ~~buildout year (2022) conditions~~.[1] The analysis includes quantifiable sustainability measures that are incorporated into the project design, including exceedance of Title 24 energy standards by 16 percent, reduction of indoor water use by 25 percent, and use of green consumer products. The Phase I Development's net criteria pollutant emissions are determined by taking the difference in operational emissions between "2022 with Phase I Development" conditions and "2022 Without Phase I Development" ~~existing (2017)~~ emissions. Table 3.2-9 presents the results of the analysis.

Table 3.2-9. Estimated Maximum Daily Unmitigated Operational Emissions for the Phase I Development (pounds/day)

Condition/Source	ROG	NOx	CO	PM10	PM2.5
Existing (2017)					
Area Sources	8	0	0	0	0
Energy Sources	0	2	1	0	0
Mobile Sources	23	61	322	188	32

[1] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025.

Condition/Source	ROG	NOx	CO	PM10	PM2.5
Stationary Sources	1	6	3	0	0
Total Existing[a]	**33**	**68**	**327**	**189**	**32**
2022[b] Without Phase I Development					
Area Sources	8	0	0	0	0
Energy Sources	0	2	1	0	0
Mobile Sources	15	32	190	197	33
Stationary Sources	1	6	3	0	0
Total 2022 Without Phase I Development[a]	**25**	**39**	**195**	**197**	**33**
2022[b] With Phase I Development					
Area Sources	14	0	0	0	0
Energy Sources	0	3	2	0	0
Mobile Sources	31	53	311	313	52
Stationary Sources	4	17	10	1	1
Total With Phase I Development[a]	**50**	**72**	**323**	**314**	**53**
Net Increase With Phase I Development					
2022 With Phase I Development v. ~~Existing[a]~~2022 Without Phase I Development[a, b]	17	33~~4~~	~~-~~4129	~~125~~117	~~21~~20
Threshold	54	54	-	82	54
Exceed Threshold?	No	No	-	Yes	No

Source: Refer to Appendix 3.2-1 for CalEEMod model outputs and mobile emissions calculations.

Notes: As noted above, the analysis includes benefits achieved by the quantifiable sustainability measures incorporated as project commitments and implementation of state measures that will reduce criteria air pollutant emissions

[a] Totals may not add up due to rounding.

[b] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025.

As shown in Table 3.2-9, the Phase I Development would result in a net increase of approximately 17 pounds of ROG, 33~~4~~ pounds of NOx, 129 pounds of CO, 117~~25~~ pounds of PM10, and 20~~1~~ pounds of PM2.5 per day, exceeding BAAQMD's thresholds for PM10 during operation. The increase in PM10 is primarily generated by mobile sources (additional vehicles traveling throughout the region resuspend dust on the roadways, resulting in an increase in PM10). ~~The Phase I Development would reduce CO by about 4 pounds per day. The decrease in CO would be due to decreasing emission factors over time as vehicles become more efficient.~~

Implementation of **Mitigation Measure TRA-2** in Section 3.10, *Transportation*, which requires the implementation of a TDM program that results in similar VMT reductions as YouTube's current program, an annual monitoring study, and continued monitoring and evaluation, would reduce mobile source emissions during operation to 29 pounds of ROG, 44 pound of NOx, 254 pounds of PM10, and 42 pounds of PM2.5 per day. Thus, mitigated emissions (net increase of 57~~66~~ pounds) would not exceed BAAQMD's PM10 thresholds of 82 pounds per day. Accordingly, operational source air quality impacts under the Phase I Development would be ***less than significant with mitigation***."

In Section 3.2, the text on page 3.2-49 has been revised as follows:

"California Department of Transportation. 2017. *CT-EMFAC 2017*. Available: https://dot.ca.gov/programs/environmental-analysis/air-quality/project-level-air-quality-analysis. Accessed: April 12, 2021.

California Department of Transportation ~~Caltrans~~. 2016. 2016 Traffic Volumes on California State Highways. http://www.dot.ca.gov/trafficops/census/docs/2016_aadt_volumes.pdf. Accessed: April 2, 2019."

3.3 Energy Use

In Section 3.3, Table 3.3-6 on page 3.3-14 has been revised as follows:

Table 3.3-6. Estimated Operational Energy Consumption for the Phase I Development

Analysis Condition/Source	Million BTU/Year
Existing (2017)[b]	
Electricity	18,647
Natural Gas	6,239
Mobile - gasoline[a]	17,992
Mobile - diesel[a]	1,931
Total Existing[b]	**44,808**
2022~~c~~ Without Phase I Development	
Electricity	18,647
Natural Gas	6,239
Mobile - gasoline	15,444
Mobile - diesel	2,108
Total 2022 Without Phase I Development[b]	**42,437**
2022~~c~~ With Phase I Development	
Electricity	32,671
Natural Gas	10,073
Mobile - gasoline	24,576
Mobile - diesel	3,345
Total 2022~~c~~ With Phase I Development[b]	**70,664**
Net Change with Proposed Phase I Development	
2022~~c~~ With Phase I Development vs. Existing (2017)~~c~~	25,856 (+58%)
2022 With Phase I Development vs. 2022 Without Phase I Development[c]	28,227 (+67%)
Energy per Square Foot (MMBTU/SF)	
Existing (2017)	0.23
2022 Without Phase I Development	0.22
2022 With Phase I Development	0.11

Source: Refer to Appendix 3.2-1 for CalEEMod model outputs and mobile emissions calculations.

Notes: As noted above, the emissions analysis does not include benefits achieved by the voluntary sustainability features but does reflect implementation of quantifiable state measures that will reduce energy consumption (e.g., SB 100).

[a] Phase I Site is approximately 11.2% of the existing square footage of the entire Project site. Therefore, existing operational gasoline and diesel consumption amounts for the Phase I Site were estimated by multiplying the Project Site's operational gasoline and diesel consumption amounts with and without the Phase I Development by this ratio.

[b] Values may not add due to rounding.

[c] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Similarly, energy efficiency standards will become increasingly stringent over time. Therefore, this analysis is conservative, as actual energy consumption would be expected to be lower in 2025.

In Section 3.3, the text on pages 3.3-15 has been revised to correct a misspelling of the word "traveled," as follows:

"This program includes, but is not limited to, a TDM coordinator; priority parking for carpools, vanpools, and clean-fuel vehicles; bicycle parking, sharing, and facilities; a guaranteed ride home program; rideshare matching services; pre-tax commuter benefits; employer commuter shuttle services; flexible work schedule program; and commuter incentives and rewards, which results in the reduction of vehicle miles travell~~l~~ed, and consequently the amount of energy consumed through gasoline and diesel."

In Section 3.3, the text on p. 3.3-17 has been revised as follows:

"These anticipated increases would be countered, in part, by ongoing increases in state and local requirements related to renewable energy and increased energy efficiency."

In Section 3.3, the text on pages 3.3-17 has been revised as follows:

"The Phase I Development would be completed in ~~2022~~ 2025. According to PCE's 2018 Integrated Resource Plan, which has a planning horizon of 2027, PCE is currently meeting a renewable energy target of 50 percent, and the proportion of PCE's resource mix that is sourced from bundled renewable energy products will significantly increase as PCE transitions toward 100% renewable energy content in 2025."

In Section 3.3, the text on pages 3.3-17 has been revised as follows:

"Cumulative development through ~~2022~~ 2025 (the Phase I Development buildout year) and 2040 (the Specific Plan buildout year) would be required to comply with all adopted state and local renewable energy and energy efficiency regulations and plans."

3.4 Greenhouse Gases

In Section 3.4, the text on page 3.4-3 has been revised to correct a misspelling of the word "traveled," as follows:

"**Regional Land Use and Transportation Planning to Reduce Vehicle Miles Travell~~l~~ed**"

In Section 3.4, the text on p. 3.4-3 has been revised as follows:

"CEQA Requirements to Assess Vehicle Miles Travell~~l~~ed

As discussed in Section 3.10, *Transportation*, SB 743 (2013) requires revisions to the CEQA Guidelines that establish new impact analysis criteria for the assessment of a project's transportation impacts. The intent behind SB 743 and revising the CEQA Guidelines is to integrate and better balance the needs of congestion management, infill development, active transportation, and GHG emissions reduction. ~~The Office of Planning and Research (OPR) recommends that vehicle miles traveled (VMT) serve as the primary analysis metric, replacing the existing criteria of delay and level of service. In 2018, OPR released a technical advisory outlining potential VMT significance thresholds for different project types.~~ The new vehicle miles traveled (VMT) methodology is required as of July 1, 2020~~, though it can be used earlier~~. The ~~City chose to base its~~ impact analysis for this EIR is based on VMT (see Section 3.10, *Transportation*)."

In Section 3.4, the text on pages 3.4-9 has been revised as follows:

"Based on the available threshold concepts recommended by air districts and the courts, GHG emissions from the Project are evaluated on a sector-by-sector (e.g., energy, water) basis using the most applicable regulatory programs, policies, and thresholds recommend by BAAQMD, CARB, and OPR, as described below ("compliance with regulatory programs"). Buildout years for the Phase I Development and the Project are ~~2022~~ 2025 and 2040, respectively.[1]"

1 This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025."

In Section 3.4, the text on pp. 3.4-12—3.4-13 has been revised as follows:

"**Selection of Future Year Baseline Conditions**

The CEQA Guidelines provide that existing conditions at the time a Notice of Preparation is released or when environmental review begins "normally" constitute the baseline for environmental analysis. (Guidelines Section 15125). In 2010, the California Supreme Court issued an opinion holding that while lead agencies have some flexibility in determining what constitutes the baseline, relying on "hypothetical allowable conditions" when those conditions are not a realistic description of the conditions without the project would be an illusory basis for a finding of no significant impact from the project and, therefore, a violation of CEQA (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310).

On August 5, 2013, the California Supreme Court issued another baseline decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (57 Cal.4th 439). This latest decision has clarified that, under certain circumstances, a baseline may reflect future, rather than existing, conditions. The rule specifies that factual circumstances can justify an agency departing from that norm in the following circumstances, when such reasons are supported by substantial evidence:

- When necessary to prevent misinforming or misleading the public and decision makers; and
- When their use in place of existing conditions is justified by unusual aspects of the project or surrounding conditions.

With respect to the Project, utilizing existing conditions to evaluate GHG impacts would potentially misrepresent and mislead the public and decision makers with respect to potential GHG impacts for two reasons: 1) natural vehicle fleet mix turnover, and 2) changes in on-road emission factors, each as described below.

1. The fleet mix in San Mateo County will be different by the time the Project is fully implemented in 2040, as the percentage of truck traffic to all vehicle traffic changes. Per CT-EMFAC 2017, in 2017, 5.1 percent of the San Mateo County fleet mix was made up of trucks, while in 2040 it is forecasted to increase to 7.7 percent (California Department of Transportation 2017). Trucks have different emission profiles and are generally more emission-intensive than passenger vehicles. Quantifying emissions under existing conditions would therefore misrepresent vehicle emissions associated with the vehicle fleet that will be in place once Project is fully operational.

3. On-road vehicle emissions rates are anticipated to lessen in the future due to continuing engine advancements and more stringent GHG regulations. Analyzing existing conditions (2017) and quantifying emissions utilizing 2017 vehicle emissions rates instead of the reduced 2040 vehicle emission rates would not only represent a factitious scenario but would also overestimate emissions reductions and potential GHG benefits achieved by the Project.

Accordingly, the CEQA baseline for the purposes of the Project's GHG analysis is defined as buildout year (2040) conditions. Evaluating 2040-With-Project conditions against 2040-Without Project conditions ensures that future fleet changes and engine exhaust emission factors are appropriately attributed to baseline conditions and not misrepresented as a project-related effect. Utilizing the Project buildout year conditions as the CEQA baseline is most appropriate to inform the public and decision makers with respect to GHG impacts, consistent with current CEQA case law. Where appropriate, emissions under existing conditions (2017) are also presented for informational purposes."

Phase I Development

Construction Emissions

Similar types of construction related GHG emission sources, as described above for the Specific Plan, are anticipated with construction of the Phase I Development. GHG emissions were estimated using the CalEEMod, version 2016.3.2.[9] Construction schedule, equipment operating details, trip numbers and lengths, and construction quantities were provided by the project sponsor (Weber pers. comm). Annual construction emissions were estimated using these project-specific details. Please refer to Appendix 3.2-1 for the construction modeling inputs and CalEEMod outputs.

Operational Mobile Source Emissions

GHG emissions from motor vehicles associated with the Phase I Development were evaluated using the same method and models (e.g., CT-EMFAC2017, EMFAC2017) as described above for the Specific Plan.[10] The analysis accounts for quantifiable trip reductions achieved by the Specific Plan policies (e.g., transit demand management measures), including proximity to transit and mixed-use design. Please refer to Appendix 3.2-1 for the CT-EMFAC and EMFAC2017 emission factors and traffic data utilized in this analysis.

Operational Area, Energy, Stationary, Water, and Waste Source Emissions

GHG emissions from other operational sources associated with buildout of the Phase I Development were evaluated using the same methods and models (e.g., CalEEMod) as described above for the proposed Specific Plan. Quantifiable features that are part of the project design, including the exceedance of Title 24 energy standards and water reduction goals, were incorporated into the CalEEMod model. Please refer to Appendix 3.2-1 for modeling assumptions and CalEEMod output files.

Selection of Future Year Baseline Conditions

Similar to the Project air quality analysis, utilizing existing conditions to evaluate GHG impacts of Phase I Development would potentially misrepresent and mislead the public and decision makers with respect to potential air quality impacts for two reasons: 1) natural vehicle fleet mix turnover, and 2) changes in on-road emission factors (detailed further above for the Project). Accordingly, the CEQA baseline for the purposes of this GHG analysis is defined as Phase I Development buildout year (2022) conditions.[11] Where appropriate, emissions under existing conditions (2017) are also presented for informational purposes.

[11] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025."

In Section 3.4, the text on pp. 3.4-14—3.4-16 has been revised as follows:

"**Operation**

Operation of land uses within the Specific Plan would generate direct and indirect GHG emissions. Sources of direct emissions include mobile vehicle trips, emergency generators, natural gas combustion, and landscaping activities. Indirect emissions would be generated by electricity consumption, waste and wastewater generation, and water use. The Specific Plan's GHG emissions are evaluated for the Maximum Office Scenario under existing conditions (2017) and buildout year conditions (2040) with and without the Specific Plan. The analysis accounts for benefits achieved by policies in the Specific Plan that are required or otherwise mandatory, including the use of green consumer products (Policy 6-13) and compliance with CALGreen (i.e., installation of low-flow fixtures). The analysis also accounts for implementation of quantifiable state measures that will reduce GHG emissions (e.g., SB 100). The Specific Plan's net GHG emissions are determined by taking the difference in operational emissions between "2040 with Specific Plan" conditions and "2040 without Specific Plan ~~existing (2017) emissions of the Project Site~~." Table 3.4-3 presents the results of the analysis.

Table 3.4-3. Estimated Annual Specific Plan Operational GHG Emissions (Maximum Office Scenario) (metric tons)

Condition/Source	CO_2	CH_4	N_2O	CO_2e	% of Total CO_2e
Existing (2017)					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	5,131	<1	<1	5,161	25%
Mobile Sources	13,583	2	1	13,982	67%
Stationary Sources	10	<1	<1	10	<1%
Waste Generation	335	20	<1	830	4%
Water Consumption	437	9	<1	741	4%
Total Existing[a]	19,496	32	1	20,724	100%
2040 Without Specific Plan					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	1,945	<1	<1	1,959	16%

Mobile Sources	8,760	1	1	8,953	74%
Stationary Sources	10	<1	<1	10	<1%
Waste Generation	335	20	<1	830	7%
Water Consumption	114	9	<1	416	3%
Total 2040 Without Specific Plan[a]	**11,165**	**30**	**1**	**12,168**	**100%**
2040 With Specific Plan					
Area Sources	<1	<1	<1	<1	0%
Energy Sources	4,696	<1	<1	4,731	12%
Mobile Sources	31,409	2	2	32,099	81%
Stationary Sources	17	<1	<1	17	0%
Waste Generation	799	47	<1	1,980	5%
Water Consumption	231	19	1	839	2%
Total 2040 With Specific Plan[a]	**37,153**	**69**	**3**	**39,666**	**100%**
Net Increase with Specific Plan					
2040 With Specific Plan v. ~~Existing~~ Without Specific Plan	17,657 25,989	37 39	1 2	18,942 27,498	-

Source: Refer to Appendix 3.2-1 for CalEEMod model outputs and mobile emissions calculations.

Notes: As noted above, the emissions analysis reflect implementation of quantifiable state measures that will reduce GHG emissions (e.g., SB 100), including Specific Plan policy related to use of green consumer products and compliance with the CALGreen which requires the installation of low-flow fixtures. In addition, for the 2040 With Specific Plan condition, the daily emissions presented are maximums anticipated under the Maximum Office Scenario. If the allowable land use exchange to hotel or retail under the equivalency program would result in higher emissions than the base office use, those emissions are shown here. Therefore, the total emissions represent the worst-case scenario.

[a] Values may not add due to rounding

The estimated Specific Plan emissions in 2040 are 39,666 metric tons of CO_2e (assuming the worst-case Maximum Office Scenario). This is an increase of 27,498 ~~18,942~~ metric tons of CO_2e from the Project Site ~~(93 percent)~~ when compared to 2040 without the Specific Plan ~~existing conditions~~. The Specific Plan would achieve additional GHG reductions through voluntary sustainability features that encourage alternative transportation, passive heating and cooling, and other GHG-reducing measures. However, these strategies were not quantified because the exact number of installed systems and affected structures are currently unknown and are not mandated by the Specific Plan. The following sections present the sector-by-sector analysis of GHG impacts, consistent with OPR, CARB, and BAAQMD guidance.

Mobile Source Emissions

GHG emissions associated with on-road mobile sources would be generated from workers, visitors, and delivery vehicles visiting the Project Site. As shown in Table 3.4-3, emissions from mobile sources represent the largest source of Project emissions (81 percent) and are expected to almost ~~more than double~~ quadruple relative to ~~existing conditions~~ 2040 without the Specific Plan."

In Section 3.4, the text on pp. 3.4-18—3.4-19 has been revised as follows:

"Stationary Source Emissions

As shown in Table 3.4-3, emergency generator testing would generate 17 metric tons of CO_2e per year in 2040, a net increase of 7 metric tons of CO_2e per year from 2040 without the Specific Plan

~~existing conditions~~, which is below BAAQMD's stationary source threshold of 10,000 metric tons CO_2e per year.

Conclusion

As described above, stationary source emissions would be below BAAQMD's stationary source threshold. The Specific Plan would also be consistent with the Scoping Plan's overall goal of avoiding losses in carbon sequestration and limited land use emissions.

As discussed in Section 3.10, *Transportation*, the Specific Plan ~~would~~ is designed to achieve the 14.3 percent VMT per service population reduction target by buildout year (2040) with the implementation of **Mitigation Measure TRA-1**, which ~~requires a reduction of~~ includes a goal to reduce the drive alone percentage from 54 percent to 43 percent (which equates to reducing VMT per service population by 14.3 percent), and requires an annual monitoring study to be completed by Project Site property owners, and ongoing monitoring and evaluation. ~~Achievement of the VMT per service population reduction target would ensure that the Specific Plan is consistent with regulatory programs such as SB 743 that expressly aims to reduce VMT consistent with the state's climate change goals.~~ This mitigation would directly reduce VMT by supporting alternative modes of transportation with provisions such as bicycle storage and car-sharing programs. However, the Project's character and context would reduce the ability of **Mitigation Measure TRA-1** to achieve the VMT and SOV reductions required. In addition to **Mitigation Measure TRA-1** ~~the VMT per service population reduction target~~, the Specific Plan would also be subject to ongoing regulatory programs related to fuel and vehicle efficiency (e.g., Pavley standards/Advanced Clean Cars, Low Carbon Fuel Standard). Vehicle electrification is also rapidly becoming part of the state's approach to reducing mobile source emissions (e.g., Title 24) and the state's cap-and-trade program continues to reduce emissions from transportation fuels. The Specific Plan would not conflict with these ongoing statewide efforts. Further, the Specific Plan includes policies that would prioritize transit and pedestrian connectivity, support transit priority measures, and enhance existing and construct new transit infrastructure to reduce per service population VMT. Nevertheless, the Specific Plan would result in significant VMT-related GHG emissions impacts after implementation of **Mitigation Measure TRA-1** on its own.

The Specific Plan policies represent a robust suite of possible strategies that will reduce emissions from building energy consumption, area sources, water consumption, and waste generation. These features are consistent with the 2017 Climate Change Scoping Plan, and if fully implemented by all land uses within the Project Site, would significantly reduce GHG emissions from these sources consistent with the state's near-term (2030) and long-term (2045) climate change goals. While the City, through the Specific Plan, would encourage implementation of voluntary sustainability features, there is no guarantee that all of these measures will be incorporated into the designs of all future developments. This is a potentially significant impact. Implementation of **Mitigation Measure GHG-2** is therefore required to reduce operational GHG emissions in the sectors with the largest amount of emissions (other than on-road emissions addressed by **Mitigation Measure TRA-1**). **Mitigation Measure GHG-2**, which includes requirements for LEED certification or equivalent, electric space and water heating, solar roofs, and waste diversion programs, would ensure consistency with the 2017 Climate Change Scoping Plan and the long-term statewide reduction trajectory. Should all measures included in **Mitigation Measure GHG-2** be implemented by a future project sponsor, that development would be consistent with the Scoping Plan and the state's reduction targets for non-transportation emissions; GHG impacts for non-transportation sectors would be less than significant and no further action would be required. However, because the

extent of implementation of **Mitigation Measure GHG-2** is currently unknown (e.g., applicability and feasibility), impacts from future development for non-transportation sectors could remain significant for some sectors if all strategies are not implemented for a particular project or equivalent measures are not identified by a project sponsor. For projects where all of the requirements of **Mitigation Measure GHG-2** (or their equivalent) are not implemented for non-transportation emissions and for all projects relative to transportation emissions where **Mitigation Measure TRA-1** does not meet the 14.3 VMT/service population threshold, implementation of **Mitigation Measure GHG-3** is further required to reduce net operational GHG emissions through purchase of GHG mitigation credits. Accordingly, with implementation of the mitigation measures described above, as applicable on a project-by-project basis, operational GHG emissions under the Specific Plan would be ***less than significant with mitigation***. It is noted that **Mitigation Measure GHG-2** and **Mitigation Measure GHG-3** are not required for the Phase I Development, which is analyzed separately below."

In Section 3.4, a new footnote has been added to Table 3.4-4 on page 3.4-19 as follows:

"[c] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025."

In Section 3.4, the text on pp. 3.4-20—3.4-21 has been revised as follows:

"**Operation**

The types of operational GHG emissions for the Phase I Development would be similar to those described above for the Specific Plan. Operational GHG emissions were evaluated under existing conditions ~~year~~ (2017) and ~~Phase I Development~~ buildout year conditions (2022) with and without Phase I Development ~~conditions~~.[12] The analysis includes emissions benefits from statewide GHG reduction programs (e.g., SB 100) and quantifiable sustainability measures, including use of green consumer products, reduction of indoor water use by 25 percent, and exceedance of Title 24 standards by 16 percent, that are incorporated into the Phase I Development design. The Phase I Development's net GHG emissions is determined by taking the difference in operational emissions between "2022 with Phase I Development" conditions and "2022 without Phase I Development" conditions ~~existing (2017) emissions~~. Table 3.4-5 presents the results of the analysis.

[12] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025.

Table 3.4-5. Estimated Annual Unmitigated Phase I Development Operational GHG Emissions (metric tons)[a]

Condition/Source	CO2	CH4	N2O	CO2e	% of Total CO2e
Existing (2017)					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	999	<1	<1	1005	7%

Condition/Source	CO2	CH4	N2O	CO2e	% of Total CO2e
Mobile Sources	13,583	2	1	13,982	91%
Stationary Sources	3	<1	<1	3	<1%
Waste Generation	63	4	<1	157	1%
Water Consumption	90	2	<1	153	1%
Total Existing [a]	**14,739**	**8**	**1**	**15,300**	**100%**
2022[b] No Phase I Development					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	800	<1	<1	805	6%
Mobile Sources [b]	11,920	1	1	12,212	92%
Stationary Sources	3	<1	<1	3	<1%
Waste Generation	63	4	<1	157	1%
Water Consumption	69	2	<1	131	1%
Total 2022[b] Without Phase I Development [a]	**12,857**	**7**	**1**	**13,309**	**100%**
2022[b] With Phase I Development					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	1,377	<1	<1	1,386	6%
Mobile Sources [b]	19,311	3	2	19,882	91%
Stationary Sources	10	<1	<1	10	<1%
Waste Generation	120	7	<1	298	1%
Water Consumption	105	3	<1	194	1%
Total 2022[b] With Phase I Development [a]	**20,924**	**13**	**2**	**21,770**	**100%**
Net Increase With Phase I Development					
2022 With Phase I Development v. ~~Existing~~[a] 2022 Without Phase I Development [a, b]	6,184 8,067	5 6	1	6,470 8,461	-

Source: Refer to Appendix 3.2-1 for CalEEMod model outputs and mobile emissions calculations.

