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Appeal of Community Plan Evaluation
429 Beale Street and 430 Main Street Project
Supplementary Response

DATE: July 27, 2018

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Lisa Gibson, Environmental Review Officer – (415) 575-9050

Joy Navarrete, Senior Environmental Planner – (415) 575-9040

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RE: Board File No. 180697, Planning Department Case No. 2014-002033ENV – Appeal of the Community Plan Evaluation for the 429 Beale Street and 430 Main Street Project. Block/Lot: 3767/305 and 306

PROJECT SPONSOR: Andrew Junius, of Reuben, Junius & Rose, on behalf of LCL Global-429 Beale Street & 430 Main Street, LLC – (415) 567-9000

APPELLANT: Dane M. Ince – (415) 321-9300

HEARING DATE: July 31, 2018

ATTACHMENTS: A – July 26, 2018, Ramboll response to Grassetti letter

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INTRODUCTION

This memorandum is a response to supplemental materials provided to the Board of Supervisors (Board) in support of an appeal of the Planning Department's (Department) issuance of a Community Plan Evaluation (CPE) under the *Rincon Hill Area Plan Final Environmental Impact Report* (Rincon Hill PEIR)[1] in compliance with the California Environmental Quality Act (CEQA) for the 429 Beale Street and 430 Main Street Project (Project). The Appeal Letter and supporting documents, along with the Appeal Response

[1] The Rincon Hill Area Plan Final EIR (Planning Department Case No. 2000.1081E), State Clearinghouse No. 1984061912) was certified by the Planning Commission on May 5, 2005. The project site is within the Rincon Hill Area Plan.

and its supporting documents, are available online as part of Board File No. 180697.[2] This memo responds to the following supplemental material:

- July 23, 2018 supplemental appeal letter from Dane M. Ince, Appellant
- July 23, 2018 supplemental material (Board of Supervisors Motion No. M09-178) from Dane M. Ince, Appellant
- July 20, 2018 letter from Richard Grassetti, Grassetti Environmental Consulting
- July 19, 2018 unsigned letter in support of the appeal

SUPPLEMENTAL APPELLANT CONCERNS AND PLANNING DEPARTMENT RESPONSES

The concerns raised in the Appellant's July 23, 2018 supplemental letter are cited below and are followed by the Planning Department's responses.

Concern 1: Air Quality: The Appellant asserts that the air quality technical report shows that $PM_{2.5}$ will increase and negatively impact the health of residents of BayCrest courtyards, and the increase in $PM_{2.5}$ would be up to 3 to 5 times the Article 38 threshold.

Response 1: *The CPE and supporting air quality technical report quantify $PM_{2.5}$ associated with construction and operational health risk and provide a building downwash analysis for informational purposes.*

Regarding construction emissions, construction equipment would emit levels of $PM_{2.5}$ at a rate substantially below significance thresholds set by the Bay Area Air Quality Management District (air district) (0.26 pounds per day of exhaust $PM_{2.5}$, compared to the threshold of 54 pounds per day without the effect of mitigation). Due to the Project's location in the Air Pollutant Exposure Zone (APEZ), a construction air quality mitigation measure (Rincon Hill PEIR Mitigation Measure E.1), which requires cleaner construction equipment, would be implemented and would further reduce construction-related emissions.

The Project would include operational traffic-related emissions and an emergency diesel generator, which would generate $PM_{2.5}$, among other pollutants. Due to the Project's location in the APEZ, a more stringent health risk threshold was used to evaluate $PM_{2.5}$. Emissions from the Project were found to be substantially below the threshold (the Project would expose off-site receptors to a $PM_{2.5}$ concentration of 0.0093 micrograms per cubic meter ($\mu g/m^3$), compared to a threshold of 0.2 $\mu g/m^3$).

A building downwash assessment, which evaluated how the Project would affect air flow in the courtyards of BayCrest Towers, the adjacent residential building to the north of the Project, was prepared for informational

[2] https://sfgov.legistar.com/LegislationDetail.aspx?ID=3542916&GUID=D73BEFC4-9D79-4536-8F5E-573547CBA53A&Options=ID|Text|&Search=180697.

purposes. The average increase in $PM_{2.5}$ related to the Project would be approximately 0.032 $\mu g/m^3$. If this value were added to Project-generated emissions (i.e., traffic and emergency generator), the Project's $PM_{2.5}$ value would not exceed the threshold of 0.2 $\mu g/m^3$.

