

PARKMERCED PROJECT EIR ERRATA

This section presents additional staff initiated text changes for the *Parkmerced Project Draft Environmental Impact Report*. These EIR text changes reflect revisions that have occurred subsequent the October 28, 2010 publication of the Comments and Responses document. The revisions are organized by EIR section and deleted text is ~~struck through~~ and new text is underlined. The text additions and revisions presented below clarify and expand the information presented in the Draft EIR and Comments and Responses document. The revised text does not provide new information that identifies new significant environmental impacts; the clarified and expanded information does not identify mitigation measures that, if implemented, would result in significant environmental impacts; and considerably different alternatives and/or mitigation measures were not identified that would clearly lessen the significant environmental impacts of the proposed project. In sum, the staff-initiated text changes provided below do not change any of the conclusions reached in the Draft EIR and Comments and Responses documents, but rather clarify, update, and provide additional relevant information.

CHAPTER V, ENVIRONMENTAL SETTING AND IMPACTS

Section V.E, Transportation and Circulation

A text change has been made to Mitigation Measure M-TR-2B, on p. V.E.65 of the Draft EIR:

M-TR-2B: Install a traffic signal at Sunset Boulevard/Lake Merced Boulevard. ~~Installation of the signal shall be the responsibility of the SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility. The SFMTA shall design and implement the measure as necessary.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.

A text change has been made to Mitigation Measure M-TR-2C, on p. V.E.65 of the Draft EIR:

M-TR-2C: Construct a dedicated northbound right-turn lane from Lake Merced Boulevard to eastbound Winston Drive. This improvement would provide a dedicated lane for the relatively large number of vehicles expected to execute the northbound right-turn movement. Implementation of the roadway improvement would require roadway widening to the east, which necessitates relocation of the sidewalk, a utility box, a signal mast, and several other elements.

~~Implementation shall be the responsibility of SFMTA, and shall be completed prior to completion of the Project or as otherwise specified in the Development Agreement. SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.

A text change has been made to Mitigation Measure M-TR-2D, on p. V.E.66 of the Draft EIR:

M-TR-2D: Provide a third northbound through lane and a second southbound left-turn lane at the Lake Merced Boulevard/Font Boulevard intersection. This mitigation measure would require restriping the northbound right-turn lane at the Lake Merced Boulevard/State Drive intersection as a through lane and removing the on-street parking on the north side of the intersection to recreate the dedicated right-turn lane (assuming that it is required for acceptable operations at this intersection).

Additionally, providing a second southbound left-turn lane at this intersection would require removal of on-street parking on the south side of Font Boulevard to create a second receiving lane, as well as the removal of some spaces on the west side of Lake Merced Boulevard and shifting the through travel lanes to the west to make room for the second southbound left-turn lane.

Implementation would require significant roadway restriping and signal optimization and coordination at multiple intersections, as well as the removal of approximately 25 parking spaces. ~~If feasible, implementation of this measure shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility. SFMTA shall design and implement the measure as necessary.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.

A text change has been made to Mitigation Measure M-TR-2E, on p. V.E.66 of the Draft EIR:

M-TR-2E: Reconfigure the westbound right-turn and southbound left-turn as the primary movements of the intersection at the Lake Merced Boulevard/Brotherhood Way. This would convert the northbound approach of Lake Merced Boulevard into the “minor” approach to the intersection. Although the configuration may be able to fit within the existing right-of-way at the intersection, further study is needed to determine the feasibility of this measure. A conceptual intersection configuration is presented in the Project’s Transportation Study.

~~If implemented, the intersection reconfiguration shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement. SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.

A text change has been made to Mitigation Measure M-TR-21A, on p. V.E.88 of the Draft EIR:

M-TR-21A: Purchase an additional two-car light rail vehicle for the M Ocean View. Purchase and insert another light-rail vehicle into the system in order to maintain headways. This will allow Muni to maintain proposed headways on the M Ocean View with a slightly longer route. The procurement of the new light rail vehicles shall be completed by SFMTA, and shall be completed prior to operating the rerouted system. However, the new transit vehicles required to serve the Proposed Project shall not be the financial responsibility of SFMTA.