Notes: As noted above, the analysis includes benefits achieved by the quantifiable sustainability measures incorporated as project commitments (e.g., indoor waste use reduction, exceedance of Title 24 standards, use of green consumer products) and implementation of state measures that will reduce GHG emissions (e.g., SB 100).

[a] Values may not add due to rounding.

[b] This analysis is based on a buildout year of 2022, which was the anticipated buildout year for the Phase I Development at the time the Draft EIR analysis was prepared. The anticipated buildout year for the Phase I Development was later updated to 2025. Equipment and vehicle emission factors decline as a function of time due to increasingly stringent air emission standards. Therefore, this analysis is conservative, as actual emissions would be expected to be lower in 2025.

As shown in Table 3.4-5, the Phase I Development would result in approximately 21,770 metric tons of CO_2e per year. This is an increase of 8,461 ~~6,470~~ metric tons of CO_2e (64 ~~42~~ percent) compared to Future Without Phase I Development ~~existing conditions~~. The following sections present the sector-by-sector analysis of GHG impacts, consistent with OPR, CARB, and BAAQMD guidance. Because the Phase I Development would be in operation in ~~2022~~ 2025, the 2017 Scoping Plan, which outlines reduction targets through 2030, is the most relevant regulatory document to evaluate the Phase I Development.

Mobile Source Emissions

As shown in Table 3.4-5, emissions associated with mobile sources would be approximately 19,882 metric ton of CO_2e per year in ~~2022~~ 2025, which is an increase of 63~~42~~ percent, relative to Future Without Phase I Development ~~existing conditions~~. This increase is primarily driven by the additional VMT expected as a result of the Phase I Development. As discussed in Section 3.10, *Transportation*, ~~prior to mitigation~~, the Phase I Development would increase per service population VMT, relative to Future Without Phase I Development and would not meet the 14.3 percent VMT per service population reduction target and therefore, could conflict with the state's long-term emission reduction trajectory.

Area Emissions

As shown in Table 3.4-5, emissions associated with area sources would be less than 1 metric ton of CO2e per year ~~in 2022~~. Area sources include gasoline-powered landscaping equipment (e.g., trimmers, mowers). Area source emissions are based on CalEEMod's default assumptions, which represent a conservative estimate of equipment usage based on square footage of new building space. The surfaces at the Phase I Site would consist of the office buildings, sidewalks and streets, landscaping, and pervious pavement. Landscaping, which would include primarily trees, shrubs and pervious pavement, as opposed to grassed areas, would thereby minimize the routine use of mowers and other landscaping equipment."

In Section 3.4, the text on p. 3.4-22 has been revised as follows:

"Waste Emissions

As shown in Table 3.4-5, emissions associated with waste would be approximately 298~~103~~ metric tons of CO_2e per year, a net increase of 141~~38~~ metric tons of CO_2e from Future Without Phase I Development ~~existing~~ conditions. The Phase I Development would install trash/recyclable/compostable receptacles, where the generation of all waste is tracked by weight on a monthly basis. In addition, the Phase I Development includes a partnership with LeanPath to track pre-consumer waste generated from on-site dining facilities to identify trends and make data-driven improvements to increase recycling and composting and reduce landfilled waste. These features are consistent with the Scoping Plan's overall goal of reducing waste emissions, and its specific strategy to avoid landfill methane emissions by reducing the disposal of landfilled waste and organics through programs such as edible food recovery programs. In addition, these features would support and comply with AB 341's mandatory recycling requirement and support the state's recycling goal.

Water Emissions

As shown in Table 3.4-5, emissions associated with water use would be approximately ~~134~~ 194 metric tons of CO_2e per year, a net increase of 63~~71~~ metric tons of CO_2e from Future Without Phase I Development ~~existing~~ conditions."

In Section 3.4, the text on p. 3.4-23 has been revised as follows:

"***Conclusion***

Stationary source emissions would be below BAAQMD's stationary source threshold. The Phase I Development would replace removed trees, and therefore would be consistent with Scoping Plan's overall goal of avoiding losses in carbon sequestration. Similarly, the Phase I Development's sustainability measures represent a robust suite of strategies that are consistent with applicable

policies from the 2017 Climate Change Scoping Plan and regulatory programs for the area, energy, water, waste, and land use sectors. As discussed in Section 3.10, *Transportation*, the Phase I Development would achieve the 14.3 percent VMT per service population reduction target with implementation of Mitigation Measure TRA-2, which would reduce mobile emissions from 19,882 metric ton of CO2e to 16,582 metric tons of CO2e per year ~~in 2022~~."

In Section 3.4, the text of Mitigation Measure GHG-1 on p. 3.4-24 has been revised as follows:

"Mitigation Measure GHG-1: Require Implementation of BAAQMD-recommended Construction Best Management Practices.

All applicants within the Planning Area shall require their contractors, as a condition of contracts, to reduce construction-related GHG emissions by implementing BAAQMD's recommended best management practices in effect at the time of construction, including the following measures (based on BAAQMD's (2017) CEQA Guidelines):

- Ensure alternative fueled (e.g. biodiesel, electric) construction vehicles/equipment make up at least 15 percent of the fleet;
- Use local building materials of at least 10 percent (sourced from within 100 miles of the Planning Area); and
- Recycle and reuse at least 50 percent of construction waste or demolition materials.

In Section 3.4, the text of Mitigation Measure GHG-3 on p. 3.4-25 has been revised as follows:

"**Mitigation Measure GHG-3: Purchase of GHG Mitigation Credits.**

This mitigation measure applies to applicants of future projects other than the Phase I Development, which has incorporated sustainability design features consistent with the 2017 Scoping Plan to meet the state's long term GHG reduction target. Where a future project does not propose to implement all of the GHG reduction measures in **Mitigation Measure GHG-2** and/or does not meet the VMT threshold of 21.7 VMT/Service Population and does not propose equivalent reduction measures to compensate for the measures not implemented or the VMT threshold not met, the project applicant shall be required to pay on a pro rata basis for net operational GHG emissions to compensate for emissions foregone from not implementing all measure in **Mitigation Measure GHG-2** or meeting the VMT threshold or providing equivalent reductions."

In Section 3.4, Mitigation Measure GHG-3 on p. 3.4-27 has been revised as follows:

"This mitigation includes the following specific requirements for applicants of future projects (other than the Phase I Development):

- Applicants shall provide the City with a 30-year operational GHG emissions estimate for the final design that includes two scenarios: 1) project operations including all **Mitigation Measure GHG-2** reduction measures and the emissions associated with meeting the VMT threshold of 21.7 VMT/Service population; and 2) project operations only including those **Mitigation Measure GHG-2** reduction measures the applicant proposes to implement and any alternative GHG reduction measures proposed by the applicant and the emissions associated with the likely achievable VMT/Service Population estimated for the project with implementation of **Mitigation Measure TRA-1**. The emissions estimate can be focused exclusively on the sectors where **Mitigation Measure GHG-2** measures will not be fully implemented and/or a shortfall in meeting the VMT threshold is expected. The difference between the Scenario 1 and Scenario 2

operational emissions will define the amount of needed annual GHG reductions to be addressed through purchase of GHG mitigation credits. The City shall review the emission estimates to ensure they are representative and determine the total amount of annual GHG emissions required to be addressed through purchase of mitigation credits."

3.5 Hydrology and Water Quality

In Section 3.5, the text on p. 3.5-5 has been revised as follows:

"**San Francisco Bay Regional Water Board General Permit Order No. R2-2017-0048**

The San Francisco Bay Regional Water Board issued general waste discharge requirements for the discharge or reclamation of extracted and treated groundwater resulting from the cleanup of groundwater polluted by volatile organic compounds (VOCs), fuel leaks, fuel additives, and other related wastes (Order No. R2-2017-0048; NPDES Permit No. CAG912002) which went into effect on January 1, 2019. This Order regulates the discharge or reclamation (or both discharge and reclamation) of extracted and treated groundwater resulting from the cleanup of groundwater at active or closed cleanup sites, such as fuel stations or construction sites."

South Westside Basin Groundwater Management Plan

The South Westside Basin Groundwater Management Plan (GWMP) was completed in July 2012 as a joint effort between Cal Water, the SFPUC, and the Cities of Daly City and San Bruno that superseded prior groundwater management and planning efforts. The GWMP was prepared pursuant to Assembly Bill 3030 (AB 3030; codified in CWC §10750 et seq.). The GWMP ensures a sustainable, high quality, reliable water supply at a fair price for beneficial uses achieved through local groundwater management. The GWMP provides steps for monitoring water quality and quantity in the South Westside Basin. Each groundwater well identified in the GWMP has defined triggers for overdraft, seawater intrusion, various water quality measures, and has identified two levels of trigger thresholds for each groundwater well based on historical water levels, and actions to address the trigger that is met. The GWMP includes the following elements:

- Groundwater Storage and Quality Monitoring
- Control of Saltwater Intrusion
- Conjunctive Use
- Recycled Water
- Source Water Protection

The GWMP indicates that the basin is not in overdraft and the City can pump at a rate of 2.1 MGD on a long-term basis.

Regional Groundwater Storage and Recovery Project

In December 2014, the Regional Groundwater Storage and Recovery (GSR) Project operating agreement was signed to ensure long-term management and sustainability of the South Westside Groundwater Basin through a strategic conjunctive use partnership. The partnership with the City of San Bruno, SFPUC, California Water Service (serving South San Francisco and Colma), and the City of Daly City allows the agencies to operate the basin jointly under two supply modes that vary

according to hydrologic conditions. Refer to Section 3.11, *Utilities and Service Systems*, of this EIR, for additional discussion of the Regional GSR Project."

In Section 3.5, the text on p. 3.5-26 has been revised as follows:

"***Operation***

The proposed parking garages would include water proofing design measures and would not require permanent dewatering. Therefore, the Project would not deplete groundwater supplies due to permanent dewatering activities. ~~The City of San Bruno, including the Project Site, is serviced by both SFPUC and local South Westside Basin groundwater resources. As a participant in the Regional Groundwater Storage and Recovery Project, the City of San Bruno is currently participating in the storage period which require the agency to purchase most of its municipal water resources from surface water agencies, primarily the SFPUC, during normal and wet years. However, the participation in the storage period could change upon notice from SFPUC. The Regional Groundwater Storage and Recovery Project permits participating jurisdictions to continue pumping groundwater during wet years to support well maintenance activities and manage distribution system constraints. The City of San Bruno does pump limited groundwater resources during wet years for these allowable purposes. SFPUC makes available for delivery up to 5.52 MGD of SFPUC water to jurisdictions during storage periods to prevent more extensive groundwater pumping and groundwater withdrawal from the basin. Purchase of water would be based on system needs, water availability, and groundwater recharge goals. Because SFPUC makes available up to 5.52 MGD to minimize groundwater pumping, and because limited groundwater pumping would continue to be permitted to support certain procedures, it is expected that water resources are sufficient to serve the City and the Project, inclusive of Phase I Development, through at least 2040. As discussed in Section 3.11, *Utilities and Service Systems*, of this EIR, approximately 0.57 MGD of water would be required under the Project (assuming the worst-case demand under Maximum Housing Scenario), inclusive of Phase I Development. The Project's Water Supply Assessment concluded that projected supplies would be sufficient to meet the demand of the Project in addition to forecasted growth in the City. Further details on surface and groundwater supply are described in Section 3.11, *Utilities and Service Systems*, of this EIR.~~"

3.6 Land Use and Planning

In Section 3.6, the text on p. 3.6-17 has been revised as follows:

"Table 3.6-2 shows some inconsistencies with the General Plan. However, these inconsistencies are either not associated with any negative environmental impact under CEQA or would be resolved with appropriate mitigation measures. The Project would thus be consistent with the majority of applicable goals, policies, and actions, resulting in ***an impact that is less than significant with mitigation*** ~~a ***less-than-significant impact***~~. ~~No mitigation measures are required.~~

Phase I Development

The Phase I Development was found to be consistent with the Land Use and Urban Design, Economic Development, Open Space and Recreation, Health and Safety, Public Facilities and Services, and Housing Elements of the General Plan. Using the same rationale for the consistency analysis of the Project, the Phase I Development's compatibility with the Transportation Element is classified as inconsistent with LOS policies set forth in the General Plan. However, while the City includes this question of vehicle delay and the General Plan's LOS policies in the Project in its planning

considerations, vehicle delay is not considered to be an environmental impact under CEQA (see Section 3.10, *Transportation*, for further discussion). The Phase I Development's compatibility with the Environmental Resources and Conservation Element was found to be consistent with mitigation.

Given that the Project is consistent with the San Bruno General Plan's applicable goals, policies, and actions (with the exception regarding LOS policy discussed above), Phase I Development impacts due to conflicts with the General Plan would be ***less than significant with mitigation.*** ~~No mitigation measures are required.~~"

In Section 3.6, the text on p. 3.6-20 has been revised as follows:

"This project could be constructed under an existing, fully entitled development agreement or, if the development agreement expires (as of ~~February 2021~~ August 2021), as part of buildout under the Project. Therefore, it is conservatively evaluated in this EIR as both a component of the Project and a cumulative project."

3.7 Noise

In Section 3.7, the text on p. 3.7-53 has been revised to unbold/unitalicize the word "significant," clarifying that the impact determination is prior to mitigation, as follows:

"Since the Phase I Development's contribution could be up to 2 dB based on the direct impact analysis presented previously, the Phase I Development's contribution to this potential cumulative impact would be cumulatively considerable. This impact would be considered ~~***significant***~~ significant, and mitigation is required."

In Section 3.7, the text on p. 3.7-54 has been revised as follows:

"With implementation of the mitigation measures below, Phase I Development impacts would be reduced to less-than-significant levels, and the contribution of Phase I Development construction to the potential cumulative impact would not be cumulatively considerable. This impact would be considered ***less than significant with mitigation***.

Mitigation Measures

Mitigation Measure NOI-1, described previously, would reduce construction noise impacts from construction of the Phase I Development during nighttime hours to less-than-significant levels by ensuring that noise at a distance of 100 feet during nighttime hours would be below 60 dBA L_{eq}, unless a permit is first obtained from the director of the City Public Works Department or his/her designee).

Implementation of **Mitigation Measure NOI-4** would reduce the potential cumulative impact related to construction-related haul truck noise for the Phase I Development to a less-than-significant level.

Mitigation Measure NOI-4: Coordination of Phase I Development Haul Truck Routes with 901 Cherry Avenue (only required for Phase I Development).

Prior to the issuance of a grading permit, the City shall determine whether hauling activities associated with the Phase I Development could occur simultaneously with hauling activities associated with the 901 Cherry Avenue development. If it is determined that hauling activities for both projects could occur simultaneously, the applicant shall consult with the City to

coordinate the appropriate haul route(s) so that both projects are not conducting hauling activities at the same time and along the same route. The final haul route shall be subject to City approval.

~~With implementation of these mitigation measures, Phase I Development impacts would be reduced to less-than-significant levels, and the contribution of Phase I Development construction to the potential cumulative impact would be not be cumulatively considerable. This impact would be considered ***less than significant with mitigation.***~~"

3.8 Population and Housing

In Section 3.8, the text on p. 3.8-13 has been revised as follows:

"The Phase I Development would construct approximately 440,000 new square feet of office space and remove 138,524 square feet of existing office space, for an increase of 301,476 net new square feet of office space. Based on the average of one job per 250 square feet, the Phase I Development is expected to generate 1,206 net new employees. Based on the statistics discussed above, approximately 164 of the net new employees for the Phase I Development would reside in the city of San Bruno (13.6% of the total), and the remaining 1,042 of the net new employees would reside outside the city of San Bruno. Based on the Bay Area average of 1.88 residents per employee, the Phase I Development would result in 308 new residents in San Bruno and 1,959 new residents outside San Bruno, for a total of 2,267 new Bay Area residents. Anticipated completion of the Phase I Development would be in ~~2022~~ 2025."

In Section 3.8, the text on p. 3.8-14 has been revised as follows:

"Buildout of the Phase I Development would occur in ~~2022~~ 2025. According to the City, development completed since adoption of the General Plan includes 5,000 square feet of restaurant space, 7,250 square feet of retail/commercial space, 67,586 square feet of professional office space, and 14 housing units."

3.9 Public Services and Recreation

In Section 3.9, the text on p. 3.9-29 has been revised as follows:

"The projected buildout year of the Phase I Development is ~~2022~~ 2025. The Phase I Development, in combination with other past, present, and reasonably foreseeable projects built by ~~2022~~ 2025, would increase the cumulative demand for fire protection, police protection, park, and library services in ~~2022~~ 2025, further exacerbating the existing need for additional fire protection, police protection, park, and library facilities that has already been identified by the City in the DIF Nexus Study."

3.10 Transportation

In Section 3.10, the text on p. 3.10-5 has been revised as follows:

"This shift in transportation impact criteria is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. The new vehicle miles traveled (VMT) methodology is required as of July 1, 2020. ~~Specific to SB 743, Section 15064.3(c) of~~

~~the revised CEQA Guidelines states that, "a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide." However, CEQA Statute Section 21099(b)(2) states that, "upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the Guidelines."~~

~~Although the Governor's Office of Planning and Research (OPR) provides recommendations for adopting new VMT analysis guidelines, lead agencies have the final say in designing their methodology. Lead agencies must select their preferred method of estimating and forecasting VMT, their preferred significance thresholds for baseline and cumulative conditions, and the mitigation strategies they consider feasible. Lead agencies must prove that their selected analysis methodology aligns with SB 743's goals to promote infill development, reduce GHGs, and reduce VMT~~."

In Section 3.10, the text on p. 3.10-11 has been revised as follows:

"~~YouTube and Walmart provide employee-only long-haul shuttles as an alternative to public transit.~~ Walmart, in partnership with Commute.org, also provides a publicly accessible shuttle service connecting the Project Site to the BART and Caltrain stations. Shuttles travel to and from San Francisco, the South Bay, and the East Bay. Approximately 40 percent of YouTube employees commute to the Project Site on the long-haul shuttles.[2] ~~YouTube also provides a local, employee-only shuttle connecting the Project Site to the BART and Caltrain stations. Employee shuttle service runs throughout the day with peak service operating during the morning and evening commute hours~~. As illustrated on Figure 3.10-2, ~~the YouTube and Walmart~~ shuttles stop in front of ~~their respective~~ buildings on Cherry and Elm Avenue."

In Section 3.10, the text on p. 3.10-25 has been revised as follows:

"Although the Specific Plan ~~Project description~~ includes a TDM requirement, tenant-specific TDM strategies ~~TDM programs~~ are not permanent in the same way as built environment factors and land use diversity and ~~instead are tied to tenants, who often~~ their effectiveness can vary as tenants turn over during the life of a project."

In Section 3.10, the text on p. 3.10-29 has been revised as follows:

"**Project**

Potential construction impacts were assessed qualitatively, based upon preliminary construction information for the Project. Construction-related activities ~~would typically occur Monday through Friday, with limited construction activities outside of daytime hours or on weekends~~ would be subject to Section 6.16.070 of the San Bruno Municipal Code, subject to time of day and other restrictions pursuant to Mitigation Measure NOI-1 and project-specific conditions the City might require. Construction staging would typically occur within individual sites and outside of the public right-of-way."

In Section 3.10, the text on p. 3.10-33 has been revised as follows:

"**Mitigation Measure TRA-1** would require new land use applicants to submit a TDM program in conjunction with the development application that would, over time, achieve the Plan's VMT per Capita threshold. The 21.7 VMT per Service Population threshold equates to no more than 43 percent of trips occurring by single-occupancy vehicles (SOV). Acknowledging reasonable

limitations on near-term TDM program success, program expectations may be less stringent for an initial occupancy period but would become more stringent over time and would ultimately require each employer or property manager to meet the VMT per Capita threshold or associated drive-alone goal."

In Section 3.10, the text of Mitigation Measure TRA-1 on p. 3.10-34 has been revised as follows:

"Mitigation Measure TRA-1 (Project not including Phase I Development): Prepare and Implement TDM Program.

Property owners of new development within the Specific Plan, not including the Phase I Development, will prepare and implement a TDM program, as denoted in Specific Plan Policies TDM 4-9 through TDM 4-11. The TDM program will require a TDM coordinator who will facilitate programming and monitoring activities. ~~The TDM coordinator would be responsible for collecting annual VMT data for the building(s) and reporting the findings to the City. Property owners or tenants must contribute their fair share to the cost of the monitoring and reporting activity.~~

New land use applicants must submit a TDM program in conjunction with the development application that will, over time, achieve the Plan's VMT per Capita threshold. The VMT threshold equates to no more than 43 percent of trips occurring by single-occupancy vehicles and SOV mode share can be used as an alternative monitoring metric. ~~TDM reduction goals will be applicant- or property-manager-specific and will be agreed upon as part of the conditions of approval.~~ TDM Program approvals will strive for the VMT per Capita threshold but acknowledge reasonable limitations on TDM program success due to surrounding transportation and land use context in the near-term. ~~Program expectations may be less stringent for an initial occupancy period but will become more stringent over time and will ultimately require each employer or property manager to meet the VMT per Capita threshold or associated drive-alone goal.~~

~~A report, documenting the TDM activities undertaken and their results, shall be submitted to the Community and Economic Development Director. Program success will be measured through a combination of VMT measurements and vehicle occupancy surveys, both of which will capture vehicle trips associated solely with net new development. Alternatively, tenants or employers have the option to monitor mode split for their site and report the results in relation to the 43 percent drive-alone threshold. Either option should account for all vehicle trips (employee, visitor, services, etc.) associated with the site. Monitoring will be required after a three-year grace period and on an annual basis thereafter. Monitoring will continue until the property manager or employer can demonstrate five consecutive years (or some other monitoring horizon agreed upon in the conditions of approval) of VMT threshold compliance for the newly occupied site.~~

~~If tenants exceed the selected threshold (the 21.7 VMT per capita threshold or the 43 percent drive alone goal) in any given year, the tenant or employer must adjust their TDM program and pay a fine assessed on either a per trip basis or based on the amount by which they exceed either the VMT per Capita or drive-alone threshold. The Community and Economic Development Director or designee shall evaluate the overall effectiveness of all of the TDM activities and may suggest new or modified activities or substitute activities to meet the program's objectives. The Community and Economic Development Director or~~

~~designee may impose reasonable changes to assure the program's objectives will be met.~~ A Bayhill VMT Monitoring and Mitigation Plan will be prepared and periodically updated to explain the details of the monitoring and mitigation requirements. If thresholds are not met, the City will collect mitigation payments, which ~~Fines~~ will be used to fund City-initiated projects and programs that reduce the SOV mode share trip rate such as bike and pedestrian network improvements, first-/last-mile shuttle services to regional transit stations, and marketing campaigns."

In Section 3.10, the text of Mitigation Measure TRA-2 on p. 3.10-35 has been revised as follows:

"Mitigation Measure TRA-2 (Phase I Development only): Monitor and Evaluate Existing TDM Program.

The Phase 1 Development applicant will be required to complete and submit to the City of San Bruno an annual monitoring study that demonstrates a 21.7 vehicle miles traveled (VMT) per Capita threshold or a single occupancy vehicle (SOV) mode share of no more than 43 percent for the new Phase 1 Development buildings~~, after a 3-year implementation grace period~~. A Bayhill VMT Monitoring and Mitigation Plan will be prepared and periodically updated to explain the details of the monitoring and mitigation requirements. If thresholds are not met, the City will collect mitigation payments, which ~~If the Phase 1 Development applicant exceeds the metric selected (VMT cap or SOV rate), the applicant must adjust their TDM program and pay a fine assessed on either a per trip basis or based on the amount by which they exceed either the VMT per Capita or drive-alone threshold. The Community and Economic Development Director or designee shall evaluate the overall effectiveness of all of the TDM activities and may suggest new or modified activities or substitute activities to meet the program's objectives. The Community and Economic Development Director or designee may impose reasonable changes to assure the program's objectives will be met. Fines~~ will be used to fund City-initiated projects and programs that reduce the SOV mode share trip rate such as bike and pedestrian network improvements, first-/last mile shuttle services to regional transit stations, and marketing campaigns."

