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To: Balboa Reservoir Compliance (ECN)
Subject: FW: Public Comment case 2018-007883ENV

From: Christine Hanson <chrisibhanson@gmail.com>
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To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>
Subject: Public Comment case 2018-007883ENV

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Public Comment on the Balboa Reservoir Project. Air Quality and Children in the City College Multi-Use Building

Impacts related to construction emissions are discussed in the draft SEIR Section 3.D, Air Quality. The draft SEIR finds Impact AQ-2a (During construction, the proposed project would generate criteria air pollutants that would violate an air quality standard, contribute substantially to an existing or projected air quality violation) and Impact AQ-4 (Construction and operation of the proposed project would generate toxic air contaminants, including Diesel Particulate Matter) will result in impacts that are Significant and Unavoidable with mitigation during the construction period of both the Developer's Proposed Option and the Additional Housing Option. The impact on air quality is greatest if the construction period is accelerated--completed in three years, and with the maximum number of units constructed. The finding for both of these categories in the Pre Environmental Impact Report (Balboa BART Station Area Plan) with a smaller development was no significant impact with mitigation.

The Draft SEIR discusses risks in the APEZ, which is the Air Pollutant Exposure Zone. The risk is highest for children, referred to as "sensitive receptors," at Childcare Centers, and the SEIR identifies Childcare Centers in the area and their distance to the construction zone. The Childcare Center at City College, located in the bungalows is identified and though it is not the closest in proximity it is the only center noted that lies within the APEZ, sits to the East and is in the prevailing path of the wind.

The draft SEIR fails to note the Childcare classes that are centered in the City College Multi-Use Building (MUB), which teaches classes with children on site. Though these children are not playing outside of the building, the MUB sits approximately 150 feet away from the proposed development (per figure 2-3) is to the East of the construction site, and downwind.

Because of the proximity of the MUB to the construction site, its location is comparable to the planned childcare site within the proposed construction area. The SEIR classifies the danger to those children for future health impacts as being significant but says that because the development's future daycare centers won't be up and running during construction this isn't likely to be an issue as follows:

From the draft SEIR page 3.D-71: “in the unlikely event that the daycare would be completed in Phase 1 and be operational during Phase 2 construction, the potential for future health risk impacts from exposure of daycare receptors to Phase 2 construction TAC emissions would be potentially significant, especially given the potential that the project could be developed under an accelerated construction schedule of as little as three years’ duration, increasing the DPM exposure of daycare receptors.”

The proposed project must study the potential danger to the children who participate in the classes in City College’s MUB. The data shows that they are not included in this study. Because the draft SEIR identifies significant health impacts for children at the future daycare centers located within the construction area, those concerns must be addressed as well with the children in the MUB whose proximity and direction of location put them at similar risk. These children in the MUB are within the APEZ and the building they are in is to the East, and downwind of the proposed project. The danger to these children is also increased with the potential for an accelerated construction schedule for both alternatives, **after studying the impacts**; the SEIR must offer mitigations for these children for all of the alternatives studied in the draft SEIR.

Christine Hanson