

10 SVN, LLC
530 Bush Street, Suite 800
San Francisco CA, 94108

Anny Huang
Manager, Emission Inventory
Analysis Section
California Air Resources Board
Air Quality Planning and Science
Division
P.O. Box 2815
Sacramento, CA 95812

December 5, 2017

10 South Van Ness Project Greenhouse Gas Emissions Offset Commitment Approach

Dear Ms. Huang,

This letter supports the Assembly Bill (AB) 900, Jobs and Economic Improvement through Environmental Leadership Act of 2011 application filed on October 4, 2017, by the Project Sponsor (Applicant), 10 SVN, LLC, for the 10 South Van Ness Mixed-Use Project (Project). The Planning Department from the City and County of San Francisco is the lead agency.

The Applicant submitted the application seeking certification of the Project as an Environmental Leadership Development Project (ELDP) pursuant to AB 900. The project has committed to meeting the requirements set forth in California Public Resources Code Section 21183 (c), which requires that the Project demonstrate that it will not result in any net greenhouse gas (GHG) emissions and achieves a 10 percent higher standard for transportation efficiency than comparable projects.

The Applicant has committed to no net increase in construction and operation-related GHG emissions. Consistent with policy recommendations included in CARB's Proposed 2017 Climate Change Scoping Plan Update¹, while offsets are a potential way to mitigate GHG emissions, other options will continue to be explored as well to the extent feasible, with the following order of preference: (1) project design feature/on-site reduction measures; (2) off-site local reductions; (3) off-site regional reductions, and (4) offset credits issued by a recognized and reputable carbon registry. To the extent offsets are used to mitigate GHG emissions, prior to issuance or any Certificate of Occupancy for any building in the project, the project sponsor or its successor shall enter into one or more contracts to purchase carbon credits issued by a recognized and reputable carbon registry, which contract, together with any previous contracts, shall evidence the purchase of carbon credits in an amount sufficient to offset the operational emissions attributable to each building constructed within the project over the analysis horizon of 30 years.

¹ Proposed 2017 Climate Change Scoping Plan Update is available at: <https://www.arb.ca.gov/cc/scopingplan/revised2017spsu.pdf>

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Prior to execution of the contract(s), the Applicant shall provide the lead agency (the City and County of San Francisco) a calculation of the net additional operational GHG emissions according to the methodology followed in the *California Assembly Bill 900 Greenhouse Gas Analysis for the 10 South Van Ness Mixed-Use Project* document. The Applicant has also agreed to promptly submit copies of executed contracts for purchased carbon credits to CARB and to the Governor's office. The commitments to enter into contracts to offset net additional GHG emissions will be incorporated as a condition of project approval under the Public Resources Code sec. 21183(d), which is binding and enforceable by the lead agency.

Sincerely,
10 SVN, LLC,
a Delaware limited liability company

By: _____
Adam Tartakovsky
Vice President
T: 415.527.9742
E: atartakovsky@crescentheights.com