In all of these cases, any emissions increases would be below the applicable thresholds. No Project-related increases would be three to five times above relevant $PM_{2.5}$ thresholds. In addition, the Appellant does not state where a three- to five-time increase can be found in either the air quality technical report or the CPE. Overall, the analysis in the CPE properly references the Project-related emissions and does not find any exceedances of applicable thresholds.

Concern 2: Further Study and Mitigation Needed: The Appellant asserts that further study is needed, based on the analysis in the Trinity's peer review of the air quality technical report and building downwash effects, and that more mitigation would likely be required.

Response 2: *As stated in the Department's July 23, 2018 Appeal Response, the Department conducted the Project's air quality analysis in accordance with the methodology established by the Department and the San Francisco Department of Public Health and the CEQA significance thresholds established by the air district, which are based on guidance from the U.S. Environmental Protection Agency, the California Air Resources Board, and the Office of Environmental Health Hazard Assessment. In addition, the air district reviewed and approved both the scope of work for the analysis and the final version of the air quality technical report prepared for the Project. In the Department's July 23, 2018 Appeal Response, the Department also addressed the assertions made in the Trinity peer review regarding the methodology used to conduct the air quality analysis.*

As stated in the CPE and in the Department's July 23, 2018 Appeal Response, the Project's contribution to lifetime excess cancer risk at on-site and off-site sensitive receptors would be below the CEQA significance threshold of 7 excess cancer risks per one million persons exposed. The Project's contribution to $PM_{2.5}$ concentrations at on-site and off-site sensitive receptors would be below the CEQA significance threshold of 0.2 $\mu g/m^3$. For these reasons, the Project's operational air quality impact would be less than significant, and no mitigation measures are necessary.

Concern 3: Board Motion No. M09-178: The Appellant has attached Board Motion No. M09-178 related to a previously proposed project on the project site. In its motion, the Board directed the Department to conduct additional environmental review for the previously proposed project related to the topics of air quality, greenhouse gas emissions, and wind.

Response 3: *In conducting the environmental review for the Project, the Department undertook the analysis described in Board Motion No. M09-178 related to air quality ($PM_{2.5}$ concentrations), greenhouse gas (GHG) emissions, and wind. For air quality, a building downwash analysis was conducted to assess the Project's effects on air pollutant concentrations in the courtyards of BayCrest Towers, the adjacent residential building to the north of the Project. For GHG emissions, the Project was evaluated for consistency with San Francisco's GHG reduction strategy. The Project was found to be consistent with San Francisco's GHG reduction strategy, and the CPE concluded that the Project would not result in a significant impact related to GHG emissions. For wind, the Project underwent wind tunnel testing. The Project would not create any hazardous wind conditions or alter wind in a manner that substantially affects public areas, and the CPE concluded that the Project would not result in a significant wind impact.*

ADDITIONAL PUBLIC COMMENTS AND PLANNING DEPARTMENT RESPONSES

The concerns raised in the July 20, 2018 letter from Grassetti Environmental Consulting are cited below and are followed by the Planning Department's responses.

Concern 1: Appropriateness of CEQA Exemption: The Grassetti letter asserts that CEQA Guidelines Section 15183 does not allow for Community Plan Exemptions.

Response 1: *The Grassetti letter incorrectly describes the CPE as an "exemption" from environmental review. In fact, the Department did not exempt the Project from environmental review; rather, the Department conducted the appropriate technical background studies (transportation, air quality, wind, shadow) and thoroughly analyzed the Project's environmental impacts before issuing a CPE Certificate of Determination and Initial Study pursuant to CEQA Section 21083.3 and CEQA Guidelines Section 15183. The CPE was published on March 19, 2018 and was distributed to the Planning Commission and all interested parties, including the Appellant and the residents of BayCrest Towers who requested copies, on the same day. CEQA Section 21083.3 and CEQA Guidelines Section 15183* ***mandate*** *that projects that are consistent with the development density established by existing zoning or community plan or general plan policies for which an EIR was certified,* ***shall not*** *require additional environmental review except as might be necessary to examine whether there are project-specific effects that are peculiar to the project or its site and that were not disclosed as significant effects in the prior EIR. The Project is consistent with the development density established by the Rincon Hill Area Plan and the zoning controls of the Rincon Hill Downtown Residential Zoning District. Therefore, the Department's CPE is an appropriate environmental review document for the Project.*

Concern 2: Air Quality and Health Risk Assessment: The Grassetti letter asserts that health risks should be more thoroughly assessed and mitigated, and that the mitigation measures would not reduce impacts to residents at 201 Harrison Street.

