



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

November 2, 2015

Tiffany Bohee
Executive Director
Office of Community Investment and Infrastructure
One S. Van Ness Ave., 5th Floor
San Francisco, CA 94103

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EXECUTIVE OFFICER/APCO

Subject: Response to Comments on the DSEIR for the Event Center & Mixed-Use Development at Mission Bay Blocks 29-32 (Project).

Dear Ms. Bohee:

The Bay Area Air Quality Management District (Air District) is willing to assist the City and County of San Francisco (City) by administering an off-site mitigation program to reduce this Project's significant air quality impacts to the extent feasible. As we have discussed extensively with City staff, the \$321,646 identified in M-AQ-2b is not sufficient to achieve the 17 tons per year of ozone precursor emission reductions needed for this Project. Due to the nature of air quality impacts that need to be mitigated, comparison of the Air District off-site mitigation program identified for this Project to other air district programs is inappropriate and incorrect.

The amount of funds required to reduce 4.4 tons of reactive organic gases (ROG) and 12.6 tons of oxides of nitrogen (NOx), including a 5 percent administration fee, is \$620,922. This amount is based on a study of the Air District's Vehicle Buy Back (VBB) program funds spent over the last 3 years and represents the average cost of reducing ROG and NOx during that three year period. Only through the VBB program can the Air District achieve the contemporaneous emission reductions and other conditions set forth in M-AQ-2b.

Air District staff continues to be willing to assist the City in implementing an off-site mitigation program. However, the Final Environmental Impact Report Response to Comments includes the following statement: "Acceptance of this fee by the BAAQMD shall serve as an acknowledgement and commitment by the BAAQMD to: (1) implement an emissions reduction project(s) within one year of receipt of the mitigation fee to achieve the emission reduction objectives specified above [i.e. 17 tons of ozone precursors per year]". Given this language, unless the City amends M-AQ-2b to fund this feasible mitigation measure at the \$620,922 level previously discussed with City staff, the Air District will be unable to participate in offsetting this Project's air quality impacts.

If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Vice Chair Eric Mar
BAAQMD Director John Avalos
BAAQMD Director Edwin M. Lee