A text change has been made to Mitigation Measure M-TR-22B, on pp. V.E.90-V.E.91 of the Draft EIR:

M-TR-22B: Maintain the proposed headways of the 18 46th Avenue. The Project Sponsor in cooperation with SFMTA shall conduct a study to evaluate the effectiveness and feasibility of the following improvements which could reduce Project impacts on transit operations along the Lake Merced Boulevard corridor, generally between Brotherhood Way and Winston Drive. The study shall create a monitoring program to determine the implementation extent and schedule (as identified below) to maintain the proposed headways of transit lines impacted by the Project.

- A transit-only queue-jump lane should be considered on Lake Merced Boulevard at Font Boulevard. This treatment could be constructed within the existing curb-to-curb right of way for the northbound direction.
- Southbound queue-jumps are viable at State Drive and Font Boulevard with removal of on-street parking. However, these treatments may conflict with mitigation measures M-TR-2C, ~~M-TR-2D~~, and ~~M-TR-2E~~ (collectively summarized in M-TR-22A), which has ~~have~~ been designed to reduce the Project's traffic impacts.

These improvements would collectively benefit not only the 18 46th Avenue prior to the TEP improvements, but also SamTrans Route 122, and the proposed "shopper shuttle."

~~SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility. Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.~~ The Project Sponsor shall fully fund the costs of implementing the transit priority improvements (either the improvements identified above, or alternative improvements of equal or greater effectiveness and comparable cost) as determined by the study and the monitoring program. Other options to be evaluated in the study could include comprehensive replacement of stop-controlled intersections with interconnected traffic signals equipped with transit priority elements.

A text change has been made to Mitigation Measure M-TR-22C, on p. V.E.91 of the Draft EIR:

M-TR-22C: Purchase additional transit vehicles as necessary to mitigate the Project impacts to headways on the 18 46th Avenue. Should mitigation measures M-TR-22A or M-TR-22B not be feasible or effective, the Project Sponsor shall work with SFMTA to purchase additional transit vehicles and contribute to operating costs and facility improvements as necessary to mitigate the Project impacts to headways for the transit line. ~~While this mitigation measure would allow headways to be maintained, it does not mitigate the transit travel time delay. The procurement of new transit vehicles shall be completed by SFMTA. However, new transit vehicles required to serve the Proposed Project shall not be the financial responsibility of SFMTA.~~ The Project Sponsor shall be responsible for the procurement and financing of the new transit vehicles.

A text change has been made to Mitigation Measure M-TR-25B, on p. V.E.94 of the Draft EIR:

M-TR-25B: Maintain the proposed headways of the 29 Sunset. The Project Sponsor in cooperation with SFMTA shall conduct a study to evaluate the effectiveness and feasibility of installing transit priority elements along Lake Merced Boulevard, between

Winston Drive and Sunset Boulevard. This may include, but is not limited to, queue-jump lanes and transit-only lanes. ~~SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or the study of its feasibility.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor. The Project Sponsor shall fully fund the costs of implementing the transit priority improvements (either the improvements identified above, or alternative improvements of equal or greater effectiveness and comparable cost) as determined by the study and the monitoring program.

A text change has been made to Mitigation Measure M-TR-36C, on p. IV.17 of the Comments and Responses document:

M-TR-36C: Install a traffic signal at Lake Merced Boulevard/John Muir Drive. Installation of a traffic signal at the intersection of Lake Merced Boulevard/John Muir Drive would improve operations to acceptable levels. ~~Implementation of the signal installation shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement. The SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or evaluating its feasibility.~~ Funding, implementation, and construction of this measure shall be the responsibility of the Project Sponsor.

Section V.G, Air Quality

The BAAQMD recently updated their 1999 CEQA Air Quality Guidelines and adopted new CEQA significance thresholds for air quality. The updated BAAQMD CEQA Guidelines include quantitative CEQA significance thresholds for construction-related and operational criteria pollutant emissions, precursor emissions, and health risks (from emissions of toxic air contaminants [TACs]). According to the BAAQMD, these recently adopted thresholds of significance are only intended to apply to environmental analyses that began on or after June 2, 2010, and thresholds pertaining to the health risks to new sensitive receptors are only intended to apply to environmental analyses that began on or after January 1, 2011. Even though the environmental analysis of the proposed project began well in advance of June 2, 2010, the analysis in this EIR conservatively relies on the recently adopted significance thresholds and mitigation strategies.

