



September 21, 2020

To: Bay Area Air Quality Management District, Attention Veronica Eady, Senior Deputy Executive Officer
From: Bayview Hunters Point Community Advocates and the Marie Harrison Community Foundation

RE: AB617 COMMUNITY SELF-NOMINATION SUBMITTAL FOR BAYVIEW HUNTERS POINT

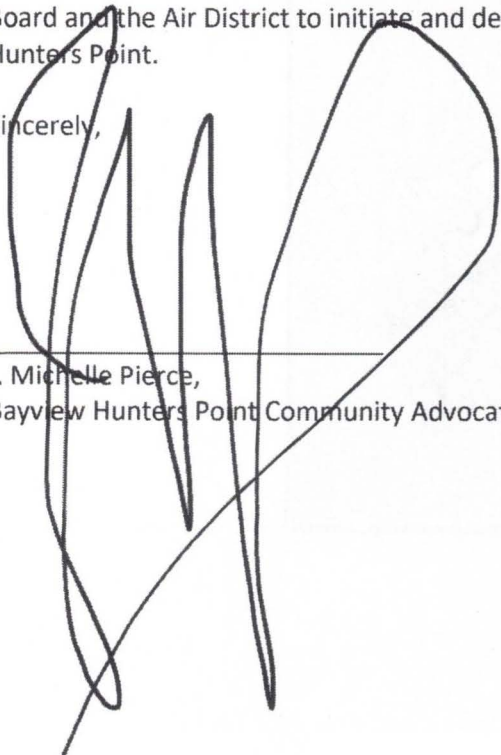
Dear Ms. Eady.

On behalf of the Bayview Hunters Point Community Advocates and the Marie Harrison Community Foundation, we are self-nominating and requesting that our community, the greater Bayview Hunters Point (BVHP) area in Southeast San Francisco, be selected for the next round of Community Emissions Reduction Planning (CERP) per AB617 for 2023.

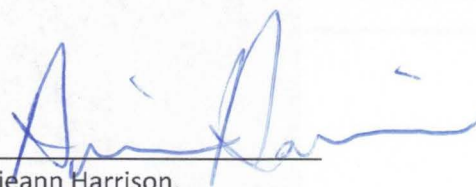
Below please find attached a description of the proposed preliminary boundaries for our intended CERP area; background on the BVHP community, the experience of air pollution impacts on the community, and a description of key on-going pollution concerns including air modeling data. Finally, we are also including a summary of the long-standing work our groups have been leading in the BVHP including ongoing community engagement, organizing and outreach to address air pollution and community health concerns.

Based on our collective track records working from the community and for the community, the wealth of environmental justice, health, and organizing expertise we bring, and our established working relations with the Air District and City/County of San Francisco, our two groups are proposing to be the co-leads of this process. We look forward to working collaboratively with the California Air Resources Board and the Air District to initiate and develop a Community Emissions Reduction Plan for Bayview Hunters Point.