Response 2: *As discussed in the Department's July 23, 2018 Appeal Response, the Project's construction and operational air quality impacts related to both criteria air pollutants and health risk were thoroughly assessed in accordance with the methodology established by the Department and the San Francisco Department of Public Health, and using the CEQA significance thresholds established by the air district, which are based on guidance from the U.S. Environmental Protection Agency, the California Air Resources Board, and the Office of Environmental Health Hazard Assessment. The Project's air quality analysis meets the requirements for air quality impact assessment under CEQA. The Project's air quality analysis also complies with a request made by the Board of Supervisors in 2009 for a previously proposed project on the project site.*

The Rincon Hill PEIR identified a mitigation measure (PEIR Mitigation Measure E.1: Construction Air Quality) to reduce construction-related air quality impacts to less-than-significant levels. This mitigation measure requires the use of construction equipment that meets higher (i.e., cleaner) emissions standards, thus substantially reducing emissions from construction equipment. PEIR Mitigation Measure E.1 is applicable to the Project. Implementation of this mitigation measure and required compliance with the provisions of the Construction Dust Control Ordinance would reduce the Project's construction-related air quality impacts on the adjacent residents at 201 Harrison Street to less-than-significant levels.

Concern 3: Health Risks Understated: The Grassetti letter asserts that health risks from the proposed project are understated, including non-cancer acute health risks.

Response 3: *The cancer risk and chronic hazard index impact due to diesel particulate matter emitted by the Project's emergency generator were evaluated in the air quality technical report and found to be less than significant. The Office of Environmental Health and Hazard Assessment does not require the evaluation of acute health impacts, and the circumstances of the Project do not warrant it, as a single diesel generator is not expected to be a significant source of pollutants with acute health impacts. Before operating a diesel generator, an applicant must meet BAAQMD permitting requirements, which include a health risk analysis and permit conditions set to ensure health standards are met.*

Concern 4: Traffic Emissions Model Outdated: The Grassetti letter asserts that the traffic emissions should have used a more recent version of EMFAC for review.

Response 4: *As discussed in the Department's July 23, 2018 Appeal Response, the use of more recent emissions factors is not necessary for the analysis of the Project's traffic-related emissions. The Project is expected to generate 263 vehicle trips per day, which is well below the threshold of 10,000 vehicle trips per day to be considered a low-impact source. The air district only requires an evaluation of health risks for roads with more than 10,000 vehicles per day. Nonetheless, a screening-level analysis of the Project's traffic-related emissions was conducted using the air district's Roadway Screening Calculator. In addition, a supplemental analysis shows that use of more updated emissions factors would reduce cancer risk and $PM_{2.5}$ concentrations, which highlights that the results in the air quality technical report represent a more conservative (i.e., worst-case) assessment.*

Concern 5: Meteorological Data: The Grasetti letter asserts that the meteorological data used in the air quality technical report may be inadequate.

Response 5: *The meteorological data used in the air quality technical report are adequate. As stated in the Department's July 23, 2018 Appeal Response, a single year of meteorological data was used to be consistent with the data used in the San Francisco Community Risk Reduction Plan (SFCRRP). The methodology for the SFCRRP was developed in partnership with the air district, and thus the air district has approved of the use of a single year of meteorological data for the purpose of air quality analysis under CEQA. In addition, the methodology used in the Project's air quality technical report was reviewed and approved by the air district.*

Concern 6: Aesthetics: The Grassetti letter asserts that the analysis of blockage of views is inadequate.

Response 6: *View blockage is an issue related to the environmental topic of aesthetics. In accordance with CEQA Section 21099: Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:*

a) The project is in a transit priority area;

b) The project is on an infill site; and

c) The project is residential, mixed-use residential, or an employment center.