Therefore, the following text changes are made to the Air Quality section of the Draft EIR, starting at the first paragraph on p. V.G.33, though the last paragraph on p. V.G.40. These changes reflect the adoption of the new guidelines, but do not change any of the substantive conclusions of the Draft EIR or Comments and Responses documents.

~~Draft~~ BAAQMD CEQA Air Quality Guidelines and Proposed Adopted 2010 Thresholds

BAAQMD recently updated ~~is currently in the process of updating~~ its CEQA Air Quality Guidelines, which ~~will include~~ revised thresholds of significance for criteria air pollutants and precursors, community risk and hazards related to TACs, and greenhouse gases (GHGs) (see Section V.H, Greenhouse Gas Emissions of this EIR for a discussion of proposed thresholds for

GHGs). BAAQMD is ~~considering~~ adopted two sets of thresholds, one that would apply to specific development projects, such as the Proposed Project, and another threshold that would apply to plan-level CEQA analyses. ~~Should the~~ The BAAQMD adopted the new CEQA thresholds on June 2, 2010. It is BAAQMD's policy that the new thresholds apply to projects for which the Notice of Preparation (NOP) was prepared on or after June 2, 2010 for all adopted thresholds except the thresholds for exposing sensitive receptors to health risks and hazards. It is BAAQMD's policy that the health risk and hazard thresholds apply to NOP's published after May 1, 2011. It is be adopted before this EIR is certified, the new thresholds could apply to the Proposed Project. The draft guidelines have yet to be formally adopted by BAAQMD and therefore cannot yet be formally adopted by the City and County of San Francisco should it choose to do so.

Criteria Related to Construction Impacts

Quantification of construction emissions is appropriate for analysis under the ~~2010 proposed Draft-BAAQMD~~ CEQA Air Quality Guidelines. A project would have a significant air quality impact if it would result in total construction-related emissions of ROG, NO_x, or PM_{2.5} (non-inclusive of fugitive dust) of 10 tons per year or greater or 54 pounds (25 kilograms) per day or greater. The ~~draft~~ guidelines have a separate emission threshold for PM₁₀ (non-inclusive of fugitive dust) of 15 tons per year or greater or 82 pounds (37 kilograms) per day.

Under the ~~2010 proposed~~ BAAQMD guidance, a ~~Plan or~~ project would also have a significant air quality impact if construction activities would result in an incremental increase in localized annual average concentrations of PM_{2.5} exceeding 0.3 micrograms per cubic meter.

Additionally, construction associated with a ~~Plan or~~ project would have a significant air quality impact if it would result expose persons to substantial levels of TACs, such that the probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million or if it would expose persons to TAC's such that a non-cancer Hazard Index of 1.0 would be exceeded.

Criteria for Project-Level Operational Impacts

The ~~2010 Draft~~ BAAQMD CEQA Guidelines recommend lower threshold levels for determining significance of operational emissions of ROG, NO_x, or PM₁₀ including PM_{2.5}. For ROG, NO_x and PM_{2.5}, a net increase of 54 pounds per day is considered significant, while for PM₁₀ a net increase of 82 pounds per day is considered significant.

The ~~proposed~~ guidance expands on the existing health risk thresholds by adding thresholds related to the incremental ambient PM_{2.5} increases associated with a project ~~or and~~ by requiring a determination of consistency with a Qualified Risk Reduction Plan, if applicable. A project would ~~also~~ have a significant air quality impact if it would result in an incremental increase in or exposure of receptors to localized annual average concentrations of PM_{2.5} exceeding 0.3 micrograms per cubic meter (µg/m³), or expose persons to substantial levels of TACs, such that the probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million or if it would expose persons to TAC's such that a non-cancer Hazard Index of 1.0 would be exceeded from project operations.

