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September 23, 2019

Jeanie Poling
Senior Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Balboa Reservoir Draft Subsequent Environmental Impact Report

Dear Ms. Poling,

Bay Area Air Quality Management District (Air District) staff has reviewed the City and County of San Francisco's (City) Draft Subsequent Environmental Impact Report (DSEIR) prepared for the Balboa Reservoir (Project). The Project applicant proposes to develop the site with mixed-income housing, open space, a childcare facility/community room available for public use, retail space, on-and-off street parking, and new streets, utilities, and other infrastructure. There are two potential buildout schedules for the Project: (1) the anticipated estimated 6-year (2021-2027) schedule and (2) the compressed estimated 3-year (2021-2023) schedule.

Air District staff greatly appreciates the opportunity to work with the City to address the potentially significant air quality impacts estimated for this Project. Project design features and the mitigation measures identified in the DSEIR will substantially lessen the local and regional air quality impacts from construction and operation of the Project.

However, even with these Project design features and on-site mitigation measures, the DSEIR finds that air quality impacts from the Project still exceed the City's thresholds of significance for the compressed schedule. Therefore, Mitigation Measure M-AQ-2d: Offset Construction Emissions for the Compressed Schedule (M-AQ-2d) proposes that the Project applicant provide funds to achieve additional emission reductions to reduce air emissions below the thresholds of significance. To this end, M-AQ-2d states that the Project applicant would provide funding to the Air District to fund emissions reduction projects in the region in order to offset the remaining criteria pollutant emissions generated by construction during the compressed schedule.

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted on a case-by-case basis based on available projects. We recommend that M-AQ-2d replace "Air District" with "governmental entity". This will allow the project applicant to seek additional options if the Air District has no available projects at the time.

Air District staff is available to assist the City to address these comments. If you have any questions, please contact Areana Flores, Environmental Planner, at (415) 749-4616 or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Gordon Mar
BAAQMD Director Shamann Walton
BAAQMD Director Tyrone Jue