

***Greenaction for Health and Environmental Justice  
Bayview Hunters Point Mothers and Fathers Committee  
Marie Harrison Community Foundation***

September 30, 2021

**Comments in Opposition to Proposed Relocation of Aircraft Maintenance Technology Program to CCSF Campus in Bayview Hunters Point, and Demand for Proper Notice and Comprehensive Public and Environmental Review**

**1. Summary of Comments:**

The Bayview Hunters Point Mothers and Fathers Committee, Marie Harrison Community Foundation, and Greenaction for Health and Environmental Justice, submit these comments in opposition to the proposed relocation of the Aircraft Maintenance Technology Program to the CCSF Campus in Bayview Hunters Point. We submit these comments on behalf of our members and constituents who reside in Bayview Hunters Point.

Bayview Hunters Point is acknowledged by local, regional and state government agencies to be highly vulnerable and at risk from pollution. CCSF's proposed project would add more pollution to this overburdened and heavily impacted neighborhood, is irresponsible and an act of environmental racism and injustice. We urge CCSF to find a more appropriate location for this program.

**2. CCSF has failed to provide proper notice or opportunities for public comment and has violated Language Access and Civil Rights laws and policies:**

The CCSF website states the following:

**Public and Agency Review**

This Initial Study/Proposed Mitigated Negative Declaration will be circulated for public and agency review from August 23, 2021, to September 22, 2021.

However, the proposed project remains unknown to the vast majority of Bayview Hunters Point residents. Meaningful notice was not provided to the community to inform them of the proposed project or of opportunities for public comment.

If anyone was lucky enough to see the Notice, if that person did not read English they would be unable to know what the Notice said and certainly unable to read the "Initial Study/Proposed Mitigated Negative Declaration."

CCSF has improperly failed to provide even summaries of the "Initial Study/Proposed Mitigated Negative Declaration" and associated documents in the main languages (other than English) spoken in Bayview Hunters Point – especially Spanish and Chinese.

The failure to provide translation of the Notice and Executive Summaries of the key environmental review documents results in the total exclusion of many Bayview Hunters Point residents from the process. This is a violation of language access and of state and federal civil rights laws.

### **3. CCSF failed to respond to our requests for an extension of the “public comment period.”**

On September 15, 2021, Greenaction’s Executive Director emailed the CCSF contact email for this project as well as the CCSF Board of Trustees, but we never got the courtesy of a reply to our important requests – except from Trustee John Rizzo who provided an accurate link to access the CEQA document. CCSF’s failure – or refusal – to respond to legitimate requests and concerns is improper and resulted in the continued exclusion of many members of the public from the CEQA review process.

The following is the text of that email to CCSF:

On behalf of our members, constituents and staff members who live in Bayview Hunters Point, Greenaction for Health and Environmental Justice requests a 30-day extension of the public comment period on the proposed CCSF Aircraft Maintenance Technology Program at 1400 Evans Avenue.

Many residents and community groups are totally unaware of this proposed project potentially moving into their community that already suffers from unacceptable levels of pollution and health disparities.

We encourage you to (1) extend the public comment period on the Initial Study/Proposed Mitigated Negative Declaration; (2) provide real and meaningful notice to the community; (3) provide notice and executive summaries of all relevant documents in languages spoken in the community, not just English (Spanish and Chinese especially); and (4) make sure that all documents are easily accessible to residents, not just online.

In addition, the link provided does not work so we cannot access the documents to be able to provide comments (see below),

As a public institution located in Bayview Hunters Point, we would hope CCSF will agree to this request, comply with public notice and language access requirements, and work with the community to reduce, not increase, pollution burdens.

Please let us know your response to this urgent request.

Thank you,

Bradley Angel, Executive Director, Greenaction for Health and Environmental Justice

On September 29<sup>th</sup>, Greenaction again attempted to get a response from CCSF to our requests, and sent the following email which has not been responded to:

Hello CCSF,

On behalf of our members who reside in Bayview Hunters Point, we again request an extension of the public comment period. We heard through the grapevine that there was an extension to the

30th, but we were never notified despite submitting several written requests and concerns about the notice, comment period, and proposed project.  
We will challenge any process that fails to provide real, meaningful public notice and opportunities for public comment.  
We expect CCSF to do the right thing.