As discussed in the CPE Initial Study (p. 4), the Project meets each of the three criteria above and thus, the CPE Initial Study does not consider aesthetics, including view blockage, in determining the significance of Project impacts under CEQA.

Concern 7: Shadows: The Grassetti letter asserts that the shading of the courtyard at 201 Harrison Street would be a significant impact.

Response 7: *As discussed in the CPE Initial Study (pp. 33-35), the Project would cast shadow on the courtyards of BayCrest Towers, the adjacent residential building to the north of the Project. Shadow on private property is not considered a significant impact under CEQA.*

There is no clear evidence to suggest that the west courtyard of BayCrest Towers is a publicly accessible open space. As discussed in the CPE Initial Study, the west courtyard is accessible from Harrison Street through a gate. However, it is unclear how frequently this gate is kept unlocked during daylight hours so that the courtyard can be accessed by the public. Department staff made four separate visits to BayCrest Towers, the gate was unlocked on one occasion and locked on the other three occasions. There is no plaque or sign on the Harrison Street façade of the building to inform the public that there is a publicly accessible open space at this location, and this open space is not identified on the Department's list of privately owned public open spaces.

This open space is currently enclosed on the north and the east by BayCrest Towers and is open on the south and the west. Construction of the Project would enclose this open space on the south, leaving only the west side of this open space unenclosed. The Project would shadow this open space from the morning until the mid-afternoon throughout the year. During the spring, summer, and autumn, sunlight would still reach this open space in the mid-afternoon. The net new Project shadow would make this open space less desirable for individuals seeking sunlight but would not substantially detract from its use when considered in an urban context. Open spaces in Rincon Hill have been developed in conjunction with, and adjacent to, mid- and high-rise development to provide open spaces for residents of and visitors to these buildings. As such, these open spaces are expected to have shadow and sunlight conditions that are generally similar to nearby pedestrian areas such as sidewalks (i.e., they are shadowed daily by related or other nearby mid- and high-rise buildings) There are four other open spaces in the vicinity of the Project that can be used by the public, and these other open spaces would not be affected by the Project's shadow

Concern 8: Noise: The Grassetti letter asserts that construction noise should have been analyzed and mitigated.

Response 8: *The Project's construction-related noise impacts were analyzed. As discussed in the CPE Initial Study (pp. 16-17), the Rincon Hill PEIR identified one mitigation measure (PEIR Initial Study Mitigation Measure 1) to reduce construction-related noise impacts from pile driving activities to less-than-significant levels. Since the Project would be supported by a mat foundation and no pile driving would be required, this mitigation measure is not applicable to the Project. In addition, the Project's construction activities would be required to comply with the regulations of the San Francisco Noise Ordinance (Noise Ordinance). Construction noise from the Project would be temporary (approximately 24 months), intermittent, and restricted in occurrence and level by the Noise Ordinance. Required compliance with the Noise Ordinance would reduce the Project's construction-related noise effects on nearby residents to the greatest extent feasible. For these reasons, the CPE correctly concluded that the Project would not result in any significant noise impacts.*

The concerns raised in the unsigned July 19, 2018 supplemental letter are cited below and are followed by the Planning Department's responses.

Concern 1: Concern: The Project violates the objectives and policies of the Urban Design Guidelines.

Response 1: *A CEQA appeal is not the proper forum for challenges to the Project approval. In any event, the Department and Commission's review and approval of the project followed all applicable requirements of the Planning Code. Prior to the Commission's review and approval of the Project, the Department reviewed the Project for compliance with Planning Code requirements and the objectives and policies of the General Plan, the Rincon Hill Area Plan, and the Urban Design Guidelines. This review process included internal meetings of the Department's Urban Design Advisory Team and meetings between Department staff and the project sponsor. In preparing a recommendation to the Commission, the Department prepared a staff report that (1) discussed the Project's compliance with the Planning Code, (2) identified any required exceptions from the Planning Code, and (3) discussed the Project's consistency with the objectives and policies of Planning Code Section 101.1, the General Plan, and the Rincon Hill Area Plan.*

The Commission held two duly noticed public hearings on the Project, on March 29, 2018 and May 24, 2018. During the March 29 hearing, the Commission considered the Department's recommendation as well as comments submitted by members of the public, including the residents of BayCrest Towers, the adjacent building to the north of the project site. The Commission instructed the project sponsor to explore several design options that would address the concerns raised by the residents of BayCrest Towers. During the May 24 hearing, the Commission reviewed and approved a modified design for the Project.