Sincerely,



J. Michelle Pierce,
Bayview Hunters Point Community Advocates



Ariann Harrison,
Marie Harrison Community Foundation

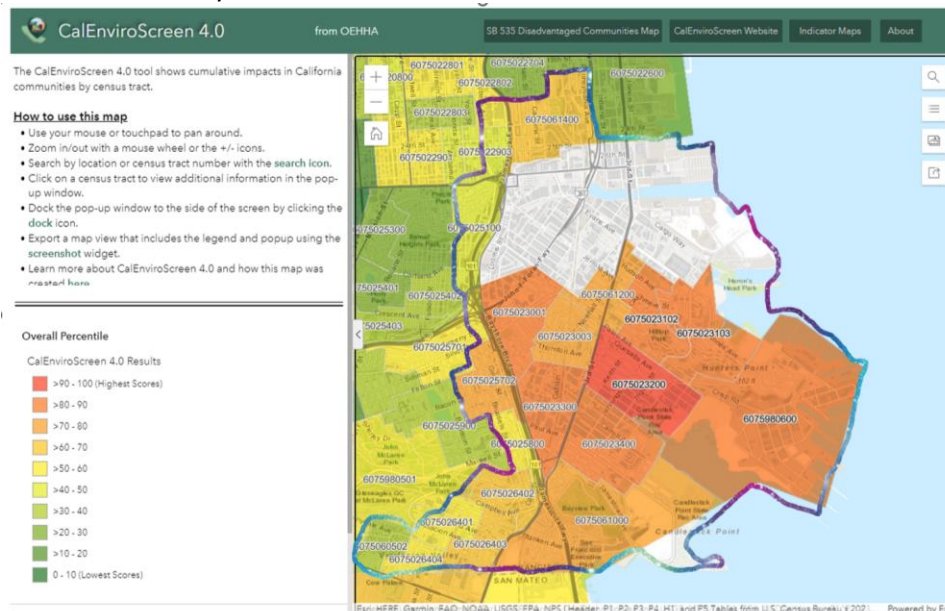
Community Location and Boundaries

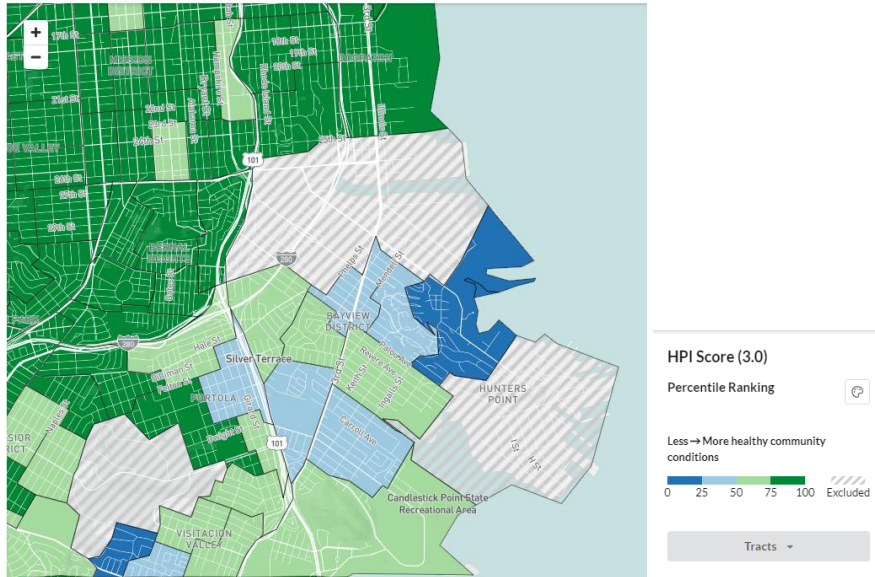
The Bayview Hunter’s Point (BVHP) community is a formal district in Southeast San Francisco bordering the San Francisco Bay to the East. BVHP is surrounded by Potrero Hill to the North, Excelsior to the West, and Visitacion Valley to the southwest. Most of this area is within San Francisco’s Board of Supervisor District 10.



Based on State of California environmental indicator maps, we have identified 17 census tracts in and around BVHP for a proposed preliminary CERP boundary. Eleven of these are within the formal BVHP district (as designated by City). There are six other adjacent census tracts to BVHP we are including for consideration for our preliminary CERP boundaries that include portions of Potrero Hill, Excelsior, Little Hollywood, and Visitacion Valley.

The CalEnviroScreen (CES) 4.0 map (below) clearly shows that the greater BVHP community suffers a disproportionate burden and exposure to air pollution and health inequities with some of the highest reporting census tracts in the region. (Note the blank census tracts on the map corresponding with the Cesar Chavez Industrial Areas are due to lack of census data collected for non-residential industrial areas). The California Healthy Places Index (HPI) 3.0 map (also below) confirms, from a different set of indicators, that the least-healthy places in the region are concentrated in the BVHP and some adjacent census tracts areas in the Excelsior as well as Visitacion Valley.