Criteria for Cumulative Impacts

Cumulative impacts are based on ~~the~~ a project's emissions and the potential for the project to expose sensitive receptors to health risks and the potential for the project to contribute to regional air pollution. As with the existing BAAQMD guidance, if a project results in an increase in ROG, NO_x, PM₁₀, or PM_{2.5} of more than their respective daily mass thresholds, then it would ~~also~~ be considered to contribute considerably to a significant cumulative effect.

Characterizing cumulative air quality impacts relative to emissions of PM_{2.5} and TAC relies on cumulative assessment methodologies that are still in development by BAAQMD. Establishing a consistent methodology for cumulative health risk assessment will affect decisions on what sources to consider in a cumulative analysis and how to obtain emission data for sources that are beyond the bounds of a project.

With regard to cumulative impacts (both construction and operations) from PM_{2.5}, the ~~proposed~~ guidance indicates that a significant cumulative air quality impact would occur if localized annual average concentrations of PM_{2.5} would exceed 0.8 micrograms per cubic meter (µg/m³) from project operations in addition to existing emission sources and cumulative emissions sources within 1,000 feet of the project. However, background annual average concentrations of PM_{2.5} currently exceed ten times this level for all previous years, as shown in Table V.G.1.

With regard to cumulative impacts from TACs, a significant cumulative air quality impact would occur if the probability of contracting cancer for the MEI defined above, would exceed 100 in one million or if would expose persons to TACs such that a non-cancer Hazard Index of 10.0 would be exceeded as a result of project operations, in addition to existing emission sources and cumulative emissions sources within a 1,000 foot radius of the project site.

~~Proposed~~ BAAQMD CEQA Adopted Thresholds, Impact Evaluation

Impact AQ-10: The Proposed Project could result in localized construction dust-related air quality impacts under ~~proposed~~ the 2010 guidelines. (*Less than Significant*) (Criteria G.b, G.d)

Under the 2010 ~~Draft~~ BAAQMD CEQA Guidelines, implementation of Best Management Practices for fugitive dust would reduce the impact of construction dust to a less-than-significant level, as required by the San Francisco Construction Dust Control Ordinance (see Impact AQ-1 above).

Impact AQ-11: The Proposed Project could result in construction-related impacts to regional air quality under the 2010 ~~proposed~~ guidelines. (*Significant and Unavoidable*) (Criteria G.b, G.d)

Criteria pollutant emissions from maximum daily use of construction equipment are quantified above (see Table V.G.4). The 2010 ~~Draft~~ BAAQMD CEQA Guidelines specifies that average daily construction emissions greater than 54 pounds per day of ROG, NO_x, and PM_{2.5}, or 82 pounds per day PM₁₀, would be a significant increase. To be conservative, this analysis shows maximum daily construction-phase emissions in Table V.G.4. Because of the considerable levels of construction activities, the construction emissions under the 2010 ~~Draft~~ BAAQMD CEQA Guidelines would be significant. Mitigation Measure M-AQ-3 that is identified above would reduce construction exhaust emissions.

Given current technologies, Mitigation Measure M-AQ-3 would achieve a feasible level of NO_x and ROG reductions, but this measure is unlikely to achieve a sufficient reduction in emissions to bring construction activities to a level below the daily thresholds for ROG, NO_x, PM₁₀, and PM_{2.5}. Construction emissions of PM₁₀ and PM_{2.5} would be significant according to the 2010 draft guidelines, after incorporating dust control strategies (see Impact AQ-1) and feasible strategies to reduce emissions in construction equipment exhaust (Mitigation Measure M-AQ-3). Therefore, the ~~potential~~ impacts of the Proposed Project with respect to the 2010 Draft BAAQMD CEQA Guidelines would be significant and unavoidable, even with implementation of mitigation.

Impact AQ-12: The Proposed Project could result in construction-related impacts of toxic air contaminants and adverse health effects under the 2010 proposed guidelines. (*Significant and Unavoidable*) (Criteria G.b, G.d)

The Proposed Project could increase cancer risk from exposure to emissions of DPM and other TACs associated with off-road construction equipment and on-road haul trucks used during construction of the Proposed Project, as these emissions would occur within 1,000 feet of existing residential units and educational facilities within and adjacent to the Project Site. The 2010 Draft BAAQMD CEQA Guidelines thresholds for TACs are similar to the current recommendations, with the addition of PM_{2.5} as a pollutant of health risk concern.