The approval of the Downtown Project Authorization for the Project is appealable to the Board of Appeals. The Appellant has appealed the Downtown Project Authorization, and a Board of Appeals hearing has been tentatively scheduled for August 8, 2018. The Board of Appeals hearing is the appropriate forum for discussing the review and approval of the Project.

CONCLUSION

The Appellant has not demonstrated nor provided substantial evidence to support a claim that the CPE fails to conform to the requirements of CEQA for a Community Plan Evaluation pursuant to CEQA Section 21083.3 and CEQA Guidelines Section 15183. The Department conducted the necessary studies and analyses and provided the Commission with the information and documents necessary to make an informed decision, based on substantial evidence in the record, at a duly noticed public hearing in accordance with the Department's CPE Certificate of Determination and Initial Study and standard procedures and pursuant to CEQA and the CEQA Guidelines. Therefore, the Department respectfully recommends that the Board uphold the Department's determination for the CPE and reject the Appellant's appeal.

ATTACHMENT A

Ramboll's Response to Grassetti Environmental Consulting's Letter, July 26, 2018

RAMBOLL

ENVIRONMENT
& HEALTH

MEMO

Via Electronic Mail

Date: July 26, 2018

To Michael Li, SF Environmental Planning
Josh Pollak, SF Environmental Planning

From Michael Keinath
Taylor Vencill

Subject Response to Grassetti Environmental Consulting Review of CEQA Determination for 430 Main Street Project dated July 20, 2018

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Ramboll US Corporation (Ramboll) has reviewed the memorandum prepared by Grassetti Environmental Consulting (GECo) dated July 20, 2018[1] which commented on the City and County of San Francisco's Community Plan Evaluation document for the proposed building at 430 Main Street/429 Beale Street in San Francisco, CA ("Project"). Specifically, the GECo Memo identified air quality and health risk issues in response to an Air Quality Analysis Technical Report ("AQTR") Ramboll prepared in October 2017.[2]

This memorandum has been prepared to address comments raised by GECo, many of which have already been raised and addressed in a comment letter prepared by Trinity Consultants on the AQTR.[3,4] The organization of this memorandum follows the "Air Quality and Health Risk Issues" section of the GECo Memo.

1) CUMULATIVELY CONSIDERABLE CONTRIBUTION EVALUATED

GECo incorrectly asserts that the Project is required to further assess and mitigate its $PM_{2.5}$ emissions and incorrectly asserts how Article 38 should be applied. The Project will not increase pollutant concentrations above the incremental project thresholds and already considers the significance standards relevant to areas with high existing pollutant concentrations.

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1 Received by the San Francisco Board of Supervisors on July 17, 2018.

2 An updated AQTR was submitted in March 2018 to correct inconsistencies between the report technical tables and text. All results presented in the technical tables remained the same, only changes to the numbers presented in the text were made. This updated report did not include any additional analyses or calculations, nor did it change any conclusions presented in the October 2017 report.

3 Memorandum. RE: Review of Technical Report by Ramboll Environ dated October 2017. Prepared by Trinity Consultants for Committee for Healthy Housing. January 19, 2018.

