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November 2, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: 350 Mission Street Office Project Draft Environmental Impact Report

Dear Mr. Wycko:

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Report (DEIR) for the 350 Mission Street Office Project (Project). The proposed Project would include demolition of an existing four-story office building and the construction of a 24-story building with 356,000 square feet (sq. ft.) of office use, 6,600 sq. ft. of retail and restaurant use, and 6,960 sq. ft. of publicly accessible indoor open space.

District staff is impressed with and strongly supports the City's binding and enforceable programs to reduce air pollution from new development in the City, such as the Transit First Policy, LEED Silver building requirements, Zero Waste and the Green Building Ordinance. This Project's attributes to reduce energy use and vehicle trips would help the City reach its greenhouse gas (GHG) reduction goals. For example, consistent with the Transit First Policy, the Project site is located in a dense urban neighborhood with a mix of uses within walking distance, is accessible by local and regional transit services, and its features include providing bicycle parking and associated facilities, limited vehicle parking, three spaces for car share vehicles, and transportation demand management services. In addition, the Project is proposed for LEED Gold certification. Projects like this not only would help the Bay Area move towards reaching the State's AB32 GHG reduction goals, but also will serve as a model for other jurisdictions seeking to reduce GHG emissions and build energy efficient projects.

While staff supports the above referenced attributes that would serve to reduce long term operational air pollutants from this Project, District staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with Project construction emissions. The DEIR concludes that Project construction could expose sensitive receptors to cancer risk and PM2.5 concentrations above BAAQMD's significance thresholds. District staff recommends that the emissions from construction be mitigated to the maximum extent feasible to protect human health and has comments on the proposed mitigation measure.

Mitigation Measure M-AQ-1

The DEIR states that construction emissions would exceed the District's 2010 CEQA thresholds for cancer and PM2.5 risk. Chapter IV page 82 states that if the Project utilized Interim Tier 4 diesel construction equipment exclusively, both the cancer risk and the concentration of PM2.5 could be reduced to a less-than-significant level, but that these engines are not readily available at this time.

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Page 1 of 2

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District staff supports the objective of using the cleanest available construction equipment, and believes it should be a requirement. At the same time, staff realizes that there is uncertainty about when specific types of equipment will be available with Interim Tier 4 engines. Our understanding is that as of year 2011, Interim Tier 4 engines will be available for all off-road equipment, with the exception of equipment engines with 75 to 175 horsepower (hp).

District staff recommends that Mitigation Measure M-AQ-1 be revised to require as a condition of Project approval:

- Use of Interim Tier 4 or equivalent equipment for all uses where such equipment is available.
- Use of Tier 3 equipment with Best Available Control Technology (BACT) or alternative fuel vehicles for applications where Tier 4 Interim engines are not available.
- Prohibition of diesel generators for construction purposes where feasible alternative sources of power are available.

To determine if any permits are needed for potential new stationary source equipment, please visit the District's permits webpage at <http://www.baaqmd.gov/Divisions/Engineering/Application-Forms.aspx> or contact engineering staff at 415-749-4990.

District staff is available to assist the City in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Chris Daly
BAAQMD Director Eric Mar
BAAQMD Director Gavin Newsom