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August 28, 2019

Angela Calvillo
Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

Re: India Basin Mixed Use Project

Dear Ms. Calvillo:

Bay Area Air Quality Management District (Air District) staff has met with San Francisco Planning staff regarding the India Basin Mixed Use Project (Project) and air quality and health issues in Eastern San Francisco. These discussions focused on the Project's potential air quality impacts and effective measures to minimize exposure to fine particulate matter (PM_{2.5}) from the Project's construction and operation activities. We are writing to offer to work with the City of San Francisco on minimizing impact from the Project as well as on a comprehensive, community-scale, air quality plan for vulnerable neighborhoods in eastern San Francisco.

PM_{2.5} is by far the most harmful air pollutant in the Air District's jurisdiction in terms of public health. Scientific evidence indicates that both long-term and short-term exposure to PM_{2.5} can cause a wide range of health effects, such as aggravating asthma, bronchitis, respiratory and cardio-vascular symptoms, and contributing to heart attacks and death.

Bayview-Hunters Point and other parts of eastern San Francisco experience higher PM_{2.5} levels than much of the region. The combination of higher pollution levels and poor health conditions led the Air District to highlight eastern San Francisco as an impacted community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Assembly Bill (AB) 617 Community Health Protection Program. The Air District has identified eastern San Francisco as a high priority community for the development of a community-developed, community-specific air quality plan under AB 617. This plan would be a good mechanism for considering and identifying strategies to reduce sources of PM_{2.5} impacting these communities, including the India Basin Mixed Use Project.

Because the Project is located in a health-vulnerable zip code, the City of San Francisco used a more stringent benchmark for analyzing PM_{2.5} impacts than State or Federal PM_{2.5} health standards.¹ Air District staff's review of the City's analysis identified that the combination of this stringent benchmark, in combination with conservative modeling assumptions, indicated that Project operations could result in

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¹ California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) health-based annual standard for PM_{2.5} is 12 µg/m³ (micrograms per cubic meter). The City of San Francisco CEQA significance threshold for this Project is 9 µg/m³.

high PM_{2.5} emissions affecting the community. While the conservative analysis may overestimate the likelihood of the impact, we believe it was an appropriate approach because any increase in air pollution above the current disproportionate burden in eastern San Francisco is unacceptable.

The Air District is concerned about the potential impact of the construction and operation of the Project. The Air District understands that the environmental impact report included a comprehensive set of measures to reduce the Project's air pollutant emissions including requiring the cleanest construction equipment, a robust transportation demand management program, and transit improvements, among other mitigation measures. It is of critical importance that emissions are minimized to the maximum extent possible to keep the actual burden as low as possible, especially from operations. The development needs to be well served by transit to minimize the use of light duty vehicles, and any air pollution sources must be considered cumulatively to ensure protection of public health.

The Air District is happy to continue working with the City to provide technical assistance and support on measures to reduce a project's air pollution burden, and invite the City to partner with the Air District, California Air Resources Board (CARB), and key local stakeholders in the Community Health Protection Program (AB 617) to ensure we together successfully addresses air quality and public health burdens in eastern San Francisco.

In addition, as you know, SB 1000 requires cities like San Francisco to include environmental justice (EJ) policies within their General Plan for which air quality will be a significant consideration. We understand the City is initiating the development of EJ policies and would like to offer our support and assistance. The Air District has deep experience developing proactive health equity policies, plan guidance such as our guidance document *Planning Healthy Places* and working with local community partners. Our staff is ready and able to assist the City and look forward to partnering with you on efforts to continue improving air quality and health outcomes in San Francisco. If you have any questions regarding this letter please contact Alison Kirk, Principal Environmental Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

Cc: BAAQMD Director Tyrone Jue
BAAQMD Director Gordon Mar
BAAQMD Director Shamann Walton
Lisa Gibson, City of San Francisco, Director of Environmental Planning
Bradley Angel, Greenaction for Health and Environmental Justice