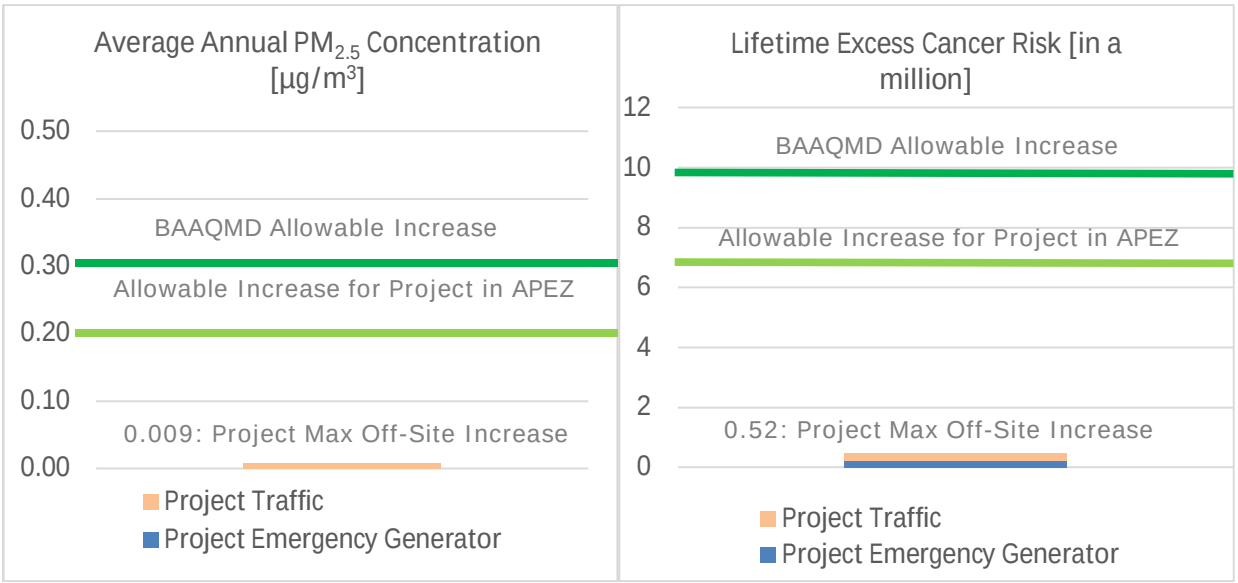
4 Memorandum. Response to Trinity Review of Technical Report by Ramboll Environ dated October 2017 for proposed project at 430 Main/429 Beale Street. Prepared by Ramboll for SF Environmental Planning. March 26, 2018.

Additionally, GECo incorrectly asserts that health risk impacts to the residences at 201 Harrison Street were not considered.

For background on air quality thresholds, the Project site is within an Air Pollution Exposure Zone ("APEZ"), due to its proximity to major freeways or other pollution sources that contribute to high existing health risks in excess of the San Francisco action levels. As shown in Table A of the AQTR, the incremental health risk thresholds for projects located in an APEZ are 7 in a million for excess lifetime cancer risk and 0.2 ug/m^3 for average annual $PM_{2.5}$ concentration. These thresholds are lower than thresholds for projects outside the APEZ of 10 in a million and 0.3 ug/m^3, respectively. These higher thresholds are recommended by the Bay Area Air Quality Management District (BAAQMD) for use in CEQA analyses throughout their jurisdiction. The City and County of San Francisco have developed the lower thresholds to be more health protective in areas of the City which may experience higher exposure to pollution. The thresholds compared to in the AQTR account for the greater pre-project $PM_{2.5}$ concentration and related health risks that are present in the APEZ. Further, under CEQA, the Project is not required to mitigate for existing conditions.

Analyses were conducted to determine whether the additional impact of the proposed Project emissions to off-site and on-site receptors would exceed these incremental thresholds. As shown in Tables 8 through 11 of the AQTR, the maximum cumulative cancer risk and $PM_{2.5}$ concentrations from traffic plus emergency generator operations were 0.52 in a million and 0.0093 ug/m^3, respectively. These maximum impacts are far below the thresholds and are therefore not considered to significantly impact health. Comparisons of the maximum Project impacts to the $PM_{2.5}$ and cancer risk thresholds are shown in Figure 1.

