
From: Poling, Jeanie (CPC)
Sent: Monday, September 23, 2019 8:27 PM
To: Balboa Reservoir Compliance (ECN)
Subject: FW: Comment on Work Day Estimates and Air Quality - Balboa Reservoir Project SEIR

From: Brian Marabello <bmarabello@yahoo.com>
Sent: Monday, September 23, 2019 1:16 PM
To: CPC.BalboaReservoir <CPC.BalboaReservoir@sfgov.org>; Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Subject: Comment on Work Day Estimates and Air Quality - Balboa Reservoir Project SEIR

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Planning Commission:

This comment is submitted in response to the Balboa Reservoir Project Draft SEIR.

INADEQUACY OF ESTIMATED NUMBER OF CONSTRUCTION WORKING DAYS PER YEAR

To calculate Average Daily Emissions of ROG, NO_x, PM₁₀, and PM_{2.5}, the SEIR's analyses use a multiplier of 260-262 days. This would grossly underestimate the emissions in the very likely scenario where construction happens on more than 262 days per year. Commercial construction sites all around the city are routinely working 6 or even 7 days a week.

And this project will be no different. As you know, the developer is allowed to construct seven days a week, which is consistent with San Francisco Police Code section 2908.

And to keep this project on schedule and keep costs in line, the developers will work many weekends.

Thus, the estimates for emissions and necessary mitigation offsets should account for more working days.

If construction happens on just an additional 27 Saturdays and/or Sundays, this will increase all emissions by 10%. If developers average 6 construction days a week, this will inflate emissions by 19.8%. That percentage doubles if construction averages 7 days a week.

Let's assume a very likely average of construction occurring 6 days a week. This would cause the NO_x levels to cross the significance threshold for both the Developers Proposed Option and the Additional Housing Option under both the six-year and compressed three-year schedules. As well, PM₁₀, and PM_{2.5} will increase significantly. Thus, all lifetime excess cancer risks should be adjusted.

All four of the proposed option-schedule scenarios would trigger the implementation of Mitigation Measure M-AQ-2d. Thus, mitigation offsets would need to increase dramatically.

It's deceptive to use an unrealistic construction working days per year. Why not use a more realistic number so the developer and the public know the maximum or at least truer impacts? Should they come in under the number of estimated days, great. The monitoring will support them and they'll save money and lives.

Submitted by:
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