Appendix F: CSC/Co-Lead Created Materials

This appendix contains the following two Community Steering Committee (CSC) or Co-Lead created reports:

1. Marie Harrison Community Foundation (MHCF) Problem Areas and Solutions
2. Sources, Emissions, and Data Gaps (SEDG) Subcommittee Final Report

Draft Statement from the Marie Harrison Community Foundation to the Bay Area Air District

Introduction

The Marie Harrison Community Foundation (MHCF), carrying forward the legacy of Marie Harrison — a mother of the movement for environmental justice in Bayview–Hunters Point (BVHP) — urges the Bay Area Air Quality Management District (BAAQMD) to address long-overlooked and under-documented sources of pollution in the BVHP community.

For decades, residents of District 10 have faced disproportionate health burdens caused by cumulative air quality impacts. Our community's voice must be centered in the AB 617 planning process, and our lived experiences must shape the priorities of the Community Emissions Reduction Plan (CERP).

Priority Problem Areas and Solutions

1. Fugitive Dust & Shipyard Remediation

- **Problem:** Dust, heavy metals, and toxic particles from Hunters Point Shipyard cleanup and construction threaten respiratory and cardiovascular health.
- **Solutions:** Deploy high-resolution fence-line and community monitoring, mandate dust control and public reporting, create a real-time alert system, and provide HEPA filters to homes and schools.

2. Small Industrial Sources & Facility Emissions

- **Problem:** Numerous small businesses, boilers, and backup generators emit harmful pollutants that are underrepresented in inventories.
- **Solutions:** Expand micro-inventory surveys, provide technical/electrification assistance to small businesses, and adopt buffer-zone permitting protections near homes and schools.

3. Freight & Mobile Source Micro-Hotspots

- **Problem:** Diesel trucks, staging yards, and rail corridors create localized diesel particulate matter (DPM) hotspots.
- **Solutions:** Identify truck/rail routes with GPS mapping and monitoring, enforce anti-idling rules, relocate truck staging areas, and incentivize zero-emission freight transitions.

4. VOCs, Toxics, and Ultrafine Particles

- **Problem:** VOCs, benzene, and ultrafine particles are not systematically monitored despite strong links to cancer and neurological harm.
- **Solutions:** Expand speciated VOC monitoring, include ultrafine particle and black carbon monitors, and adopt event-triggered grab sampling.

5. Southeast Sewage Treatment Plant & Wastewater Emissions

- **Problem:** Odors and gases such as hydrogen sulfide create chronic exposure risks and undermine quality of life.
- **Solutions:** Require continuous H_2S monitoring, strengthen odor complaint tracking, and invest in digester covers, gas capture, and site redesign.

6. Cumulative Impacts & Health Data Justice

- **Problem:** Single-pollutant monitoring misses the combined harm of multiple exposures, and community health data are scarce.
- **Solutions:** Establish a BVHP health surveillance program with local clinics, use cumulative impact mapping, and guarantee community control over data transparency.

7. Indoor Air & School Protections

- **Problem:** Children are uniquely vulnerable, yet indoor exposures are overlooked.
- **Solutions:** Upgrade school and childcare HVAC systems, distribute HEPA filtration to households, and support community education on indoor air protections.

8. Community Leadership & Enforcement Capacity

- **Problem:** Community steering committees lack adequate technical and legal resources to ensure accountability.
- **Solutions:** Fund MHCF and other trusted community-based organizations to provide technical assistance, training, and enforcement liaisons. Require accountability metrics and annual public audits of AB 617 commitments.

Call to Action

The Marie Harrison Community Foundation calls on the Bay Area Air Quality Management District to adopt these community-driven priorities into the Bayview–Hunters Point AB 617

CERP. A **just future** demands monitoring and enforcement that reflect real exposures, investments that reduce cumulative impacts, and governance that honors community expertise.

Marie Harrison's legacy reminds us: **environmental justice is not negotiable.** BVHP residents deserve clean air, healthy homes, and a transparent, accountable air district.