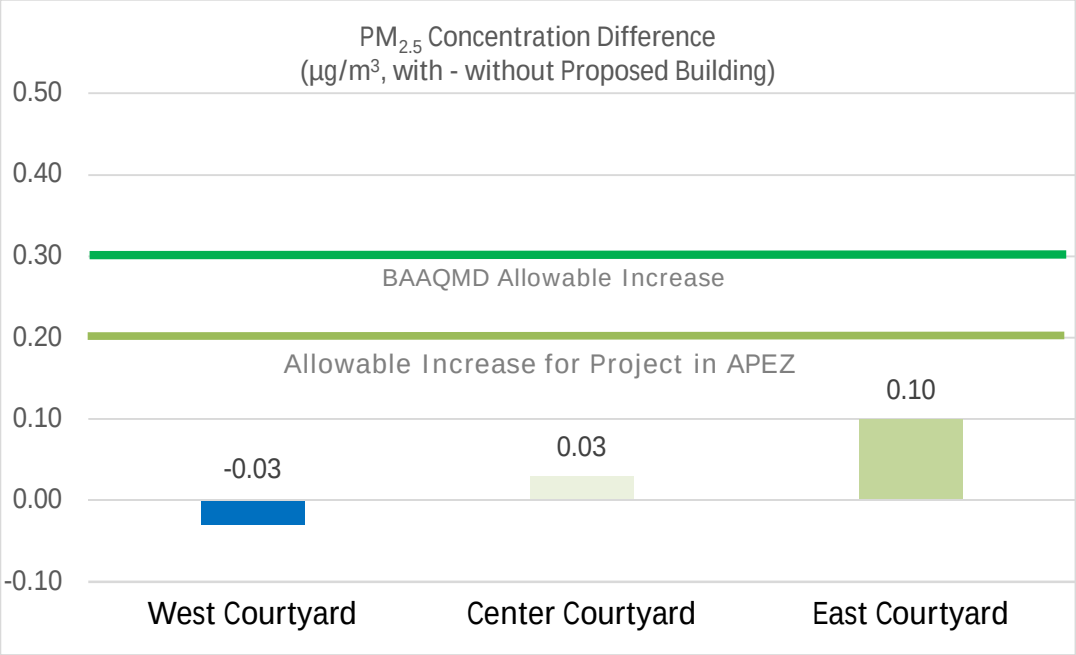
Figure 1. (left) $PM_{2.5}$ Thresholds and Maximum Project Impact. (right) Cancer Risk Thresholds and Maximum Project Impact.



In order to address specific concerns raised by community members, CFD modeling was performed to further visualize the potential impacts of the proposed building on existing traffic emissions dispersion in response to the 2009 CEQA appeal of a previous project on the project site. As shown in Table 13 of the AQTR, the maximum increase in $PM_{2.5}$ concentration in any of the neighboring courtyards due to

the building placement was 0.1 ug/m^3. This increase would also be well below the threshold of 0.2 ug/m^3, as shown in Figure 2.

Figure 2. CFD Modeling Results



Due to its location within an APEZ, the Project's impacts were shown to be well below the most stringent, health-protective thresholds developed by the San Francisco Planning Department (which are more stringent than standards applied anywhere else in California). This is contrary to GECo's assertion that "cumulative $PM_{2.5}$ emissions are substantially higher than levels considered reasonable for residential projects per local codes." As shown in Figure 2 above, and Table 13 of the AQTR, the Project's impacts are well below the stringent San Francisco standard of 0.2 µg/m^3, and in some cases, show a decrease in expected exposure. The comparison to the 0.2 µg/m^3 threshold is conservative as the CFD modeling performed was a supplemental assessment performed specifically to address concerns raised by community members, and is not otherwise required under CEQA. As no threshold or action level was exceeded, no further analysis is warranted and no mitigation is required.

With regards to consideration of health risk impacts to the residents at 201 Harrison Street, these residences were included in the evaluation of potential off-site impacts from Project operations, as shown in Figure 1 above. Further, in the CFD modeling performed (see Figure 2 above), evaluation of the open courtyards is a conservative estimate for any residences that may open windows nearby as reported values assume 100% outdoor exposure. In fact, concentrations indoors would be a fraction of outdoor levels so exposures reported in the AQTR are higher than what someone living at 201 Harrison Street would actually see.

2) NON-CANCER HEALTH HAZARDS EVALUATED

GECo incorrectly asserts that acute health impacts should have been evaluated for components of diesel exhaust for the emergency generator, in contradiction to BAAQMD recommendations and practice.

The analysis presented in the AQTR quantified the cancer risk and chronic hazard index impacts due to the proposed rooftop diesel emergency generator. While the OEHHA guidance does present a

methodology to quantify the acute health impacts by speciating diesel exhaust, the OEHHA guidance does not require the evaluation of acute health impacts, and the circumstances of the project here do not warrant it because a single emergency diesel generator is not expected to be a significant source of pollutants with acute health impacts.

