

I-HANSON3-1

I-HEGGIE2-19

I-MARABELLO1-1

“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, Email, September 11, 2019 [I-HANSON3-1])

“Please include the sensitive receptors identified above for noise in assessments of air quality as appropriate, although air travels farther than noise.”

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-19])

“FAILURE TO INCLUDE A SIGNIFICANT SENSITIVE RECEPTOR — STUDENT-ATHLETES

1. Both the PEIR (page 251) and BAAQMD guidelines (<http://www.sparetheair.org/understanding-air-quality/air-pollutants-and-health-effects/whos-at-risk>) include persons engaged in strenuous exercise as sensitive receptors.

The SEIR does not do so similarly for a sizable group that exercises routinely and strenuously adjacent to the project area — CCSF athletes. It does not designate them, many of whom train and compete outdoors within 1/4 mile of the BR, as sensitive receptors. It fails to mention this significant group altogether. Thus they were not included in any of the analyses, including the Health Risk Assessment.

This is a violation of San Francisco Administrative Code chapter 31.

There are hundreds of CCSF student-athletes exercising strenuously, outdoors and indoors, who need to be factored in to required air quality analyses.

Plus there are many more who are strenuously exercising in CCSF Ocean Campus physical education courses that should be accounted for.

Also, if health risk assumptions used in the SEIR's air quality analyses are different for athletes than they are for students, and they probably are, then the athletes among the student body at Archbishop Riordan should be their own receptor type in the analyses."

(Brian Marabello, Email, September 23, 2019 [I-MARABELLO1-1])

I-HEGGIE2-20

I-MARABELLO2-1

"The EIR construction modeling of air quality in Appendix D assumes three years. Again, six years is the Developers Option and should be the default, not three years which is not recommended due to air quality and other impacts."

(Jennifer Heggie, Email, September 23, 2019 [I-HEGGIE2-20])

"INADEQUACY OF ESTIMATED NUMBER OF CONSTRUCTION WORKING DAYS PER YEAR

To calculate Average Daily Emissions of ROG, NOx, PM10, and PM2.5, 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 NOx 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 PM2.5 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."

(Brian Marabello, Email, September 23, 2019 [I-MARABELLO2-1])

A-BAAQMD-1

"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."

(Greg Nudd, Deputy Air Pollution Control Officer, BAAQMD, Letter, September 23, 2019 [A-BAAQMD-1])