Under-documented / under-resourced air-quality focus areas for Bayview-Hunters Point (for your AB 617 plan) — problems & pragmatic solutions

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1) Fugitive dust & re-suspension from Hunters Point Shipyard cleanup and construction

Problem: Remediation, demolition, soil disturbance and truck/rail movement at the Shipyard and adjacent sites generate episodic spikes of dust, toxic particulates (including heavy metals, asbestos fragments, radionuclides historically reported), and ultrafine particles — events that are intermittent and often under-sampled by routine monitors. These episodic peaks drive acute exposures (asthma attacks, cardiovascular stress) but can be invisible in averaged datasets. San Francisco Government+1

Solutions

- Deploy **short-term high-time-resolution monitoring** (real-time PM2.5, PM10, ultrafine particle counters) at fence-lines and community hot-spots, plus triggered sampling during demolition/earthwork. Integrate portable/vans + community sensors.
- Require **dust control & real-time reporting** as permit conditions: water suppression, covered loads, paved truck routes, limits on visible emissions, and instantaneous notifications to the community and Air District when threshold exceedances occur.
- Establish a **community right-to-know dashboard** (alerts by SMS/email) and independent third-party audits of contractor mitigation during cleanup.
- Fund home **HEPA filter distribution** and school filtration upgrades for construction windows of impact.

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2) Unregulated / small industrial sources, boilers and facility fugitive emissions

Problem: Much of the community burden comes from many small or poorly regulated sources (small metal shops, boilers, backup generators, paint/solvent operations) that may escape frequent inspections and are underrepresented in inventories. Cumulative impacts from many small emitters are rarely fully captured. greenaction.org

Solutions

- Expand **micro-inventory** efforts: door-to-door surveys, targeted fence-line screening, and short-term VOC/PM sampling around clusters of small businesses.
- Create a **tiered enforcement + assistance program**: low-cost upgrades and technical assistance for small businesses (electrification incentives, solvent recovery, low-NOx boilers) combined with progressive enforcement for noncompliance.
- Adopt **local permitting triggers** that require best available control measures (e.g., filtered exhaust, enclosed operations) for high-risk activities within a buffer distance of residences, schools, and community centers.

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3) Mobile source micro-hotspots: last-mile freight, idling, truck staging, and intracity rail/port traffic

Problem: Diesel PM and ultrafine particle exposure concentrated at truck routes, truck idling/staging areas, loading docks, and along Caltrain/other rail corridors through BVHP—these "micro-hotspots" create elevated exposures not visible from distant regional monitors. Existing reports show diesel is a major contributor and local freight patterns have concentrated impacts. SFE+1

Solutions

- Map truck/rail routes + truck staging zones with GPS/plate surveys, then place **mobile monitoring runs** and permanent monitors at identified hotspots.
- Implement **truck route changes**, anti-idling enforcement, truck staging relocation (outside residential areas), and require electrified drayage/yard tractors via incentive and regulatory pathways.
- Prioritize **zero-emission freight pilots** (e.g., electrified drayage, e-yard tractors, shore power for vessels) with subsidies for local small fleets and a timeline for cleaner truck replacement tied to AB-617 funding.

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4) Gaps in chemical specificity — VOCs, air toxics, and ultrafine particles (UFP)

Problem: Traditional monitoring focuses on PM2.5 and NOx; but **VOCs, speciated toxics (benzene, 1,3-butadiene), ultrafine particles**, and short high-concentration spikes are poorly measured. These pollutants have strong links to cancer and neurological effects and may come from local small facilities, shipyard operations, and mobile sources. The

monitoring overview highlights community-level VOC concerns that vary by location and season. BAAQMD

Solutions

- Add **speciated VOC and toxic air contaminant monitoring** at multiple sites, plus passive samplers for longer integration where continuous analyzers aren't feasible.
- Include **ultrafine particle counters** and black carbon monitors in the AB-617 monitoring suite to capture diesel/combustion signatures.
- Use **event-triggered sampling** (grab samples) tied to complaints, cleanup activities, or sensor exceedances so discrete toxic events are characterized and traced to sources.