3.11 Utilities and Service Systems

In Section 3.11, p. 3.11-1 has been revised as follows:

- "Bayhill Specific Plan Development Project Water Supply Assessment (WSA) (West Yost Associates 2019), included in Appendix 3.11-1a;
- Bayhill Specific Plan Development Project Water Supply Assessment Addendum (WSA Addendum) (West Yost Associates 2021), included in Appendix 3.11-1b;"

In Section 3.11, p. 3.11-2 has been revised as follows:

"This legislation also expands the requirements for certain types of information in an UWMP, including an identification of any existing water supply entitlements, water rights, or water service contracts held relevant to the WSA for a proposed project, and a description of water deliveries received in prior years. A WSA has been prepared for the Project, and is included in Appendix 3.11-1a to this Draft EIR. An addendum to the WSA is included in Appendix 3.11-1b."

In Section 3.11, pages 3.11-4 to 3.11-8 have been replaced with the following revised pages 3.11-4 through 3.11-11:

on all new homes, as well as measures that encourage energy storage technologies, such as batteries, heat pump water heaters, and highly efficient air filters.

3.11.1.3 Regional

SFPUC Right-of-Way (ROW) Policies

The SFPUC owns and manages land and water system infrastructure for its own exclusive use that is part of the Hetch Hetchy Regional Water System. The primary use of SFPUC lands and easements is for the delivery, operation, maintenance and protection of water, power, and sewer systems. As discussed in Chapter 2, *Project Description*, the SFPUC maintains two easements in the Project Site. The SFPUC has adopted guidelines to help inform how and in which instances the easements can serve the needs of public agencies, private parties, nonprofit organizations, and developers, while maintaining the safety and security of the SFPUC pipelines. SFPUC guidelines pertain to land use and structures, recreational use, utilities, vegetation, and water efficiency. The easements also are subject to terms and restrictions regarding use of land contained in the original deeds granting the easements to the SFPUC.

Water System Improvement Program

SFPUC's Water System Improvement Program (WSIP) was approved on October 31, 2008, with the purpose of improving the delivery reliability of the Regional Water System (RWS) that is operated by SFPUC. The objectives of the WSIP related to water supply are listed below.

- Meet average annual water demand of 265 MGD from the SFPUC watersheds for retail and wholesale customers during non-drought years for system demands consistent with the 2009 Water Supply Agreement.
- Meet dry-year delivery needs while limiting rationing to a maximum 20 percent system-wide reduction in water service during extended droughts.
- Diversify water supply options during non-drought and drought periods.
- Improve use of new water sources and drought management, including groundwater, recycled water, conservation, and transfers.

The WSIP provides benefits to the City by improving the reliability of wholesale water purchased from SFPUC, especially during periods of drought. The program aims to meet customer water needs in non-drought and drought conditions and provides dry-year water supply projects to augment all year type water supplies during drought. As of August 1, 2018, the WSIP was over 96 percent complete; the current forecasted date to complete the overall WSIP is December 2021 (SFPUC 2021).

South Westside Basin Groundwater Management Plan

~~The SFPUC developed a plan describing~~The South Westside Basin Groundwater Management Plan (GWMP), completed in July 2012, includes strategies and recommendations that guide planning decisions in a manner that preserves groundwater within the South Westside Groundwater Basin, which underlays the Project Site (SFPUC 2012). The GWMP indicates that the basin is not in overdraft and the City can pump at a rate of 2.1 MGD on a long-term basis. For additional details pertaining to the South Westside Basin Groundwater Management Plan, please refer to Section 3.5, *Hydrology and Water Quality*, of this Draft EIR.

Regional Groundwater Storage and Recovery Project

In December 2014, the Regional Groundwater Storage and Recovery (GSR) Project operating agreement was signed to ensure long-term management and sustainability of the South Westside Groundwater Basin through a strategic conjunctive use partnership. The partnership with the City of San Bruno, SFPUC, California Water Service (serving South San Francisco and Colma), and the City of Daly City allows the agencies to operate the basin jointly and provides a new 20-billion-gallon regional dry year groundwater supply. The project is included as part of the SFPUC WSIP described above. The City implemented conjunctive use operations starting in 2016.

The Regional GSR Project is an in-lieu groundwater recharge program that balances groundwater and the SFPUC RWS to increase drought year water supplies. Under the Regional GSR Project, the City operates under two supply modes that vary according to hydrologic conditions. During wet and normal years ("put" operations), SFPUC provides additional surface water to the City to reduce the City's groundwater pumping. The additional supply is stored in the South Westside Basin as groundwater until it is needed during a drought or emergency. During dry years ("take" operations), the City utilizes available groundwater supplies and reduces surface water deliveries, thereby freeing surface water supply to be delivered to other SFPUC customers.

~~In 2014, SFPUC, in conjunction with the City of Daly City, the California Water Service Company, and the City of San Bruno, established the Regional Groundwater Storage and Recovery Project. This project encourages water resource preservation in healthy groundwater basins during normal and wet years, such that the groundwater resources may be utilized in future drought years if needed. Under this joint program, groundwater basin pumping is significantly reduced during normal precipitation and wet years. In exchange, SFPUC provides additional surface water resources in excess of the jurisdiction's Individual Supply Guarantee to match the amount of groundwater that would have otherwise been withdrawn from the basin. Under the Regional Groundwater Storage and Recovery Project, the SFPUC makes available for delivery of up to 5.52 million gallons per day (MGD) of SFPUC water to prevent groundwater pumping. Participating jurisdictions are permitted to continue pumping groundwater during wet years to support well maintenance, distribution system constraint management, and water quality blending (City and County of San Francisco Planning Department 2013). In dry years, when surface water resources are at risk of depletion, water resources may be extracted from the replenished local groundwater basin supply to supplement SFPUC water supplies. The South Westside Basin is part of the Regional Groundwater Storage and Recovery Project. Therefore, while the basin has historically provided substantial groundwater resources in the City of San Bruno, it is currently subject to Regional Groundwater Storage and Recovery Project restrictions in accordance with the terms and conditions of the Groundwater Storage and Recovery Agreements.~~

Bay Delta Plan Amendment

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, establishing water quality objectives to maintain the health of the State's rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment) (SWRCB 2019). The State Water Resources Control Board has stated that it intends to implement the Bay-Delta Plan Amendment by 2022, assuming all required approvals are obtained by that time. Implementation of the Bay-Delta Plan Amendment will result in a substantial reduction in the City's SFPUC water supplies from the Tuolumne River watershed during dry years, requiring rationing in the City to a degree greater than that previously anticipated to address supply shortages that were not accounted for in the 2015 Urban Water Management Plan, which is discussed in greater detail below.

In a letter dated July 31, 2019 from the SFPUC Director of Water Resources to the Bay Area Water Supply & Conservation Agency (BAWSCA) Water Resources Manager, SFPUC provided a memorandum[1] titled *"Water Supply Reliability Information for BAWSCA Member Agencies Water Supply Assessments (with Corrections)"* (Reliability Memorandum). This Reliability Memorandum (Appendix 3.11-1b, Attachment A) states that implementation of the Bay-Delta Plan Amendment is uncertain for several reasons:

- **First**: Under the Clean Water Act, the U.S. Environmental Protection Agency (USEPA) must approve the water quality standards identified in the Bay-Delta Plan Amendment within 90 days from the date the approval request is received. By letter dated June 11, 2019, USEPA rejected the State Board's two-page submittal as inadequate under the requirements of the Clean Water Act. Pursuant to USEPA's letter, the State Board has 90 days to respond with a submittal that complies with the law. At this point, USEPA has neither approved, nor disapproved, any of the revised water quality objectives. It is uncertain whether the USEPA will approve or disapprove the water quality standards in the future. Furthermore, the determination could result in litigation.

- **Second**: Since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal court, challenging the State Board's adoption of the Bay-Delta Plan Amendment, including two legal challenges filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation in state and federal courts. These cases are in the early stage and there have been no dispositive court rulings to date.

- **Third**: The Bay-Delta Plan Amendment is not self-implementing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the 401 certification process in the Federal Energy Regulatory Commission's (FERC) relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-23 timeframe. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different water supply impact on the SFPUC).

- **Fourth**: In recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, State Board Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the State Board "as early as possible after December 1, 2019." In accordance with the State Board's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the State Board ("March 1st Proposed Voluntary Agreement"). On March 26, 2019, SFPUC adopted Resolution No. 19-0057 to support SFPUC's participation in the Voluntary Agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency and California Environmental Protection Agency and the leadership of the Newsom

[1] Letter from Paula Kehoe, SFPUC Director of Water Resources to Tom Francis, Water Resources Manager, BAWSCA, dated July 31, 2019. Includes attachment titled Water Supply Reliability Information for BAWSCA Member Agencies Water Supply Assessments (with Corrections).

administration. The negotiations for a voluntary agreement have made significant progress since an initial framework was presented to the State Board on December 12, 2018. The package submitted on March 1, 2019 is the product of renewed discussions since Governor Newsom took office. While significant work remains, the package represents an important step forward in bringing together diverse California water interests.

San Mateo Countywide Stormwater Pollution Prevention Program

The City of San Bruno is one of twenty participating cities in the San Mateo Countywide Water Pollution Prevention Program, which manages a shared National Pollutant Discharge Elimination System (NPDES) permit utilized by all participating agencies (City/County Association of Governments of San Mateo County 2015). The Program ensures that participating jurisdictions manage stormwater runoff flows such that contaminated water runoff and discharge into waterbodies is minimized. The program accomplishes this by directing construction projects, municipal operations, and other potential stormwater sources countywide to incorporate appropriate Low-Impact-Development (LID) measures that contain, filter, and treat stormwater prior to discharge. The City of San Bruno administers stormwater quality protection through the C.3 Municipal Regional Stormwater Permit (MRP) which is issued under NPDES and by RWQCB through this program.

3.11.1.4 Local

Sanitary Sewer Management Plan

The City of San Bruno Sewer System Management Plan is a comprehensive planning document that describes the policies and procedures required to maintain compliant sewer services Citywide (City of San Bruno 2016). These policies help fulfill San Francisco Bay Regional Water Quality Control Board (RWQCB) water quality and sewer management requirements and to prevent sanitary sewer overflows and maintain water quality. Generally, goals and policies described in the Sanitary Sewer Management Plan pertain to maintaining adequate sanitary sewer wastewater conveyance and treatment capacity, minimizing sewer overflow incidents, and preventing illicit discharges including contaminated stormwater, chemicals, debris, and fats and oils.

2015 Urban Water Management Plan

The City of San Bruno 2015 Urban Water Management Plan (West Yost Associates 2016) provides both current and future water supply planning guidance and implementation strategies citywide in accordance with RWQCB requirements and with the Urban Water Management Planning Act (AB 797). The UWMP is intended to preserve water resources in the City of San Bruno to ensure sufficient water supplies and adequate water quality in the City based on catalogued and projected water use data and the City's Individual Supply Guarantee (ISG), the amount of SFPUC-provided surface water resources that are guaranteed for purchase.

Chapter 8 of the 2015 ~~City of San Bruno Urban Water Management Plan~~ UWMP outlines the City's Water Shortage Contingency Plan (WSCP), which includes specific water conservation procedures intended to incentivize water use reductions and water conservation citywide. The WSCP details four increasing levels of conservation measures the City Council can implement during water shortage events, as authorized under Chapter 10.16 of the San Bruno Municipal Code. The stages were developed to meet supply cutbacks ranging from 5 percent to 50 percent:

- The first stage, Stage I, aims at reducing the City's water use by 10 percent in response to a reduction in supply ranging from 5 percent to 10 percent. Stage I reflects a scenario where the SFPUC is forced to reduce wholesale water deliveries to customers of the RWS by 10 percent. Stage I includes voluntary water conservation measures that are promoted through a public information campaign aimed at increasing awareness through the distribution of literature and bill inserts, newspaper advertisements, and educational speakers for schools and other groups.

- The actions outlined in Stage II are to be implemented when the City requires a 20 percent reduction in water use. The City may be faced with such cutbacks during multiple dry year periods when the RWS experiences a 20 percent reduction in water supply. Stage II calls for mandatory conservation measures as determined necessary by the City Council and the Public Services Director, an aggressive public information campaign, and voluntary water allocations.

- Stage III water conservation and rationing measures are geared toward a 35 percent reduction in City-wide water use. The steps to achieve a Stage III reduction include all of the steps outlined in Stage II, as well as mandatory water allotments for all accounts, increased monitoring of water use, and increased rates and penalties for excess water use.

- Stage IV identifies mechanisms by which the City could reduce total water use by up to 50 percent, as required by the Urban Water Management Planning Act. To achieve a reduction in water use of 50 percent, the City would adjust mandatory allotments and reductions from Stage III as necessary to reach a City-wide water use reduction of 50 percent. If necessary, the City may prohibit all water use except as required for public health and safety. Increased enforcement mechanisms would be instituted to enforce the Stage IV cutbacks.

The City's 2015 UWMP includes demand reduction assumptions under dry year conditions that reflect implementation of the WSCP:

- During Single Dry Years, the potable water demands are assumed to be 90 percent of Normal Year demands (10 percent reduction in water use). This assumes that the City implements Stage I of the WSCP.

- During Multiple Dry Years, the potable water demands are assumed to be 90 percent of Normal Year demands (10 percent reduction in water use) for the first dry year and 80 percent of Normal Year demands (20 percent reduction in water use) for the second and third dry year. This assumes that the City implements Stage I of the WSCP in the first year and implements a Stage II water shortage in the second and third years.

The City is currently preparing its 2020 UWMP, which is scheduled for public review in September 2021. The demand estimates in the draft 2020 UWMP account for the estimated water demand of the Project, inclusive of the Phase I Development, as shown in Table 3.11-6a (West Yost Associates 2021).

Storm Drain Master Plan

The City of San Bruno Storm Drain Master Plan guides storm drain infrastructure planning to help reduce overall storm drain runoff and localized flooding risks, with special consideration for site topography, drainage patterns, and system capacity limitations (City of San Bruno 2014a). The Storm Drain Master Plan identifies the storm drain system currently serving the Project Site as being comprised of underground pipes, box culverts, and channels.

City of San Bruno Green Infrastructure Plan

The City of San Bruno Green Infrastructure Plan (City of San Bruno 2019), approved in August 2019, guides sustainable development in the City of San Bruno, with a focus on converting the City's storm drainage systems from a traditional "grey" infrastructure system, in which stormwater flows across impervious surfaces directly into storm drains, to an integrated approach that will direct runoff to vegetated areas for infiltration. The plan intends to identify and prioritize low-impact development (LID) opportunities citywide in which such stormwater management infrastructure can be installed in the form of bioretention areas, stormwater tree well filters, suspended pavement systems, pervious pavement, infiltration facilities, green roofs, and rainwater harvesting facilities. Portions of the Project Site are located in either medium- or high-priority LID or regional project opportunities.

3.11.1.5 Environmental Setting

This section provides a discussion of the existing conditions related to utilities and service systems on and serving the Project Site, inclusive of Phase I Site. Described utilities include potable water facilities; wastewater treatment facilities; electricity, natural gas, and telecommunications infrastructure; sanitary sewer facilities; stormwater facilities; and solid waste providers.

City of San Bruno

Water Supply, Demand, and Conveyance System

The City of San Bruno purchases treated surface water from SFPUC and North Coast County Water District (NCCWD) and delivers water to its customers through the City's water distribution system, which consists of 100 miles of pipelines, 9,000 valves, 985 fire hydrants, 8 pumping stations, 8 storage tanks, and 13 pressure zones (City of San Bruno n.d. a). SFPUC water supplies are primarily derived from the Hetch Hetchy watershed within Yosemite National Park and subsequent downstream reservoirs, with the remaining SFPUC water supplies originating locally within the Bay Area. SFPUC provides an Individual Supply Guarantee of 3.25 millions of gallons per day (MGD) to the City of San Bruno, and a collective 184 MGD Individual Supply Guarantee to all ~~Bay Area Water Supply & Conservation Agency (~~BAWSCA~~)~~ members, including the City of San Bruno. ~~However, under the Regional Groundwater Storage and Recovery Project, SFPUC may require jurisdictions to purchase up to 5.52 MGD of water based on system needs, water availability, and groundwater recharge goals (West Yost Associates 2015).~~ Purchased NCCWD water supplies only the ~~Treetop Apartment Complex~~ Crystal Springs Terrace Apartments, which does not fall within the Project Site and therefore is not discussed in detail in this analysis (West Yost Associates 2016).

The City of San Bruno also obtains water locally from South Westside Basin groundwater resources (West Yost Associates 2019a). Much of the City of San Bruno is underlain by the South Westside Basin, which produces approximately 8,600 acre-feet of water annually. Additional information regarding the physical conditions of the South Westside Basin, as well as further details regarding the hydrological setting within the City of San Bruno and the Project Site, are included in Section 3.5, *Hydrology and Water Quality*, of this Draft EIR.

In 2010, 2,364 acre-feet (28 percent) of the City's water was produced from four supply wells within City boundaries (SFPUC 2012). Approximately half of the City's water supply was sourced from the South Westside Basin, a "Very Low Priority" groundwater basin, between the years 2005 and 2010, with the remaining water supply purchased from SFPUC and NCCWD (California Department of Water Resources 2019). ~~However, a~~As described in greater detail in the Regulatory Setting section above, the South

Westside Basin is a shared groundwater resource. The local agencies overlying the basin manage the resource jointly through use of a GWMP and the Regional GSR Project. ~~preserved under the Regional Groundwater Storage and Recovery Project, which identifies healthy groundwater basins in which natural recharge is prioritized (SFPUC 2018). Therefore, as part of the Regional Groundwater Storage & Recovery Project agreement, the City of San Bruno relies primarily on South Westside Basin groundwater resources during dry-weather years, and purchases SFPUC water resources during wet years, in accordance with specific Project provisions. Under the agreement, wet year water purchases may exceed the City's Individual Supply Guarantee.~~ From Fiscal Year 2013/2014 through Fiscal Year 2015/2016, the City pumped an average of 1.82 MGD of groundwater from the South Westside Basin; in Fiscal Year 2016/2017, this quantity was reduced to 0.27 MGD with ~~program~~ implementation of the Regional GSR Project (West Yost Associates 2019a).

Water supply demand generally increases with population growth to meet water supply needs to serve the larger population (West Yost Associates 2016). As described in greater detail in Section 3.8, *Population and Housing*, of this Draft EIR, the City of San Bruno is projected to reach a population of 41,455 by 2020; 43,835 by 2030; and 51,370 by 2040. ~~Notwithstanding projected population growth, water supply shortages are not anticipated during Normal, Single Dry, or Multiple Dry water years in the City through 2040, though SFPUC water supplies are expected to decrease over consecutive dry year conditions (West Yost Associates 2019a).~~ Table 3.11-1a, below, displays historical and projected water demands during Normal years across land use types citywide, based on population growth projections for the City of San Bruno. As shown in Table 3.11-1b, ~~D~~dry-year water demand is less than what is displayed in Table 3.11-1a due to updates in proposed development and mandated water conversation measures ~~as described in greater detail in Tables 4-2 and 4-4 of the WSA~~ (West Yost Associates ~~2019a~~2021). The demand projections in Table 3.11-1b, which are based on the City's draft 2020 UWMP, account for the estimated water demand of the Project, inclusive of the Phase I Development (West Yost Associates 2021).

Table 3.11-1a. Historical and Future/Projected Water Demands Across Land Uses in the City of San Bruno for Normal Years (MGD)

Land Use Sector	FY 2004/05	FY 2009/10	FY 2014/15	2020	2025	2030	2035	2040
Residential	2.78	2.48	2.14	2.68	2.89	3.12	3.39	3.62
Commercial	0.52	0.59	0.62	0.78	0.84	0.91	0.99	1.06
City Parks/ Facilities	--	0.17	0.13	0.16	0.17	0.18	0.20	0.21
Other	0.32	0.01	--	--	--	--	--	--
Water Losses[a]	0.15	0.40	0.25	0.31	0.34	0.37	0.40	0.42
Total (MGD)[b]	**3.76**	**3.65**	**3.14**	**3.93**	**4.24**	**4.58**	**4.98**	**5.31**

Source: West Yost Associates 2016~~, West Yost Associates 2019~~
Notes:
MGD = millions of gallons per day
FY = Fiscal Year
[a] Future water losses were projected at a rate of approximately 8% of total ~~combined~~ water production ~~and import~~
[b] ~~While projected water demands for the years 2020-2040 in the City of San Bruno exceed the City's current 3.25 MGD Individual Supply Guarantee, SFPUC may require jurisdictions to purchase up to 5.52 gallons of water to prevent groundwater withdrawal from the South Westside Basin under the provisions of the Regional Groundwater Storage and Recovery Project.~~

Table 3.11-1b, Projected City of San Bruno Future Water Demand During Varying Hydrologic Conditions (MGD)

Hydrologic Condition	Demand Reduction Percent[a]	2025	2040	2045
Average (Normal) Year[b]	0	3.53	4.78	4.78
Single Dry Year	10	3.18	4.30	4.30
Multiple Dry Years, Year 1	10	3.18	4.30	4.30
Multiple Dry Years, Year 2	20	2.82	3.82	3.82
Multiple Dry Years, Year 3	20	2.82	3.82	3.82
Multiple Dry Years, Year 4	20	2.82	3.82	3.82
Multiple Dry Years, Year 5	20	2.82	3.82	3.82

Source: West Yost Associates 2021
[a] Demands will be reduced 10 percent for single dry years for a Stage I water shortage and 20 percent for multiple dry years, after year 1, for a Stage II water shortage.
[b] Based on totals presented in the City's working draft 2020 UWMP. Demand estimates include the projected demands of the Project, inclusive of the Phase I Development, as shown in Table 3.11-6a.

Wastewater Generation, Conveyance, and Treatment

The City of San Bruno owns and maintains the sanitary sewer conveyance system within City limits and is responsible for sewer system operation and maintenance therein. Wastewater is transported through this conveyance system to the Shaw Road Pump Station from two sewer pipeline segments: one located near Tanforan Avenue and serving the Project Site, and the other at 7th Avenue. The Tanforan Avenue system discharges are approximately 1.91 MGD under average dry weather flow conditions, 3.11 MGD under peak dry weather flow conditions, and 12.1 MGD under peak wet weather flow conditions (Woodard & Curran 2019). The City does not identify the Tanforan Avenue system as requiring long-term system improvements and updates to serve future wastewater conveyance needs (City of San Bruno 2014b). Wastewater is then transported from the South San Francisco Shaw Road Sewage Pump Station, ultimately to the South San Francisco/San Bruno Water Quality Control Plant (WQCP) in South San Francisco for treatment (City of South San Francisco n.d.). The WQCP processes wastewater discharge for the Cities of South San Francisco, San Bruno, and the Town of Colma, There is no formal agreement about the proportion of wastewater treatment capacity entitled to each city, however, the agreement is specific that the share of operating costs is proportional to use (City of San Bruno 2009).

During dry weather conditions, the WQCP has a peak flow capacity of 13 MGD of wastewater, which is increased to a peak capacity of 62 MGD during wet weather flow conditions; average dry-weather flows at the WQCP are approximately 9 MGD, and average peak weather flows can exceed 60 MGD. (City of South San Francisco n.d., Carollo Engineers 2019). To accommodate peak wet-weather flows, the WQCP is in the process of conducting facility improvements, which would include installation of a new storage basin to retain excess flows during wet-weather conditions (EKI 2018, Carollo Engineers 2011). Currently, the City of San Bruno generates an average of approximately 2.9 MGD of dry-weather wastewater which is eventually conveyed to and treated at the South San Francisco/San Bruno WQCP from both the Tanforan Avenue and 7th Avenue systems, and has an allocated dry-weather capacity of 3.5 MGD at the plant (Woodard & Curran 2019) (Ju pers. Comm). The City generates a peak wet weather flow of approximately 20.3 MGD; the City does not have an allocated wet weather capacity at the South San Francisco/San Bruno WQCP but is responsible for its share of flows (Woodard & Curran 2019) (Ju pers. Comm).

In Section 3.11, Figure 3.11-1, Existing and Proposed Water and Wastewater, has been revised as shown to adjust the location of the existing water main in Elm Avenue.