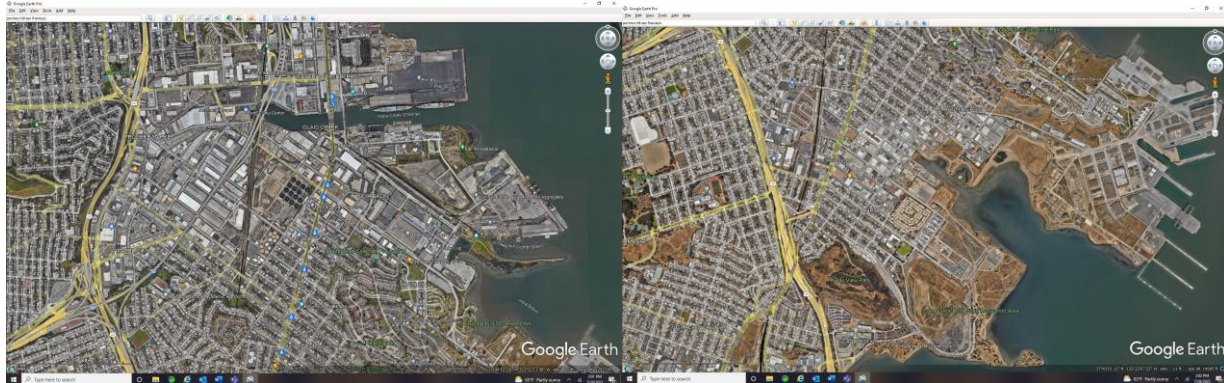




Census Tracts for Preliminary CERP Boundary

| Census Tracts | CES 4.0 | HPI | Notes |
|---|-----------|---------------------|--|
| 607-502-3200 | 90-100 | Light green (50-75) | Bordered by 3 rd , Palau Ave., to Yosemite Slough |
| 607-502 | No number | No color | Cesar Chavez Industrial areas |
| 607-502-3001 | 80-90 | Light green (50-75) | |
| 607-502-3300 | 80-90 | Light blue (25-50) | |
| 607-502-3400 | 80-90 | Light blue (25-50) | Study Area of Thompkins et al/around Carroll Street |
| 607-502-3102 | 80-90 | Light blue (25-50) | Hilltop |
| 607-502-3103 | 80-90 | Dark blue (0-25) | |
| 607-598-0600 | 80-90 | No color | Naval Shipyard |
| 607-506-1000 | 70-80 | Light green (50-75) | Candlestick area and Little Hollywood |
| 607-502-3003 | 70-80 | Light green (50-75) | |
| 607-506-1200 | 70-80 | Light blue (25-50) | |
| Outlier Areas for on-going Consideration | | | |
| 607-502-5702 | 70-80 | Light blue (25-50) | In D9 – Portola Area. Around Bacon Street – mostly residential |
| 607-502-6402 | 60-70 | Light green (50-75) | Vis Valley East along freeway |
| 607-502-6403 | 60-70 | Light green (50-75) | Vis Valley East along freeway |
| 506—0502?? | 30-40 | Dark blue (0-25) | Sunnydale projects |
| 502-6404?? | 50-60 | Light blue (25-50) | Vis Valley West |
| 607-506-1400 | 70-80 | Dark green (75-100) | Sits b/w two freeways, includes Potrero Hill housing project areas at edge (new phases of Rebuild Potrero at 25 th /26 th /Connecticut, with other phases to be built by 2029 replacing old Potrero Terrace and Annex. |

Aerial views of the greater BVHP community (Google Earth):



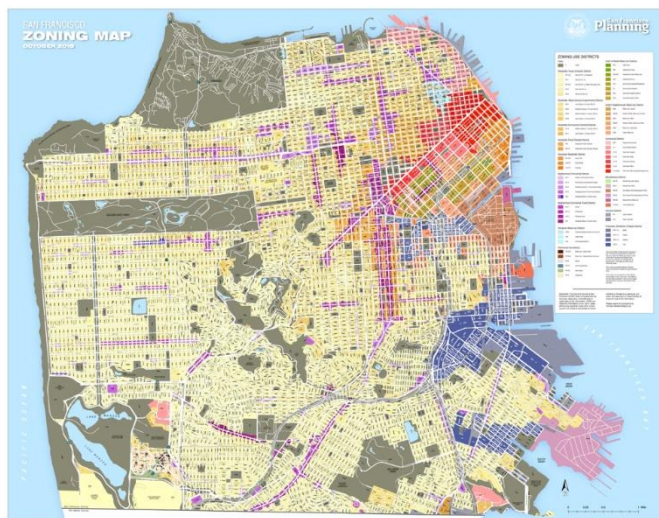
Description of the BVHP Community

The community for the proposed CERP is focused on the Bayview Hunters Point Neighborhood District and portions of adjacent areas – Portrero Hill, the site of the former Terrace Housing project and Visitacion Valley, known for the Sunnyside Housing projects. This community is bisected by the commercial oriented Third Street corridor and straddles two busy freeways (the I-280 and the I-101) that bring freight trucks and high volumes of commuter traffic between the South Peninsula and downtown San Francisco. BVHP, in general, took on its contemporary industrial and worker housing character amidst the public disinvestment and siting of hazardous uses that accelerated post-WWII. With the lure of the Great Migration pulling folks from the South to work in the shipyards, the BVHP community grew to become predominantly African American with a focus for several generations around the bustling commercial corridor of Third Street and the shipyard. More recently, with influxes of Asian Americans AAPI communities as well as greater Latinx folks, the community has become very multi-racial and multi-ethnic.