Bradley Angel, Greenaction for Health and Environmental Justice

#### **4. CCSF Claims About Non-Sensitive Environment, No Cumulative Impact, and No Significant Environmental Effects is Without Basis in Fact or Reality:**

Page 13 of the “Initial Study” document states in relevant part:

Background. On January 23, 2020, the CCSF District’s Board of Trustees approved a CEQA determination as a categorical Exemption for the Evans Center Renovation and Temporary Campus Project. In its determination the District concluded that the renovation and temporary campus project is not barred by any exceptions contained in CEQA Guidelines section 15300.2. The District found that the project 1) is not located in a sensitive environment, 2) has no cumulative impact, 3) will not have significant effect on the environment due to unusual circumstances, 4) will not result in damage to scenic resources, 5) is not located on a hazardous waste site, and 6) will not cause a substantial adverse change in the significance of a historical resource. Based on these findings, CCSF filed a Notice of Exemption for this renovation and temporary campus project.

The claim that the project would not be located in a sensitive environment and would have “no cumulative impact” is factually and boldly false. CCSF should know better.

As an academic institution, CCSF should know that a few minutes of research would reveal that government agencies agree that Bayview Hunters Point itself is in a sensitive environment and cumulatively impacted by multiple stationary and mobile pollution sources.

The CCSF facility is not in a bubble. It is not enclosed. There will be emissions.

Adding pollution sources to the CCSF campus will clearly have some negative impact directly and cumulatively on the environment of Bayview Hunters Point – posing an additional and new environmental health threat to a neighborhood that already suffers profound environmental and health disparities.

Adding more pollution in the heart of an already at risk community is reckless and unacceptable, especially as there are alternative location more distant from residential areas than the proposed site.

#### **5. Bay Area Air Quality Management District Designates Bayview Hunters Point/Southeast San Francisco as a “CARE Community” Vulnerable to Cumulative Impacts from Air Pollution:**

Bayview Hunters Point (BVHP) is a diverse, low-income community of color in Southeast San Francisco that suffers from the disproportionate burden of pollution and is at risk from climate change due to its location on the San Francisco Bay. Bayview Hunters Point is a majority-minority community; One-third of residents are African American, 30% Asian/Pacific Islander, and almost 25%

Hispanic/Latino. Residents suffer high rates of infant mortality, asthma, cardiovascular diseases, and cancer.

The Bay Area Air Quality Management District (BAAQMD) identifies BVHP as a "CARE" community area vulnerable to "Cumulative Impacts from Air Pollution" including 24-hour PM 2.5 exceedances.

## **6. The State of California's CalEnviroScreen Ranks Bayview Hunters Point as one of the Communities in the State Most Vulnerable to Pollution:**

CalEPA's CalEnviroScreen evaluates and ranks communities statewide based on environmental, health and socio-economic characteristic and disparities to determine vulnerability.

According to CalEnviroScreen 4.0, Bayview Hunters Point ranks in the 90th percentile in terms of pollution. This means that Bayview Hunters Point has a higher pollution burden than 90% of California. For diesel particulate matter, Bayview Hunters Point falls in the 99th percentile and the 97th percentile for groundwater threats. Additionally, most of Bayview Hunters Point is within the 80<sup>th</sup>-96<sup>th</sup> percentile for hazardous waste facilities in the area, according to the CalEnviroScreen 3.0 Hazardous Waste Map. The effects of this pollution are reflected in the health of the community. Bayview Hunters Point lies in the 97th percentile for low birth weight and the 96th percentile for asthma.

## **7. Initial Study's Claim of No Air Quality Impact is Incorrect:**

Page 24 of the Initial Study contains a check list: "ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages."

The checklist indicates that there would be no potentially significant impact on air quality. We disagree strongly with that assertion.

On page 32 it states there would be "Less than significant impact" on air quality. We disagree that the impact would be "less than significant."

Page 57 of the Initial Study states: "However, **the proposed project will include stationary sources of TAC emissions from the operation of jet engines on the project site.** The main pollutant of concern is lead compounds from the jet engines fueled by aviation gas (AVGAS)" (bold emphasis added)

It is thus clear that the project would add both criteria and Toxic Air Contaminants into the environment of the community. Adding any additional pollution – especially toxics - into a neighborhood clearly overburdened and impacted by current and historic pollution is significant.

## **8. Conclusion:**

CCSF needs to be respectful of the community and its students, faculty and workers, and reject this proposed project.

If CCSF wants to continue studying the potential impacts of the project, do it correctly in compliance with all legal requirements – including proper notice, language access, proper public comment periods, and comprehensive public and environmental review including public hearings.

The best path forward would be for CCSF to work with the community to find a more appropriate location for this program.

Lastly, please acknowledge receipt of these comments and provide a response to comments.

Thank you,

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