



February 10, 2020

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Dianne Wong, Environmental Coordinator
UCSF Campus Planning
654 Minnesota Street
San Francisco, CA 94143-0286

RE: UCSF Comprehensive Parnassus Heights Plan – Notice of Preparation

Dear Ms. Wong,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Comprehensive Parnassus Heights Plan (Project). The Project establishes a long-term development framework for growth including new research, patient care, education, housing and open space land uses; demolition and major renovations; and improvements to on-campus mobility and circulation. In total, the Project provides for development of approximately 2.9 million gross square feet of new building at the campus. The Initial Phase is anticipated to be completed by 2030; the next and final Future Phase is anticipated to be completed by 2050. Because the Project proposes to modify the Parnassus Heights development plans identified in the 2014 Long Range Development Plan (LRDP), an amendment to the 2014 LRDP is proposed as part of the Project.

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

- **The GHG impact analysis should include an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Project will be consistent with the Scoping Plan.
- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TACs) 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 TACs and PM_{2.5} emissions on sensitive receptors within and near the Project area.

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- **The EIR should include design features that lessen Project air quality and GHG impacts.**

Examples of potential design features that lessen air quality and GHG impacts include, but are not limited to:

- Creating a construction phase traffic management plan that reduces diesel equipment idling.
- Creating a Transportation Demand Management Program that includes funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.
- Providing the funding and infrastructure for new, and connections to existing bicycle and pedestrian projects that improve access to transit, employment, and major activity centers.
- Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>).
- Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.
- Requiring construction vehicles to operate with the highest tier engines commercially available.
- Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.

The EIR should prioritize onsite project features to reduce air quality and GHG impacts first. Only when onsite features have been exhausted should the EIR consider offsite mitigation measures within the Project area.

- **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 EIR should analyze the Project's consistency with the 2017 Greenhouse Gas Reduction Strategy Update, the City and County of San Francisco's most recently adopted Climate Action Plan.** The *Strategy Update* can be found at this link: https://sfmea.sfplanning.org/GHG/GHG_Strategy_October2017.pdf. The EIR should also analyze the Project's consistency with the University of California's Carbon Neutrality Initiative.
- **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG 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>. If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.
- **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators and hot water/space heat boilers).** 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. All stationary sources of air pollution should be described in the EIR.

We encourage UCSF 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, please contact Alison Kirk, Principal Environmental Planner, at 415-749-5169 or akirk@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Shamann Walton
BAAQMD Director Tyrone Jue