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5) Sewage plant and wastewater emissions (odors + H2S/other gases) as an air-quality & environmental justice issue

Problem: The Southeast Sewage Treatment Plant and associated infrastructure produce odors and emissions (hydrogen sulfide, other reduced sulfur compounds, and bioaerosols) that cause chronic nuisance exposures and health stressors — often treated as "quality of life" rather than pollutant exposures and thus underregulated. Community groups have long raised this. greenaction.org

Solutions

- Require **continuous H2S and odor event logging**, rapid response mitigation, and publicly accessible odor complaint maps.
- Fund **process upgrades** (digester covers, gas capture) and site design changes to reduce offsite odor dispersion, plus buffer/greenbelt landscaping where feasible.
- Tie plant modernization to **community benefits** (local hiring, funding for health/climate resilience projects).

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6) Cumulative impacts, health monitoring, and data justice

Problem: Single-pollutant regulatory approaches miss cumulative and synergistic harms (multi-pollutant exposures + social vulnerability). Health outcome tracking (asthma ER visits, cancer clusters) and linking exposure data to outcomes is minimal and

underfunded. Community members lack access to actionable, locally granular health-linked data. gis.carb.arb.ca.gov+1

Solutions

- Create a **community health surveillance program** co-designed with local clinics and public health (asthma registries, ER visit tracking, birth outcomes) that protects privacy and allows evaluation of interventions.
- Use **cumulative impact mapping** (pollution, sociodemographics, health outcomes) to prioritize interventions and funding.
- Ensure **data sovereignty & transparency**: community-governed dashboards, raw data downloads, and public trainings on interpreting sensor & health data.

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7) Indoor exposure & school protections (often left out)

Problem: Much attention is on outdoor air, but indoor exposures (homes, childcare centers, schools) — especially for children — are critical and underresourced. Building infiltration from outdoor pollution, older heating systems, and indoor sources contribute to total exposure. BAAQMD

Solutions

- Fund **indoor air quality upgrades** for schools and childcare centers (HVAC upgrades, MERV/HEPA filtration, maintenance).
- Home weatherization + clean-air kits (HEPA units, stove/exhaust ventilation upgrades) targeted to the most impacted households.
- School curriculum + community workshops on reducing indoor exposures and advocating for healthier building codes.

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8) Insufficient community leadership, governance & enforcement capacity

Problem: AB-617 requires community steering committees (CSCs), but community members often lack technical, legal, and monitoring backstops; enforcement actions are slow; and community-identified priorities can be sidelined without legal/political teeth. BAAQMD+1

Solutions

- Fund **technical assistance hubs** housed in trusted local CBOs (training residents to operate monitors, interpret data, engage in rulemaking).
- Create **community enforcement liaisons** inside the Air District with expedited complaint investigation timelines and clear SLA (service level agreements) for response.
- Require **accountability metrics** in the CERP (timelines, benchmarks, funding commitments) and annual public audits co-led by community representatives.

Implementation checklist for the AB-617 CERP (practical items to include)

1. **Expanded monitor suite**: PM2.5, PM10, ultrafines, black carbon, speciated VOCs, H2S, real-time fence-line monitors + mobile monitoring runs. (Make a 12-site tiered monitoring plan: permanent + intermittent + mobile). BAAQMD
2. **Event response protocol**: automatic notifications, rapid grab sampling, mitigation enforcement triggers.
3. **Micro-inventory & source mapping**: GIS maps of small facilities, truck routes, idling zones, and demolition sites.
4. **Community health surveillance**: anonymized registries and clinic partnerships to measure program impact.
5. **Funding & jobs**: dedicate AB-617 and state funds to community-led technical assistance, home filtration, crew training for green jobs (electrification, remediation oversight). BAAQMD
6. **Enforcement & permitting reforms**: tighten permit conditions for projects near residences; tiered penalties plus assistance for upgrades.
7. **Transparency & data sovereignty**: dashboards with raw & interpreted data, community training, and community control of certain monitoring sites.
8. **Pilot & scale**: start with fast-wins (HEPA in schools, anti-idling enforcement, truck route changes), run pilots for ZE freight, then scale by measurable benchmarks.

