



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

June 21, 2019

Michael Li
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: SFO Recommended Airport Development Plan (RADP) Project – Notice of Preparation

Dear Mr. Li:

Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) for a draft Environmental Impact Report (DEIR) for the proposed SFO Recommended Airport Development Plan—or RADP (Project). This Project is a long-range plan for approximately 20 years to guide the Airport’s development and accommodate the forecast passenger and operations growth. The Project consists of a total of 34 individual RADP projects within the Terminal Area, West Field, North Field, and East Field of the SFO property. The project construction schedule is described as a “demand-driven plan” and “is expected to occur over approximately 15 years from 2020 to 2035.”

The total demolition and construction would approximately be as follows:

Area	Demolition	New Construction
Terminal	~4.8 million square (sq.) feet	~4.1 million sq. feet
West Field	~718,000 sq. feet	~837,900 sq. feet
North Field	~239,600 sq. feet	~3.7 million sq. feet
East Field	~280,000 sq. feet	~474,000 sq. feet

The RADP proposes approximately 10,000 additional parking spaces.

Air District staff recommends the DEIR include the following information and analysis regarding potential regional and local air quality impacts and greenhouse gas (GHG) emissions in the San Francisco Bay Area Air Basin:

- **The Air District recommends that a significance determination be based on an evaluation of the Project’s consistency with the most recent draft of the SB 32 Scoping Plan by the California Air Resources Board and with the State’s 2030 and 2050 climate goals.** The Air District’s CEQA Guidelines are based on the State’s 2020 greenhouse gas targets which are now superseded by the 2030 targets for greenhouse gases established in SB 32.
- **The DEIR should evaluate the Project’s consistency with the City & County of San Francisco Climate Change Goals and Action Plan.** Staff supports SFO’s mission of including sustainability through the SFO Strategic Plan (2017 – 2021). One of the goals is to achieve zero energy and waste by 2021, reduce greenhouse gas emissions by 50 percent (from 1990 baseline), and achieve carbon neutrality.

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- **The DEIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The DEIR should quantify the Project's potential construction and operational impacts to local and regional air quality.** The analysis should evaluate whether the project will have a cumulatively considerable net increase for construction and operational emissions for all the phases of the project. The DEIR should also include a discussion of the potential health effects of exposure to criteria pollutants.
 - **The DEIR should estimate and evaluate the potential health risk to existing and future sensitive receptors, within the Project, including worker receptors, from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the DEIR include a cumulative site-specific health risk assessment that includes all stationary and mobile sources from this project and the existing sources.
 - **The DEIR should evaluate all feasible mitigation measures, both onsite and offsite, for all potentially significant air quality and GHG impacts identified in the DEIR.** The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures. For example, the project should encourage the use of zero-emission airport shuttles, zero-emission airport ground support equipment, fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity, and transportation demand measures.
 - **The Project may require Air District permits for demolitions/renovations, internal combustion engines greater than 50 horsepower, boilers, and other stationary equipment that may cause air pollution.** The SFO is subject to the Air District's Major Facility Review/Title V requirements. The DEIR should list the Air District as a responsible agency with permitting approval required for stationary sources of air pollution. The DEIR should disclose all potential stationary sources of air pollution and disclose daily and annual emissions from these sources. The following type of permits may be required:
 - Asbestos J-Number Permit: Issued for demolitions and renovations of buildings and structures that may contain asbestos. To apply online, use the following link: <http://www.baaqmd.gov/permits/asbestos>.
 - Authority to Construct: Issued before construction and after Air District engineers review project to ensure it will comply with air quality laws. To apply online, use the following link: <http://www.baaqmd.gov/permits/apply-for-a-permit>
 - Authority to Operate: Issued after project is built and compliance is demonstrated. Must be renewed annually. To apply online use the following link: <http://www.baaqmd.gov/permits/apply-for-a-permit>
 - **The DEIR should include a description of the cleanup and remediation at the Project Site, including the nature of the contamination, and any remaining site cleanup/remediation.** The emissions associated with the remediation should be included in the cumulative health risk assessment and emission estimates associated with this project.

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- **The DEIR should include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions assessment calculation and the health risk assessment files.** Without all the supporting air quality documentation, Air District staff may be unable to review the air quality and GHG analyses.

If you have any questions about the Air District's review of this NOP, please contact Ada Márquez, Principal Environmental Planner, at (415) 749-8673 or amarquez@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Gordon Mar
BAAQMD Director Tyrone Jue
Tania Sheyner, Principal Environmental Planner
Lisa Gibson, Environmental Review Officer