

**From:** [David Harrison](#)  
**To:** [David Harrison](#)  
**Cc:** [John Bryant](#)  
**Subject:** BOMA San Francisco Comments on Proposed Emergency Ordinance for Enforcement of Workplace Ventilation Standards During COVID-19 Pandemic  
**Date:** Friday, April 2, 2021 2:09:00 PM  
**Attachments:** [04-02-2021 BOMA SF Letter on Proposed Ventilation Emergency Ordinance.pdf](#)

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Dear Supervisors and Staff,

Please find the attached letter with BOMA San Francisco's comments on the proposed emergency ordinance for enforcement of workforce ventilation standards during the COVID-19 pandemic. Thank you for your consideration, and I hope you have a wonderful weekend.

Sincerely,

**David Harrison**

Manager of Government and Public Affairs

BOMA San Francisco

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April 2, 2021

The Honorable Ahsha Safai  
Supervisor, District 11  
San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

The Honorable Shamann Walton  
President  
San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

**Re: Emergency Ordinance - Enforcement of Workplace Ventilation Standards During COVID-19 Pandemic**

Dear Supervisor Safai and President Walton,

On behalf of BOMA (Building Owners and Managers Association) San Francisco, I would like to thank you for the opportunity to comment on your proposed emergency ordinance pertaining to the enforcement of workplace ventilation standards during the COVID-19 pandemic. BOMA commends your efforts to reassure all San Franciscans that safety requirements are being met throughout this public health emergency. We look forward to continuing our partnership with the City to craft workable policies that meet this critical public health goal.

Ensuring the safety of our buildings throughout this pandemic is of the utmost priority to our members. Since the release of BOMA International's first COVID-19 guidance document back in January 2020, BOMA San Francisco and our members have acted decisively to take the necessary measures in preventing the spread of COVID-19 within the built environment. These actions include ensuring compliance with state and local public health guidance, promoting enhanced cleaning procedures within our buildings, advising members on PPE usage and COVID-19 prevention plans, and sharing insightful best practices and comprehensive research.

As our City moves towards recovery, we will continue to work with our partners in government and the commercial real estate industry to ensure the continued safety of our buildings. We stand ready to assist in providing industry-specific expertise that addresses health concerns while mitigating unintended environmental or economic consequences that may stem from these policies. With these goals in mind, we offer the following comments and questions for consideration:

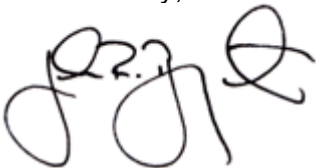
1. We respectfully request further guidance from DBI and DPH on how building operators can meet the hand-annotated notes requirement currently stipulated by the City's Stay-Safer-at-Home Order.
  - a. Is this requirement met by completing the "Draft Ventilation Annotation Form" provided by DPH?
  - b. How should buildings who elect to follow allowable alternative ventilation guidance meet this requirement?
2. What do DBI and DPH anticipate the self-certification process to be?
  - a. Will the City provide a certification posting template through its "COVID-19 Outreach Toolkit?"

3. BOMA is ready to provide our industry expertise to help ensure the efficiency of the certification process.
  - a. Will there be an opportunity for property managers and building engineers to assist the City by providing feedback to DPH and DBI on the certification process?
4. To ensure compliance, we respectfully request a defined grace period between the release of this guidance and the start of enforcement. This will allow building operations staff to ensure that all logistical and posting requirement are met before enforcement begins.

BOMA recognizes the unique public health challenges posed by COVID-19. As long as this challenge remains, we acknowledge the need to take additional measures to ensure the safety of our buildings. However, these additional measures are accompanied by environmental burdens. Beyond the existence of a public health emergency, we caution that any new ventilation requirements pose significant challenges to San Francisco's environmental goals as well as building operations. An extension of these requirements beyond the current health emergency would pose serious barriers for buildings to meet their robust climate change and energy efficiency goals, including ENERGY STAR certifications, Global Real Estate Sustainability Benchmarks (GRESB) obligations, Leadership in Energy and Environmental Design (LEED) certifications, Building Research Establishment Environmental Assessment Methodology (BREEAM) accreditations, and BOMA's 360 Performance Program requirements. Furthermore, an inability to meet these targets would put our buildings in direct conflict with the City's stated and forthcoming environmental goals.

We hope these questions and comments are useful as you continue to review this emergency ordinance. Thank you for your consideration, and we welcome further discussion with our members to address these concerns.

Sincerely,



John R. Bryant  
Chief Executive Officer  
BOMA San Francisco

**Cc:** The Honorable Connie Chan, District 1 Supervisor  
The Honorable Catherine Stefani, District 2 Supervisor  
The Honorable Aaron Peskin, District 3 Supervisor  
The Honorable Gordon Mar, District 4 Supervisor  
The Honorable Dean Preston, District 5 Supervisor  
The Honorable Matt Haney, District 6 Supervisor  
The Honorable Myrna Melgar, District 7 Supervisor  
The Honorable Rafael Mandelman, District 8 Supervisor  
The Honorable Hillary Ronen, District 9 Supervisor  
Honorable Members and Staff, Land Use and Transportation Committee