Quick draft language you can drop into the AB-617 CERP (short & powerful)

"The CERP shall prioritize under-measured pollution pathways — fugitive remediation dust, ultrafine particles, VOCs and small-source cumulative emissions — by funding a

community-driven monitoring network, instituting immediate mitigation triggers and ensuring enforcement capacity and health surveillance are co-funded and co-governed with BVHP residents."

If you want, I can:

- Turn this into a **one-page community priority memo** for submission to the BVHP CSC/BAAQMD (I can draft it now), or
- Produce a **detailed monitoring plan** with suggested monitor models, siting map suggestions, detection thresholds and sample timeline.

BVHP/SESF AB 617 CERP CSC

SOURCES, EMISSIONS, AND DATA GAPS SUBCOMMITTEE

FINAL REPORT

MEMBERS

Agustin Angel
Amelia Erskine
Jun Zhong
Makayla Scott
Tuli Hughes
Chalam Tubati (ex-member/non-voting member)

We are extremely grateful to staff from the Air District, the Air Resources Board, municipal agencies and nonprofit partners for their time and insights through the duration of the subcommittee.

BACKGROUND AND MOTIVATION

The Sources, Emissions, and Data Gaps (SEDG) Subcommittee was formed in response to the Bay Area Air District (Air District) providing a planning inventory of emissions dataset to the Bayview Hunters Point/Southeast San Francisco (BVHP/SESF) AB 617 Community Steering Committee (CSC). The SEDG Subcommittee is comprised of 5-6 CSC members that represent the BVHP/SESF community. The CSC believed a subcommittee should be formed to conduct a nuanced review of the provided data as well as gather and analyze additional data from the Air District and the California Air Resources Board (CARB). The following report was written by the SEDG Subcommittee and additional information and responses to open questions were provided by the Air District.

SUMMARY OF SUBCOMMITTEE'S WORK

The information provided in the first two sections is intended to serve as foundational knowledge to help better understand the Subcommittee findings in sections 1a, 2a & 3a.

Permits 101

Facility Permit Category Types

- EXEMPT SOURCE
    i. Emissions are low enough to neither get registered or permitted.
    ii. Facilities are not required to renew their exempt status.
    iii. Exempt facilities are not required to seek or have an Air District certificate of exemption but must be able to demonstrate that they qualify for their exemption at all times.
- REGISTERED SOURCE
    i. Emissions are not low enough to be exempted but not high enough to require a permit.
    ii. Facilities must renew their status annually.
- PERMITTED SOURCE
    i. Emissions considered high enough to warrant a permit (assume a broad range of emissions levels).
    ii. Facilities must renew their status annually.
- MFR (Major Facility Review) TITLE V FACILITY
    i. Large facilities producing large amounts of emissions that also require both a local district permit and a federal Title V permit. The Air District is responsible for managing the Title V permits on the EPA's behalf.
    ii. Facilities must renew their permit every 5 years.
    iii. Title V facilities are required to have an Air District permit, however, there are currently no Title V facilities in the BVHP/SESF AB617 boundary area.
- Authority to Construct (ATC) - A pre-construction permit. An ATC is issued before a permit to operate is issued. Once the Air District reviews the application and ensures compliance with regulations an ATC is issued which allows the facility to construct the source. Once the facility is ready for start up, they submit a form and demonstrates compliance to receive a permit to operate.

