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Sent via email

Dear Josh Pollak:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Amazon 900 7th Street Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2026020145. The Project site previously operated as a Recology waste management services site for automotive uses. The Project proposes to demolish all existing structures on the site and construct a new 710,000 square-foot production, distribution, and repair building. This building would include approximately 706,000 square-feet of parcel delivery service as a "last mile"¹ delivery station for Amazon logistics. The Project site is located within the City and County of San Francisco (City), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial developments, such as the proposed last-mile delivery station, can result in high daily volumes of heavy-duty diesel truck traffic and the operation of on-site equipment (e.g., forklifts and yard tractors) that emit diesel particulate matter (diesel PM) and contribute to regional air pollution. Diesel PM is a carcinogen and is linked to cancer and respiratory health effects such as asthma.² The proposed Project would operate 24 hours per day, seven days a week. The operation would provide 503 spaces for vans and local delivery vehicles and is expected to accommodate approximately 300 delivery van drivers, 80 "flex" drivers, and 28 linehaul truck drivers every day.³ The community surrounding the Project site would be exposed to diesel PM during the construction and operation of the proposed industrial development.

¹ A last-mile delivery station is a specialized local facility serving as the final hub in the supply chain, where bulk shipments are received, sorted, and dispatched directly to customers.

² CARB. Summary: Diesel Particulate Matter Health Impacts. Accessible at:

<https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>

³ City and County of San Francisco. Notice of Preparation for the Amazon 900 7th Street Project. January 2026. 'Employees and Hours of Operation'. Accessible at:

<https://ceqanet.lci.ca.gov/2026020145/Attachment/a6SoER>

There are numerous existing and planned sensitive receptors located near the Project site. A five-story mixed-use residential building and a four-story commercial building are located north of Berry Street. Additionally, Founder's Hall of the California College of the Arts, which serves as student housing, is located south of Channel Street. The remainder of the California College of the Arts campus lies an additional block south, across Hopper Street and includes student housing. Additionally, the University of California, San Francisco (UCSF) Mission Bay Hospital is located 1,300 feet southeast of the Project site. Furthermore, Hiba Academy, a pre-kindergarten through fifth grade school, is planned to open in Fall 2026 at 99 Rhode Island, directly west of De Haro Street. Due to the Project's proximity to these existing and future sensitive receptors, CARB is concerned with the potential health impacts associated with the construction and operation of the Project.

These residences, hospital and future school are located near the Bayview Hunters Point/Southeast San Francisco community (Bayview), which has been designated as a disadvantaged community under Assembly Bill (AB) 617 (Garcia, Chapter 136, Statutes of 2017).⁴ To protect these receptors near the Project site from toxic diesel PM exposure, CARB staff urges the City to plan for the use of zero-emission technologies within the Project site as recommended in this letter.

The Project May Increase Exposure to Air Pollution for the Bayview Hunters Point/Southeast San Francisco AB 617 Community

The Project is located approximately a half of a mile north of the boundaries of the Bayview community. In 2023, CARB formally selected the Bayview community for the development of a Community Emissions Reduction Plan (CERP) under AB 617.⁵ This community was selected as a high priority for focused action due to its high cumulative exposure burden from mobile and stationary sources of air pollution, alongside longstanding environmental justice issues and health inequities. Community members have specifically identified emissions from truck traffic and freight movement activities both on the highways and local roads as primary sources of concern during the CERP development process.⁶

Given the proposed Project's expected operation hours and massive volume of continuous fleet operations, it is reasonably foreseeable that Project-related heavy-duty trucks and

⁴ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

⁵ CARB. Bayview Hunters Point/Southeast San Francisco. Overview. Accessible at: <https://ww2.arb.ca.gov/capp/com/cip/bayview-hunters-point-southeast-san-francisco>

⁶ BVHP/Southeast San Francisco Community Steering Committee Meeting, 2/17/26. Presentation available at: https://www.baaqmd.gov/~media/files/ab617-community-health/bayview-hunters-point/meetings/2026/021726-bvhp-mtg/final_bvhp_sesf-cerp-csc-meeting-24-pdf.pdf?rev=b79d8444ad184e59802b3e817cab6101&sc_lang=en

delivery vehicles will utilize regional transportation corridors (I-280 and US-101) that travel through or adjacent to the Bayview community. This traffic would generate toxic diesel PM and other criteria air pollutants, directly threatening to exacerbate the cumulative pollution burden in this environmental justice community.

The City must ensure the DEIR includes a robust analysis of all potential air quality and health risk impacts on the Bayview Hunters Point/Southeast San Francisco community resulting from the Project's mobile emissions. To align with the State's goals of reducing exposure in AB 617 communities, CARB strongly urges the City to require the implementation of all feasible mitigation measures, most notably the contractual requirements for a zero-emission delivery and linehaul fleet, to limit the Project's disproportionate impact on this overburdened neighborhood.

The DEIR Should Quantify and Mitigate the Potential Cancer Risks from Project Operation

The Project Overview states that the operation would include 28 linehaul trucks that will likely generate diesel-powered truck traffic along roadways adjacent to residential communities and schools; CARB urges the City to prepare a health risk assessment (HRA) for the project.⁷ The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including but not limited to, back-up generators, onsite diesel-powered equipment, and heavy-duty trucks. The HRA must specifically model the worst-case scenario for vehicle routing near sensitive receptors, particularly given the 24-hour operations window and internal vehicle queuing.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments).⁸ The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2025 Emission Factors model (EMFAC2025). Mobile emission factors can be easily obtained by running the EMFAC2025 Web Database:

<https://arb.ca.gov/emfac/>

According to the Project Overview Section of the NOP, the facility will handle "retail merchandise" but does not explicitly state the proposed uses would not include cold storage.⁹ Therefore, there is a possibility that trucks and trailers visiting the Project site would

⁷ City and County of San Francisco. Notice of Preparation for the Amazon 900 7th Street Project. January 2026. 'Project Overview'. Accessible at: <https://ceqanet.lci.ca.gov/2026020145/Attachment/a6SoER>

⁸ Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: <https://oehha.ca.gov/media/downloads/cnrr/2015guidancemanual.pdf>.