Over the last half-century, BVHP has unfortunately come to be known as the “forgotten neighborhood” of San Francisco, a community rife with poverty and violence, and a historically disadvantaged environment justice community whose activists have been on the frontlines of notorious battles such as shutting the PG&E plant and fighting the Naval Shipyard’s radioactive waste contamination resulting from the negligent clean-up of this superfund site. The Hunters Point radiological defense lab and naval shipyard repair facility closed in 1974 but became a notorious site for continuing contamination and community exposures to legacy cancer-causing pollutants that are exacerbated by windblown dust and on-going re-development efforts. Much of the existing southeast shoreline was created by landfill prior to the development of modern environmental regulations and standards and the soils in these industrial areas, along with the naturally occurring asbestos deposits in the rocks, pose hazardous conditions to the community. This legacy of environmental racism and the spirit of activism still animate our community. We acknowledge and are continued to be inspired by those who stood up and those who have given their lives in this fight, including Ms. Marie Harrison.

From a land-use perspective, BVHP has a red-lined impacted pattern with industry and housing as the dominant uses. The conflict between housing and industry are an issue in the following areas: the eastern edge of the South Basin industrial area, which abuts the Candlestick Point State Park and former stadium; the Yosemite Slough; the Alice Griffith public housing project; and areas that experience a heavy circulation of industrial truck traffic through neighborhood residential and commercial districts.

Truck traffic and diesel idling continue to be problems that our groups have directly addressed through various outreach campaigns with CARB and the Air District. Ingalls and Carroll Avenues are existing truck routes, and we note that there are efforts to develop new housing in these areas which must be adequately insulated from the adverse effects of heavy traffic. The industrial areas surrounding the maritime operations (break bulk, bulk cargo, ship repair/dry dock – piers 70, 80, 90, 92, 94 and 96) and the shipyard need to have policies in place to minimize impacts from trucks on the surrounding residential areas.



Zoning and land use map for the City of San Francisco (left). The grey, purple and dark blue designate land uses areas of industrial, utility, and transportation related activities. Note that these areas are in direct proximity to residential (yellow) areas interspersed into three main “fingers”, the middle one sticking into the Naval Shipyard. The community district has varying topography and can be exposed to very swirling winds that bring and intensify dust and other pollutants mixing with the emanating pollution from industrial sources and traffic as well as illegal dumping such as along the eastern industrial edge.

BVHP has a high density of sensitive populations including children and the elderly at schools, hospitals, and day care centers located near mobile and stationary emissions sources of concern, including roadways. These sensitive receptors have been burdened with disproportionate health impacts from the chronic and acute pollution. Health impacts and conditions from existent air pollution include preventable health problems such as increased illness and premature death from asthma, bronchitis, emphysema, pneumonia, coronary heart disease, abnormal heart rhythms, congestive heart failure, and stroke. People exposed to poor air quality from roadway-generated pollution have increased incidences of severe health problems including higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death.

Our Community’s Health Equity Challenge

Policymakers regularly dismiss the deep harms inflicted by environmental racism on human and public health as anecdotes, erasing decades of pollution or contamination. This stance is sustained and amplified by the institutional dimensions of systemic racism, accepting the premise that “economic development” or other erratically defined benefits in the built environment are worth sacrificing the lives, health, and territories of (some) citizens. In these circles, even *noticing* these sacrifices prompts dismissal as a naïve activist who doesn’t understand realpolitik. Yet for communities at the frontlines — often Black, Indigenous, or Latinx and already facing crushing inequities and exclusion from full citizenship — environmentally unjust practices pose real, measurable, and ongoing existential threats.

According to the 2017 *American Community Survey* (<https://censusreporter.org/profiles/86000US94124-94124/>) the Bayview-Hunters Point neighborhood of San Francisco (zip code 94124) has a population of 35,492. The population is 28% Black, 35% Asian, and 24% Hispanic. The per capita income in the neighborhood is \$26,061, roughly half of the per capita income in the San Francisco-Oakland-Hayward metropolitan area (\$48,538). 21.3% of people in the neighborhood live below the poverty line, more than double the rate of the San Francisco-Oakland-Hayward metropolitan area. In addition, 26% of the population is 19 years old or younger, a higher percentage than almost every other neighborhood in San Francisco. According to the San Francisco Community Health Needs Assessment at www.sfhip.org: the Bayview-Hunters Point neighborhood has one of the highest mortality rates, and one of the lowest life expectancies, in all of San Francisco. As mentioned above, the neighborhood has substantially higher rates of emergency room visits and hospitalizations for asthma and chronic obstructive pulmonary disease than any City neighborhood. Black and Latinx residents, especially in the City's southeast neighborhoods, have higher rates of cancer and numerous other illnesses.