Figure 3.11-1
Existing and Proposed Water and Wastewater Infrastructure

In Section 3.11, p. 3.11-18 has been revised as follows:

> "Potential project-related impacts on utilities and service systems were evaluated based on existing capacity and demand data identified in the WSA, WSA Addendum, Water System Hydraulic Evaluation, HWQE, and SSIS, as well as from Site Plans and publicly available sources."

In Section 3.11, pages 3.11-26 to 3.11-29, comprising Utilities Impacts UT-2a and UT-2b, have been replaced with the following revised pages 3.11-26 through 3.11-33:

Mitigation Measures

The following mitigation measure would reduce Project impacts to a less-than-significant level.

> **Mitigation Measure UT-1: Require Project-Specific Sewer Studies for Projects Served by the 6-Inch Sanitary Sewer Pipe in San Bruno Avenue east of Traeger Avenue.**
>
> Future projects within the area served by the 6-inch sanitary sewer pipe located within San Bruno Avenue east of Traeger Avenue that flows to the 10-inch sanitary sewer pipe in Kains Avenue at El Camino Real (Subcatchment 168C)[1] proposing to discharge into the aforementioned system shall conduct a project-specific Sewer Impact Study prior to the issuance of a building permit. The Sewer Impact Study shall be subject to review and approval by the City of San Bruno Public Works Department. The Sewer Impact Report shall evaluate current sewer capacity and conditions, as well as a maximum anticipated sewer output for the new proposed development, taking land use and space occupancy into consideration. Projects that are found to cause likely strain on existing sewer capacity shall confer with the City of San Bruno Public Works Department to identify strategies that would minimize such impacts, which may include conveyance capacity increases such as sewer pipe replacements. Future improvements not included in this EIR may be subject to subsequent CEQA review.

The following mitigation measure would reduce Project and Phase I Development impacts to a less-than-significant level.

> **Mitigation Measure HWQ-2: Prepare Drainage Report and Implement Stormwater Control Measures to Avoid Increases in Peak Flows.** See Section 3.5, *Hydrology and Water Quality.*

Impact UT-2a. The Project would not result in the creation of a need for new or expanded entitlements or resources for sufficient water supply to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (Project: Less than Significant)

Impact UT-2b. The Phase I Development would not result in the creation of a need for new or expanded entitlements or resources for sufficient water supply to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (Phase I Development: Less than Significant)

Project

Table 3.11-6a describes anticipated operational water uses associated with the Project and the Phase I Development. Water demands were estimated based on standard unit demand factor as described in the Project's WSA, which is included in Appendix 3.11-1a of this EIR. As shown in Table 2-4 of the WSA, the Maximum Housing Scenario would generate a greater demand for water than the Maximum Office Scenario (0.57 MGD compared to 0.56 MGD); therefore, this analysis assumes buildout of the Maximum Housing Scenario.

As shown in Table 3.11-6a, the Project Site, inclusive of Phase I Development and existing demands, would require up to approximately 0.57 MGD of water, representing a net increase in water use of 0.33 MGD when compared to existing uses on the Project Site. The Phase I Development would utilize a total of approximately 0.06 MGD of water, a net increase of approximately 0.04 MGD when compared to existing uses on the Phase I site. In either case, the WSA's evaluation of whether there is adequate water supply to

[1] Does not include Phase I Development.

serve the Project is conservatively based on the total water demand and does not factor in a reduction for the removal of on-site uses.

As noted above, implementation of the Bay-Delta Plan Amendment would result in reduced SFPUC water deliveries to the City. In March 2021, SFPUC sent a letter to BAWSCA[2] (Appendix 3.11-1b, Attachment B) presenting water supply reliability modeling results for use in member agencies' 2020 UWMPs. BAWSCA then evaluated the impacts for each SFPUC water wholesale customer (also in Appendix 3.11-1b, Attachment B). For San Bruno, the water supply reliability results indicated a potential SFPUC water supply shortfall of up to 19 percent in the fourth and fifth years of a multiple year dry period if the Bay-Delta Plan Amendment were not implemented and up to 54 percent in the fourth and fifth years of a multiple year dry period if the Bay-Delta Plan Amendment were implemented as it currently stands.

Tables 3.11-6b and 3.11-6c summarize the City's projected water supply and demand with implementation of the Project, assuming no Bay-Delta Plan Amendment (Table 3.11-6b) and full implementation of the Bay-Delta Plan Amendment (Table 3.11-6c). As noted above, the demand estimates are based on the City's draft 2020 UWMP, which accounts for the estimated demand of the Project and the Phase I Development (West Yost Associates 2021). Also, in accordance with the Regional GSR Project, projected groundwater supplies under normal hydrologic conditions assume that groundwater use is minimized (i.e., "put" operations). During single dry and multiple dry years, projected groundwater supplies are assumed to be equal to 2.10 million gallons per day (MGD).

Tables 3.11-6b and 3.11-6c reflect "bookends" for water supply reliability projections. SFPUC is currently implementing projects to help mitigate the effects of the Bay-Delta Plan Amendment should it be implemented. These projects are further discussed in the WSA Addendum included in Appendix 3.11-1b of this EIR.

As shown in Table 3.11-6c, even with the City's anticipated dry year demand reductions shown in Table 3.11-1b, supply deficits would still occur during the first, fourth, and fifth years of a multiple dry year hydrologic condition. The maximum total demand reduction required to meet the projected water supply is approximately 24 percent (total water supply of 3.61 MGD versus a normal year demand of 4.78 MGD, not accounting for the 20 percent demand reduction) by 2045, in the fourth and fifth years of a multiple dry year hydrologic condition.

Although the impact of the Bay-Delta Plan Amendment is severe, a maximum demand reduction of approximately 20 percent in single dry years and the first three years of a multiple dry year hydrologic condition (total water supply of 3.87 MGD versus a normal year demand of 4.78 MGD) and a demand reduction of up to 24 percent in the fourth and fifth years of a multiple dry year hydrologic condition can still be achieved by implementation of Stages 2 and 3 of the City's WSCP.[3] While the City is in the process of updating its WSCP, the working draft WSCP indicates a Stage 3 Shortage Level would build upon the Stage 2 Shortage Level by increasing monitoring of water use (meter reading), implementing mandatory water allotments for all accounts, and increasing rates and penalties for excess water use.

~~As a participant in the Regional Groundwater Storage and Recovery Project, the City of San Bruno currently purchases the majority of its municipal water resources from surface water agencies, primarily the SFPUC, during normal and wet years, and relies on local groundwater resources to supplement SFPUC~~

[2] Letter from Paula Kehoe, SFPUC Director of Water Resources to Danielle McPherson, Senior Water Resources Specialist, BAWSCA, dated March 30, 2021.

[3] The City's WSCP will be updated in the 2020 UWMP to include six water shortage stages (Stages 1 – 6) to align with the State's six standard water shortage levels. Each stage corresponds to progressive ranges of up to 10, 20, 30, 40, 50 percent, and greater than 50 percent shortages from the normal supply condition.

~~resources in dry years. The SFPUC provides an Individual Supply Guarantee of 3.25 MGD to the City of San Bruno; however, as described in greater detail in the Regulatory Setting section above, the Regional Groundwater Storage and Recovery Project permits the City of San Bruno to pump limited groundwater resources during wet years for maintenance and water quality blending purposes.~~

~~The approximately 0.57 MGD of water that would be required under the Project (inclusive of Phase I Development and current water use) accounts for approximately 17.5 percent of the City of San Bruno's allotted 3.25 MGD Individual Supply Guarantee from the SFPUC. Thus, while the 3.25 MGD Individual Supply Guarantee would be sufficient to continue serving the City of San Bruno with implementation of the Project, as displayed in Table 3.11-1, projected normal-year water demands from 2020-2040 in the City of San Bruno (without the Project) are expected to exceed the quantity provided under the Individual Supply Guarantee (demand during dry years will also increase, but to a less extent due to mandatory conservation measures). In accordance with the Regional Groundwater Storage and Recovery Project, the SFPUC provides surface water to the City beyond the 3.25 MGD contracted amount in normal years, and in return, the City pumps less groundwater. The Project's WSA forecasts that with implementation of the Regional Groundwater Storage and Recovery Project, a total water supply of 5.40 MGD will be available in 2020-2040 during normal years, while 5.07 MGD will be available during single-dry years and 4.67 MGD will be available during multiple-dry years (West Yost Associates 2019). The WSA concludes that these projected supplies would be sufficient to meet the demand of the Project in addition to forecasted growth in the City.~~

It should also be noted that Specific Plan Policy 6-15 would require future development to be capable of achieving at least a Silver standard in Leadership in Energy and Environmental Design (LEED) Certification. Specific Plan Policies 5-4, 5-5, and 5-17 would require developers to promote water efficiency through the use of water efficient appliances and water-efficient landscaping strategies to reduce demands. These water conservation strategies would further reduce the Project's water demand. However, because it is speculative to presume exactly how much they would reduce water use onsite, they are not factored into the Project's estimated water demand shown in Table 3.11-6a to maintain a conservative analysis.

Conclusion

As indicated above, without implementation of the Bay-Delta Plan Amendment, the City would generally have sufficient water supplies during normal and dry hydrologic conditions to meet the City's projected water demands, including the Project's estimated water demand, in addition to the City's existing and other planned future uses.

With implementation of the Bay-Delta Plan Amendment, the City would need to implement Stage 3 of its WSCP to reduce normal year water demands by approximately 24 percent during the fourth and fifth years of a multiple dry year hydrologic condition. A 24 percent reduction in normal year water demands is a reasonable reduction that can be achieved by implementing a Stage 3 water shortage as defined in the City's WSCP. During the most severe part of the recent drought in 2015 to 2016, the City implemented a Stage 2 Shortage Level and was able to reduce water demand by about 20 percent from 2013 water demand, which exceeded the 8 percent conservation standard mandated by the State Board. Other BAWSCA member agencies achieved water demand reductions between 10 to 40 percent. In summary, all BAWSCA member agencies exceeded their mandated conservation standard. The graphic provided in Appendix 3.11-1b, Attachment D shows the conservation standard and percent reduction for each BAWSCA member agency as reported by BAWSCA.

Actions that the SFPUC is taking in response to a potential water supply shortage are expected to mitigate the water supply shortage by some, as yet unquantified, amount. Therefore, the water supply and demand summaries provided in Tables 3.11-6b and 3.11-6c should be considered as the best case (without the Bay Delta Plan Amendment) and worst case (full implementation of the Bay-Delta Plan Amendment without mitigating actions) water supply conditions for the City.

~~Notwithstanding~~ Therefore, as demonstrated in the WSA and WSA Addendum prepared for the Project and summarized above, the Project would not require new or expanded water supply entitlements or resources, and impacts would be ***less than significant***. No mitigation is required.

Table 3.11-6a. Anticipated Water Demand for the Project (Maximum Housing Scenario) and Phase I Development[a]

Proposed Land Use	Unit Demand Factor[b]	Existing	Existing Water Demand (MGD)	Full Quantity at Proposed Buildout (including Existing to remain)	Future Water Demand (existing + buildout) (MGD)	Net Increase in Water Demand (MGD)
Project (inclusive of Phase I Development)						
Office	0.13 gpd/sf	1,557,847 sf	0.20	3,500,743 gsf	0.46	0.26
Retail	0.19 gpd/sf	121,846 sf	0.02	121,846 gsf	0.02	0
Hotel	120 gpd/room	133 rooms	0.02	133 rooms	0.02	0
Residential	120 gpd/du	0 du	0.00	573 du	0.07	0.07
Total					**0.57 MGD**	**0.33 MGD**
Phase I Development						
Office	0.13 gpd/sf	138,524 sf	0.02	440,000 sf	0.06	0.04
Total					**0.06 MGD**	**0.04 MGD**

Source: West Yost Associates 2019
Notes:
[a] Landscaping is not considered a significant source of water usage under this analysis, because landscaping plans would include water-saving strategies such as bioretention planters, turf, and drought-tolerant vegetation.
[b] Unit Demand Factors account for irrigation demand (West Yost Associates 2016).
Key:
MGD = millions of gallons per day
sf = square feet
du = dwelling unit

Table 3.11-6b Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – Without Bay-Delta Plan Amendment

Hydrologic Condition		MGD 2050	2040	2045
Normal Year				
Available Water Supply		5.39	5.35	5.36
	Total Water Demand	**3.53**	**4.78**	**4.78**
	Potential Surplus (Deficit)	1.86	0.57	0.58
	Precent of Shortfall of Demand	-	-	-
Single Dry Year				
Available Water Supply		5.39	5.35	5.36
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	2.21	1.05	1.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Years				
Multiple Dry Year 1	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	2.21	1.05	1.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 2	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	1.54
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 3	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	1.54
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 4	Available Water Supply	5.39	5.35	4.74
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	0.92
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 5	Available Water Supply	5.39	5.35	4.74
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	0.92
	Percent Shortfall of Demand	-	-	-

Source: West Yost Associates 2021

Table 3.11-6c. Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – With Bay-Delta Plan Amendment

Hydrologic Condition		MGD 2050	2040	2045
Normal Year				
Available Water Supply		5.39	5.35	5.36
	Total Water Demand	**3.53**	**4.78**	**4.78**
	Potential Surplus (Deficit)	1.86	0.57	0.58
	Precent of Shortfall of Demand	-	-	-
Single Dry Year				
Available Water Supply		4.20	4.16	3.88
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	1.02	(0.14)	(0.42)
	Percent Shortfall of Demand	-	3.3%	9.8%
Multiple Dry Years				
Multiple Dry Year 1	Available Water Supply	4.20	4.16	3.88
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	1.02	(0.14)	(0.42)
	Percent Shortfall of Demand	-	3.3%	9.8%
Multiple Dry Year 2	Available Water Supply	3.90	3.87	3.88
	Total Water Demand (20% reduction from normal year)	2.82	3.82	3.82
	Potential Surplus (Deficit)	1.08	0.05	0.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 3	Available Water Supply	3.90	3.87	3.88
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	0.05	0.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 4	Available Water Supply	3.90	3.66	3.61
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	(0.16)	(0.21)
	Percent Shortfall of Demand		4.2%	5.5%
Multiple Dry Year 5	Available Water Supply	3.90	3.66	3.61
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	(0.16)	(0.21)
	Percent Shortfall of Demand	-	4.2%	5.5%

Source: West Yost Associates 2021

Phase I Development

The water demand associated with the Phase I Development is included in the estimated water demand for the Project presented in the WSA and summarized above. As noted, the WSA and WSA Addendum concludes that the Project, inclusive of the Phase I Development, would not require new or expanded water supply entitlements or resources. there are sufficient water entitlements and water resources to serve the City of San Bruno through at least 2040 through a combination of purchased SFPUC surface water resources, the mandate permitting SFPUC to require jurisdictions to purchase up to 5.52 MGD of water resources to minimize groundwater pumping under the Regional Groundwater Storage and Recovery Project, and local groundwater resources (City and County of San Francisco 2013).

Additionally, the Phase I Development would incorporate sustainability features to meet a Silver standard in Leadership in Energy and Environmental Design (LEED) Certification, which would improve water efficiency through creative sustainability design strategies to further conserve water use onsite. Specific Plan Policies 5-5, and 5-17 would require developers to promote water efficiency through the use of water efficient appliances and water-efficient landscaping strategies to reduce demands. These water conservation strategies would minimize the amount of water that would be used for landscaping purposes, further reducing the Phase I Development's water demand. However, because it is speculative to presume exactly how much they would reduce water use onsite, they are not factored into the Project's estimated water demand shown in Table 3.11-6a to maintain a conservative analysis. Notwithstanding, as demonstrated in the WSA and WSA Addendum prepared for the Project, inclusive of the Phase I Development, new or expanded water supply entitlements or resources would not be required to serve Phase I Development operation, and impacts would be ***less than significant***.

Impact UT-3a. Project implementation would not result in an exceedance of existing wastewater treatment capacity (Project: Less than Significant)

Impact UT-3b. Phase I Development implementation would not result in an exceedance of existing wastewater treatment capacity (Phase I Development: Less than Significant)

Project

As described in greater detail under Impact UT-2, Project implementation would increase on-site water consumption when compared to current conditions. Accordingly, a corresponding increase in wastewater production would occur. This analysis assumes that the Project's wastewater generation is equal to its water consumption. This is a conservative assumption since not all water that is delivered to a property is conveyed to the wastewater system due to human consumption, landscape use, and evaporation loss.

Based on the water analysis in Impact UT-2, the Project would result in a net increase in wastewater generation of 0.33 MGD when compared to existing uses on the Project Site (for a total of 0.57 MGD if 2010 metering data is assumed for existing uses). The Phase I Development's share of the net increase in wastewater usage would be 0.04 MGD (or a total of 0.06 MGD if 2010 metering data is assumed for existing uses). This analysis conservatively assumes the higher net increase.

The new sewer line would tie into the existing sanitary sewer and wastewater treatment network, which follows the Project Site's southern boundary until Traeger Avenue, where it travels north until Bayhill Drive then proceeds eastward to its connection with El Camino Real. All wastewater and sewage generated within the Project Site, including the Phase I Site, would discharge to the pipelines at Tanforan Avenue and the

In Section 3.11, page 3.11-37 has been revised as follows:

"However, the project's ~~Water Supply Assessment~~ WSA (Appendix 3.11-1a) and WSA Addendum (Appendix 3.11-1b) includes projected future City water demands out to 2040 along with the project demands. Thus, long-term water resources serving the City of San Bruno are sufficient to supply foreseeable long-term development including both the Project and forecasted growth described in the ~~Water Supply Assessment~~ WSA and WSA Addendum."

In Section 3.11, page 3.11-40 has been revised as follows:

"As displayed in Table 3.11-~~6~~7, the Maximum Office Scenario (inclusive of Phase I Development), would generate the greatest quantity of solid waste through both direct onsite generation and indirect generation from offsite project-generated City of San Bruno residents."

In Section 3.11, page 3.11-44 has been revised as follows:

"SFPUC. 2021. WSIP Overview. Available at https://sfwater.org/index.aspx?page=115. Accessed July 17, 2021."

In Section 3.11, page 3.11-45 has been revised as follows:

"West Yost Associates. 2021. Bayhill Specific Plan Development Project Water Supply Assessment (WSA) Addendum. Technical Memorandum. Prepared for the City of San Bruno."

Chapter 4 – Other CEQA Considerations

In Chapter 4, the text on p. 4-2 has been revised as follows:

"Therefore, it is conservatively assumed that the cumulative health impacts from TAC emissions would be ***significant and unavoidable*** ~~after mitigation~~, and that the Project's contribution would be cumulatively considerable.''

In Chapter 4, the text on pages 4-2 has been revised to correct a misspelling of the word "traveled," as follows:

"Impact TRA-5a: Project-Generated Vehicle Miles Travel~~l~~ed (VMT). The Project would be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), concerning VMT, even with implementation of a Transportation Demand Management Program."

Chapter 5 – Analysis of Alternatives

In Chapter 5, the text in Table 5-2, Projected 2040 Development under the Residential Alternative, on page 5-9 has been revised as follows:

"Phase I Development ~~(2022)~~."

In Chapter 5, the text in Table 5-3, Projected 2040 Development under the Increased Height Alternative Maximum Office Scenario, on page 5-12 has been revised as follows:

"Phase I Development ~~(2022)~~."

In Chapter 5, the text in Table 5-4, Projected 2040 Development under the Increased Height Alternative Maximum Housing Scenario, on page 5-13 has been revised as follows:

"Phase I Development ~~(2022)~~."

In Chapter 5, the text in the "Residential (DU)" column in Table 5-4, Projected 2040 Development under the Increased Height Alternative Maximum Housing Scenario, on page 5-13, has been revised to remove a superscript letter typo attached to the number of dwelling units. The text has been revised as follows:

"1,070~~[a]~~"

In Chapter 5, the text on page 5-19 has been revised as follows:

Upon buildout, VMT would decrease under the Residential Alternative,[5] thereby resulting in fewer operational GHG mobile source emissions than the Project. Like the Project,[6] mobile sources are anticipated to comprise most of the operational emissions generated by the Residential Alternative. Accordingly, reductions in mobile source emissions are anticipated to offset any relative GHG emissions increases from other sources, resulting in comparable emissions levels under the Residential Alternative as to the Project. Similar to the Project, implementation of **Mitigation Measure TRA-1** would be required to reduce mobile source emissions; in the case of the Residential Alternative, this would result in less-than significant VMT-related GHG emissions impacts. In addition, Specific Plan policies, if fully implemented by all land uses under the Residential Alternative, would significantly reduce GHG emissions from other emission sources (e.g., waste, water, energy) consistent with the State's climate change goals. While the City, through the Specific Plan, would encourage implementation of voluntary sustainability features, there is no guarantee that all of these measures will be incorporated into the designs of all future developments under the Residential Alternative. This is a potentially significant impact. As such, implementation of **Mitigation Measure GHG-2** would make voluntary design features required for the Residential Alternative. Should all measures included in **Mitigation Measure GHG-2** be implemented by a future project sponsor, GHG impacts would be less than significant and no further action would be required. However, because the extent of implementation of **Mitigation Measure GHG-2** is currently unknown for the Residential Alternative (e.g., applicability and feasibility), impacts from future development could remain significant for some sectors if all strategies are not implemented for a particular project or equivalent measures are not identified by a project sponsor. For projects where all of the requirements of **Mitigation Measure GHG-2** (or their equivalent) are not implemented, implementation of **Mitigation Measure GHG-3** is further required to reduce net operational GHG emissions through purchase of GHG mitigation credits. Accordingly, GHG impacts (which are inherently cumulative) would be ***less than significant with mitigation*** and similar to the Project's less-than-significant-with-mitigation GHG impacts during operation.

In Chapter 5, the text on pp. 5-30—5-32 has been revised as follows:

"Operational criteria pollutant emissions were estimated for the Increased Height Alternative under existing conditions (2017) and 2040 conditions with and without the Increased Height Alternative using the same methodology as described for the Project and presented in Table 5-10. As shown in Table 5-10, buildout of the Increased Height Alternative (assuming the worst-case Maximum Office Scenario[9]) would result in a net increase of approximately 81~~67~~ pounds of (reactive organic gas) ROG, 70 ~~27~~ pounds of nitrogen oxides (NO_X), 536 ~~553~~ pounds of particulate matter 10 microns or smaller in diameter (PM10), and 89 ~~91~~ pounds of PM2.5 per day compared to 2040 without the Increased Height Alternative ~~existing~~ conditions. When compared to the Project, this is an increase

~~decrease of approximately 1 pound of reactive organic gas (ROG) and an increase~~ of approximately 1 pound of ROG, NO_X, PM10, and PM2.5.

Table 5-10. Estimated Maximum Daily Unmitigated Emissions from the Increased Height Alternative (pounds/day)

Condition/Source	ROG	NO_X	CO	PM10	PM2.5
Existing (2017)					
Area Sources	43	0	0	0	0
Energy Sources	1	9	7	1	1
Mobile Sources	23	61	322	188	32
Stationary Sources	4	17	10	1	1
Total Existing [a]	**71**	**87**	**339**	**190**	**33**
2040 without Increased Height Alternative					
Area Sources	43	0	0	0	0
Energy Sources	1	9	7	1	1
Mobile Sources	9	18	127	206	34
Stationary Sources	4	17	10	1	1
Total 2040 without Increased Height Alternative [a]	**56**	**44**	**144**	**207**	**35**
2040 with Increased Height Alternative					
Area Sources	96	0	0	0	0
Energy Sources	2	21	18	2	2
Mobile Sources	32	65	455	740	121
Stationary Sources	6	28	16	1	1
Total 2040 without Increased Height Alternative [a]	137	114	489	743	124
Net Increase with Increased Height Alternative					
2040 with Increased Height Alternative v. ~~Existing~~	~~**67**~~	~~**27**~~	~~**150**~~	~~**553**~~	~~**91**~~
2040 without Increased Height Alternative [a]	**81**	**70**	**345**	**536**	**89**

Source: CalEEMOD and CT-EMFAC. See Appendix 3.2-1.
Notes:
For the 2040 without Increased Height Alternative, the daily emissions presented are maximums anticipated under the Maximum Office Scenario, which would result in more VMT than the Residential Scenario. As mobile sources make up the largest portion of emissions, the total emissions presented above represent the worst-case scenario.
[a] See note above. Values may not add up due to rounding.