Emissions of PM_{2.5} from construction activities would occur at regionally significant levels, as described above. Additionally, health risks due to PM_{2.5} emissions would be considered significant under 2010 Draft BAAQMD CEQA Guidelines for construction activities causing concentrations of PM_{2.5} over an annualized threshold of 0.3 micrograms per cubic meter (µg/m³). This annualized threshold is applicable during any single year of construction activity, as opposed to the cancer risk threshold, which is based on lifetime exposure. Construction-related exhaust emissions and fugitive dust emissions would contribute to total PM_{2.5} concentrations at nearby receptors. With construction-related annual total PM_{2.5} emissions exceeding the BAAQMD threshold of 10 tons per year, local PM_{2.5} concentrations would likely be above the BAAQMD 2010 proposed threshold of 0.3 µg/m³ on an annualized basis during some years of construction, depending on the intensity of activity and proximity of receptors. Existing residential units and educational facilities within 1,000 feet of construction activities would be most likely to experience this impact.

The 2010 Draft BAAQMD CEQA Guidelines of ~~May 2010~~ include a “Draft Construction Health Risk Screening Table” that provides an approximate minimum offset distance for typical construction projects of various sizes.¹ For the phased and high-density development of the Proposed Project, up to about 40 acres could be under construction at any one time (given four major phases across the 152-acre Project Site). According to the ~~draft construction~~ screening approach tables, the minimum offset distance (buffer distance) to ensure that a sensitive receptor would have a less than significant impact would be 300 meters (984 feet). Existing and planned residential units and educational facilities within this distance would experience a ~~potentially~~ significant impact due to construction-related TAC and PM_{2.5}.

¹ BAAQMD, *Draft CEQA Guidelines, Screening Tables for Air Toxics Evaluation During Construction, Version 1.0*, May 2010.

Reducing this impact could involve reducing construction equipment emissions or providing sufficient offset distances between construction and occupied land uses. Although implementation of the construction emission control measures (including Mitigation Measure M-AQ-3) would reduce TAC, including DPM, exhaust emissions by implementing feasible controls and requiring up-to-date equipment, adverse TAC and PM_{2.5} health effects during construction would remain. Due to the high-density surroundings, individuals would occasionally be essentially adjacent to construction activity. It would be practically impossible to phase construction or restrict public access in such a manner to eliminate the potential risks to individuals occupying and visiting areas within 1,000 feet of the proposed construction activities. Due to uncertainty in quantifying the construction-related incremental cancer risk and non-cancer health impacts, the impact is considered significant and unavoidable under the 2010 Draft BAAQMD Guidelines for existing residential units and educational facilities within the Project Site and within 1,000 feet of the Proposed Project.

Impact AQ-13: The Proposed Project could result in operation-related impacts to regional air quality under the 2010 proposed guidelines. (*Significant and Unavoidable*) (Criteria G.b, G.d)

Table V.G.5 shows that the Proposed Project would result in an increase in criteria pollutant emissions that would be considered significant according to the 2010 proposed BAAQMD significance thresholds of ROG, NO_x, or PM_{2.5} greater than 54 pounds per day or PM₁₀ greater than 82 pounds per day. This impact would occur with the project incorporating feasible emission reduction measures within its extensive TDM program and Sustainability Plan. As such, this impact would be significant and unavoidable.

Impact AQ-14: The Proposed Project could result in operation-related impacts to CO ambient air quality standards under the 2010 proposed guidelines. (*Less than Significant*) (Criterion G.d)

The significance of localized CO emissions from mobile sources is determined via a screening assessment methodology from the ~~proposed~~ 2010 Draft BAAMQD CEQA Guidelines. According to the 2010 proposed approach, a project would result in a less-than-significant impact to localized CO concentrations if the following three criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans. The Draft II Transportation Impact Analysis for the Proposed Project indicates that the proposed Parkmerced Transportation Demand Management (TDM) Plan would be consistent with City and County of San Francisco agency policies (Fehr & Peers, February 2010).
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. The Draft II Transportation Impact Analysis for the Proposed Project indicates that the study intersections with the highest volumes would experience approximately 20,000 vehicles per peak hour under the Proposed Project and cumulative scenarios (Fehr & Peers, February 2010).
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon,

below-grade roadway). The Proposed Project would not introduce or increase traffic to these levels for any of the proposed underground parking garages.