Bayview-Hunters Point has also long served as San Francisco's "dumping ground," home to a significant concentration of hazardous waste facilities. It is home to one of the most polluted Superfund sites in the country that is also the largest redevelopment project in San Francisco's history; the botched cleanup of that site clearly correlates with higher cancer and disease rates in the neighborhood. 80% of the city's sewage is treated at Bayview's wastewater plant; all the City's garbage and recycling is processed here. These are not unrelated facts. We don't raise this history because it is unique, but because it is common. We are far from the only community forced into adversarial relationships with policymakers committed to urban transformation packed with complex histories of power, racism, and inequality. As a result, we must believe that community-based and community-led advocacy is critical to pursuing the goals of environmental and health justice; indeed, we have no alternative. Our health equity challenge is to reverse our adverse health outcomes by finally cleaning up our environment. Researchers have developed tools for analyzing the health studies, scientific data, and regulatory measures that underpin environmental assessments. At the same time, grass roots environmental-justice organizers can tell you that local residents are the experts about their own neighborhoods, conditions, and exposures to contaminants. Our work requires an interdisciplinary approach, built on trust and exchanges of knowledge and experience.

Community-based, community-led efforts are critically important to a neighborhood's self-sustaining future, to develop research and practices that co-produce knowledge *with* communities instead of merely extracting data *from* them. We seek to create an evidence-based policy platform for environmental justice in Bayview-Hunters Point, combining site-based documentation of systemic racism with measured environmental impacts on public health and health outcomes, along with training on policy creation and advocacy. Through this shared work and the new community leaders who participate in it, we will support longer, healthier lives in our vulnerable neighborhood.

A Description of Our Specific Air Pollution Concerns

Over the last decades of increased environmental justice and health equity activism our community has been especially concerned about the legacy pollution (including radiation) from the Naval Shipyard, dust and asbestos from on-going large-scale redevelopment, perennial odors and emissions from the Waste treatment facility, chronic diesel truck idling, and prominent odors from facilities such as Recology and Darling Industries Rendering.

Based on the Air District's "Permitted Stationary Source Risk and Hazards Map" there are over 81 permitted facilities in the preliminary boundary area (and an undisclosed number of hidden hazards) unpermitted sources). Key stationary sources of pollution exposure in the BVHP area include big institutional uses (SF General hospital, SE Community College) to numerous gas stations, auto body shops and repair, trucking companies; numerous industrial and utility uses such as waste recycling center, concrete recycling, the Southeast Wastewater Treatment Facility, concrete, and aggregate operations, along with smaller sheet metal, iron, maritime, and other associated industrial uses. The largest mobile sources of pollution are from the I-280 and I-101 freeways and the steady vehicular and truck traffic they carry through the community. The congestion along these freeways also impacts our community from the constant braking, idling causes bits of tire and brake pads to erode and drift in atmosphere and disproportionately burdens the surrounding neighborhoods.

We also acknowledge the huge concern with indoor air pollution exposure due to proximity to industries and freeways. The SF Health Department (2018 report: *In-House Pollution Exposure at Houses Near High Trafficked Roadways*) states:

"The higher prevalence of industrial businesses and proximity to local freeways results in higher air pollution conditions in eastern San Francisco compared to its western counterparts. Air pollution produced from these sources can infiltrate the indoor air environment through openings, joints, cracks, open windows and doors, and as makeup air from mechanical ventilation systems. People exposed to poor air quality from roadway-generated pollution have increased incidences of severe health problems including higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death.

According to an article in the *San Francisco Chronicle* (Rachel Swan, 9/4/2017) "Statistics from the California Office of Statewide Health Planning and Development show that between 2013 and 2015, the Bayview – which is surrounded by freeways, cement plants and other industry – has 93 asthma emergency room visits for every 10,000 people" which is significantly higher than other neighborhoods, especially those insulated from freeways and major streets.

Existing Monitoring Data

We understand from the Air District that while air monitoring coverage is spotty (in terms of pollutants, geography, and duration) the existent air monitoring results can characterize the high air pollution exposure burden experienced by the community well enough to inform a community emissions reduction program development. In a meeting with our two groups, Air District technical staff recently provided the following community-specific summaries of available monitoring data for BVHP as a high-level overview of insights from existing current/historical monitoring in the area. Some key takeaways were:

- Long-term trends show that levels at the San Francisco monitoring site at Arkansas St. and 16th St. are similar to or higher than levels at monitoring sites located within or nearby other communities experiencing disproportionate impacts from air pollution.
- The long-term PM_{2.5} trends from 2012-2021 also show that there has been less overall improvement in recent years.