As was the case with the Project, the particulate matter emissions under the Increased Height Alternative would exceed BAAQMD's project level thresholds. These emissions could contribute to ozone formation and other air pollution in the San Francisco Bay Area Air Basin, which at certain concentrations can contribute to short- and long-term human health effects if left unmitigated. Implementation of **Mitigation Measures TRA-1** and **AQ-7** would be required to reduce operational emissions and health risks from criterial air pollutants under the Increased Height Alternative. **Mitigation Measure TRA-1** would reduce mobile source emissions, resulting in a reduced net increase of approximately 79 ~~64~~ pounds of ROG, 63 ~~20~~ pounds of NO_X, 439 ~~457~~ pounds of PM10, and 73 ~~75~~ pounds of PM2.5 per day compared to 2040 without Increased Height Alternative ~~existing~~ conditions. When compared to the Project's mitigated emissions, ROG~~.~~ ~~emissions increased by approximately 1 pound per day and~~ NO_X, PM10, and PM2.5 emissions each increased by approximately 1 pound per day."

In Chapter 5, the text on pp. 5-34—5-36 has been revised as follows:

"**Greenhouse Gases ~~and Energy~~**

The Increased Height Alternative would allow for a greater density of residential and hotel uses compared to the Project, while the intensity of office development would remain. All other features of the Increased Height Alternative would be the same as or substantially similar to those of the Project, including the potential civic use, the proposed circulation and infrastructure improvements, the pedestrian realm and open space improvements, building design, TDM program, and sustainability features.

The Increased Height Alternative would result in increased GHG impacts from the Project and would potentially conflict with an applicable, plan, policy, or regulation adopted for the purposes of reducing emission of GHGs during construction and operation. The additional residential and hotel uses allowed under the Increased Height Alternative are anticipated to increase construction activities and associated GHG emissions relative to the Project. However, similar to the Project, implementation of **Mitigation Measure GHG-1** would be required to reduce construction GHG impacts. These impacts would be ***less than significant with mitigation***, but greater than the Project's less-than-significant-with-mitigation impacts.

Operational area, energy, mobile, stationary, waste, and water emissions were estimated for the Increased Height Alternative under existing conditions (2017) and 2040 conditions with and without the Increased Height Alternative using the same methodology as described for the Project and presented in Table 5-12. As shown in Table 5-12, the 39,808 metric tons of carbon dioxide equivalent (CO_2e) (assuming the worst-case Maximum Office Scenario[2]) are anticipated in 2040. This is an increase of 27,640 ~~19,084~~ (227~~92~~ percent) metric tons of CO_2e from 2040 without Increased Height Alternative conditions. This is an increase of ~~and~~ 142 (less than 1 percent) metric tons of CO_2e from ~~existing and~~ Project conditions, ~~respectively,~~ slightly greater than the Project's increase of 27,498 ~~18,942~~ metric tons.

Table 5-12. Estimated Annual Specific Plan Operational GHG Emissions from the Increased Height Alternative (metric tons)

Condition/Source	CO_2	CH_4	N_2O	CO_2e	% of Total CO_2e
Existing (2017)					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	5,131	<1	<1	5,161	25%
Mobile Sources	13,583	2	1	13,982	67%
Stationary Sources	10	<1	<1	10	<1%
Waste Generation	335	20	<1	830	4%
Water Consumption	437	9	<1	741	4%
Total Existing[a]	**19,496**	**32**	**1**	**20,724**	**100%**

2 See Section 5.4.3.10, *Transportation* for additional details.

Condition/Source	CO_2	CH_4	N_2O	CO_2e	% of Total CO_2e
2040 without Increased Height Alternative					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	1,945	<1	<1	1,959	16%
Mobile Sources	8,760	1	1	8,953	74%
Stationary Sources	10	<1	<1	10	<1%
Waste Generation	335	20	<1	830	7%
Water Consumption	114	9	<1	416	3%
Total 2040 without Increased Height Alternative [a]	**11,165**	**30**	**1**	**12,168**	**100%**
2040 with Increased Height Alternative					
Area Sources	<1	<1	<1	<1	<1%
Energy Sources	4,761	<1	<1	4,795	12%
Mobile Sources	31,469	2	2	32,160	81%
Stationary Sources	17	<1	<1	17	<1%
Waste Generation	805	48	<1	1,995	5%
Water Consumption	232	19	<1	840	2%
Total 2040 with Increased Height Alternative	**37,284**	**69**	**3**	**39,808**	**100%**
Net Increase with Increased Height Alternative					
2040 with Increased Height Alternative v. 2040 without Increased Height Alternative~~Existing~~	~~17,788~~ 26,120	~~37~~ 39	2	~~19,084~~ 27,640	-

Source: Refer to Appendix 3.2-1 for CalEEMod model outputs and mobile emissions calculations.
Notes: The emissions analysis reflect implementation of similar quantifiable state measures that will reduce GHG emissions (e.g., Senate Bill 100) and policies related to use of green consumer products and installation of low-flow fixtures as the Project. In addition, for the 2040 with Increased Height Alternative condition, the daily emissions presented are maximums anticipated under the Maximum Office Scenario, which would result in more VMT than the Maximum Residential Scenario. As mobile sources make up a large portion of emissions, the total emissions presented above represent the worst-case scenario.
[a] Values may not add due to rounding.
CH_4 = methane
N_2O = nitrous oxide

Implementation of **Mitigation Measure TRA-1** would reduce mobile source emissions to approximately 28,355 metric tons of CO_2e, but would still result in an increase of approximately 23,835~~15,279~~ metric tons of CO_2e (196~~73~~ percent) and 133 metric tons CO_2e (less than 1 percent) from 2040 without Increased Height Alternative ~~existing~~ and mitigated Project conditions, respectively. Nevertheless, the Specific Plan would result in significant VMT -related GHG emissions impacts after implementation of **Mitigation Measure TRA-1** on its own. In addition, Specific Plan policies, if fully implemented by all land uses under the Increased Height Alternative, would significantly reduce GHG emissions from other emission sources (e.g., waste, water, energy) consistent with the State's climate change goals. While the City, through the Specific Plan, would encourage implementation of voluntary sustainability features, there is no guarantee that all of these measures will be incorporated into the designs of all future developments under the Increased Height Alternative. This is a potentially significant impact. As such, implementation of **Mitigation**

Measure GHG-2 would make voluntary design features required for the Increased Height Alternative. Should all measures included in **Mitigation Measure GHG-2** be implemented by a future project sponsor, GHG impacts for non-transportation sectors would be less than significant and no further action would be required. However, because the extent of implementation of **Mitigation Measure GHG-2** is currently unknown for the Increased Height Alternative (e.g., applicability and feasibility), impacts from future development for non-transportation sectors could remain significant for some sectors if all strategies are not implemented for a particular project or equivalent measures are not identified by a project sponsor. For projects where all of the requirements of **Mitigation Measure GHG-2** (or their equivalent) are not implemented for non-transportation emissions and for all projects relative to transportation emissions where **Mitigation Measure TRA-1** does not meet the 14.3 VMT/service population threshold, implementation of **Mitigation Measure GHG-3** is further required to reduce net operational GHG emissions through purchase of GHG mitigation credits. Accordingly, GHG impacts (which are inherently cumulative) would be ***less than significant with mitigation*** and similar to the Project's less-than-significant-with-mitigation GHG impacts during operation given the similar emission levels."

In Chapter 5, p. 5-48 has been revised as follows:

"As displayed in Table 5-20, the Increased Height Alternative would result in 0.07 MGD more of water demand compared to the Project (0.40 MGD – 0.33 MGD = 0.07 MGD), and subsequently 0.07 MGD more of generated wastewater. The Water Supply Assessment (WSA) in Appendix 3.11-1a and the WSA Addendum in Appendix 3.11-1b of this EIR evaluated the impacts of the Increased Height Alternative and determined that the Increased Height Alternative (Maximum Housing Scenario) would not require new or expanded water supply entitlements or resources."

In Chapter 5, the text on pages 5-49 in Table 5-21, Comparison of Impacts under Proposed Project and Alternatives, has been revised to correct a misspelling of the word "traveled," as follows:

"Vehicle Miles Travel~~l~~ed."

Appendix 3.10-1 Transportation Supporting Data

In Appendix 3.10-1, Transportation Supporting Data, page 10 has been revised as follows:

"As described in the EIR, the Project requires a reduction of ~~23 percent~~ 22 percent under current conditions; therefore, implementation of a TDM program would not result in a significant reduction that would meet the VMT per Capita threshold."

Appendix 3.11-2 Water System Hydraulic Evaluation

In Appendix 3.11-2, Water System Hydraulic Evaluation, page 2 has been revised as follows:

"The first phase of the Project is YouTube's campus expansion plan (Phase I Development), which consists of adding 301,476 square feet (sf) of net new office space to the Project Site by building 440,000 square feet of new space while demolishing 138,524 square feet of office space on an adjacent property that will be the site of future phase development ~~8.15-acres~~."

Appendix 4 Equivalency Analysis

In Appendix 4, Equivalency Analysis, page 1 has been revised as follows:

"This appendix provides an analysis of the equivalency exchanges and demonstrates that the potential environmental impacts of the equivalency exchanges under the Equivalency Program would be within the scope of the analysis included in the EIR.[2]

[2] Subsequent to the preparation of this analysis, the unallocated square footage in the Specific Plan was adjusted from 180,347 square feet to 180,718 square feet, a difference of 371 square feet (equal to a square measuring 19 by 19 feet). This nominal difference would not change the conclusions of this analysis."

Appendix A

Meeting Notes from March 25, 2021 Meeting with the San Francisco Public Utilities Commission (SFPUC)

Meeting Minutes

Meeting Type:
Video Conference

Project:	Bayhill Specific Plan
Date:	March 25, 2021
Time:	12:00 p.m. – 12:30 p.m.
Meeting Attendees:	Matthew Neuebaumer, City of San Bruno Hae Won Ritchie, City of San Bruno Christopher Lyles, SFPUC Nicholas M. Johnson, SFPUC Heidi Mekkelson, ICF Amy Kwong, West Yost & Associates Polly Boissevain, West Yost & Associates
Subject:	**SFPUC Comments on Bayhill Specific Plan Draft EIR**

Purpose of meeting is to discuss SFPUC's comments on Bayhill Specific Plan Draft EIR. Specifically, SFPUC's March 1, 2021 comment letter states: "I recommend that the City of San Bruno and the DEIR consultants work with our Water Resources staff to resolve this issue. Please contact Nicholas Johnson, Water Operations Analyst, at NJohnson@sfwater.org or Christopher Lyles, Regulatory Specialist, at clyles@sfwater.org for more information."

SFPUC staff state that discussions of the Regional Groundwater Storage and Recovery Project (RGSRP) in Draft EIR Sections 3.5 and 3.11 are inaccurate, but discussion of RGSRP in project's Water Supply Assessment (WSA) in Draft EIR Appendix 3.11-1 is accurate.

SFPUC staff are concerned that text describing RGSRP in Draft EIR misrepresents the RGSRP. SFPUC staff state that RGSRP is not a part of the overall water supply; rather, it is a back-up source. SFPUC staff state that the RGSRP is a local project and that the Draft EIR should focus on the regional water supply.

City and ICF staff ask if SFPUC staff have specific recommended revisions. SFPUC state that they do not have specific recommended revisions. Rather, as a general comment, all references to the RGSRP in the Draft EIR should be corrected to refer to the WSA's discussion of the RGSRP, which is accurate.

City and ICF staff agree to make the requested corrections to the Draft EIR in the Final EIR.

Appendix B

Water Supply Assessment Addendum (New Draft EIR Appendix 3.11-1b)

WEST YOST
Water. Engineered.

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Pleasanton CA 94566

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TECHNICAL MEMORANDUM

DATE: July 13, 2021

Project No.: 462-60-19-24
SENT VIA: EMAIL

TO: Hae Won Ritchie, City of San Bruno

CC: Mark Reinhardt, City of San Bruno
Joanna Kwok, City of San Bruno

FROM: Jim Connell, PE, RCE #63052

REVIEWED BY: Elizabeth Drayer, PE, RCE #46872
Amy Kwong, PE, RCE #73213

SUBJECT: Bayhill Specific Plan Development Project Water Supply Assessment Addendum

The purpose of this technical memorandum (TM) is to provide an addendum to the September 2019 Bayhill Specific Plan Development Project (Project) Water Supply Assessment (Bayhill WSA) prepared for the City of San Bruno (City) to address recent changes in water supply reliability and updated City-wide water demand projections.

This TM discusses the following topics:

- Summary of Bayhill WSA
- Impact of Revised Water Supply Reliability Assumptions
- Potential Water Supply Shortage Mitigation Measures
- Conclusions

SUMMARY OF BAYHILL WSA

The Bayhill WSA was prepared for the City in 2019 and was based on supply and demand assumptions developed in the City's 2015 Urban Water Management Plan (UWMP) and 2012 Water System Master Plan. It should be noted that both of these documents are currently being updated to reflect more current water supply and demand conditions.

The Bayhill WSA found that under normal hydrologic conditions, there would be sufficient water supplies to meet the projected demands, associated with the Project's highest water demand future scenario, in addition to the City's existing and planned future uses.

To address potential water supply shortages in dry hydrologic conditions, the City assumed demands would be reduced. The demand reduction assumptions under dry year conditions, as included in the City's 2015 UWMP and used in the Bayhill WSA, are listed below.

- During Single Dry Years, potable water demands are assumed to be 90 percent of Normal Year demands (10 percent reduction in water use). This assumes that the City implements a Stage I water shortage as defined in its Water Shortage Contingency Plan (WSCP).[1]
- During Multiple Dry Years, potable water demands are assumed to be 90 percent of Normal Year demands (10 percent reduction in water use) for the first dry year and 80 percent of Normal Year demands (20 percent reduction in water use) for the second and third dry years (updated to second through fifth dry years for this TM). This reduction assumes that the City implements a Stage I water shortage as defined in its WSCP in the first year and implements a Stage II water shortage in the following years.

Given these demand reduction assumptions, the Bayhill WSA found that under single dry year and multiple dry year hydrologic conditions there would be sufficient water supplies to meet the projected demands, associated with the Project's highest water demand future scenario, in addition to the City's existing and planned future uses.

As discussed in the Bayhill WSA, in December 2018, the State Water Resources Control Board (State Board) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento San Joaquin Delta Estuary, establishing water quality objectives to maintain the health of the State's rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment). At the time of the Bayhill WSA, the specific impacts of the Bay-Delta Plan Amendment to the City's water supply availability were not known, but the Bayhill WSA pointed out that any supply reductions would affect the entire City and would not be exacerbated by the Bayhill Specific Plan Development Project. This statement was valid at the time because the City-wide water demand projections were provided by the Bay Area Water Supply and Conservation Agency (BAWSCA) based on growth projections that could include the Bayhill Specific Plan, but could also include other growth. If the Bayhill Specific Plan did not move forward, the assumption in the Bayhill WSA was that other development would take place elsewhere in the City and fulfill the projected water demand.

However, the City's water demand projections currently being updated for the 2020 Water System Master Plan and the 2020 UWMP do specifically include the Bayhill Specific Plan Development Project so the water demand assumption in the Bayhill WSA has been revised to reflect the current water demand projection methodology.

[1] The City's WSCP as defined in the 2015 UWMP includes four water shortage stages: Stage I = up to 10 percent supply reduction; Stage II = up to 20 percent supply reduction; Stage III = up to 35 percent supply reduction; and Stage IV = up to 50 percent supply reduction.

IMPACT OF REVISED WATER SUPPLY RELIABILITY ASSUMPTIONS

In a letter dated July 31, 2019 from the San Francisco Public Utilities Commission (SFPUC) Director of Water Resources to the BAWSCA Water Resources Manager, SFPUC provided a memorandum[2] titled "*Water Supply Reliability Information for BAWSCA Member Agencies Water Supply Assessments (with Corrections)*" (Reliability Memorandum). This Reliability Memorandum (Attachment A) states that implementation of the Bay-Delta Plan Amendment is uncertain for several reasons:

- **First:** Under the Clean Water Act, the U.S. Environmental Protection Agency (USEPA) must approve the water quality standards identified in the Bay-Delta Plan Amendment within 90 days from the date the approval request is received. By letter dated June 11, 2019, USEPA rejected the State Board's two-page submittal as inadequate under the requirements of the Clean Water Act. Pursuant to USEPA's letter, the State Board has 90 days to respond with a submittal that complies with the law. At this point, USEPA has neither approved, nor disapproved, any of the revised water quality objectives. It is uncertain whether the USEPA will approve or disapprove the water quality standards in the future. Furthermore, the determination could result in litigation.
- **Second**: Since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal court, challenging the State Board's adoption of the Bay-Delta Plan Amendment, including two legal challenges filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation in state and federal courts. These cases are in the early stage and there have been no dispositive court rulings to date.
- **Third**: The Bay-Delta Plan Amendment is not self-implementing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the 401 certification process in the Federal Energy Regulatory Commission's (FERC) relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-23 timeframe. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different water supply impact on the SFPUC).
- **Fourth**: In recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, State Board Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the State Board "as early as possible after December 1, 2019." In accordance with the State Board's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the State Board ("March 1st Proposed Voluntary Agreement"). On March 26, 2019, SFPUC adopted Resolution

[2] Letter from Paula Kehoe, SFPUC Director of Water Resources to Tom Francis, Water Resources Manager, BAWSCA, dated July 31, 2019. Includes attachment titled Water Supply Reliability Information for BAWSCA Member Agencies Water Supply Assessments (with Corrections).

> No. 19-0057 to support SFPUC's participation in the Voluntary Agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency and California Environmental Protection Agency and the leadership of the Newsom administration. The negotiations for a voluntary agreement have made significant progress since an initial framework was presented to the State Board on December 12, 2018. The package submitted on March 1, 2019 is the product of renewed discussions since Governor Newsom took office. While significant work remains, the package represents an important step forward in bringing together diverse California water interests.

In March 2021, SFPUC sent a letter to BAWSCA[3] (Attachment B) presenting water supply reliability modeling results for use in member agencies' 2020 UWMPs. BAWSCA then evaluated the impacts for each SFPUC water wholesale customer (also in Attachment B). For San Bruno, the water supply reliability results indicated a potential SFPUC water supply shortfall of up to 19 percent in the fourth and fifth years of a multiple year dry period if the Bay-Delta Plan Amendment were not implemented and up to 54 percent in the fourth and fifth years of a multiple year dry period if the Bay-Delta Plan Amendment were implemented as it currently stands.

It should be noted that the City also utilizes groundwater as a supply source. As discussed in the Bayhill WSA, the City participates in the Regional Groundwater and Storage Recovery (GSR) Project. Therefore, the City is projected to have two supply modes that vary according to hydrologic conditions. The supply modes include "put" operations (in normal and wet years) and "take" operations (in dry years). During "put" operations, SFPUC provides additional surface water to the City to reduce the City's groundwater pumping. During "take" operations, the City utilizes available groundwater supplies and reduces surface water deliveries, thereby freeing surface water supply to be delivered to other SFPUC customers. Projected groundwater supplies under normal hydrologic conditions assume that groundwater use is minimized (i.e., "put" operations). During single dry and multiple dry years, projected groundwater supplies are assumed to be equal to 2.10 million gallons per day (MGD).

West Yost has evaluated the impact that the revised SFPUC water supply reliability modeling results with and without the Bay-Delta Plan Amendment would have on the Bayhill WSA findings and conclusions.

The water demand projections used in this evaluation are shown below in Table 1. Table 1 provides an update to Tables 4-2 and 4-3 from the Bayhill WSA based on more current water demand projections which specifically include the projected water demands for the Bayhill Specific Plan Development Project.

[3] Letter from Paula Kehoe, SFPUC Director of Water Resources to Danielle McPherson Senior Water Resources Specialist, BAWSCA, dated March 30, 2021, plus tables summarizing Drought Allocations by Agency provided by BAWSCA on April 1, 2021 .

Table 1. Projected City of San Bruno Future Water Demand, MGD

Hydrologic Condition	Demand Reduction[a], percent	2025	2040	2045
Average (Normal) Year[b]	0	3.53	4.78	4.78
Single Dry Year	10	3.18	4.30	4.30
Multiple Dry Years, Year 1	10	3.18	4.30	4.30
Multiple Dry Years, Year 2	20	2.82	3.82	3.82
Multiple Dry Years, Year 3	20	2.82	3.82	3.82
Multiple Dry Years, Year 4	20	2.82	3.82	3.82
Multiple Dry Years, Year 5	20	2.82	3.82	3.82

(a) Demands will be reduced 10 percent for single dry years for a Stage I water shortage and 20 percent for multiple dry years, after year 1, for a Stage II water shortage.
(b) Based on totals presented in the City's working draft 2020 UWMP.

Table 7-1 of the Bayhill WSA summarized the water supply and demand findings of the evaluation. That table has been updated for this re-evaluation assuming no Bay-Delta Plan Amendment (shown in Table 2 below) and full implementation of the Bay-Delta Plan Amendment (shown in Table 3 below).

Table 2. Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – Without Bay-Delta Plan Amendment

Hydrologic Condition		MGD		
		2025	2040	2045
Normal Year				
	Available Water Supply	5.39	5.35	5.36
	Total Water Demand	**3.53**	**4.78**	**4.78**
	Potential Surplus (Deficit)	1.86	0.57	0.58
	Percent Shortfall of Demand	-	-	-
Single Dry Year				
	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	2.21	1.05	1.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Years				
Multiple Dry Year 1	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	2.21	1.05	1.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 2	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	1.54
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 3	Available Water Supply	5.39	5.35	5.36
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	1.54
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 4	Available Water Supply	5.39	5.35	4.74
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	0.92
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 5	Available Water Supply	5.39	5.35	4.74
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	2.57	1.53	0.92
	Percent Shortfall of Demand	-	-	-

As shown in Table 2, no supply deficits are anticipated through the planning period assuming the demand reductions indicated in Table 1. With no demand reductions, a supply deficit of approximately 1 percent would occur during the fourth and fifth years of a multiple dry year hydrologic condition by 2045 (total water supply of 4.74 MGD versus a normal year water demand of 4.78 MGD).

Table 3. Summary of City of San Bruno Water Demand Versus Supply During Hydrologic Normal, Single Dry, and Multiple Dry Years – With Bay-Delta Plan Amendment

Hydrologic Condition		MGD		
		2025	2040	2045
Normal Year				
	Available Water Supply	5.39	5.35	5.36
	Total Water Demand	**3.53**	**4.78**	**4.78**
	Potential Surplus (Deficit)	1.86	0.57	0.58
	Percent Shortfall of Demand	-	-	-
Single Dry Year				
	Available Water Supply	4.20	4.16	3.88
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	1.02	(0.14)	(0.42)
	Percent Shortfall of Demand	-	3.3%	9.8%
Multiple Dry Years				
Multiple Dry Year 1	Available Water Supply	4.20	4.16	3.88
	Total Water Demand (10% reduction from normal year)	**3.18**	**4.30**	**4.30**
	Potential Surplus (Deficit)	1.02	(0.14)	(0.42)
	Percent Shortfall of Demand	-	3.3%	9.8%
Multiple Dry Year 2	Available Water Supply	3.90	3.87	3.88
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	0.05	0.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 3	Available Water Supply	3.90	3.87	3.88
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	0.05	0.06
	Percent Shortfall of Demand	-	-	-
Multiple Dry Year 4	Available Water Supply	3.90	3.66	3.61
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	(0.16)	(0.21)
	Percent Shortfall of Demand	-	4.2%	5.5%
Multiple Dry Year 5	Available Water Supply	3.90	3.66	3.61
	Total Water Demand (20% reduction from normal year)	**2.82**	**3.82**	**3.82**
	Potential Surplus (Deficit)	1.08	(0.16)	(0.21)
	Percent Shortfall of Demand	-	4.2%	5.5%

As shown in Table 3, even with the City's anticipated dry year demand reductions shown in Table 1, supply deficits would still occur during the first, fourth, and fifth years of a multiple dry year hydrologic condition. The maximum total demand reduction required to meet the projected water supply is approximately 24 percent (total water supply of 3.61 MGD versus a normal year demand of 4.78 MGD) by 2045, in the fourth and fifth years of a multiple dry year hydrologic condition.

Although the impact of the Bay-Delta Plan Amendment is severe, a maximum demand reduction of approximately 20 percent in single dry years and the first three years of a multiple dry year hydrologic condition (total water supply of 3.87 MGD versus a normal year demand of 4.78 MGD) and a demand reduction of up to 24 percent in the fourth and fifth years of a multiple dry year hydrologic condition can still be achieved by implementation of Stages 2 and 3 of the City's WSCP.[4] While the City is in the process of updating its WSCP (the WSCP is scheduled for public review in September 2021), the working draft WSCP indicates a Stage 3 Shortage Level would build upon the Stage 2 Shortage Level by increasing monitoring of water use (meter reading), implementing mandatory water allotments for all accounts, and increasing rates and penalties for excess water use.

