October 16, 2023

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 Draft Environmental Impact Report (SCH Number: 2022030286)

Dear Elizabeth White,

Bay Area Air Quality Management District (Air District) staff has reviewed the proposed San Francisco Gateway Project (Project) Draft Environmental Impact Report (DEIR) and appreciate the opportunity to share the following comments.

Project Summary

The Project is located at 749 Toland Street in the Bayview Hunters Point (BVHP) neighborhood of southeast San Franciso. The Project applicant Prologis Inc. proposes to demolish four existing buildings on 17 acres in a core industrial area of BVHP. The Project would construct two 97 to 115 feet tall structures for a 2,160,000 gross square feet production, distribution, and repair operation, including approximately 35,000 gross square feet of ground-floor maker spaces and 8,400 gross square feet of ground-floor retail space. The Project includes a roof top solar array which would screen the roof parking and storage while generating electricity for onsite use.

We appreciate the City of San Francisco and the Project teams' efforts to include measures to further minimize air quality impacts and recommend the following additional considerations and mitigations to further reduce air quality impacts.

Support for the Code Compliant Project Alternative

The BVHP neighborhood in southeast San Franciso is a known environmental justice community disproportionately impacted by air pollution from the mix of transportation, industrial, port-related, and utility uses concentrated in the area. The area is a designated air protection community pursuant to Assembly Bill (AB) 617. The Air District is working collaboratively with the BVHP community to improve air quality and reduce health risks through the development of an AB 617 Community Emissions Reduction Plan.

As BVHP is impacted by air pollution it is imperative that future development does not further increase the community's cumulative air pollution emissions and exposure. By selecting the Code Compliant Project Alternative and reducing the height of the building to the 65-foot limit, Project operational NOx emission impacts would be reduced to less than significant (PM and TAC emissions will also be less than significant as with the proposed Project). The Code Compliant Alternative also reduces air quality impacts from reduced building-induced wind hazards (down-washing), decreases employee parking demand, and adds fewer truck trips and less congestion during the a.m. peak period. In addition, as compared to the proposed Project, the Code Compliant Alternative also shortens the construction period by six months, thereby limiting worker and sensitive receptor exposure to asbestos and hazardous air borne fugitive dust.

The Air District also recommends that proposed Project Mitigation Measure AQ-3h - requiring a City approved and monitored construction plan for ensuring electric-powered construction equipment to the maximum extent feasible and that any diesel engines, whether for off-road or on-road, shall not be left idling for more than two minutes at any location - be included in the Code Compliant Project Alternative to achieve maximal cumulative air pollution protection.

Comments on Air Quality Assessment and Mitigations

Propose proactive concrete mitigation measures for NOx emissions beyond the OEMP that do not defer emission reductions.
The DEIR states that, even with mitigation measures 3a-3g (e.g., electrification of yard equipment and TRUs, limits to idling of tractor trailers, adopting cleaner fleet mixes and zero-emission infrastructure, including Tier 4 generators) the Project's total NOx emissions of 64.1 pounds per day would exceed the NOx significance threshold. Additional mitigation measures to further reduce construction related emissions and implementation of a 10-year Operations Emissions Management Plan (OEMP) are proposed to ensure that the Project's NOx emissions will remain below the Air District significance thresholds until such time all feasible measures and changes to fleets are in place to ensure cumulative compliance.

The OEMP (mitigation 3i, p. 3D-49) is proposed to address operational emissions. While innovative and welcomed as a proactive emissions management bridge mitigation approach for prospective lessees, emission reductions are nevertheless too contingent to conclude that NOx will be reduced to a less than significant level. Further, any triggered new mitigations that would be required for projected exceedances (to be implemented by a yet to be determined tenant) are deferred mitigations that are not sufficiently concrete, measurable, or enforceable to ensure NOx will remain below the significance thresholds for the life of the project.

The Air District recommends the mitigation measure explicitly state, for the various projected truck types and trips associated with the proposed tenant mix options, a numeric, quantified limit of truck types and operational trips based on NOx emissions that will be allowed to ensure the overall Project remains below the threshold of significance. These identified truck types and trip parameters can then also help to inform and guide the OEMP.

Prioritize all available on-site emissions reductions rather than relying on potential off-site mitigation.
Proposed mitigation measure AQ-3i includes a proposed measure to achieve NOx reductions through off-site offset projects that might be located anywhere in the Bay Area. Off-site mitigation should not be used in communities, such as Bayview Hunters Point, which already endure a disproportionate burden of pollution. While off-site mitigation is an alternative approach under CEQA, the Air District strongly supports the implementation of all available on-site emission reduction measures before relying on off-site mitigation. Further, any off-site mitigations must be demonstrated to be real, permanent, quantifiable, verifiable, and enforceable and should be implemented concurrently with Project emissions (rather than delayed or deferred).

Further address operational truck trips and impacts
While recognizing that much of the operational truck types (box trucks, vans, and semi-trucks) and trips is unknowable at this time and dependent on specific tenants and fleet mixes, the Air District recommends the DEIR should further address, assess, and consider the impacts of projected truck movements at critical times and locations.

- **Morning peak conflicts with the SF Produce Market.** It is not clear in the DEIR if morning peak conflicts are analyzed (e.g., p. 3B-20-21). The Air District recommends that, to the extent feasible, peak time truck trips should be managed/coordinated with the ongoing morning peak of truck deliveries at the adjacent SF Wholesale Produce Market (early morning from 3 a.m. – 9 a.m.).

- **Potential heavy-duty truck impacts nearby residential and sensitive uses**. It is not clear if Jerrold Avenue as a secondary truck route beyond Phelps Street to Third Street was evaluated as this roadway section is currently closed until 2028. While the DEIR states that truck traffic will be rerouted from Jerrold to Innes, the report does not discuss what will occur when Jerold re-opens (see p. 3D-16). The Air District recommends that operational inbound/outbound heavy-duty truck traffic along Jerrold from Third Street after 2028 be restricted/eliminated as this area contains residential uses already impacted by emissions from the wastewater treatment facility. We also recommend the City require heavy-duty truck traffic be restricted or eliminated along Oakdale Avenue given the predominance of residential uses along this corridor.

Further address potential down-washing wind and venting impacts

While the proposed Project plans appear to show vents on the roof, it should be called out that any specific or additional tenant venting or mechanical venting for enclosed storage areas are not directed in such a way to mingle into the confluence of the projected down-washing of air currents and/or otherwise unduly impact would-be street-level pedestrian, adjacent SF Produce Market vendors, or any adjacent perennial unhoused communities. We also recommend that the Project includes adding specific green "living wall" design features as wind baffling mitigations along appropriate building faces.

The Air District strongly encourages the Project to work directly with community partners such as the Bayview Hunter's Point AB 617 Community Steering Committee to select and implement specific and appropriate strategies to further address potential impacts from operational truck trips, including monitoring of truck activities in collaboration with the future tenants and the City or establishing new street trees or vegetative screens/buffers along proposed truck routes.

Thank you again for the opportunity to provide comments on this Project and please contact David Ralston, dralston@baaqmd.gov, for any follow-up questions on these comments.

Sincerely,

Greg Nudd
Deputy Executive Officer of Science and Policy
Bay Area Air Quality Management District

Cc: BAAQMD Director Shaman Walton
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