This discussion of the screening criteria analysis indicates that violations of the state and federal one-hour and eight-hour standards for CO would not be expected at any study intersections during worst-case atmospheric conditions (wintertime conditions when CO concentrations are typically greatest). Therefore, the Proposed Project would continue to have a less than significant impact on local CO concentrations.

Impact AQ-15: The Proposed Project could result in operation-related impacts to sensitive receptors and substantial pollutant concentrations of toxic air contaminants under proposed 2010 guidelines. (*Significant and Unavoidable*) (Criterion G.d)

Local community risk and hazard impacts are a focus of the 2010 Draft BAAQMD Guidelines. The proposed 2010 guidelines emphasize a focus on “impacted communities” including Eastern San Francisco, which is not within or adjacent to the Project Site. Existing local air quality is affected by numerous sources of DPM, other TACs, and criteria pollutants, including traffic on roadways and some stationary sources within 1,000 feet that are permitted but not considered major under BAAQMD rules (see Setting). The primary major roadway within 1,000 feet of the Project Site is Highway 1 (Junipero Serra Boulevard and 19th Avenue).

Operation of the Proposed Project operation would cause increases in traffic emitting DPM, other TACs, and PM_{2.5} and would increase the density of residential uses in an area exposed to these emissions. The May 2010 Draft 2010 BAAQMD Thresholds include screening tables (updated October 2010) identifying potential cancer risk and non-cancer health hazards experienced by sensitive receptors along Highway 1 (Junipero Serra Boulevard and 19th Avenue).² According to the new BAAQMD screening tables, sensitive receptors are exposed to potentially significant concentrations of TAC and PM_{2.5} (exceeding 0.3 µg/m³) within 200 feet east or west of Highway 1. The new BAAQMD screening tables also indicate that the estimated incremental

lifetime cancer risk (70-year lifespan) due to traffic on Highway 1 is greater than 10 cases per

million people for locations within 200 400 feet east or west of the roadway. Health risks from all roadways are dominated by the effects of DPM, a TAC, and PM_{2.5}.

The Proposed Project would include new residential uses within 1,000 feet of existing stationary sources of TACs and within 200 400 feet of Highway 1, which could expose new sensitive receptors to concentrations of DPM, other TACs, and PM_{2.5} considered ~~potentially~~ significant under the proposed 2010 guidelines. To address this issue, ~~potential~~ mitigation could be provided in the form of air filtration for the impacted new residential development near traffic causing elevated DPM and PM_{2.5}. This would reduce the impact of exposing new receptors to elevated concentrations near roadways, but it would not avoid the impact of placing new receptors near Highway 1 and other existing sources of TACs typical of urban environments. Because of

² BAAQMD, *Draft CEQA Guidelines, San Francisco County Screening Tables for Roadways, October 2010 ~~May 2010~~*.

uncertain effectiveness and feasibility of implementing this measure, the impact under the 2010 Draft BAAQMD CEQA Guidelines would remain significant and unavoidable.

Mitigation Measure M-AQ-15: Mechanical Ventilation Systems for New Residential Uses.
~~Potential Mitigation Under the Proposed Guidelines for Health Effects from Roadways:~~

New residential uses within 200 ~~400~~ feet from the edge of the Project Site boundary along Junipero Serra Boulevard, including ramps on Brotherhood Way, 19th Avenue, or Brotherhood Way shall incorporate mechanical ventilation systems. If the project anticipates operable windows or other sources of infiltration of ambient air, the residences shall be provided with a central HVAC (heating, ventilation and air conditioning) system that includes high efficiency filters for particulates (MERV-13 or higher). The system should operate to maintain positive pressure within the building interior to prevent entrainment of outdoor air indoors. Alternatively, if the development limits infiltration through non-operable windows and other techniques, the residences shall be provided with a ventilation and filtration system that meets the following specifications: (1) ASHRAE MERV-13 supply air filters; (2) ≥ 1 air exchanges per hour of fresh outside filtered air; (3) ≥ 4 air exchanges / hour recirculation; and (4) ≤ 0.25 air exchanges per hour in unfiltered infiltration.