Facility Permit Category selection

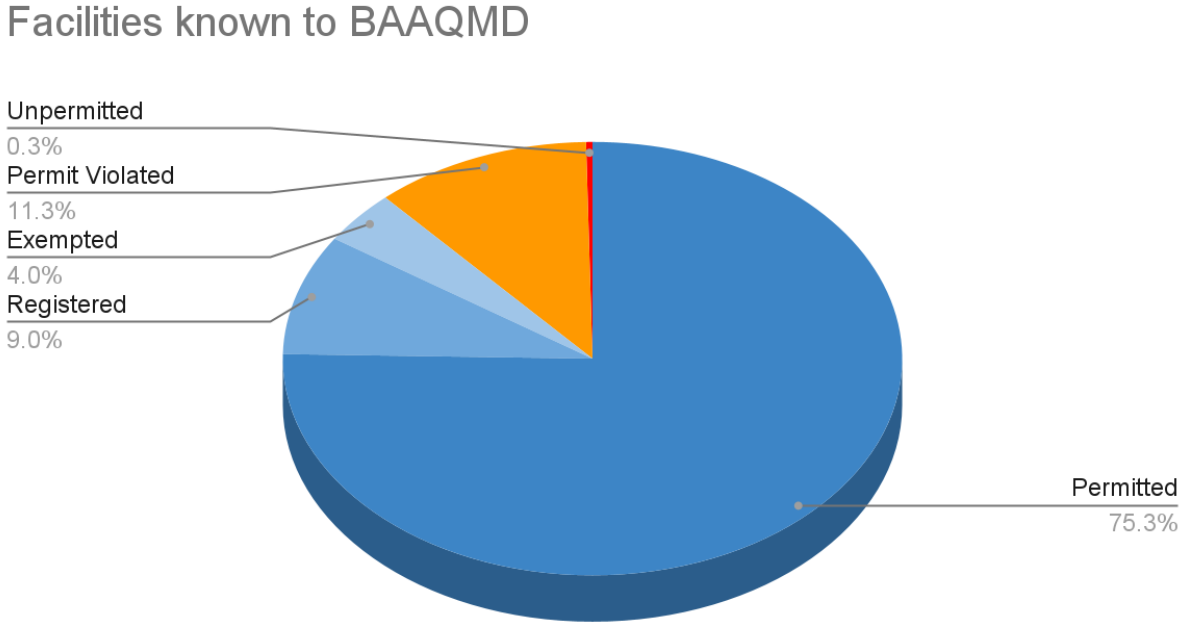
- Facilities decide which certification/status to apply for based on the equipment they have and emissions they produce (following Air District rules and regulations). The Air District reviews the operations and make the final determination.
- The Air District Permitting Program was established in 1979, and all regulatory limits have evolved and become more stringent since then. The permitted emissions limits in the permit conditions are determined at the time of application review based on compliance with the air quality regulations at that time. This would vary based on the

date that new or modified equipment was permitted. If a new application is submitted to modify, replace, or alter a source, the source would be subject to the most recent and stringent air quality regulations.

- EXEMPT and REGISTER applications are not as expansive (and expensive) as PERMIT applications.
- A facility may receive an in person visit if the permit engineer deems it is necessary for evaluating the source/operations, however this is not a requirement.
- It is unclear what it means that a facility is “unknown” to Air District
    i. From the Air District: A facility that is “unknown” to the Air District is one that does not have a permit history, nor has engaged with the Air District in an exemption or a registration, nor has been inspected during a routine inspection or due to a complaint.
- It is unclear if businesses can get licenses to operate without fulfilling or exempting themselves CEQA (California Environmental Quality Act) requirements under law.
    i. From the Air District: More information about this question is needed to answer fully, however, in general, the Air District CEQA determinations are based on the Lead Agency’s findings (typically a city or county) when issuing a discretionary permit. This is referred to as being a CEQA responsible agency.

