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Bay Area Air District:



October 10, 2018

Malia Cohen, President of the Board of Supervisors  
Angela Calvillo, Clerk of the Board of Supervisors  
City and County of San Francisco  
1 Dr. Carlton B Goodlett Place, Room 244  
San Francisco, CA 94102

Subject: Air District comments at October 2, 2018 Board Hearing regarding the India Basin Mixed-Use Project EIR Appeal

Dear Ms. Cohen and Ms. Calvillo

Bay Area Air Quality Management District (Air District) staff made public comments at the October 2, 2018 Board Hearing regarding the India Basin EIR Appeal. These comments were regarding the Project's air quality mitigation measures to minimize exposure to fine particulate matter (PM<sub>2.5</sub>) from the Project's construction and operation activities. PM<sub>2.5</sub> is by far the most harmful air pollutant in the Air District's jurisdiction in terms of public health. Scientific evidence indicates that both long-term and short-term exposure to PM<sub>2.5</sub> can cause a wide range of health effects, such as aggravating asthma, bronchitis, respiratory and cardio-vascular symptoms, and contributing to heart attacks and death.

Bayview-Hunters Point and other parts of eastern San Francisco experience higher PM<sub>2.5</sub> levels than much of the region. The combination of higher pollution levels and a community particularly vulnerable to air pollution led the Air District to highlight eastern San Francisco as an impacted community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program we are developing in response to AB 617.

In the spirit of protecting public health and in response to the October 10<sup>th</sup> memo from Lisa Gibson to Angela Calvillo regarding Appeal of the Certification of the Project EIR, we would like to elaborate and clarify on the October 2, 2018 comments as follows:

**The Project's analysis and mitigation measures are sufficient**

Since the October 2, 2018 Board Hearing, Air District staff has reviewed City staff's responses intended to identify feasible mitigation measures in response to Air District comments at the Board Hearing. Air District staff greatly appreciates City staff's responsiveness to our concerns. Air District staff agrees that the Project's analysis of and mitigation measures for PM<sub>2.5</sub> concentrations are sufficient. The Project's PM<sub>2.5</sub> analysis adheres to recommended Air District methods. Where the Project's analysis diverges from Air District methods, the methods are more stringent and, thus, more health protective. These more stringent methods rely on the City's Community Risk Reduction Plan and Project-specific emissions analysis. In sum, the result is a rigorous and highly health-protective analysis of both background and Project-specific emissions.

**Air District supports mixed-use and infill projects**

The Air District has long recognized the importance of mixed-use and infill projects, such as this Project, to help the Bay Area reach its air quality goals. Mixed-use and infill projects that provide jobs and housing in urban areas with excellent access to transit and short distances between residential, employment, retail, and recreational uses help to reduce transportation emissions. Transportation emissions include criteria air pollutants (including PM<sub>2.5</sub>), greenhouse gas emissions, and diesel particulate matter and other toxic air contaminants. For more information about the Air District's work to support mixed-use and infill development while protecting public health, please see the guidebook [Planning Healthy Places](#) (2016) and the 2017 Clean Air Plan: [Spare the Air, Cool the Climate](#).

**The Air District and City staff have an excellent partnership**

As stated at the October 2, 2018 Board Hearing, the City has been a great partner to the Air District. In addition to adopting a Greenhouse Gas Reduction Strategy, the City is the only jurisdiction within the Air District to implement rigorous health protective policies within the rubric of a citywide Community Risk Reduction Plan to reduce the health impacts of air pollution citywide (and particularly for vulnerable populations). The City's risk reduction efforts to require new residential construction projects located in the City's Air Pollution Exposure Zones to install enhanced ventilation to protect residents from air pollution, the City has also adopted a Construction Dust Control Ordinance and the Clean Construction Ordinance. Air District staff greatly appreciates San Francisco's commitment to reducing air pollution emissions and exposure. City staff's response to Air District's concerns the week of October 1, 2018 about the Project is just another example of staff's responsiveness and flexibility.

Air District staff approaches this collaboration as technical experts on air pollution and climate issues. We do not make land use decisions; that is the appropriate role for City staff and decision makers. We are committed to continue to work with you to assure that air quality, health, and climate impacts are analyzed correctly and minimized to the greatest extent possible.

In sum, Air District staff greatly appreciates the opportunity to work with the City to address air quality impacts on this Project and others. We look forward to a meeting with City staff soon to discuss ways the Air District and City can work to improve our air quality consultation process. If you have any further questions about the Air District's review of this Project, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or [akirk@baaqmd.gov](mailto:akirk@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

Cc: BAAQMD Director Tyrone Jue  
BAAQMD Director Rafael Mandelman  
BAAQMD Director Hillary Ronen  
Lisa Gibson, Environmental Review Officer