



July 30, 2013

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Mike Gougherty
San Francisco Bay Area Water Emergency Transportation Authority (WETA)
Pier 9, Suite 111, The Embarcadero
San Francisco, CA 94111

Subject: Downtown San Francisco Ferry Terminal Expansion Project Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR)

Dear Mr. Gougherty:

Bay Area Air Quality Management District (District) staff reviewed your agency's Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) for the Downtown San Francisco Ferry Terminal Expansion Project (Project). The Project would expand berthing capacity at the Downtown San Francisco Ferry Terminal (Ferry Building), including construction of three new gates, overwater berthing facilities, supportive landside improvements, such as additional passenger waiting and queuing areas, circulation improvements, and other water transit-related amenities.

Air Quality Analysis

District staff reviewed the Project's DEIS/EIR and have the following comments:

- ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Nate Miley
(Vice-Chair)
Tim Sbranti
 - CONTRA COSTA COUNTY
John Gioia
David Hudson
Mary Piepho
Mark Ross
 - MARIN COUNTY
Susan Adams
 - NAPA COUNTY
Brad Wagenknecht
 - SAN FRANCISCO COUNTY
John Avalos
Edwin M. Lee
Eric Mar
 - SAN MATEO COUNTY
Carole Groom
(Secretary)
Carol Klatt
 - SANTA CLARA COUNTY
Ash Kalra
(Chair)
Liz Kniss
Jan Pepper
Ken Yeager
 - SOLANO COUNTY
James Spering
 - SONOMA COUNTY
Teresa Barrett
Shirlee Zane
- Jack P. Broadbent
EXECUTIVE OFFICER/APCO

1. The DEIS/EIR states that the screening for the construction and operational risks and hazards analysis is consistent with the District's *Recommended Methods for Screening and Modeling Local Risks and Hazards (Recommended Methods)*. However, the methodology described in Appendix B differs greatly from the *Recommended Methods*. Overall, the methodology employed in the DEIS/EIR significantly underestimates the potential cancer risk to sensitive receptors. The District recommends that the analysis be revised to include:
 - a. A age sensitivity value consistent with the Office of Environmental Health Hazard Assessment (OEHAA) *Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures (Technical Support Document)*.
 - b. A child breathing rate of 581 L/kg-day for the construction analysis.
 - c. A ratio of 0.10 for converting a one hour maximum concentration from SCREEN3 to annual average concentrations.

2. The DEIS/EIR states that the cumulative health risk assessment is consistent with the District's *California Environmental Quality Act Air Quality Guidelines (CEQA Guidelines)*, but significant mobile sources were excluded from the assessment and the cumulative risks and emissions are likely underestimated. The District recommends that the analysis be revised to include:
 - a. Cancer risk and PM2.5 concentrations from roadways with at least 10,000 annual average daily traffic, such as The Embarcadero, Market Street, and Mission Street.

- b. An analysis of emissions, risk, and criteria pollutants from WETA's planned expansion of water transit routes that were analyzed in WETA's 2003 Program EIR for Implementation and Operations (2003 EIR). Since the 2003 EIR was completed, there have been significant changes in federal ambient air quality standards. The U.S. Environmental Protection Agency lowered the PM2.5 standard in 2006 and designated the Bay Area as nonattainment for the PM2.5 standard in October 2009.
- c. An analysis of the Greenhouse Gas (GHG) emissions from the Project. Since the 2003 Program EIR was completed, the State of California has set forth a series of target dates through Executive Order S-3-05 and Assembly Bill 32 by which statewide GHG emissions would be progressively reduced; and the City and County of San Francisco has adopted a Climate Action Plan. The Project should evaluate its consistency with these statewide goals.

The DEIS/EIR concludes that Air Quality Impacts 3.6-2, 3.6-5, and 3.6-8 are less than significant, or less than significant with mitigation. However, District staff believe that if the DEIS/EIR is revised as described above there may be significant impacts that will require further mitigation.

For more information about methodologies, please refer to the District's *Recommended Methods* (May, 2011) and *CEQA Guidelines* (May, 2012), both available through the District's website: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, and OEHA's *Technical Support Document* (May, 2009), located at: http://oehha.ca.gov/air/hot_spots/2009/TSDCancerPotency.pdf.

District staff is available to assist 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 John Avalos
BAAQMD Director Edwin M. Lee
BAAQMD Director Eric Mar