BVHP Facilities’ Profile

Chart 1. Facilities known to Bay Area Air District from BVHP Draft Facility List 2024 (https://drive.google.com/file/d/1xa_-InvZ2vk7zYuKasyDhELImLazfMx1/view?usp=sharing)



From CSC Meeting 8/20/2024, Slide 13
Permitted – 226, Non-Permitted - Registered – 27, Exempt – 12, Permit Violated – 34, Unpermitted – 1

Table 1. Permit Facility Category Types. Note: All facilities below are required to Comply with Federal, State, and Air District Regulation		
CATEGORY		**DESCRIPTION**
Permitted		Applied for and maintained an Air District permit based on their facility operations and sources. The permit may include conditions that are designed to keep the facility in compliance with all applicable air quality regulations.
Non-Permitted	Unpermitted (*some reasons may include*→)	Facility unaware that they might be subject to air permits
		Facility knows they need a permit and have not applied
		Facility may have had a permit but have let it expire
		Facility knows they need a permit and have applied
		Facility may have been exempt in the past but are no longer exempt. Could be due to changes in permit exemptions and/or changes in operations
	Permit-Exempt	May or may not have a formal Certificate of Exemption, but they are exempt from requiring an Air District permit. Exempt facilities are not required to seek or have an Air District certificate of exemption but must be able to demonstrate that they qualify for their exemption at all times.
	Registered	Certain pieces of equipment are required to be registered with the Air District (https://www.baaqmd.gov/en/permits/register-equipment)

* If a source is excluded from Air District regulations (Reg 1-110), they are not required to comply with local regulations, but they are subject to state and federal regulations

1a. Selected Key Findings Related to Sources

Air Monitoring

- Air District does not have any air monitors they own and operate in BVHP.
- Air District has one air monitoring station in the City of San Francisco in Potrero Hill, with a main purpose of complying with EPA requirements.
- Air District has one mobile air monitor van that serves all of the district.
    i. From the Air District: The Air District is currently working with the Marie Harrison Community Foundation (MHCF) on a CARB grant to develop a community-partnered air monitoring study in BVHP that will use the Air District mobile air monitoring van and other portable monitoring technologies.

Identifying Additional Sources (Mapping)

- In April and May of 2024, the CSC identified 85 unique sources of concern and 98 locations where vulnerable populations live, work, and play. The SEDG Subcommittee built upon this work through multiple meetings and documented more than 300 additional sources of concern in a Google Map platform.
- These additional sources may fall under one of five categories:
    i. Facilities under the purview of the Air District that are exempt but do not have the certificate of exemption from the Air District. These facilities can include ‘cottage’ facilities that never had a business license or operated under an expired license. Exempt facilities are not required to seek or have an Air District certificate of exemption but must be able to demonstrate that they qualify for their exemption at all times.
    ii. Facilities under the purview of the Air District that are over the registration thresholds and hence are required to register with the Air District that have not engaged in the registration process. Registrations are only required for certain source categories
    iii. Facilities under the purview of the Air District that exceed applicable permit thresholds and are required to apply for and obtain a permit from the Air District. However, some facilities choose not to engage in the application process or comply with permitting regulations established by the Air District.
    iv. Facilities that have relocated or have been newly established since 2022 – the date of emissions inventory – as well as those that moved prior to 2022 but have not updated their address nor reapplied for a new permit with the Air District.
    v. Facilities not currently under the purview of the Air District that may have significant emissions, for example a warehouse without a stationary source of emissions that generates truck traffic.
- The list is not intended to be an exhaustive nor a scientifically sampled list. Since SEDG Subcommittee had limited capacity to thoroughly discover and analyze these additional sources. In particular areas of BVHP we prioritized facilities such as auto body shops.