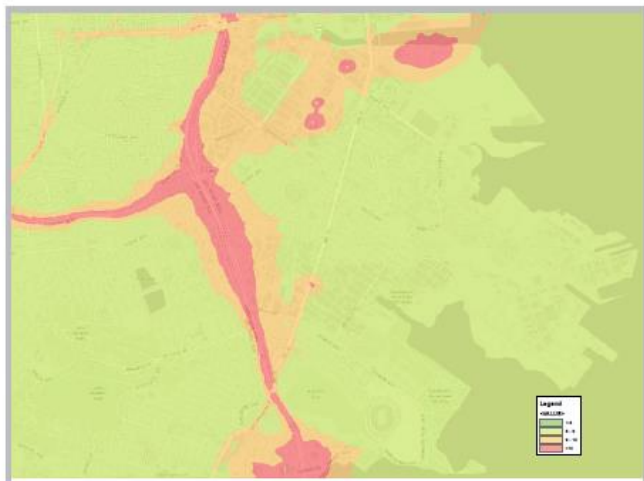
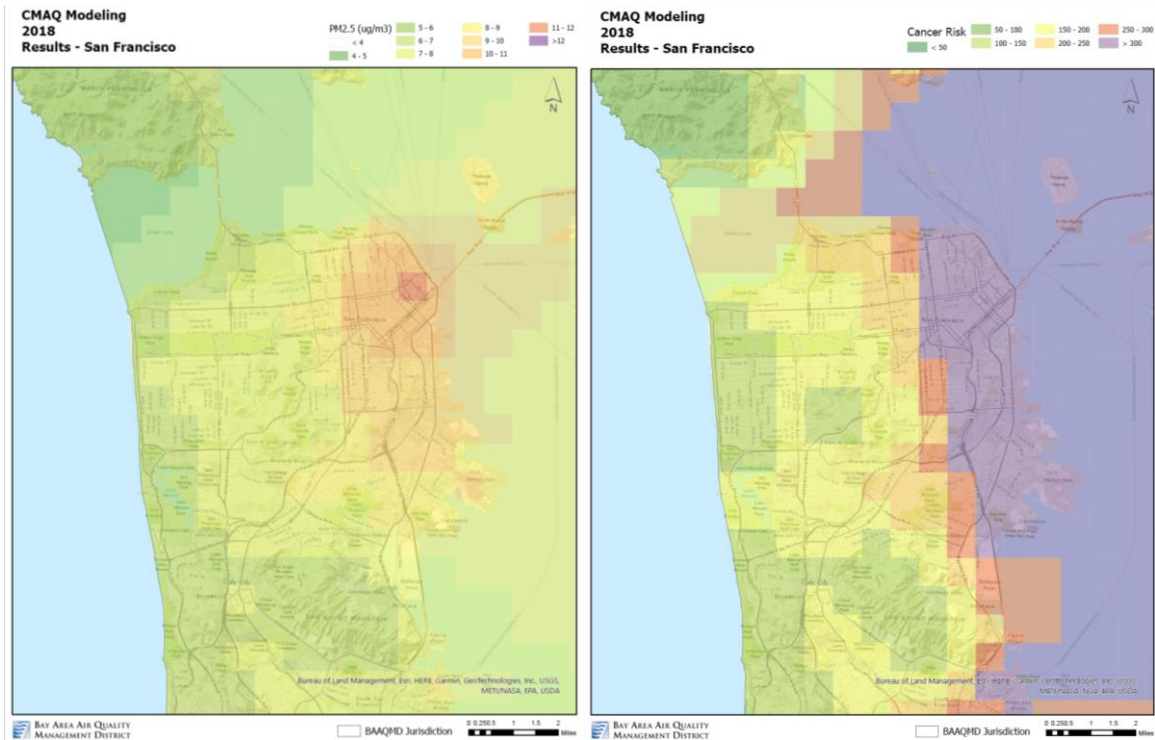
- While PM_{2.5} levels are below the National Ambient Air Quality Standards (NAAQS), we know the PM_{2.5} NAAQS are not health protective, especially for populations experiencing cumulative impacts. Therefore, reducing the concentrations of PM_{2.5} further is warranted.
- Air District expects that pollutant concentrations, especially over short time periods, could be higher at times within Bayview Hunters Point than those measured at the San Francisco monitoring site and those elevated concentrations may vary significantly from place-to-place depending on proximity to nearby sources and the wind speed and direction.
- A review of the data shows that elevated levels of PM_{2.5} can occur throughout the year.
- There are multiple different types of meteorological patterns (wind speed, wind direction, inversions, etc.) that occur throughout the year that can affect which sources of air pollution contribute to elevated levels of PM_{2.5} in different places.
- Levels of Volatile Organic Compounds (VOCs) are similar compared to regional averages, except for two compounds (Ethyl Alcohol and Methylethylketone), which are slightly higher than other sites in the Bay Area.
- Data from additional sources (previous short-term monitoring studies, Aclima) highlight the potential for short-duration or intermittent elevated concentration levels of PM_{2.5}, NO₂, and VOCs that may occur at different locations throughout the community during different times of the year.

