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Connect with the
Bay Area Air District:



October 19, 2021

Sarah Price
San Francisco Unified School District
135 Van Ness Avenue, Room 216
San Francisco, CA 94102

RE: Mission Bay School Project – Draft Environmental Impact Report

Dear Ms. Price,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Mission Bay School Project (Project). The San Francisco Unified School District (SFUSD) proposes the demolition of a surface parking lot and construction of a multistory, approximately 105,700 square foot school in the Mission Bay neighborhood of San Francisco. The Project would include a preschool, transitional kindergarten, kindergarten through fifth grade elementary school, linked learning hub, professional learning space, outdoor learning area, outdoor play area, and paved surface parking lot.

The Air District appreciates the need for a school to serve the growing community in Mission Bay. That said, school siting warrants particular care. California Education Code §17251 and California Code of Regulations (CCR) Title 5, §14001 - §14012, outline school siting requirements by the California Department of Education. The proposed Project site is located near I-280 and the CalTrain tracks, and is an area with high air pollution levels, as identified in CalEPA's CalEnviroScreen 4.0 mapping tool, San Francisco's Air Pollution Exposure Zone (APEZ) map, and the Air District's Community Air Risk Evaluation (CARE) program. As such, the Air District is concerned about exposing students and staff to unhealthy levels of fine particulate matter (PM_{2.5}), toxic air contaminants, and other air pollutants.

Health Risk Assessment

The DEIR concludes that the Project would result in on-site exposure of sensitive receptors to substantial pollutant concentrations and that this impact would be significant and unavoidable. Although the Project would mitigate impacts by installing MERV 14 or better filters and create vegetative barriers around the outdoor play area, the analysis indicates that students and teachers would still be exposed to PM_{2.5} concentrations beyond the cumulative PM_{2.5} threshold of 0.8 µg/m³. According to the Air Quality Site Assessment Report for the Mission Bay Block 14 and Block 15 Project (AQTR), local roads account for the preponderance of the PM_{2.5} exposure. SFUSD should consider further mitigation specifically targeting pollution from local streets. This could include wind breaks, frequent street

sweeping, and stabilizing the surrounding empty lots with vegetation to keep dust off the streets.

Air District staff recommend SFUSD consider alternative school sites that would reduce the exposure of air pollution to on-site receptors. According to the Alternatives analysis, Block 15 was rejected as an alternative site because “it would not substantially lessen or avoid the significant environmental effect associated with the proposed project.” However, the AQTR shows that Block 14 (the Project site) would result in a maximum PM_{2.5} exposure of 3.4 µg/m³ while Block 15 would result in a maximum PM_{2.5} exposure of 2.6 µg/m³. Because Block 15 is further away from I-280 and would decrease the PM_{2.5} exposure compared to Block 14, siting the Project at Block 15 can be an effective mitigation strategy. As noted below, we have questions about the AQTR analysis and we would like to work with SFUSD staff to resolve these questions, but we believe there is clear evidence that moving the proposed site further away from large emissions sources such as I-280 and CalTrain would reduce on-site exposure. The Air District recommends further consideration of Block 15 or alternative sites that would reduce the exposure of PM_{2.5} to on-site receptors.

Furthermore, Air District staff recommend that SFUSD revise the AQTR and coordinate with the Air District on the best practices and protocols to ensure the most current models and methods are used. The AQTR used EMFAC2017; however, EMFAC2021 is available and includes substantial changes in PM and total organic gasses (TOG) emissions estimates. In addition, SFUSD should conduct and provide additional analysis of emissions and exposure in future years to reflect the air quality benefits of cleaner vehicle fleets, especially as heavy-duty vehicles will be subject to more stringent standards starting in 2023. This analysis would help determine whether project scheduling would be an effective mitigation measure. In addition to using EMFAC2021, SFUSD should provide more detail on the on-road modeling and assumptions given the high local roads impact on PM_{2.5} concentration. More specificity is required on all sources and analysis years, vehicle fleet mix, speed estimates, breakdown of PM_{2.5} emissions (i.e., exhaust, tire wear, brake wear, and road dust), and criteria used to include or exclude certain local roads in the assessment.

Compliance with Air District Permitting Requirements

The Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Please note that certain equipment and operations (e.g., boilers) will require SFUSD to apply for an Air District Authority to Construct/Permit to Operate. If you have any questions regarding the Air District’s permits, please contact Barry Young, Senior Advanced Projects Advisor, at byoung@baaqmd.gov or (415) 940-9641 to discuss permit requirements.

Air District staff is available to assist SFUSD in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Tyrone Jue
BAAQMD Director Myrna Melgar
BAAQMD Director Shamann Walton