Impact AQ-16: The Proposed Project could result in impacts related to odors under ~~proposed~~ the 2010 guidelines. (*Less than Significant*) (*Criterion G.e*)

The 2010 ~~proposed~~ BAAQMD thresholds for odor impacts would not alter this discussion or the conclusion illustrated above that the Proposed Project would result in a less-than-significant impact related to odors.

Impact AQ-17: The Proposed Project could result in conflicts with adopted plans related to air quality under ~~proposed~~ the 2010 guidelines. (*Less than Significant*) (*Criterion G.a*)

The 2010 ~~proposed~~ BAAQMD thresholds of analysis for determining consistency with the most recently adopted Clean Air Plan would not alter this discussion or the conclusion illustrated above that the Proposed Project would not exceed the population or VMT assumptions contained in the CAP and that the project would implement applicable TCMS, resulting in a less-than-significant impact related ~~potential~~ conflicts with regional air quality management plans.

Cumulative air quality impacts under ~~proposed~~ 2010 guidelines. (*Criteria G.b, G.c, G.d*)

Impact AQ-18: The Proposed Project could result in cumulative construction impacts under ~~proposed~~ the 2010 guidelines. (*Significant and Unavoidable*)

Impact AQ-2 identifies the emission increases attributable to construction of the Proposed Project. As indicated in Table V.G.4, p. V.G.20, the Proposed Project would exceed the BAAQMD's adopted ~~proposed~~ significance thresholds for construction-related ROG, NO_x, PM₁₀, and PM_{2.5}. Consequently, under the 2010 ~~Draft~~ BAAQMD CEQA Guidelines, the project construction would result in a significant cumulative impact with regard to these emissions.

Impact AQ-19: The Proposed Project could result in cumulative criteria pollutant impacts under ~~proposed~~ 2010 guidelines. (*Significant and Unavoidable*)

Table V.G.5, p. V.G.28. identifies increases in the regional emission inventory that would be caused by the Proposed Project, with levels exceeding the 2010 proposed BAAQMD significance thresholds. According to the 2010 Draft BAAQMD CEQA Guidelines, the Proposed Project operational emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Additional analysis to assess cumulative impacts is deemed unnecessary by BAAQMD, and the Proposed Project would result in a significant cumulative impact with regard to ROG, NO_x, PM₁₀, and PM_{2.5} emissions.

Impact AQ-20: The Proposed Project could result in cumulative DPM, PM_{2.5}, and TAC impacts under ~~proposed~~ the 2010 guidelines. (*Significant and Unavoidable*)

The Proposed Project would cause DPM, PM_{2.5}, and TAC impacts having adverse health effects due to mobile source activity generated by the existing and proposed land uses, but the Proposed Project does not include any new major stationary sources of DPM, PM_{2.5}, or TACs. Any notable or non-exempt emissions from stationary sources such as the proposed boilers and cogeneration system would be subject to additional review including BAAQMD New Source Review requirements, which requires sources to install the best available control technology and be subject to health risk screening for toxic air contaminants (see Impact AQ-4).

Impact AQ-6 shows that, according to the 2010 Draft BAAQMD CEQA Guidelines, the operational impacts due to exposure of receptors to DPM and TACs would be significant and unavoidable because the Proposed Project would expose planned receptors to substantial concentrations of DPM or other TACs. With no additional foreseeable sources of DPM or TACs identified for the cumulative conditions, the cumulative impact would be similar to that described for the Proposed Project. Roadside PM_{2.5} exposure levels found by the analysis performed by the DPH would not exceed the ~~proposed~~ 2010 BAAQMD significance threshold for a cumulatively considerable contribution of PM_{2.5} at 0.8 µg/m³. No additional PM_{2.5} impacts are identified for the cumulative conditions. Cumulative projects in the area are not anticipated to contribute considerable emissions in addition to the project. However, due to health risks caused by existing sources of TACs including nearby major roadways (Highway 1), the project-related DPM, PM_{2.5}, and TAC exposures would result in a significant and unavoidable cumulative impact.