The summary also states: “These available air monitoring data confirms that there is community exposure to air pollutants that is likely exacerbated by emissions from sources within the community and that these impacts affect the health of people living and spending time in Bayview Hunters Point.”

Air District staff further concurs that “the existing air monitoring data supports the development of a Community Emission Reduction Plan to reduce emissions and exposure to all sources of air pollution, especially considering the additional cumulative impacts the community experiences from nearby sources (commercial, utility, industrial, mobile, etc.). Staff concluded by acknowledging “that air monitoring data cannot by itself completely characterize the extent of air pollution issues... and a multi-faceted approach is needed - most important of which is the lived experience of Bayview Hunters Point community members.”

Existing Modeling Data

Below are two Congestion Mitigation and Air Quality (CMAQ) 1 km x 1km grid data and maps based on air quality modeling quantifying air pollution exposure burden from the Air District’s latest 2018 emission inventory program of average concentrations of PM 2.5 and Toxics Cancer Risk.

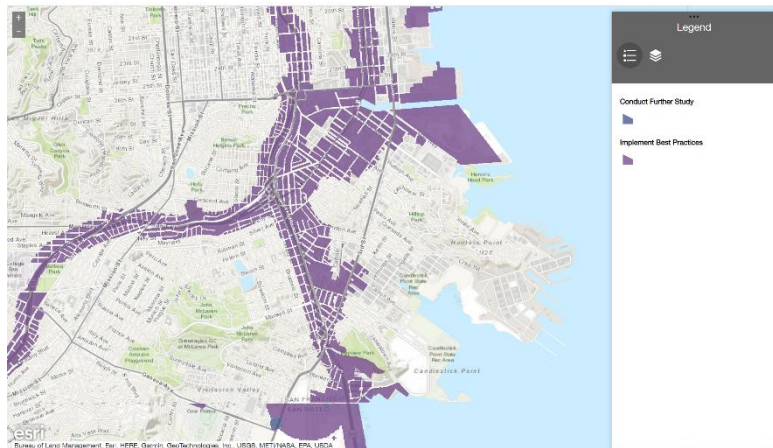


The modeled PM_{2.5} results shows, along with the highly urbanized and transportation intensive Eastern San Francisco in general, that there are high and unhealthy concentrations (9-10 mg/m³) of fine particulate matter in the areas around and between the two freeways from the downtown core through the industrial and residential areas of central BVHP and inclusive of the neighborhoods overlooking and adjacent to the Shipyard. A closer view of PM_{2.5} (see 2018 map to left) from the County Health Department reveals

average PM_{2.5} levels that exceed 10 mg/m³ along the freeway corridors in Bayview Hunters Point and Portero Hill and pockets of industrial areas along Islais Creek (Pier 92) and industrial areas south of candlestick Point.

In addition to the well-documented dangers from PM_{2.5} exposure, the most prominent pollution story, impacting so many families, centers on the elevated toxic risks for cancer. Here almost the entire proposed BVHP CERP area is within the highest ranges of greater than 300 up to 600 in a million and above cancer risk. Much of this we attribute to diesel particulate matter and industrial toxics, and we look to the Air District and CARB to help us characterize these emissions and their sources. We note too that this modeled CMAQ data is based on *known* permitted sources, and we have already documented numerous “hidden hazards” and unpermitted sources that are operating within the area (See Dr. Ray Tompkins et al, 2019. *Hidden Hazards of Bayview Hunters Point*, Phase 1 Report and Ground-Truthing

Study for Bayview Hunters Point). Furthermore, the daily pollution exposure from dust, asbestos, idling diesel trucks, and other toxics and radiation exposure also need to be accounted (please see testimonies, studies, and assessments also conducted via the interagency IVAN process that has been operating in BVHP since 2017 and which CARB and the Air District are regular participants and sponsors).



