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Bay Area Air District:



April 6, 2022

Elizabeth White, Senior Environmental Planner
City and County of San Francisco
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

RE: San Francisco Gateway Project – Notice of Preparation for a Draft Environmental Impact Report (SCH Number: 2022030286)

Dear Elizabeth White,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for the San Francisco Gateway Project (Project). Located at 749 Toland Street and 2000 McKinnon Avenue, the Project site is in the Bayview Hunters Point Area Plan. The Project sponsor proposes to develop two new multi-story production, distribution, and repair (PDR) buildings. The Project would demolish currently occupied PDR space, totaling 448,000 gross square feet and construct two new three-story buildings totaling 2,160,000 gross square feet. The Project would include adjacent streetscape improvements, as well as new sidewalks, stormwater control measures, and ADA curb ramp accessibility.

The Bayview Hunters Point community is disproportionately impacted by air pollution. We have identified Bayview Hunters Point as a priority community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program. The City and County of San Francisco (City) also has identified the Project site as within an Air Pollution Exposure Zone (APEZ). Accordingly, increased emissions in Bayview Hunters Point would be concerning.

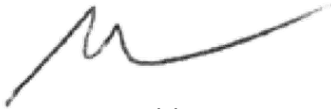
Air District staff recommends the EIR include the following information and analysis:

- **The Bayview Hunters Point community is currently cumulatively impacted with air pollution, which makes additional air pollution a potentially significant localized impact.** We recommend that the EIR use a very conservative significance threshold to evaluate impacts and mitigation requirements for this Project.
- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations near the Project area 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 EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors near the Project area.

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- **The EIR should evaluate all feasible measures, both onsite and offsite, to minimize air quality and GHG impacts.** The EIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Require or incentivize zero emission trucks for facility operations to the greatest degree feasible
 - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
 - Require construction vehicles to operate with Tier 4 or zero-emission engines as commercially available
 - Use grid power for construction activities whenever possible; if grid power is not available, use alternative power such as battery storage, hydrogen fuel cells, or renewable fuels. If no other options are available, use Final Tier 4 diesel generators
 - Prohibit trucks from idling for more than two minutes or prohibit idling altogether
 - Implement a program that incentivizes construction workers and building tenants to carpool, use EVs, or use public transit to commute to and from the site. The program may include the following features, as feasible:
 - Provide a shuttle service to and from BART
 - Provide preferential parking to carpool vehicles, vanpool vehicles, and EVs
 - Schedule work shifts to be compatible with the schedules of local transit services
 - Install electric vehicle charging infrastructure
 - Install electric connections for transportation refrigeration units
 - Require electric forklifts and install associated charging stations
 - Install outdoor electrical receptacles for charging or powering of electric landscape equipment
 - **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. 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 Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
 - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, or would like to schedule a meeting, please contact Samuel Garcia, Environmental Planner, at 415-749-5124, or sgarcia@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

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