- We sought for the Air District to use their enforcement resources to visit and estimate the emissions of these facilities concentrated in a particular area of BVHP in order to derive estimates that can be extrapolated to the rest of BVHP as well as other AB 617 communities across the State. For example, by listing more exhaustively auto body shops in a 1-square-mile area, we hoped the Air District could visit such facilities and estimate emissions missing from the inventory. We then hope such estimates can be refined through modeling to output an underestimation factor, and hope that underestimation factor can be extrapolated to model emissions in areas where an additional sources list is unavailable.
    i. From the Air District: The Air District has sector-wide emissions (not facility specific) for "Cleaning & Surface Coatings - Auto Refinishing." These emissions are estimated based on the total number of autobody shops in a county.
- We are very grateful to the Air District staff for prioritizing enforcement activities based on the additional sources list provided by the CSC and SEDG Subcommittee. Air District staff has flagged 61 sites for investigation (link below), including 43 sites identified by the SEDG Subcommittee (List of 43 sites) and 18 sites from earlier mapping or internal Air District efforts. As of January 2025, 21 sites had been physically inspected. 8 of these 21 required no immediate action due to exemption status or site closures, while 13 sites required follow-up actions, including Notices of Violation, compliance notices, or permit applications and the remaining 40 had undergone preliminary desktop review and remained pending field inspections. The Air District also invited the CSC to assist in prioritizing future inspections (List of Flagged Additional Sources).
    i. From the Air District: The Air District completed compliance inspections at all requested sites by the end of April 2025. 6 sites required a permit/registration. Enforcement notices were issued, and the identified sites are being followed up on to ensure a return to compliance.

1b. Recommendations Related to Sources

Air Monitoring

- We recommend an increase in community involvement in regard to the deployment of monitoring systems. We can envision recommending a system where air monitors are provided to various sites where vulnerable populations live, work, and play in the Bayview, where the data can be provided to the Air District to help improve their existing models (these sites are typically locations where certain groups, such as children, older adults, people with respiratory and cardiovascular disease, and pregnant people that are more sensitive to the harmful effects of air pollution, spend time. These include places such as hospitals, schools, daycare centers, community centers, parks, and even densely populated residential areas). We are aware of air monitors in the hundreds of dollar range that are effective, but we are unsure which they are and how best to deploy them. Data can also be used by the Air District to

better understand air pollution in BVHP and community-identify concerns, track improvements, or inform Air District actions like enforcement or regulatory changes.

- One proposed idea is to engage local youth to build simple, portable, personal air quality monitors. One example is the backpAQ which makes use of easy to source parts and open source software. Projects such as this one could help youth in the community learn about coding and building hardware as well as engage in community-led efforts to increase monitoring at low cost versus other monitoring systems. These monitors are not FRM or FEM certified (Federal Reference Methods (FRM) or and Federal Equivalent Methods (FEM)) but may still prove useful as an interim data source for the community to consider alongside more robust studies and measurement by the Air District.
- We also recommend moving the federally-required air monitoring site from Potrero Hill into BVHP.
    i. From the Air District: The Air District has recommended moving the Air District monitor (San Francisco – Arkansas St.) from Potrero Hill into BVHP.
- Also, we believe it's important to conduct an emissions study, such as one using the air monitoring van, to validate the current emissions estimates and potential estimates from exempted and unregistered facilities. Data can also be used by the Air District to better understand air pollution in BVHP and community-identify concerns, track improvements, or inform Air District actions like enforcement or regulatory changes. However, we're not sure if we should put finite financial incentives into supporting the study.
    i. From the Air District: The Air District is currently working with MHCF on a CARB grant to develop a community-partnered air monitoring study in BVHP that will utilize the Air District mobile air monitoring van and other portable monitoring technologies.
- Upon the recommendation of the sub-committee, the Air District is working on a modeling report based on BVHP emission inventory.

Mapping Tools & Platform

- We recommend Air District partner with Subcommittee during the CERP process to complete discovering & analyzing the full list of 300 additional sources mapped by the Subcommittee. The 43 identified by the Subcommittee is only a preliminary list.
- We believe community crowdsourcing should be expanded past the membership and timeline of the CERP process. If a mapping interface is to be in production, we recommend including elements that will make the map available to the community for an extended period of time. We recommend building living functions that allow community members to input potentially unregistered sources of pollution, sites of high fugitive dust, sites where vulnerable populations congregate, roads that are not allowed for truck traffic but where a high proportion of trucks are traversing, and other markers that the CSC believe to be helpful to crowdsource. We recommend inputting into the CERP the recommendation that the Air District and CARB utilize the information submitted by the community members on this map to conduct enforcement and measurement activities. In other words, the data submitted by the

community are submitted into Air District and CARB databases, and they are required to act upon them.