These CMAQ data, collected pursuant to the Air District mandate to maintain National Ambient Air Quality Standards, also serve to target cost-effective clean air strategies and to maximize public health benefits. In fact, the patterns of pollution are nothing new and have been reflected by the Air District's CARE (Community Air Risk Evaluation Program) which, since 2009 designated BVHP as an "impacted" community and "overburdened" community. This

designation was further emphasized in the Air District's 2011 "Planning Healthy Places" mapping highlighting key areas along the freeways and industrial areas to implement "best practices." Along with the many studies and measurements, there have been some positive movements: The SF County Health Department in 2000 did implement (through Article 38) an "Air Pollution Exposure Zone" that covers most of BVHP while the Air District began (starting July 1, 2022) setting more stringent health risk limits and public noticing requirements for projects located in designated "overburdened communities" (see *Regulation 2-1-243*). However much more needs to be done as far as community planning and developing implementable mitigation strategies given the still clearly high chronic and acute pollution levels. We seek to build from specific pollution planning tactics that other AB617 communities in the Bay Area and across the State have developed as part of our planning and mitigation interventions.

About Our Co-Lead Groups

Bayview Hunters Point Community Advocates

Bayview Hunters Point Community Advocates, founded in 1994, is governed and operated by long-term members of the Bayview-Hunters Point neighborhood in San Francisco. Our programs combine community organizing with education, advocacy, and direct services. We seek to build the neighborhood's capacity as a self-determining, fully autonomous force for social change in today's San Francisco. The organization is structured as a traditional non-profit organization, with a staff and a governing Board of Directors. But our Board is an activist board, not a fundraising board. And we seek guidance in all our programs from our Southeast Community Council – residents from diverse Bayview neighborhoods (90% BIPOC), paid a stipend for their participation, serving as new leaders in the neighborhood and as advocates for shared work throughout our communities.

Bayview Hunters Point Community Advocates created a Southeast Community Council to give local leaders and their constituencies a stronger platform for building neighborhood power; the Council receives training in research and analysis tools and are structured along the lines of the City's Board of Supervisors. In short, we founded the Council to hold both local policymakers and us accountable. The

Council is quickly growing as an independent voice in community affairs, and we are proud to see that development.

Other key projects related to this effort include our collaborative public health projects designed with authentic community participation from the ground up:

- Our Community Toxic Index trains and employs community members to document and map environmental exposures.
- Our branch of the Umoja Health initiative relies on peer-to-peer outreach to bring public health outreach and services to underserved Black communities.
- The Health Equity Advocates and Leaders in Environmental Research and Science (HEALERS) program utilizes peer-to-peer education and training for policy advocacy to address local inequities surrounding breast cancer outcomes.

Simply put, all our work and partnerships are co-created with the diverse and underserved communities of Bayview-Hunters Point, often bringing public agencies in to support the collective vision of local residents. Our work has always connected residents with environmental justice issues in our neighborhood, seeking to increase community participation in environmental decision-making, and to build skills in the community to support a cleaner environmental future. Our projects are capacity-building initiatives for the organization and the neighborhood; the local power we build in Bayview can model practices to make community relationships less extractive and more collaborative.

The Marie Harrison Community Foundation

The Marie Harrison Community Foundation (MHCF) for environmental and social justice was founded in 2019 to honor the legacy, advocacy and dedication of Marie Harrison, the “Mother of the Environmental Justice movement.” The foundation serves as a platform to develop the next generation of environmental and social justice leaders, mobilize grassroots community power and develop campaigns to advance community-designed solutions and policies to long-standing health, economic and environmental issues in Bayview Hunters Point. Most recently, the foundation launched the #CanWeLive campaign, a youth-driven effort to amplify the community’s call for full clean-up of the numerous Brownfield and Superfund Sites in the district as well advocate for full reparations and lifetime medical services for residents, ex-residents and workers who disproportionately suffer poor health outcomes due to toxic Shipyard exposures.

MHCF has experience developing programs and conducting outreach in the community including creating the Marie Harrison Youth Scholarship program, distributing air filters to unsheltered communities at Pier 94 in San Francisco and Pollution Patrol - a ground truthing team - illegal dumping in District 10. The foundation has built long-term relationships with the Air District and participating in meetings and enforcement issues. As a result, MHCF has gained deep leadership and expertise around engaging the Air District with regulatory rulemaking, enforcement, planning processes and programs.

The MHCF is continuing our role in strongly advocating for a Community Emissions Reduction Plan process for Bayview Hunters Point. Our director, Arieann Harrison, daughter of Marie Harrison, has become an uncompromising spokesperson and community leader in her own right for environmental justice. Her story and the disturbing results of her recent biomonitoring study showing the extent of heavy metal toxins present in her body from a lifetime exposure to community sources can be found here: <https://sfbayview.com/2022/06/arienna-harrison-continues-her-mothers-environmental-justice-advocacy-for-bayview-hunters-point/>.