⁹ City and County of San Francisco. Notice of Preparation for the Amazon 900 7th Street Project. January 2026. 'Project Overview'. Accessible at: <https://ceqanet.lci.ca.gov/2026020145/Attachment/a6SoER>

Furthermore, the NOP notes that the 503 van parking spaces on Levels Two and Three would be "EV ready".¹³ While infrastructure is a necessary first step, CARB urges the City to require a project design feature or mitigation measure ensuring the contractual use of Zero-Emission Vehicles (ZEVs) for the fleet, rather than only providing the capability to charge them.

To further reduce diesel PM exposure and associated cancer risks during the operation of the Project, CARB urges the City to include all the air pollution reduction measures listed below:

- Include contractual language in tenant lease agreements requiring tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- Include contractual language in tenant lease agreements requiring future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Include contractual language in tenant lease agreements requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).¹⁴
- Include contractual language in tenant lease agreements requiring all heavy-duty trucks, entering or on the project site, to be zero-emission vehicles to the maximum extent feasible. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).¹⁵ Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.¹⁶
- Include contractual language in tenant lease agreements requiring the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,¹⁷

¹³ City and County of San Francisco. Notice of Preparation for the Amazon 900 7th Street Project. January 2026. 'Vehicle Parking'. Accessible at: <https://ceqanet.lci.ca.gov/2026020145/Attachment/a6SoER>

¹⁴ Clean Off-Road Equipment Voucher Incentive Project. Accessible at: <https://californiacore.org/how-to-participate/>

¹⁵ Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

¹⁶ Carl Moyer Program and Voucher Incentive Program. <https://ww2.arb.ca.gov/carl-moyer-program-apply>

¹⁷ In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://ww2.arb.ca.gov/our-work/programs/ttghg>

Advanced Clean Trucks Regulation,¹⁸ Clean Truck Check (Heavy-Duty Inspection and Maintenance Program),¹⁹ and the Statewide Truck and Bus Regulation.²⁰

- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.
- Include contractual language in tenant lease agreements, requiring the installing of vegetative walls²¹ or other effective barriers that separate loading docks and people living or working nearby.

The DEIR Should Quantify and Mitigate the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should be included in the air quality section of the DEIR and the Project's HRA. According to the Project, construction is anticipated to take over 18 months, beginning in 2028, which would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment.²² The OEHHA guidance recommends assessing cancer risks for construction Projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction. The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. To reduce

¹⁸ On June 25, 2020, CARB approved the Advanced Clean Trucks Regulation. The regulation requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 electric trucks in California by the end of 2030 and about 300,000 by 2035. CARB is expected to consider a fleet regulation in 2021 that would be compatible with the Advanced Clean Trucks regulation, requiring fleets to purchase a certain percentage of zero-emission trucks and vans for their fleet operations. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

¹⁹ CARB. Enforcement of Clean Truck Check HD I/M Regulation. Accessible at: <https://ww2.arb.ca.gov/es/our-work/programs/heavy-duty-diesel-inspection-periodic-smoke-inspection-program/about>

²⁰ The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>

²¹ Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>

²² City and County of San Francisco. Notice of Preparation for the Amazon 900 7th Street Project. January 2026. Page 20 - 'Construction Activities and Schedule'. Accessible at: <https://citypln-m-extnl.sfgov.org/External>

diesel PM exposure and associated cancer risks during the construction of the Project, CARB urges the City to include all the air pollution reduction measures listed below:

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near zero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 Final or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available.
- Consistent with the 2022 Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation (Adopted January 01, 2024), construction contracts must prohibit the addition of Tier 3 and older vehicles to fleets and mandate the phase-out of the oldest engines [Tiers 0, 1, and 2].²³
 - In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that emission reductions achieved are equal to or exceed that of a Tier 4 Final engine.
- In construction contracts, include language requiring the use of renewable diesel (R99 or R100) in all off-road diesel-powered equipment, consistent with the 2022 amendments to the Off-Road Regulation.²⁴
- In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be ZEV where feasible. If ZEVs are not feasible, trucks must be model year 2017 or

²³ CARB. In-Use Off-Road Diesel-Fueled Fleets Regulation. Accessible at: <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>

²⁴ CARB. Fact Sheet: Renewable Diesel Fuel Requirements. Accessible at: <https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-renewable-diesel-fuel-requirements>

later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard.²⁵

- In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Conclusion

Given the Project's location near the AB 617 designated Bayview and other surrounding urban communities, the City has a critical responsibility to ensure its development does not further burden residents in the Bayview community with toxic air pollution. To this end, the Project should serve as a model for modern, zero-emission logistics and commercial development. CARB strongly urges the City and the applicant to incorporate the emission reduction measures provided in this letter.

Given the breadth and scope of Projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to respond to all issues associated with a Project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

²⁵ In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards>

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Alejandro (Alex) Sanchez, Air Pollution Specialist via email at alex.sanchez@arb.ca.gov.

Sincerely,



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