POTENTIAL WATER SUPPLY SHORTAGE MITIGATION MEASURES

Tables 2 and 3 presented above reflect "bookends" for water supply reliability projections. SFPUC is currently implementing projects to help mitigate the effects of the Bay-Delta Plan Amendment should it be implemented. These projects are discussed briefly below.

In early June 2021, SFPUC sent a memorandum (memo)[5] (Attachment C) to its wholesale customers with a description of projects being implemented to mitigate some of the supply reductions that could be triggered by the Bay-Delta Plan Amendment.

As indicated in the memo, SFPUC is "pursuing several courses of action to remedy" the impacts of the Bay-Delta Plan Amendment. As stated in the SFPUC memo, such actions include:

- Pursuing a Tuolumne River Voluntary Agreement
- Evaluating our [SFPUC's] Drought Planning Scenario in light of climate change
- Pursuing Alternative Water Supplies
- In litigation with the State over the Bay-Delta Plan Amendment
- In litigation with the State over the proposed Don Pedro FERC Water Quality Certification [which could exacerbate the impacts of the Bay-Delta Plan amendment]

These actions are described briefly in Attachment C. Although the extent that the above-listed actions could mitigate the impacts of the Bay-Delta Plan Amendment are not known, the fact the SFPUC is pursuing these actions indicates that the supply projections shown in Table 3 would likely represent a worst-case scenario.

[4] The City's WSCP will be updated in the 2020 UWMP to include six water shortage stages (Stages 1 – 6) to align with the State's six standard water shortage levels. Each stage corresponds to progressive ranges of up to 10, 20, 30, 40, 50 percent, and greater than 50 percent shortages from the normal supply condition.

[5] Regional Water System Supply Reliability and UWMP 2020, memo from Steven R. Ritchie, Assistant General Manager, SFPUC, to SFPUC Wholesale Customers, June 2, 2021.

CONCLUSIONS

As indicated above, without implementation of the Bay-Delta Plan Amendment, the City would generally have sufficient water supplies during normal and dry hydrologic conditions to meet the City's projected water demands, including the highest water demand future scenario for the Bayhill Specific Plan Development Project, in addition to the City's existing and other planned future uses.

With implementation of the Bay-Delta Plan Amendment, the City would need to implement Stage 3 of its WSCP to reduce normal year water demands by approximately 24 percent during the fourth and fifth years of a multiple dry year hydrologic condition. A 24 percent reduction in normal year water demands is higher than the 20 percent reduction assumed in the Bayhill WSA but is still a reasonable reduction that can be achieved by implementing a Stage 3 water shortage as defined in the City's WSCP. During the most severe part of the recent drought in 2015 to 2016, the City implemented a Stage 2 Shortage Level and was able to reduce water demand by about 20 percent from 2013 water demand, which greatly exceeded the conservation standard mandated by the State Board of approximately 8 percent. Other BAWSCA member agencies achieved water demand reductions between 10 to 40 percent. In summary, all BAWSCA member agencies exceeded their mandated conservation standard. The graphic provided in Attachment D shows the conservation standard and percent reduction for each BAWSCA member agency as reported by BAWSCA.

Actions that the SFPUC is taking in response to a potential water supply shortage are expected to mitigate the water supply shortage by some, as yet unquantified, amount. Therefore, the water supply and demand summaries provided in Tables 2 and 3 should be considered as the best case (without the Bay-Delta Plan Amendment) and worst case (full implementation of the Bay-Delta Plan Amendment without mitigating actions) water supply conditions for the City.

Attachment A

San Francisco Public Utilities Commission
Reliability Memorandum

San Francisco
Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
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F 415.554.3161
TTY 415.554.3488

July 31, 2019

Tom Francis, Water Resources Manager
Bay Area Water Supply and Conservation Agency
155 Bovet Road, Suite 650
San Mateo, CA 94402

Dear Mr. Francis,

This letter is a follow-up to our letter dated June 27, 2019, which provided information you requested on impacts to the Regional Water System under implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment). Three errors in the attachment to that letter were recently identified: (1) a typo in the narrative describing the range of shortfalls anticipated under Scenario 1, (2) typos in the table note numbering in Table 1, and (3) incorrect projections for the year 2020 under Scenario 3 because if the Bay-Delta Plan Amendment were to be implemented, such implementation is not anticipated to occur until after 2020. Corrections to these errors are provided in the attachment to this letter.

It is our understanding that you will pass this information on to the Wholesale Customers. It also should be repeated that the information regarding anticipated shortages in the attachment only apply to Tier 1 of the Shortage Allocation Plan, the shortages for the individual wholesale customers will require the application of Tier 2 of the Shortage Allocation Plan. We assume BAWSCA can provide the necessary support to the Wholesale Customers in applying Tier 2.

If you have any questions or need additional information, please do not hesitate to contact me at (415) 554-0792.

Sincerely,

Julie Ortiz for Paula Kehoe

Paula Kehoe
Director of Water Resources

Enclosure: ATTACHMENT - Water Supply Reliability Information for BAWSCA Member Agencies' Water Supply Assessments (with Corrections)

ATTACHMENT

Water Supply Reliability Information for BAWSCA Member Agencies' Water Supply Assessments (with Corrections)

2018 Bay-Delta Plan Amendment

In December 2018, the State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The SWRCB is required by law to regularly review this plan. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 40% of the "unimpaired flow"[1] on the three tributaries from February through June in every year type, whether wet, normal, dry, or critically dry.

If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet its contractual obligations to its Wholesale Customers as presented in the SFPUC's 2015 UWMP in normal years. The SFPUC's 2015 UWMP already assumes shortages in single and multiple dry years through 2040, but implementation of the Bay-Delta Plan Amendment will result in greater shortages.

The SWRCB has stated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by the year 2022, assuming all required approvals are obtained by that time. But implementation of the Plan Amendment is uncertain for several reasons. First, under the Clean Water Act, the United States Environmental Protection Agency (U.S. EPA) must approve the water quality standards identified in the Plan Amendment within 90 days from the date the approval request is received. By letter dated June 11, 2019, EPA rejected the SWRCB's two-page submittal as inadequate under the requirements of the Clean Water Act. Pursuant to EPA's letter, the Board has 90 days to respond with a submittal that complies with the law. At this point, EPA has neither approved, nor disapproved, any of the revised water quality objectives. It is uncertain whether the U.S. EPA will approve or disapprove the water quality standards in the future. Furthermore, the determination could result in litigation.

Second, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal court, challenging the SWRCB's adoption of the Bay-Delta Plan Amendment, including two legal challenges filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation in state and federal courts. These cases are in the early stage and there have been no dispositive court rulings to date.

Third, the Bay-Delta Plan Amendment is not self-implementing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the 401 certification process in the Federal Energy Regulatory Commission's relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be

[1] Unimpaired flow represents the water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds. Bay-Delta Plan Amendment, Introduction, p.1-8.

completed in the 2022-23 timeframe. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different water supply impact on the SFPUC).

Fourth, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, SWRCB Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the SWRCB "as early as possible after December 1, 2019." In accordance with the SWRCB's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the SWRCB ("March 1st Proposed Voluntary Agreement"). On March 26, 2019, the Commission adopted Resolution No. 19-0057 to support SFPUC's participation in the Voluntary Agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency and the leadership of the Newsom administration. The negotiations for a voluntary agreement have made significant progress since an initial framework was presented to the SWRCB on December 12, 2018. The package submitted on March 1, 2019 is the product of renewed discussions since Governor Newsom took office. While significant work remains, the package represents an important step forward in bringing together diverse California water interests.

For all these reasons, whether and when the Bay-Delta Plan Amendment will be implemented, and how those amendments if implemented will affect the SFPUC's water supply is currently uncertain and possibly speculative. Given this uncertainty, this WSA analyzes water supply and demand through 2040 under three scenarios: (1) No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement ("Scenario 1"), (2) Implementation of the March 1st Proposed Voluntary Agreement ("Scenario 2"), and (3) Implementation of the Bay-Delta Plan Amendment ("Scenario 3").

Dry Year Water Supplies

Since adoption of the UWMP, the following milestones have occurred:

- Calaveras Dam Replacement Project – Construction of the new dam was completed in September 2018, and the overall project was completed in June 2019.

- Regional Groundwater Storage and Recovery Project – Construction of this project is still underway. Phase 1 of the project, consisting of installation of 13 production wells, will be completed in 2019. Since May/June 2016, the project has been in a storage phase through periodic deliveries of RWS surface water in lieu of groundwater pumping by Daly City, San Bruno, and the California Water Service Company.

Additional Water Supplies

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations to RWS supply during dry years, the SFPUC is increasing and accelerating its efforts to acquire additional water supplies and explore other projects that would increase overall water supply resilience. Developing these additional supplies would reduce water supply shortfalls and reduce rationing associated with such shortfalls. In addition to the Daly

City Recycled Water Expansion project, which was a potential project identified in the 2015 UWMP and had committed funding at that time, the SFPUC has taken action to fund the study of potential additional water supply projects. Capital projects under consideration to develop additional water supplies include surface water storage expansion, recycled water expansion, water transfers, desalination, and potable reuse. The SFPUC is also considering developing related policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments. A more detailed list and descriptions of these efforts are provided below.

The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. Because these water supply projects would take 10 to 30 or more years to implement, and because required environmental permitting negotiations may reduce the amount of water that can be developed, the yield from these projects are not currently incorporated into SFPUC's supply projections. Capital projects would be funded through rates from both Wholesale and Retail Customers based on mutual agreement, as the additional supplies would benefit all customers of the RWS, unless otherwise noted. State and federal grants and other financing opportunities would also be pursued for eligible projects, to the extent feasible, to offset costs borne by ratepayers.

1. **Daly City Recycled Water Expansion** (Regional, Normal- and Dry-Year Supply, 3 mgd)

   Project Description: The SFPUC and North San Mateo County Sanitation District (NSMCSD, or Daly City) have been exploring ways to increase the recycled water treatment capacity in Daly City to serve additional customers and decrease irrigation water withdrawals from the Westside Groundwater Basin, both in San Francisco and further south of Daly City. The majority of the irrigation demand met by groundwater withdrawals, approximately 2 mgd, serves cemeteries in Colma. An initial feasibility study completed in 2010 identified the capital requirements that would be needed to produce additional capacity at the existing treatment plant location. The study demonstrated that a new tertiary treatment facility would be required onsite to produce additional capacity of up to 3.4 mgd. Currently, flows that exceed the capacity of the existing treatment plant are discharged into the Pacific Ocean. With this project, some of that discharge may be treated and used for irrigation. New facilities would include a treatment facility, pump station, distribution pipelines, and storage.

   Estimated Costs and Financing: The capital cost is estimated to be $85 million, which is budgeted for in the SFPUC's 10-year capital planning horizon. The annual operations and maintenance (O&M) cost is estimated to be $3 million. This project may present regional benefits that would result in cost-sharing with Wholesale Customers because the replacement of groundwater used for irrigation with recycled water will result in a greater volume of groundwater storage that can be used in dry years as part of the SFPUC's existing Groundwater Storage and Recovery project, approved by the SFPUC in 2014 in Resolution no. 14-0127.

   Permits and Approvals: Daly City adopted a Final Initial Study/Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring and Reporting Program (MMRP) for the proposed project in September 2017. The SFPUC has not yet approved its participation in the project. Other permits and/or approvals that may be needed for this project include: BART, CAL/OSHA, San Francisco Bay RWQCB, and encroachment permits from Caltrans, Daly City, South San Francisco, SFPUC, San Mateo County, and Colma to construct distribution and storage facilities. Institutional agreements between the project

partners for project construction and operation, as well as with the customers whose supplies will change from groundwater to recycled water, will also need to be developed.

Estimated Acquisition: Construction may occur as soon as 2023 with operation beginning in 2027.

2. **Alameda County Water District Transfer Partnership** (Regional, Normal- and Dry-Year Supply, 5 mgd)

Project Description: Water would be acquired from Contra Costa Water District (CCWD) for delivery to Alameda County Water District (ACWD) through the South Bay Aqueduct utilizing a planned expansion of the Los Vaqueros Reservoir.

Estimated Costs and Financing: The capital cost is estimated to be $50-150 million, with an annual O&M cost of $2.5 million.

Permits and Approvals: Planning and environmental review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, National Pollutant Discharge Elimination System (NPDES), Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water right modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as 2028 with operation beginning in 2032.

3. **Brackish Water Desalination in Contra Costa County** (Regional, Normal- and Dry-Year Supply, 9+ mgd)

Project Description: The Bay Area Brackish Water Treatment (Regional Desalination) Project is a partnership between CCWD, East Bay Municipal Utility District (EBMUD), SFPUC, Santa Clara Valley Water District (SCVWD) and Zone 7 to turn brackish water into a reliable, drought-proof drinking water supply, delivering a total of up to 10-20 mgd in drought and non-drought years (i.e., dry and normal years), throughout the region. A new brackish water treatment plant would be constructed in East Contra Costa and tie into the existing CCWD system for delivery through Los Vaqueros Reservoir and the South Bay Aqueduct, or delivery via a connection with EBMUD.

The SFPUC would rely on existing infrastructure and institutional agreements to receive water transfers from partner agencies. For planning and cost estimation purposes, it was assumed that the SFPUC's share of the regional water supply would be 9 mgd in all year types; however, if additional capacity is available, the SFPUC may secure additional water supply, based on negotiations with partner agencies.

Estimated Costs and Financing: The capital cost is estimated to be $200-800 million, with an annual O&M cost of $12-20 million.

Permits and Approvals: To proceed, this concept would require extensive institutional agreements, permitting, and environmental review. Construction of a new desalination plant will require construction and operating permits such as NPDES, Dredge and Fill, consultations with federal and state agencies, and others. In addition, water rights will need to be secured and/or modified. In California, permitting and regulatory approvals of desalination projects has typically taken 10-18 years. In addition, institutional agreements among partner agencies will be needed.

Estimated Acquisition: Construction may occur as soon as 2032 and be phased so that 5-9 mgd would be available to the region by 2035 and a total of 5-11 mgd would be available after 2040.

4. **ACWD-USD Purified Water Partnership** (Regional, Normal- and Dry-Year Supply, 5 mgd)

Project Description: This may be an indirect or direct potable reuse project that would inject highly-treated water from Union Sanitary District (USD) for groundwater recharge, then recover the water through the ACWD Brackish Groundwater Desalination Plant. How the water is transferred to the SFPUC remains to be determined.

Estimated Costs and Financing: The capital cost is estimated to be $200-400 million, with an annual O&M cost of $2.5 million.

Permits and Approvals: An initial assessment will be underway in 2019, which will identify potential project scenarios. Permitting and approvals for a project will depend on its design and nature, which have not yet been identified.

Estimated Acquisition: Construction may occur as soon as 2038 with operation beginning in 2045.

5. **Crystal Springs Purified Water** (Regional, Normal- and Dry-Year Supply, 6+ mgd)

Project Description: This is an indirect potable reuse project that would blend wastewater from Silicon Valley Clean Water and possibly San Mateo into Crystal Springs Reservoir and treat the blended water at Harry Tracy Water Treatment Plant for potable reuse.

Estimated Costs and Financing: The capital cost is estimated to be $400-700 million, with an annual O&M cost of $18-25 million.

Permits and Approvals: Construction and operating permits would be required for this project. They would likely include NPDES, Encroachment, consultations with state and federal agencies, and others. Surface water augmentation is regulated by the SWRCB, and consultations and public hearings would be required.

Estimated Acquisition: Construction may occur as soon as 2034 and be phased so that 3-5 mgd would be available to the region by 2035 and a total of 3-7 mgd would be available after 2040.

6. Additional Storage Capacity in Los Vaqueros Reservoir from Expansion (Regional)

Project Description: Expansion of storage capacity in Los Vaqueros is to allow the ACWD Transfer Partnership and Brackish Water Desalination in Contra Costa County to be optimized.

Estimated Costs and Financing: The capital cost is estimated to be $20-50 million. SFPUC's portion of the project yield and cost share are not yet known. The annual O&M cost is yet to be estimated.

Permits and Approvals: Planning and review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, NPDES, Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water rights modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as 2021 with operation beginning in 2027.

7. Calaveras Reservoir Expansion (Regional)

Project Description: Calaveras Reservoir would be expanded to create 289,000 AF additional capacity to store excess Regional Water System supplies or other source water in wet and normal years. In addition to reservoir enlargement, the project would involve infrastructure to pump water to the reservoir, such as pump stations and transmission facilities.

Estimated Costs and Financing: The costs of this project is yet to be determined.

Permits and Approvals: Similar to Los Vaqueros Reservoir Expansion, this project would require numerous permits, approvals and consultations, such as Dredge and Fill, NPDES, Streambed Alteration, Encroachment, possible water right modifications, etc. These permits and approvals will be obtained by SFPUC and/or its contractor. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as the early 2040s with operation beginning around 2050.

Even if all the capital projects above are implemented, the total amount of water and storage yielded would not be enough to make up for the dry year shortfall that may result from implementation of the Bay-Delta Plan Amendment as adopted, and would occur years after such shortfalls begin. Thus, the SFPUC continues to proactively explore opportunities for reuse and innovation, such as the following policy:

- **Evaluation of Recycled Water Throughout Service Area**
  Wastewater treatment plants throughout the SFPUC service area would be surveyed to identify potential non-potable, indirect potable, and direct potable projects.

Comparison of Projected Supply and Demand

The following sections provide a supply and demand comparison for the three scenarios described above. Procedures for determining RWS supply availability are provided in the Water Supply Allocation Plan (WSAP) between the SFPUC's Retail and Wholesale Customers. It also should be noted that the information regarding anticipated shortages in the tables provided below only apply to Tier 1 of the WSAP, the shortages for the individual wholesale customers will require the application of Tier 2 of the WSAP to derive available supply for each wholesale customer. In addition, wholesale customers will need to include the availability of other supplies in addition to SFPUC supplies to drive their total water supply shortages under each scenario.

Scenario 1: No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement

Table 1 below compares the SFPUC's wholesale water supplies and demands through 2040 during normal year, single dry-, and multiple dry-year periods under Scenario 1.

The RWS supply projections shown in Table 1 differ from those provided previously for use in the 2015 UWMP. First, Table 1 reflects SFPUC's full 8.5-year design drought sequence instead of the minimum 3-year sequence required to be provided in the 2015 UWMP. Under legislation adopted in 2018 (S.B. 606) future UWMPs will be required to project water supply availability during a minimum of 5 years of continuous drought (Water Code section 10631(b)(1)). Second, the SFPUC water supply system model includes the following assumptions, which differ from those used for the 2015 UWMP projections:

- In-stream flow releases from Crystal Springs Reservoir to San Mateo Creek were included in this simulation. The average volume of these releases is approximately 3,900 acre-feet per year.
- Annual water supply transfers from the irrigation districts that operate New Don Pedro Reservoir (Districts) to SFPUC were not included in this analysis. An annual transfer of 2,300 acre-feet was assumed from the Districts to the SFPUC Water Bank Account in the WSIP 2018 simulation.

As shown in Table 1, under Scenario 1 without implementation of the Bay-Delta Plan Amendment, RWS supplies would meet wholesale demands (i.e., contractual obligations) in all normal years, single dry years, and the first year of the 8.5-year design drought. During subsequent drought years, shortfalls would range from 31 to 60 mgd, or 17-~~36~~33%, increasing into the outer years of the design drought.

**Table 1: Projected Supply and Demand Comparison Under Scenario 1
(No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement) (mgd)**

		Normal Year	Single Dry Year[1]	Multiple Dry Years							
				Year 1[1]	Year 2[21]	Year 3[21]	Year 4[2]	Year 5[2]	Year 6[2]	Year 7[3]	Year 8[3]
2020	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5]	184.0	184.0	184.0	152.6	152.6	132.5	132.5	132.5	124.2	124.2
	Shortfall	0.0	0.0	0.0	31.4	31.4	51.5	51.5	51.5	59.8	59.8
	Shortfall as % of Demand	0.0%	0.0%	0.0%	17.1%	17.1%	28.0%	28.0%	28.0%	32.5%	32.5%
2025	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5]	184.0	184.0	184.0	152.6	152.6	132.5	132.5	132.5	124.2	124.2
	Shortfall	0.0	0.0	0.0	31.4	31.4	51.5	51.5	51.5	59.8	59.8
	Shortfall as % of Demand	0.0%	0.0%	0.0%	17.1%	17.1%	28.0%	28.0%	28.0%	32.5%	32.5%
2030	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5]	184.0	184.0	184.0	152.6	152.6	132.5	132.5	132.5	124.2	124.2
	Shortfall	0.0	0.0	0.0	31.4	31.4	51.5	51.5	51.5	59.8	59.8
	Shortfall as % of Demand	0.0%	0.0%	0.0%	17.1%	17.1%	28.0%	28.0%	28.0%	32.5%	32.5%
2035	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5]	184.0	184.0	184.0	152.6	152.6	132.5	132.5	132.5	124.2	124.2
	Shortfall	0.0	0.0	0.0	31.4	31.4	51.5	51.5	51.5	59.8	59.8
	Shortfall as % of Demand	0.0%	0.0%	0.0%	17.1%	17.1%	28.0%	28.0%	28.0%	32.5%	32.5%
2040	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5]	184.0	184.0	184.0	152.6	152.6	132.5	132.5	132.5	124.2	124.2
	Shortfall	0.0	0.0	0.0	31.4	31.4	51.5	51.5	51.5	59.8	59.8
	Shortfall as % of Demand	0.0%	0.0%	0.0%	17.1%	17.1%	28.0%	28.0%	28.0%	32.5%	32.5%

Notes:
1. During multiple dry years 2-3 (years 3-4 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 64.0% of available RWS supply, or 152.6 mgd.
2. During multiple dry years 4-6 (years 5-7 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 62.5% of available RWS supply, or 132.5 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 62.5% of available RWS supply, or 124.2 mgd.
4. It is assumed that wholesale demands will continue to be limited to the Supply Assurance of 184 mgd. The 184 mgd assumes that San Jose and Santa Clara remain temporary, interruptible customers.
5. Procedures for RWS allocations are provided in the WSAP.

Scenario 2: Implementation of the Voluntary Agreement

As stated earlier, the March 1st Proposed Voluntary Agreement has yet to be accepted by SWRCB as an alternative to the Bay-Delta Plan Amendment and thus the shortages that would occur with its implementation are not known with certainty. However, given that the objectives of the Voluntary Agreement are to provide fishery improvements while protecting water supply through flow and non-flow measures, the RWS supply shortfalls under the Voluntary Agreement would be less than those under the Bay-Delta Plan Amendment, and therefore would require rationing of a lesser degree than that which would occur under Scenario 3. The degree of rationing would also more closely align with the SFPUC's RWS LOS goal of limiting rationing to no more than 20% on a system-wide basis in drought years. This goal was adopted in 2008 by the Commission (Resolution No. 08-0200).

Scenario 3: Implementation of the Bay-Delta Plan Amendment

Table 2 below provides projected supplies and demands under Scenario 3. The RWS is projected to experience significant shortfalls in single dry and multiple dry years ~~starting as soon as 2022 and~~ through 2040, regardless of whether the proposed project is constructed. The 2020 projections in Table 2 are based on the assumption that the Bay Delta Plan Amendment will not be implemented until after 2020. These significant shortfalls are a result of implementation of the Bay-Delta Plan Amendment and not attributed to the incremental retail demand associated with the proposed project. *[Note to Wholesale Customers: This statement will need to be tailored to reflect your own water supply planning (e.g., you may already be showing significant shortfalls regardless of the Bay-Delta Plan Amendment].*

If additional water supplies were not acquired before the Bay-Delta Plan Amendment were implemented, the SFPUC would impose Wholesale Customer rationing to help balance water supply deficits during dry years.

Given the severity of the reduction in RWS supply with implementation of the Bay-Delta Plan Amendment, existing and planned dry-year supplies would not be enough to meet projected wholesale water demand obligations without rationing above the SFPUC's RWS LOS goal of limiting rationing to 20% on a system-wide basis for all dry years starting as soon as 2022. Although the WSAP does not address implications to supply during system-wide shortages above 20%, the WSAP indicates that if system-wide shortage greater than 20% were to occur, RWS supply would be allocated between retail and Wholesale Customers per the rules corresponding to a 16-20% system-wide reduction, subject to consultation and negotiation between the SFPUC and its Wholesale Customers to modify the allocation rules. The allocation rules corresponding to the 16-20% system-wide reduction are reflected in Table 2 above for Scenario 3. These allocation rules result in shortfalls of 85 to 124 mgd, or 46-68%, across the wholesale service area under Scenario 3.

