



BAY AREA
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October 19, 2010

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

Subject: California Pacific Medical Center (CPMC) Long Range Development
Plan 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 California Pacific Medical Center (CPMC) Long Range Development Plan (Project). The proposed Project is the multi-phased strategy to meet State seismic safety requirements for hospitals (SB1953) and create a 20-year plan for CPMC's four existing medical campuses and a proposed new medical campus at Van Ness Avenue and Geary Boulevard. Major Project components include:

- At the Cathedral Hill Campus site (Van Ness Avenue and Geary Boulevard): Demolition of the existing Cathedral Hill Hotel and 1255 Post Street Office Building, construction of the proposed Cathedral Hill Hospital, a medical office building (MOB) and an underground pedestrian tunnel connecting the two, and renovation of an existing MOB.
- At the Pacific Campus (Sacramento and Buchanan Streets): Construction of a new building and parking structure, and renovation of other existing buildings.
- At the Davies Campus (Castro and 14th Streets) and St. Luke's Campus (Cesar Chavez and Valencia Street): Demolition of existing structures at each campus, and construction of medical facilities, a MOB and parking improvements.

District staff is concerned about the significant and unavoidable air quality impacts identified in the DEIR that are associated with Project construction and operation emissions. The San Francisco Bay Area region is currently in non-attainment for state and federal ozone standards and fine particulate matter (PM2.5) standards, and for state PM10 standards. The emissions associated with this Project need to be mitigated to the maximum extent feasible to ensure the Project does not adversely affect the region's ability to attain health-based ambient air quality standards.

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Impact AQ-9

The DEIR states that construction activities would exceed BAAQMD 2010 CEQA thresholds for criteria pollutants and contribute to existing air quality violations. In response, the DEIR refers to Mitigation N-2, which states that CPMC would:

Implement Accelerated Emission Control Device Installation on Construction Equipment...[and] CPMC shall *make reasonable efforts* to ensure that all construction equipment used at these campuses would use equipment that meets the EPA Tier 4 engine standards for PM and NOx control (or equivalent) throughout the entire duration of construction activities, to the extent that equipment meeting the EPA Tier 4 engine standards is available to the contractor at the time construction activities requiring the use of such equipment occur. (DEIR p. 4.7-36) (emphasis added)

Staff realizes that there is uncertainty about when specific types of equipment will be available with Tier 4 engines. Our understanding is that as of year 2011, Tier 4 Interim engines will be available for all off-road equipment, with the exception of equipment engines with 75 to 175 horsepower, and that by 2015, Tier 4 engines will be available for all off-road engines, regardless of horsepower.

District staff supports the objective of using the cleanest available construction equipment, and believes it should be a requirement. District staff recommends “make reasonable efforts” be stricken from the clause above and Mitigation N-2 be revised to require Tier 4 or equivalent equipment for all uses where such equipment is available.

Staff also recommends that diesel generators for construction activity be prohibited as a condition of Project approval. Where it is not possible to plug into the electric grid for construction purposes, the City should require use of solar powered generation, and only as a last resort, the City should require the cleanest diesel generators and control technology available. In addition, the City should require all on-road haul trucks utilized during construction be model year 2007 engines equipped with DPFs or newer engines.

Impact GH-3

District staff understands that the Project will comply with the City’s measures to help reach climate projection goals, including the Transit First Policy, Sustainability Plan, Climate Action Plan and Green Building Ordinance. We also support CPMC’s additional commitments to energy efficiency, reduced water consumption, green roofs, construction waste recycling, and reduction in use of steel building materials.

The Project’s GHG’s emissions are reported at 5.9 metric tons of CO₂-e per service person per year (MTCO₂e/SP/yr). This is above the threshold of 4.6 MTCO₂e/SP/yr established by the BAAQMD’s 2010 CEQA Guidelines and therefore the DEIR finds that Impact GH-3 is significant. District staff considers additional measures to be feasible and recommends that the following measures be required as a condition of Project approval:

- Adjusting parking prices to further discourage vehicle trips to the Project.

- Providing an alternative-fueled shuttle service with the cleanest technology available for employees traveling between the campuses and transit centers.
- Adding on-site renewable energy sources, such as wind turbines or solar panels, and committing to powering a specific percentage of the Project with this renewable energy source.
- Meeting LEED for Healthcare green building standards.
- Instead of increasing energy efficiency 14% beyond Title 24 as stated in the DEIR, committing to a percentage reduction greater than 14% beyond Title 24.
- Electrifying loading docks and prohibiting idling of all trucks.

In addition to the specific measures above, the City could establish an offsite mitigation program to fund emission reductions projects if on-site construction and/or operation emission reductions cannot lower emissions to the less-than-significant level.

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