Furthermore, BAAQMD states "diesel exhaust particulate matter should be used as a surrogate for all TAC emissions from diesel-fueled compression-ignition internal combustion engines" (BAAQMD Rule 2-5). There is currently no acute non-cancer toxicity value available for diesel exhaust particulate matter. In addition, before operating the diesel generator, the applicant must comply with BAAQMD permitting requirements, which include a health risk analysis and permit conditions set to ensure health standards are met.

3) APPROPRIATE TRAFFIC EMISSIONS MODEL USED

GECo incorrectly concludes that an analysis of Project traffic emissions and impacts using 2014 and 2017 data is warranted, even though the Proposed Project risk results are well below thresholds using a conservative screening approach, consistent with current Bay Area Air Quality Management District traffic analysis tools.

The Proposed Project is expected to generate just 263 net new trips per day, which is well below the threshold of 10,000 trips per day to be considered a low-impact source (BAAQMD, 2017) (see Section 3.1.2 of the AQTR). BAAQMD only requires an evaluation of health risks for roads with 10,000 or more trips per day.

Nevertheless, a screening analysis was performed using the BAAQMD Roadway Screening Calculator, which is a BAAQMD-developed tool for use in CEQA analyses. The Calculator uses emission factors for the County for calendar year (CY) 2014 from EMFAC2011. These factors could be updated to use either factors from the current USEPA-approved model EMFAC2014, or the newest ARB model EMFAC2017. In addition, the factors could be adjusted to more accurately represent the health risks at project buildout in year 2020 rather than 2014. To test this potential refinement, Ramboll ran EMFAC2011 for San Francisco County and CY 2014 (as used in the current BAAQMD Roadway Screening Calculator) and compared to results from EMFAC2014 and EMFAC2017 for CY 2020 (representative of conditions for an updated Screening Calculator). As shown in Table 1 below, using the more up-to-date emission factors would reduce the cancer risk and $PM_{2.5}$ concentrations from that reported in the AQTR. Thus, again, the results in the AQTR are conservative (i.e., worst case).

Table 1. Reduction of Emissions Factors for Project Buildout Year (2020) with Newer EMFAC vs BAAQMD Screening Tool Default (EMFAC2011 for Year 2014)

Pollutant	Reduction Using EMFAC2014	Reduction Using EMFAC2017
$PM_{2.5}$	-16%	-22%
PM_{10}	-62%	-66%
TOG (exhaust)	-88%	-83%
TOG (evaporative)	-28%	-22%

As shown in Table 7 of the AQTR, the traffic analysis resulted in a total lifetime excess cancer risk of 0.32 in a million and a $PM_{2.5}$ concentration of 0.0091 ug/m^3 at the maximum exposed off-site receptor. This analysis could be refined to more specifically model emissions and dispersion at the Project site; however, as shown in the table above, this would only reduce estimated impacts further.

Therefore, since results are already well below significance thresholds, updating to the more recent traffic emissions model is not required.

4) APPROPRIATE METOROLOGICAL DATA USED

GECo incorrectly asserts that the use of the meteorological data collected and approved by the BAAQMD for use in the citywide San Francisco Community Risk Reduction Plan likely would not satisfy the 2015 OEHHA Guidelines.

Section 4.1.3.1 of the AQTR describes the selection of meteorological data for use in AERMOD modeling. A single year of data from Mission Bay was used to be consistent with the data used in the SF CRRP. The 2015 OEHHA Guidance states "…the District may determine that one year of representative meteorological data is sufficient to adequately characterize the facility's impact" (OEHHA, 2015, p. 4-28). The SF CRRP methodology was developed in partnership with the BAAQMD and thus they have approved of the use of the meteorological data used as sufficient to adequately characterize impacts.

5) CONSTRUCTION IMPACTS

GECo asserts that a construction air quality analysis is needed to complete CEQA requirements, even though construction impacts for the Proposed Project have already been analyzed in the Rincon Hill Plan and these impacts will be discussed further in the Community Plan Exemption.

The Rincon Hill Plan EIR includes a discussion of air quality impacts from construction that applies to this project. It also identifies mitigation measures that can be implemented on a project-specific basis. Potential construction impacts, Project compliance, and mitigation measures from the Rincon Hill Plan EIR are discussed in detail in the Project's CEQA determination document.