Table 2: Projected Supply and Demand Comparison Under Scenario 3 (Implementation of the Bay-Delta Plan Amendment) (mgd)

		Normal Year	Single Dry Year[1]	Multiple Dry Years							
				Year 1[1]	Year 2[2]	Year 3[2]	Year 4[2]	Year 5[2]	Year 6[2]	Year 7[3]	Year 8[3]
2020	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5,6]	184.0	~~99.4~~ 184.0	~~99.4~~ 184.0	~~76.2~~ 152.6	~~76.2~~ 152.6	~~76.2~~ 132.5	~~76.2~~ 132.5	~~76.2~~ 132.5	~~59.6~~ 124.2	~~59.6~~ 124.2
	Shortfall	0.0	~~84.6~~ 0.0	~~84.6~~ 0.0	~~107.8~~ 31.4	~~107.8~~ 31.4	~~107.8~~ 51.5	~~107.8~~ 51.5	~~107.8~~ 51.5	~~124.4~~ 59.8	~~124.4~~ 59.8
	Shortfall as % of Demand	0.0%	~~46.0%~~ 0.0%	~~46.0%~~ 0.0%	~~58.6%~~ 17.1%	~~58.6%~~ 17.1%	~~58.6%~~ 28.0%	~~58.6%~~ 28.0%	~~58.6%~~ 28.0%	~~67.6%~~ 32.5%	~~67.6%~~ 32.5%
2025	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5,6]	184.0	99.4	99.4	76.2	76.2	76.2	76.2	76.2	59.6	59.6
	Shortfall	0.0	84.6	84.6	107.8	107.8	107.8	107.8	107.8	124.4	124.4
	Shortfall as % of Demand	0.0%	46.0%	46.0%	58.6%	58.6%	58.6%	58.6%	58.6%	67.6%	67.6%
2030	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5,6]	184.0	99.4	99.4	76.2	76.2	76.2	76.2	76.2	59.6	59.6
	Shortfall	0.0	84.6	84.6	107.8	107.8	107.8	107.8	107.8	124.4	124.4
	Shortfall as % of Demand	0.0%	46.0%	46.0%	58.6%	58.6%	58.6%	58.6%	58.6%	67.6%	67.6%
2035	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5,6]	184.0	99.4	99.4	76.2	76.2	76.2	76.2	76.2	59.6	59.6
	Shortfall	0.0	84.6	84.6	107.8	107.8	107.8	107.8	107.8	124.4	124.4
	Shortfall as % of Demand	0.0%	46.0%	46.0%	58.6%	58.6%	58.6%	58.6%	58.6%	67.6%	67.6%
2040	Total Wholesale Demand[4]	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0	184.0
	Total Wholesale RWS Supply[5,6]	184.0	99.4	99.4	76.2	76.2	76.2	76.2	76.2	59.6	59.6
	Shortfall	0.0	84.6	84.6	107.8	107.8	107.8	107.8	107.8	124.4	124.4
	Shortfall as % of Demand	0.0%	46.0%	46.0%	58.6%	58.6%	58.6%	58.6%	58.6%	67.6%	67.6%

Notes:
1. During a single dry year and multiple dry year 1 (year 2 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 62.5% of available RWS supply, or 99.4 mgd.
2. During multiple dry years 2-6 (years 3-7 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 62.5% of available RWS supply, or 76.2 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC's design drought sequence), the wholesale allocation under the WSAP is 62.5% of available RWS supply, or 59.6 mgd.
4. It is assumed that wholesale demands will continue to be limited to the Supply Assurance of 184 mgd. The 184 mgd assumes that San Jose and Santa Clara remain temporary, interruptible customers.
~~4.~~5. Implementation of the Bay-Delta Plan Amendment is assumed to occur after 2020 and by 2022.
~~5.~~6. Procedures for RWS allocations are provided in the WSAP.

Attachment B

San Francisco Public Utilities Commission
Water Supply Reliability Letter

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
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March 30, 2021

Danielle McPherson
Senior Water Resources Specialist
Bay Area Water Supply and Conservation Agency
155 Bovet Road, Suite 650
San Mateo, CA 94402

Dear Ms. McPherson,

Attached please find additional supply reliability modeling results conducted by the SFPUC. The SFPUC has conducted additional supply reliability modeling under the following planning scenarios:

- Projected supply reliability for years 2020 through 2045, assuming that demand is equivalent to the sum of the projected retail demands on the Regional Water System (RWS) and Wholesale Customer purchase request projections provided to SFPUC by BAWSCA on January 21st (see Table 1 below).
- Under the above demand conditions, projected supply reliability for scenarios both with and without implementation of the Bay-Delta Plan Amendment starting in 2023.

The SFPUC will be using this supply modeling in the text of its draft UWMP and moving the original modeling results into an appendix.

Table 1: Retail and Wholesale RWS Demand Assumptions Used for Additional Supply Reliability Modeling (mgd)

	2020	2025	2030	2035	2040	2045
Retail	66.5	67.2	67.5	68.6	70.5	73.7
Wholesale[1, 2]	132.1	146.0	147.9	151.9	156.3	162.8
Total	**198.6**	**213.2**	**215.4**	**220.5**	**226.8**	**236.5**

[1] Wholesale purchase request projections provided to the SFPUC by BAWSCA on January 21st, 2021
[2] Includes demands for Cities of San Jose and Santa Clara

Please note the following about the information presented in the attached tables:

- Assumptions about infrastructure conditions remain the same as what was provided in our January 22nd letter.
- The Tier 1 allocations were applied to the RWS supplies to determine the wholesale supply, as was also described in the January 22nd letter; for any system-wide shortage above 20%, the Tier 1 split for a 20% shortage was applied.
- The SFPUC water supply planning methodology, including simulation of an 8.5-year design drought, is used to develop these estimates of water supply available from the RWS for five dry years. In each demand scenario for 2020 through 2045, the RWS deliveries are estimated using the standard SFPUC procedure, which includes adding increased levels of rationing as needed to balance the demands on the RWS system with available water supply. Some simulations may have increased levels of rationing in the final years of the design drought sequence, which can influence the comparison of results in the first five years of the sequence.
- Tables 7 and 8 in the attached document provide RWS and wholesale supply availability for the five-year drought risk assessment from 2021 to 2025. SFPUC's modeling approach does not allow for varying demands over the course of a dry year sequence. Therefore, the supply projections for 2021 to 2025 are based on meeting 2020 levels of demand. However, in years when the Bay-Delta Plan Amendment is not in effect, sufficient RWS supplies will be available to meet the Wholesale Customers' purchase requests assuming that they are between the 2020 and 2025 projected levels. This is not reflected in Tables 7 and 8 because SFPUC did not want to make assumptions about the growth of purchase requests between 2020 and 2025.

In our draft UWMP, we acknowledge that we have a Level of Service objective of meeting average annual water demand of 265 mgd from the SFPUC watersheds for retail and Wholesale Customers during non-drought years, as well as a contractual obligation to supply 184 mgd to the Wholesale Customers. Therefore, we will still include the results of our modeling based on a demand of 265 mgd in order to facilitate planning that supports meeting this Level of Service objective and our contractual obligations. The results of this modeling will be in an appendix to the draft UWMP. As will be shown in this appendix, in a normal year the SFPUC can provide up to 265 mgd of supply from the RWS. The RWS supply projections shown in the attached tables are more accurately characterized as supplies that will be used to meet projected retail and Wholesale Customer demands.

It is our understanding that you will pass this information on to the Wholesale Customers. If you have any questions or need additional information, please do not hesitate to contact Sarah Triolo, at striolo@sfwater.org or (628) 230 0802.

Sincerely,

Paula Kehoe
Director of Water Resources

Table 2: Projected Total RWS Supply Utilized and Portion of RWS Supply Utilized by Wholesale Customers in Normal Years [For Table 6-9]:

Year	2020	2025	2030	2035	2040	2045
RWS Supply Utilized (mgd)	198.6	213.2	215.4	220.5	226.8	236.5
RWS Supply Utilized by Wholesale Customers[a] (mgd)	132.1	146.0	147.9	151.9	156.3	162.8

[a] RWS supply utilized by Wholesale Customers is equivalent to purchase request projections provided to SFPUC by BAWSCA on January 21, 2021, and includes Cities of San Jose and Santa Clara.

Basis of Water Supply Data: With Bay-Delta Plan Amendment

Table 3a: Basis of Water Supply Data [For Table 7-1], Base Year 2020, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2020	198.6	100%	132.1	
Single dry year		198.6	100%	132.1	
Consecutive 1st Dry year		198.6	100%	132.1	
Consecutive 2nd Dry year		198.6	100%	132.1	
Consecutive 3rd Dry year[1]		119.2	60%	74.5	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 4th Dry year		119.2	60%	74.5	• Same as above
Consecutive 5th Dry year		119.2	60%	74.5	• Same as above

[1] Assuming this year represents 2023, when Bay Delta Plan Amendment would come into effect.

Table 3b: Basis of Water Supply Data [For Table 7-1], Base Year 2025, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2025	213.2	100%	146.0	
Single dry year		149.2	70%	93.3	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 1st Dry year		149.2	70%	93.3	• Same as above
Consecutive 2nd Dry year		127.9	60%	80.0	• Same as above
Consecutive 3rd Dry year		127.9	60%	80.0	• Same as above
Consecutive 4th Dry year		127.9	60%	80.0	• Same as above
Consecutive 5th Dry year		127.9	60%	80.0	• Same as above

Table 3c: Basis of Water Supply Data [For Table 7-1], Base Year 2030, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2030	215.4	100%	147.9	
Single dry year		150.8	70%	94.2	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 1st Dry year		150.8	70%	94.2	• Same as above
Consecutive 2nd Dry year		129.2	60%	80.8	• Same as above
Consecutive 3rd Dry year		129.2	60%	80.8	• Same as above
Consecutive 4th Dry year		129.2	60%	80.8	• Same as above
Consecutive 5th Dry year		129.2	60%	80.8	• Same as above

Table 3d: Basis of Water Supply Data [For Table 7-1], Base Year 2035, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2035	220.5	100%	151.9	
Single dry year		154.4	70%	96.5	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 1st Dry year		154.4	70%	96.5	• Same as above
Consecutive 2nd Dry year		132.3	60%	82.7	• Same as above
Consecutive 3rd Dry year		132.3	60%	82.7	• Same as above
Consecutive 4th Dry year		132.3	60%	82.7	• Same as above
Consecutive 5th Dry year		121.3	55%	75.8	• Same as above

Table 3e: Basis of Water Supply Data [For Table 7-1], Base Year 2040, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2040	226.8	100%	156.3	
Single dry year		158.8	70%	99.2	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 1st Dry year		158.8	70%	99.2	• Same as above
Consecutive 2nd Dry year		136.1	60%	85.1	• Same as above
Consecutive 3rd Dry year		136.1	60%	85.1	• Same as above
Consecutive 4th Dry year		120.2	53%	75.1	• Same as above
Consecutive 5th Dry year		120.2	53%	75.1	• Same as above

Table 3f: Basis of Water Supply Data [For Table 7-1], Base Year 2045, With Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2045	236.5	100%	162.8	
Single dry year		141.9	60%	88.7	• At shortages 20% or greater, wholesale allocation is assumed to be 62.5%
Consecutive 1st Dry year		141.9	60%	88.7	• Same as above
Consecutive 2nd Dry year		141.9	60%	88.7	• Same as above
Consecutive 3rd Dry year		141.9	60%	88.7	• Same as above
Consecutive 4th Dry year		120.6	51%	75.4	• Same as above
Consecutive 5th Dry year		120.6	51%	75.4	• Same as above

Table 3g: Projected RWS Supply Availability [Alternative to Table 7-1], Years 2020-2045, With Bay-Delta Plan Amendment

Year	2020	2025	2030	2035	2040	2045
Average year	100%	100%	100%	100%	100%	100%
Single dry year	100%	70%	70%	70%	70%	60%
Consecutive 1st Dry year	100%	70%	70%	70%	70%	60%
Consecutive 2nd Dry year	100%	60%	60%	60%	60%	60%
Consecutive 3rd Dry year[1]	60%	60%	60%	60%	60%	60%
Consecutive 4th Dry year	60%	60%	60%	60%	53%	51%
Consecutive 5th Dry year	60%	60%	60%	55%	53%	51%

[1] Assuming that at base year 2020, this year represents 2023, when Bay Delta Plan Amendment would come into effect.

Basis of Water Supply Data: Without Bay-Delta Plan Amendment

Table 4a: Basis of Water Supply Data [For Table 7-1], Base Year 2020, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2020	198.6	100%	132.1	
Single dry year		198.6	100%	132.1	
Consecutive 1st Dry year		198.6	100%	132.1	
Consecutive 2nd Dry year		198.6	100%	132.1	
Consecutive 3rd Dry year		198.6	100%	132.1	
Consecutive 4th Dry year		198.6	100%	132.1	
Consecutive 5th Dry year		198.6	100%	132.1	

Table 4b: Basis of Water Supply Data [For Table 7-1], Base Year 2025, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2025	213.2	100%	146.0	
Single dry year		213.2	100%	146.0	
Consecutive 1st Dry year		213.2	100%	146.0	
Consecutive 2nd Dry year		213.2	100%	146.0	
Consecutive 3rd Dry year		213.2	100%	146.0	
Consecutive 4th Dry year		213.2	100%	146.0	
Consecutive 5th Dry year		213.2	100%	146.0	

Table 4c: Basis of Water Supply Data [For Table 7-1], Base Year 2030, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2030	215.4	100%	147.9	
Single dry year		215.4	100%	147.9	
Consecutive 1st Dry year		215.4	100%	147.9	
Consecutive 2nd Dry year		215.4	100%	147.9	
Consecutive 3rd Dry year		215.4	100%	147.9	
Consecutive 4th Dry year		215.4	100%	147.9	
Consecutive 5th Dry year		215.4	100%	147.9	

Table 4d: Basis of Water Supply Data [For Table 7-1], Base Year 2035, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2035	220.5	100%	151.9	
Single dry year		220.5	100%	151.9	
Consecutive 1st Dry year		220.5	100%	151.9	
Consecutive 2nd Dry year		220.5	100%	151.9	
Consecutive 3rd Dry year		220.5	100%	151.9	
Consecutive 4th Dry year		220.5	100%	151.9	
Consecutive 5th Dry year		220.5	100%	151.9	

Table 4e: Basis of Water Supply Data [For Table 7-1], Base Year 2040, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2040	226.8	100%	156.3	
Single dry year		226.8	100%	156.3	
Consecutive 1st Dry year		226.8	100%	156.3	
Consecutive 2nd Dry year		226.8	100%	156.3	
Consecutive 3rd Dry year		226.8	100%	156.3	
Consecutive 4th Dry year		226.8	100%	156.3	
Consecutive 5th Dry year		226.8	100%	156.3	

Table 4f: Basis of Water Supply Data [For Table 7-1], Base Year 2045, Without Bay-Delta Plan Amendment

Year Type	Base Year	RWS Volume Available (mgd)	% of Average Supply	Wholesale Volume Available (mgd)	Notes on Calculation of Wholesale Supply
Average year	2045	236.5	100%	162.8	
Single dry year		236.5	100%	162.8	
Consecutive 1st Dry year		236.5	100%	162.8	
Consecutive 2nd Dry year		236.5	100%	162.8	
Consecutive 3rd Dry year		236.5	100%	162.8	
Consecutive 4th Dry year		212.8	90%	139.1	• At a 10% shortage level, the wholesale allocation is 64% of available supply • The retail allocation is 36% of supply, which resulted in a positive allocation to retail of 2.9 mgd, which was re-allocated to the Wholesale Customers
Consecutive 5th Dry year		212.8	90%	139.1	• Same as above

Table 4g: Projected RWS Supply [Alternative to Table 7-1], Years 2020-2045, Without Bay-Delta Plan Amendment

Year	2020	2025	2030	2035	2040	2045
Average year	100%	100%	100%	100%	100%	100%
Single dry year	100%	100%	100%	100%	100%	100%
Consecutive 1st Dry year	100%	100%	100%	100%	100%	100%
Consecutive 2nd Dry year	100%	100%	100%	100%	100%	100%
Consecutive 3rd Dry year	100%	100%	100%	100%	100%	100%
Consecutive 4th Dry year	100%	100%	100%	100%	100%	90%
Consecutive 5th Dry year	100%	100%	100%	100%	100%	90%

Supply Projections for Consecutive Five Dry Year Sequences

Table 5: Projected Multiple Dry Years Wholesale Supply from RWS [For Table 7-4], With Bay-Delta Plan Amendment

	2025	2030	2035	2040	2045
First year	93.3	94.2	96.5	99.2	88.7
Second year	80.0	80.8	82.7	85.1	88.7
Third year	80.0	80.8	82.7	85.1	88.7
Fourth year	80.0	80.8	82.7	75.1	75.4
Fifth year	80.0	80.8	75.8	75.1	75.4

Table 6: Projected Multiple Dry Years Wholesale Supply from RWS [For Table 7-4], Without Bay-Delta Plan Amendment

	2025	2030	2035	2040	2045
First year	146.0	147.9	151.9	156.3	162.8
Second year	146.0	147.9	151.9	156.3	162.8
Third year	146.0	147.9	151.9	156.3	162.8
Fourth year	146.0	147.9	151.9	156.3	139.1
Fifth year	146.0	147.9	151.9	156.3	139.1

Table 7: Projected Regional Water System Supply for 5-Year Drought Risk Assessment [For Table 7-5], With Bay-Delta Plan Amendment. This table assumes Bay Delta Plan comes into effect in 2023.

Year	2021	2022	2023	2024	2025
RWS Supply (mgd)	198.6	198.6	119.2	119.2	119.2
Wholesale Supply (mgd)	132.1	132.1	74.5	74.5	74.5

Table 8: Projected Regional Water System Supply for 5-Year Drought Risk Assessment [For Table 7-5], Without Bay Delta Plan

Year	2021	2022	2023	2024	2025
RWS Supply (mgd)	198.6	198.6	198.6	198.6	198.6
Wholesale Supply (mgd)	132.1	132.1	132.1	132.1	132.1

Section 1: Basis for Calculations. Projected Wholesale RWS Purchases Through 2045

Table A: Wholesale RWS Actual Purchases in 2020 and Projected Purchases for 2025, 2030, 2035, 2040, and 2045 (mgd)[a]

Agency	2020 Actual	Projected Wholesale RWS Purchases 2025	2030	2035	2040	2045
ACWD	7.87	7.68	7.68	7.68	7.68	9.11
Brisbane/GVMID	0.64	0.89	0.89	0.88	0.89	0.89
Burlingame	3.48	4.33	4.40	4.47	4.58	4.69
Coastside	1.02	1.40	1.38	1.36	1.33	1.33
CalWater Total	29.00	29.99	29.74	29.81	30.27	30.70
Daly City	3.97	3.57	3.52	3.49	3.46	3.43
East Palo Alto	1.57	1.88	1.95	2.10	2.49	2.89
Estero	4.34	4.07	4.11	4.18	4.23	4.38
Hayward	13.92	17.86	18.68	19.75	20.82	22.14
Hillsborough	2.62	3.26	3.25	3.26	3.26	3.26
Menlo Park	2.96	3.55	3.68	3.87	4.06	4.29
Mid-Peninsula	2.66	2.86	2.84	2.88	2.89	2.93
Millbrae	1.90	2.29	2.50	2.45	2.82	3.20
Milpitas	5.92	6.59	6.75	7.03	7.27	7.53
Mountain View	7.67	8.60	8.90	9.20	9.51	9.93
North Coast	2.37	2.34	2.33	2.34	2.34	2.34
Palo Alto	9.75	10.06	10.15	10.28	10.51	10.79
Purissima Hills	1.75	2.09	2.09	2.12	2.13	2.15
Redwood City	8.76	8.46	8.49	8.64	8.74	8.90
San Bruno	0.95	3.24	3.22	3.20	3.20	3.21
San Jose	4.26	4.50	4.50	4.50	4.50	4.50
Santa Clara	3.27	4.50	4.50	4.50	4.50	4.50
Stanford	1.43	2.01	2.18	2.35	2.53	2.70
Sunnyvale	9.33	9.16	9.30	10.70	11.44	12.10
Westborough	0.82	0.86	0.85	0.85	0.84	0.84
Total	**132.22**	**146.01**	**147.87**	**151.90**	**156.31**	**162.76**

[a] Wholesale RWS purchase projections for 2025, 2030, 2035, 2040, and 2045 were provided to BAWSCA between July 2020 and January 2021 by the Member Agencies following the completion of the June 2020 Demand Study.

Table B: Basis for the 5-Year Drought Risk Assessment Wholesale RWS Actual Purchases in 2020 and 2021-2025 Projected Purchases (mgd)

Agency	2020 Actual	Projected and Estimated Wholesale RWS Purchases 2021[b]	2022[b]	2023[c]	2024[c]	2025[c]
ACWD	7.87	9.44	9.46	9.46	9.46	9.46
Brisbane/GVMID	0.64	0.62	0.65	0.65	0.65	0.65
Burlingame	3.48	3.34	3.35	3.35	3.35	3.35
Coastside	1.02	1.54	1.23	1.23	1.23	1.23
CalWater Total	29.00	29.66	29.81	29.81	29.81	29.81
Daly City	3.97	4.00	4.01	4.01	4.01	4.01
East Palo Alto	1.57	1.63	1.69	1.69	1.69	1.69
Estero	4.34	4.48	4.51	4.51	4.51	4.51
Hayward	13.92	14.47	15.12	15.12	15.12	15.12
Hillsborough	2.62	2.95	3.05	3.05	3.05	3.05
Menlo Park	2.96	2.92	2.93	2.93	2.93	2.93
Mid-Peninsula	2.66	2.65	2.80	2.80	2.80	2.80
Millbrae	1.90	1.95	2.15	2.15	2.15	2.15
Milpitas	5.92	5.88	5.34	5.34	5.34	5.34
Mountain View	7.67	7.80	8.05	8.05	8.05	8.05
North Coast	2.37	2.58	2.66	2.66	2.66	2.66
Palo Alto	9.75	9.44	9.66	9.66	9.66	9.66
Purissima Hills	1.75	1.97	2.02	2.02	2.02	2.02
Redwood City	8.76	8.72	9.07	9.07	9.07	9.07
San Bruno	0.95	3.39	3.40	3.40	3.40	3.40
San Jose	4.26	4.31	4.51	4.51	4.51	4.51
Santa Clara	3.27	3.29	3.50	3.50	3.50	3.50
Stanford	1.43	1.40	1.54	1.54	1.54	1.54
Sunnyvale	9.33	9.35	9.45	9.45	9.45	9.45
Westborough	0.82	0.84	0.81	0.81	0.81	0.81
Total	**132.22**	**138.61**	**140.77**	**140.77**	**140.77**	**140.77**

[b] Wholesale RWS purchase projections for 2021 and 2022 were provided to Christina Tang, BAWSCA's Finance Manager, by the Member Agencies in January 2021.

[c] The SFPUC's supply reliability tables assume the Bay-Delta Plan takes effect in 2023. In the event of a shortage, the Tier 2 Plan specifies that each agencies' Allocation Factor would be calculated once at the onset of a shortage based on the previous year's use and remains the same until the shortage condition is over. Therefore, for the purpose of drought allocations for the 5-year Drought Risk Assessment, wholesale RWS demand is assumed to remain static from 2022 through the drought sequence.

Section 2: Drought Allocations *With* Bay-Delta Plan

Table C: RWS Supply Available to the Wholesale Customers (Combined Tables 3a-3f from the SFPUC's March 30th letter) *With* Bay-Delta Plan (mgd)

	2020[e]	2025	2030	2035	2040	2045
Projected Purchases[d]	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 1st Dry Year	138.6	93.3	94.2	96.5	99.2	88.7
Consecutive 2nd Dry Year	140.8	80.0	80.8	82.7	85.1	88.7
Consecutive 3rd Dry Year	74.5	80.0	80.8	82.7	85.1	88.7
Consecutive 4th Dry Year	74.5	80.0	80.8	82.7	75.1	75.4
Consecutive 5th Dry Year	74.5	80.0	80.8	75.8	75.1	75.4

[d] Values for 2020 are actual purchases. This row aligns with what is labeled as an "Average Year" in Tables 3a-3f in the SFPUC's March 30th letter. However, these values do not represent an average year and instead are actual purchases for 2020 or projected purchases for 2025 through 2045.

