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May 18, 2022

Honorable Mayor Mackin and Members of the City Council  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005  
USA

Dear Mayor Mackin,

On behalf of the Google Transportation Team, I would like to thank the members of the City Council and City staff for the opportunity to submit the details outlined in this letter in advance of the Appeal Hearing related to Interim Use Permit 2021-UP-3. Google has appreciated the ability to consider the City of Brisbane as one of the most important hubs for our transportation system and we value the partnership with the City through our tenancy at this location.

Brisbane continues to be an ideal geographic location to anchor Google's Peninsula-based shuttle fleet of 90 Google commuter buses. The location minimizes the total amount of non-passenger miles traveled which substantially reduces our local and regional carbon footprint and enables the optimization of scheduled passenger service resulting in fewer single occupancy vehicles (SOVs) on the US-101 corridor and adjacent arterial roadways. During peak commuter hours our commuter bus operation can remove approximately 4,000 SOVs from the US-101 corridor between Candlestick Point and Oyster Point during peak commute hours.

- Reduced bus miles traveled along US-101 corridor between Mountain View and San Francisco: 126,500 per month (1,518,000 per year)
- Reduced bus emissions: 233 metric tons of CO2 per month (2,796 per year)

Interim Use Permit 2021-UP-3 was approved on November 16, 2021, and was a renewal of Interim Use Permit UP-4-19, at the end of its 2-year term. The approved interim use permit allows for parking of 90 Google commuter buses to serve Google employees. During the public hearing in November 2021, concerns were raised about Google's operations and whether those operations complied with the permit. One was whether bus movements were following the schedule provided by Google and the second was whether some buses were using the roadway south of the site, instead of all buses coming and going along the northbound route.

At the time of approval of the renewal on November 16, 2021, the Commission added a condition of approval that Google was to monitor bus movements and provide a report to staff, for presentation to the Commission after another 90-days of operation. The report was presented to the Planning Commission on March 10, 2022. A summary of the trip data is provided below. In addition to the Gbus trip data, we also worked with Fehr & Peers, a leading transportation consulting firm, to complete a traffic study to verify the traffic capacity of Tunnel Avenue and the impacts of the commuter buses during hours of operation. The study concluded that the bus traffic had little to no effect on roadway capacity, even during peak hours which validates previous input from City staff and Brisbane Police Department. The report of these findings were presented to the Planning Commission on March 10, 2022 (see summary of the data on the following page).

One thing in particular to address, the original use permit application included expected hours of operation – although, not a condition of approval. The data showed that buses were running during midday hours, outside the operational hours stated in the application materials. This change can be attributed to shifts in schedules following the onset of the COVID-19 pandemic in early 2020, and was not accurately updated for the 2021 renewal application. This change can be attributed to shifts in its employee work schedules following the onset of the COVID-19 pandemic in early 2020 and that its requested schedule to include midday hours was not accurately updated for the 2021 renewal application to capture those actual needs.

**ROUTING VIOLATIONS:**

Reporting Period	Routing Violations*		
	Total Violations	Total Trips	Compliant Trips
November, 2021	6	2,181	99.72%
December, 2021	5	1,970	99.75%
January, 2022	1	2,055	99.95%
February, 2022	2	2,066	99.90%
March, 2022	7	3,130	99.78%
April, 2022	5	4,381	99.89%
	<b>26</b>	<b>15,783</b>	<b>99.84%</b>

\*Routing violations can be attributed to the following: 55% substitute drivers, 40% new driver training, 5% maintenance

**GBUS TRIP DATA:**

Time Periods	Original Permit (90 buses)		Current (April data) (90 buses)	
	Percent of Trips	Avg Trips Per Day	Percent of Trips	Avg Trips Per Day
12:00am - 02:59am	0%	0	0%	0
03:00am - 05:59am	39%	90	10%	20
06:00am - 08:59am	13%	30	35%	63
09:00am - 11:59am	0%	0	5%	14
12:00pm - 02:59pm	0%	0	5%	10
03:00pm - 05:59pm	17%	40	10%	21
06:00pm - 08:59pm	30%	70	32%	65
09:00pm - 11:59pm	0%	0	3%	11
		230		204

**SUMMARY OF FEHR & PEERS TRAFFIC STUDY (complete study included in City Council packet):**

- The hourly volume on Tunnel Avenue is well below its hourly vehicle capacity throughout the day.
- During both days with traffic count and shuttle data available, corporate shuttle daily trips comprise ten percent or less of the total daily trips on Tunnel Avenue.
- The 85th-percentile speed on Tunnel Avenue was observed to be 37.5 miles per hour. There is no posted speed limit on the observed section of Tunnel Avenue.
- Approximately 11% of vehicles on Tunnel Road are commuter shuttles/buses or heavy vehicles/trucks. The remaining 89% of vehicles are light vehicles/automobiles.

In closing, we respectfully request that the City Council reconsider the determination of the Planning Commission and allow us the opportunity to continue to work very closely with City Manager Holstine and Community Development Director Swiecki to ensure full compliance with the conditions of approval and a regular cadence of reporting to ensure full compliance with Interim Use Permit 2021-UP-3.

Thank you in advance for your consideration,

Ross Benson  
Transportation Program Manager