[e] In years when the Bay-Delta Plan is not in effect, sufficient RWS supplies will be available to meet the Wholesale Customers' purchase requests assuming that they are between the 2020 and 2025 projected levels. As such, RWS supply available to the Wholesale Customers in the 1st and 2nd consecutive dry years under base year 2020 is equal to the cumulative projected wholesale RWS purchases for 2021 and 2022, respectively.

Table D: Wholesale RWS Demand (Combined Totals from Tables A and B) (mgd)[f]

	2020	2025	2030	2035	2040	2045
Projected Purchases[d]	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 1st Dry Year	138.6	146.0	147.9	151.9	156.3	162.8
Consecutive 2nd Dry Year	140.8	146.0	147.9	151.9	156.3	162.8
Consecutive 3rd Dry Year	140.8	146.0	147.9	151.9	156.3	162.8
Consecutive 4th Dry Year	140.8	146.0	147.9	151.9	156.3	162.8
Consecutive 5th Dry Year	140.8	146.0	147.9	151.9	156.3	162.8

[f] The SFPUC's modeling approach does not allow for varying demands over the course of a dry year sequence. Additionally, the Tier 2 Plan calculates each agencies' Allocation Factor once at the onset of a drought and it remains the same until the shortage condition is over. When system-wide shortages are projected, wholesale RWS demand is assumed to be static for the remainder of the drought sequence.

Table E: Percent Cutback to the Wholesale Customers *With* Bay-Delta Plan[g]

	2020	2025	2030	2035	2040	2045
Projected Purchases[d]	0%	0%	0%	0%	0%	0%
Consecutive 1st Dry Year	0%	36%	36%	36%	37%	46%
Consecutive 2nd Dry Year	0%	45%	45%	46%	46%	46%
Consecutive 3rd Dry Year	47%	45%	45%	46%	46%	46%
Consecutive 4th Dry Year	47%	45%	45%	46%	52%	54%
Consecutive 5th Dry Year	47%	45%	45%	50%	52%	54%

[g] Agencies that wish to use new or different projected RWS purchases may use the percent cutbacks listed in this table to determine their drought allocation.

Table F1: Basis of Water Supply Data [For Tables 7-1 and 7-5], Base Year 2020, *With* Bay-Delta Plan (mgd)

Year Consecutive Dry Year	2020 Actual	2021 1st	2022 2nd	2023 3rd	2024 4th	2025 5th
Wholesale RWS Demand	132.2	138.6	140.8	140.8	140.8	140.8
Wholesale RWS Supply Available	132.2	138.6	140.8	74.5	74.5	74.5
Percent Cutback	0%	0%	0%	47%	47%	47%

Table F2: Individual Agency Drought Allocations [For Tables 7-1 and 7-5], Base Year 2020, *With* Bay-Delta Plan (mgd)

	2020	Wholesale RWS Drought Allocations				
Agency	Actual	2021	2022	2023	2024	2025
ACWD	7.87	9.44	9.46	5.01	5.01	5.01
Brisbane/GVMID	0.64	0.62	0.65	0.34	0.34	0.34
Burlingame	3.48	3.34	3.35	1.77	1.77	1.77
Coastside	1.02	1.54	1.23	0.65	0.65	0.65
CalWater Total	29.00	29.66	29.81	15.78	15.78	15.78
Daly City	3.97	4.00	4.01	2.12	2.12	2.12
East Palo Alto	1.57	1.63	1.69	0.89	0.89	0.89
Estero	4.34	4.48	4.51	2.39	2.39	2.39
Hayward	13.92	14.47	15.12	8.00	8.00	8.00
Hillsborough	2.62	2.95	3.05	1.61	1.61	1.61
Menlo Park	2.96	2.92	2.93	1.55	1.55	1.55
Mid-Peninsula	2.66	2.65	2.80	1.48	1.48	1.48
Millbrae	1.90	1.95	2.15	1.14	1.14	1.14
Milpitas	5.92	5.88	5.34	2.83	2.83	2.83
Mountain View	7.67	7.80	8.05	4.26	4.26	4.26
North Coast	2.37	2.58	2.66	1.41	1.41	1.41
Palo Alto	9.75	9.44	9.66	5.11	5.11	5.11
Purissima Hills	1.75	1.97	2.02	1.07	1.07	1.07
Redwood City	8.76	8.72	9.07	4.80	4.80	4.80
San Bruno	0.95	3.39	3.40	1.80	1.80	1.80
San Jose	4.26	4.31	4.51	2.39	2.39	2.39
Santa Clara	3.27	3.29	3.50	1.85	1.85	1.85
Stanford	1.43	1.40	1.54	0.82	0.82	0.82
Sunnyvale	9.33	9.35	9.45	5.00	5.00	5.00
Westborough	0.82	0.84	0.81	0.43	0.43	0.43
Total	**132.2**	**138.6**	**140.8**	**74.5**	**74.5**	**74.5**

Table G1: Basis of Water Supply Data [For Tables 7-1 and 7-4], Base Year 2025, *With* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	146.0	146.0	146.0	146.0	146.0
Wholesale RWS Supply Available	93.3	80.0	80.0	80.0	80.0
Percent Cutback	36%	45%	45%	45%	45%

Table G2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2025, *With* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations				
Consecutive Dry Year	1st	2nd	3rd	4th	5th
ACWD	4.91	4.21	4.21	4.21	4.21
Brisbane/GVMID	0.57	0.49	0.49	0.49	0.49
Burlingame	2.76	2.37	2.37	2.37	2.37
Coastside	0.89	0.77	0.77	0.77	0.77
CalWater Total	19.16	16.43	16.43	16.43	16.43
Daly City	2.28	1.96	1.96	1.96	1.96
East Palo Alto	1.20	1.03	1.03	1.03	1.03
Estero	2.60	2.23	2.23	2.23	2.23
Hayward	11.41	9.78	9.78	9.78	9.78
Hillsborough	2.08	1.79	1.79	1.79	1.79
Menlo Park	2.27	1.95	1.95	1.95	1.95
Mid-Peninsula	1.83	1.57	1.57	1.57	1.57
Millbrae	1.46	1.25	1.25	1.25	1.25
Milpitas	4.21	3.61	3.61	3.61	3.61
Mountain View	5.49	4.71	4.71	4.71	4.71
North Coast	1.49	1.28	1.28	1.28	1.28
Palo Alto	6.43	5.51	5.51	5.51	5.51
Purissima Hills	1.33	1.14	1.14	1.14	1.14
Redwood City	5.40	4.63	4.63	4.63	4.63
San Bruno	2.07	1.77	1.77	1.77	1.77
San Jose	2.88	2.47	2.47	2.47	2.47
Santa Clara	2.88	2.47	2.47	2.47	2.47
Stanford	1.28	1.10	1.10	1.10	1.10
Sunnyvale	5.85	5.02	5.02	5.02	5.02
Westborough	0.55	0.47	0.47	0.47	0.47
Total	**93.3**	**80.0**	**80.0**	**80.0**	**80.0**

Table H1: Basis of Water Supply Data [For Tables 7-1 and 7-4], Base Year 2030, *With* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	147.9	147.9	147.9	147.9	147.9
Wholesale RWS Supply Available	94.2	80.8	80.8	80.8	80.8
Percent Cutback	36%	45%	45%	45%	45%

Table H2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2030, *With* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations				
Consecutive Dry Year	1st	2nd	3rd	4th	5th
ACWD	4.89	4.20	4.20	4.20	4.20
Brisbane/GVMID	0.56	0.48	0.48	0.48	0.48
Burlingame	2.80	2.40	2.40	2.40	2.40
Coastside	0.88	0.75	0.75	0.75	0.75
CalWater Total	18.94	16.25	16.25	16.25	16.25
Daly City	2.24	1.92	1.92	1.92	1.92
East Palo Alto	1.24	1.07	1.07	1.07	1.07
Estero	2.62	2.24	2.24	2.24	2.24
Hayward	11.90	10.21	10.21	10.21	10.21
Hillsborough	2.07	1.78	1.78	1.78	1.78
Menlo Park	2.35	2.01	2.01	2.01	2.01
Mid-Peninsula	1.81	1.55	1.55	1.55	1.55
Millbrae	1.59	1.37	1.37	1.37	1.37
Milpitas	4.30	3.69	3.69	3.69	3.69
Mountain View	5.67	4.86	4.86	4.86	4.86
North Coast	1.48	1.27	1.27	1.27	1.27
Palo Alto	6.47	5.55	5.55	5.55	5.55
Purissima Hills	1.33	1.14	1.14	1.14	1.14
Redwood City	5.41	4.64	4.64	4.64	4.64
San Bruno	2.05	1.76	1.76	1.76	1.76
San Jose	2.87	2.46	2.46	2.46	2.46
Santa Clara	2.87	2.46	2.46	2.46	2.46
Stanford	1.39	1.19	1.19	1.19	1.19
Sunnyvale	5.92	5.08	5.08	5.08	5.08
Westborough	0.54	0.47	0.47	0.47	0.47
Total	**94.2**	**80.8**	**80.8**	**80.8**	**80.8**

Table I1: Basis of Water Supply Data [For Tables 7-1 and 7-4], Base Year 2035, *With* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	151.9	151.9	151.9	151.9	151.9
Wholesale RWS Supply Available	96.5	82.7	82.7	82.7	75.8
Percent Cutback	36%	46%	46%	46%	50%

Table I2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2035, *With* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations				
Consecutive Dry Year	1st	2nd	3rd	4th	5th
ACWD	4.88	4.18	4.18	4.18	3.83
Brisbane/GVMID	0.56	0.48	0.48	0.48	0.44
Burlingame	2.84	2.44	2.44	2.44	2.23
Coastside	0.86	0.74	0.74	0.74	0.68
CalWater Total	18.94	16.23	16.23	16.23	14.88
Daly City	2.22	1.90	1.90	1.90	1.74
East Palo Alto	1.33	1.14	1.14	1.14	1.05
Estero	2.66	2.28	2.28	2.28	2.09
Hayward	12.55	10.75	10.75	10.75	9.86
Hillsborough	2.07	1.78	1.78	1.78	1.63
Menlo Park	2.46	2.10	2.10	2.10	1.93
Mid-Peninsula	1.83	1.57	1.57	1.57	1.44
Millbrae	1.56	1.34	1.34	1.34	1.22
Milpitas	4.47	3.83	3.83	3.83	3.51
Mountain View	5.84	5.01	5.01	5.01	4.59
North Coast	1.49	1.27	1.27	1.27	1.17
Palo Alto	6.53	5.60	5.60	5.60	5.13
Purissima Hills	1.34	1.15	1.15	1.15	1.06
Redwood City	5.49	4.70	4.70	4.70	4.31
San Bruno	2.03	1.74	1.74	1.74	1.60
San Jose	2.86	2.45	2.45	2.45	2.25
Santa Clara	2.86	2.45	2.45	2.45	2.25
Stanford	1.49	1.28	1.28	1.28	1.17
Sunnyvale	6.80	5.83	5.83	5.83	5.34
Westborough	0.54	0.46	0.46	0.46	0.42
Total	**96.5**	**82.7**	**82.7**	**82.7**	**75.8**

Table J1: Basis of Water Supply Data [For Table 7-1 and 7-4], Base Year 2040, *With* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	156.3	156.3	156.3	156.3	156.3
Wholesale RWS Supply Available	99.2	85.1	85.1	75.1	75.1
Percent Cutback	37%	46%	46%	52%	52%

Table J2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2040, *With* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations				
Consecutive Dry Year	1st	2nd	3rd	4th	5th
ACWD	4.87	4.18	4.18	3.69	3.69
Brisbane/GVMID	0.56	0.48	0.48	0.43	0.43
Burlingame	2.91	2.49	2.49	2.20	2.20
Coastside	0.85	0.73	0.73	0.64	0.64
CalWater Total	19.21	16.48	16.48	14.54	14.54
Daly City	2.20	1.88	1.88	1.66	1.66
East Palo Alto	1.58	1.36	1.36	1.20	1.20
Estero	2.69	2.30	2.30	2.03	2.03
Hayward	13.21	11.34	11.34	10.00	10.00
Hillsborough	2.07	1.78	1.78	1.57	1.57
Menlo Park	2.58	2.21	2.21	1.95	1.95
Mid-Peninsula	1.84	1.58	1.58	1.39	1.39
Millbrae	1.79	1.53	1.53	1.35	1.35
Milpitas	4.62	3.96	3.96	3.49	3.49
Mountain View	6.03	5.18	5.18	4.57	4.57
North Coast	1.49	1.27	1.27	1.12	1.12
Palo Alto	6.67	5.72	5.72	5.05	5.05
Purissima Hills	1.35	1.16	1.16	1.03	1.03
Redwood City	5.55	4.76	4.76	4.20	4.20
San Bruno	2.03	1.74	1.74	1.54	1.54
San Jose	2.86	2.45	2.45	2.16	2.16
Santa Clara	2.86	2.45	2.45	2.16	2.16
Stanford	1.61	1.38	1.38	1.22	1.22
Sunnyvale	7.26	6.23	6.23	5.49	5.49
Westborough	0.54	0.46	0.46	0.41	0.41
Total	**99.2**	**85.1**	**85.1**	**75.1**	**75.1**

Table K1: Basis of Water Supply Data [For Tables 7-1 and 7-4], Base Year 2045, *With* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	162.8	162.8	162.8	162.8	162.8
Wholesale RWS Supply Available	88.7	88.7	88.7	75.4	75.4
Percent Cutback	46%	46%	46%	54%	54%

Table K2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2045, *With* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations				
Consecutive Dry Year	1st	2nd	3rd	4th	5th
ACWD	4.97	4.97	4.97	4.22	4.22
Brisbane/GVMID	0.49	0.49	0.49	0.41	0.41
Burlingame	2.56	2.56	2.56	2.17	2.17
Coastside	0.72	0.72	0.72	0.61	0.61
CalWater Total	16.73	16.73	16.73	14.22	14.22
Daly City	1.87	1.87	1.87	1.59	1.59
East Palo Alto	1.58	1.58	1.58	1.34	1.34
Estero	2.39	2.39	2.39	2.03	2.03
Hayward	12.07	12.07	12.07	10.26	10.26
Hillsborough	1.78	1.78	1.78	1.51	1.51
Menlo Park	2.34	2.34	2.34	1.99	1.99
Mid-Peninsula	1.59	1.59	1.59	1.36	1.36
Millbrae	1.74	1.74	1.74	1.48	1.48
Milpitas	4.11	4.11	4.11	3.49	3.49
Mountain View	5.41	5.41	5.41	4.60	4.60
North Coast	1.28	1.28	1.28	1.09	1.09
Palo Alto	5.88	5.88	5.88	5.00	5.00
Purissima Hills	1.17	1.17	1.17	1.00	1.00
Redwood City	4.85	4.85	4.85	4.12	4.12
San Bruno	1.75	1.75	1.75	1.49	1.49
San Jose	2.45	2.45	2.45	2.08	2.08
Santa Clara	2.45	2.45	2.45	2.08	2.08
Stanford	1.47	1.47	1.47	1.25	1.25
Sunnyvale	6.59	6.59	6.59	5.61	5.61
Westborough	0.46	0.46	0.46	0.39	0.39
Total	**88.7**	**88.7**	**88.7**	**75.4**	**75.4**

Section 3: Drought Allocations *Without* Bay-Delta Plan

Table L: RWS Supply Available to the Wholesale Customers (Combined Tables 4a-4f from the SFPUC's March 30th letter) *Without* Bay-Delta Plan (mgd)[h]

	2020	2025	2030	2035	2040	2045
Projected Purchases[i]	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 1st Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 2nd Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 3rd Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 4th Dry Year	132.2	146.0	147.9	151.9	156.3	139.1
Consecutive 5th Dry Year	132.2	146.0	147.9	151.9	156.3	139.1

[h] The SFPUC's modeling approach does not allow for varying demands over the course of a dry year sequence. However, the SFPUC has indicated that sufficient supplies are available to meet wholesale RWS demand so long as they reasonably stay within 2020 and 2040 levels. The SFPUC's modeling does not indicate cutbacks will be required till the 4th and 5th consecutive dry year at 2045 levels.

[i] Values for 2020 are actual purchases. This row aligns with what is labeled as an "Average Year" in Tables 4a-4f in the SFPUC's March 30th letter. However, these values do not represent an average year and instead are actual purchases for 2020 or projected purchases for 2025 through 2045.

Table M: Wholesale RWS Demand (Combined Totals from Tables A and B) (mgd)

	2020	2025	2030	2035	2040	2045
Projected Purchases[i]	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 1st Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 2nd Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 3rd Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 4th Dry Year	132.2	146.0	147.9	151.9	156.3	162.8
Consecutive 5th Dry Year	132.2	146.0	147.9	151.9	156.3	162.8

Table N: Percent Cutback to the Wholesale Customers *Without* Bay-Delta Plan

	2020	2025	2030	2035	2040	2045
Projected Purchases[i]	0%	0%	0%	0%	0%	0%
Consecutive 1st Dry Year	0%	0%	0%	0%	0%	0%
Consecutive 2nd Dry Year	0%	0%	0%	0%	0%	0%
Consecutive 3rd Dry Year	0%	0%	0%	0%	0%	0%
Consecutive 4th Dry Year	0%	0%	0%	0%	0%	15%
Consecutive 5th Dry Year	0%	0%	0%	0%	0%	15%

Table O1: Basis of Water Supply Data [For Tables 7-1 and 7-4], Base Year 2045, *Without* Bay-Delta Plan (mgd)

Consecutive Dry Year	1st	2nd	3rd	4th	5th
Wholesale RWS Demand	162.8	162.8	162.8	162.8	162.8
Wholesale RWS Supply Available	162.8	162.8	162.8	139.1	139.1
Percent Cutback	0%	0%	0%	Tier 2 Plan	Tier 2 Plan

Table O2: Individual Agency Drought Allocations [For Tables 7-1 and 7-4], Base Year 2045, *Without* Bay-Delta Plan (mgd)

	Wholesale RWS Drought Allocations					Tier 2 Drought Cutback
Consecutive Dry Year	1st	2nd	3rd	4th	5th	
ACWD	9.11	9.11	9.11	8.20	8.20	10.0%
Brisbane/GVMID	0.89	0.89	0.89	0.74	0.74	16.8%
Burlingame	4.69	4.69	4.69	4.02	4.02	14.3%
Coastside	1.33	1.33	1.33	1.19	1.19	10.0%
CalWater Total	30.70	30.70	30.70	26.73	26.73	12.9%
Daly City	3.43	3.43	3.43	3.01	3.01	12.4%
East Palo Alto	2.89	2.89	2.89	2.68	2.68	7.3%
Estero	4.38	4.38	4.38	3.94	3.94	10.0%
Hayward	22.14	22.14	22.14	18.67	18.67	15.7%
Hillsborough	3.26	3.26	3.26	2.93	2.93	10.2%
Menlo Park	4.29	4.29	4.29	3.58	3.58	16.5%
Mid-Peninsula	2.93	2.93	2.93	2.63	2.63	10.0%
Millbrae	3.20	3.20	3.20	2.54	2.54	20.7%
Milpitas	7.53	7.53	7.53	6.55	6.55	13.1%
Mountain View	9.93	9.93	9.93	8.91	8.91	10.3%
North Coast	2.34	2.34	2.34	2.11	2.11	10.0%
Palo Alto	10.79	10.79	10.79	9.71	9.71	10.0%
Purissima Hills	2.15	2.15	2.15	1.41	1.41	34.5%
Redwood City	8.90	8.90	8.90	7.92	7.92	11.1%
San Bruno	3.21	3.21	3.21	2.60	2.60	19.1%
San Jose	4.50	4.50	4.50	2.95	2.95	34.5%
Santa Clara	4.50	4.50	4.50	2.95	2.95	34.5%
Stanford	2.70	2.70	2.70	2.27	2.27	16.0%
Sunnyvale	12.10	12.10	12.10	10.11	10.11	16.5%
Westborough	0.84	0.84	0.84	0.76	0.76	10.0%
Total	**162.8**	**162.8**	**162.8**	**139.1**	**139.1**	

Attachment C

San Francisco Public Utilities Commission
Water Supply Reduction Mitigation Memorandum

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
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TO: SFPUC Wholesale Customers

FROM: Steven R. Ritchie, Assistant General Manager, Water

DATE: June 2, 2021

RE: Regional Water System Supply Reliability and UWMP 2020

This memo is in response to various comments from Wholesale Customers we have received regarding the reliability of the Regional Water System supply and San Francisco's 2020 Urban Water Management Plan (UWMP).

As you are all aware, the UWMP makes clear the potential effect of the amendments to the Bay-Delta Water Quality Control Plan adopted by the State Water Resources Control Board on December 12, 2018 should it be implemented. Regional Water System-wide water supply shortages of 40-50% could occur until alternative water supplies are developed to replace those shortfalls. Those shortages could increase dramatically if the State Water Board's proposed Water Quality Certification of the Don Pedro Federal Energy Regulatory Commission (FERC) relicensing were implemented.

We are pursuing several courses of action to remedy this situation as detailed below.

Pursuing a Tuolumne River Voluntary Agreement

The State Water Board included in its action of December 12, 2018 a provision allowing for the development of Voluntary Agreements as an alternative to the adopted Plan. Together with the Modesto and Turlock Irrigation Districts, we have been actively pursuing a Tuolumne River Voluntary Agreement (TRVA) since January 2017. We believe the TRVA is a superior approach to producing benefits for fish with a much more modest effect on our water supply. Unfortunately, it has been a challenge to work with the State on this, but we continue to persist, and of course we are still interested in early implementation of the TRVA.

Evaluating our Drought Planning Scenario in light of climate change

Ever since the drought of 1987-92, we have been using a Drought Planning Scenario with a duration of 8.5 years as a stress test of our Regional Water System supplies. Some stakeholders have criticized this methodology as being too conservative. This fall we anticipate our Commission convening a workshop

regarding our use of the 8.5-year Drought Planning Scenario, particularly in light of climate change resilience assessment work that we have funded through the Water Research Foundation. We look forward to a valuable discussion with our various stakeholders and the Commission.

Pursuing Alternative Water Supplies

The SFPUC continues to aggressively pursue Alternative Water Supplies to address whatever shortfall may ultimately occur pending the outcome of negotiation and/or litigation. The most extreme degree of Regional Water System supply shortfall is modeled to be 93 million gallons per day under implementation of the Bay-Delta Plan amendments. We are actively pursuing more than a dozen projects, including recycled water for irrigation, purified water for potable use, increased reservoir storage and conveyance, brackish water desalination, and partnerships with other agencies, particularly the Turlock and Modesto Irrigation Districts. Our goal is to have a suite of alternative water supply projects ready for CEQA review by July 1, 2023.

In litigation with the State over the Bay-Delta Plan Amendments

On January 10, 2019, we joined in litigation against the State over the adoption of the Bay-Delta Water Quality Control Plan Amendments on substantive and procedural grounds. The lawsuit was necessary because there is a statute of limitations on CEQA cases of 30 days, and we needed to preserve our legal options in the event that we are unsuccessful in reaching a voluntary agreement for the Tuolumne River. Even then, potential settlement of this litigation is a possibility in the future.

In litigation with the State over the proposed Don Pedro FERC Water Quality Certification

The State Water Board staff raised the stakes on these matters by issuing a Water Quality Certification for the Don Pedro FERC relicensing on January 15, 2021 that goes well beyond the Bay-Delta Plan amendments. The potential impact of the conditions included in the Certification appear to virtually double the water supply impact on our Regional Water System of the Bay-Delta Plan amendments. We requested that the State Water Board reconsider the Certification, including conducting hearings on it, but the State Water Board took no action. As a result, we were left with no choice but to once again file suit against the State. Again, the Certification includes a clause that it could be replaced by a Voluntary Agreement, but that is far from a certainty.

I hope this makes it clear that we are actively pursuing all options to resolve this difficult situation. We remain committed to creating benefits for the Tuolumne River while meeting our Water Supply Level of Service Goals and Objectives for our retail and wholesale customers.

cc.: SFPUC Commissioners
Nicole Sandkulla, CEO/General Manager, BAWSCA

Attachment D

Figure 7.12 from BAWSCA Drought Report, August 2017

Figure 7.12: BAWSCA Member Agency Conservation Standards and Total Water Use Reductions, June 2015 to May 2016