- Upon the recommendation of the Subcommittee, the Air District has started working on a mapping platform. This initial map product will serve to visualize data layers requested by the CSC and created by SEDG Subcommittee. Further consideration can be given to an interactive platform as described in the comment above. For now, the CSC and community can be encouraged to use the Air District complaint reporting system:
    1. https://www.baaqmd.gov/en/online-services/air-pollution-complaints/air-quality-complaint-program
    2. GENERAL AIR QUALITY COMPLAINTS 1.800.334.6367
    3. WOOD SMOKE COMPLAINTS 1.877.466.2876
    4. SMOKING VEHICLE COMPLAINTS 1.800.394.2878

2a. Selected Key Findings Related to Enforcement

- Visits to facilities are prioritized by oldest recorded visit to most recent recorded.
- {At the time the report was written, it was} unclear if all facilities are visited regularly or only facilities with lapsed permits.
    i. From the Air District: The Air District confirms that all facilities were visited.
- Air District does not have a process beyond planned checks (with one inspector for the City of San Francisco) to evaluate if facilities are being compliant to their respective statuses.
    i. From the Air District: The Air District is assessing adding additional inspectors to the City of San Francisco.
- Remaining inspector visits are triggered by community complaints and inspector patrols.
- Only one Air District inspector is primarily assigned for the City of San Francisco (See comment above).
- Additional inspectors may be available, but it is unclear when that decision will be made.
    i. From the Air District: See comment above. Additional resources are made available when required, such as to inspect the recent list of 43 priority non-permitted sites identified by the SEDG Subcommittee.
- It's unclear if lapsed permits are flagged immediately.
    i. From the Air District: The Air District does not have authority to shut down a facility. It must obtain an order from the Hearing Board or a court, which will consider factors like the extent of emissions and health risks posed to the community, as well as harm to the business in having to shut down, in deciding whether to order the facility to stop operating.

2b. Recommendations Related to Enforcement

Commercial and Industrial

- We recommend an increase in enforcement staff. We recommend avoiding using incentives funding for such pursuit. In this pursuit, we recommend designing a pipeline program for community members, especially youth, to become inspector trainees.
    i. From the Air District: The Air District does not use incentive funding for inspectors. There may be opportunities to fund an education program through publicly available grants, though further exploration is needed and any hiring would proceed through the normal recruitment process.
- We recommend designing strategies to make it easier for inspectors to visit a facility.

Fugitive Dust, Other PM & Pollutants

- There is not robust data on fugitive dust, though Air District technical staff has shown us some estimates based upon construction and vehicle sources. The community cannot wait for robust data on fugitive dust before actions are taken on reducing its prevalence in the community. We recommend the CSC consider strategies and actions to control dust, such as requiring covering of stationary and mobile sources, especially sources transporting and storing construction and demolition materials. For soil and bulk material transportation and soil on premises such as unpaved roads, we recommend soil wetting be required.
- For mitigating fugitive dust as well as particulate matter, VOCs, NOx, and other harmful emissions, we recommend a sound wall to be built on the eastern side of 101/280 near residential neighborhoods. This would include from the Northbound on-ramp from 3rd and Bayshore to Paul and Bayshore, as well as from Egbert and Bayshore to Oakdale and Industrial. Within 500 feet of this stretch is the Third Street Community Garden, Silver Terrace Athletic Fields, a kindergarten, a middle school and a high school.
- Another strategy for mitigating fugitive dust as well as harmful emissions from vehicular traffic is to enforce truck vehicular traffic to designated truck routes. We also recommend a review of existing truck routes and consider a revision for any that are near residential homes.
- We also recommend deploying systems like CARB Portable Emission Acquisition System (PEAQS) to aid with monitoring and enforcement.

3a. Selected Key Findings Related to Emissions & Data Gaps

- The most recent emission inventory data provided is from 2022. An inventory year of 2022 for the BVHP CERP was selected based on CARB's AB 617 requirements, which are intended to establish a baseline for tracking emission changes over time. Updated

emissions data is available and can be reviewed to assess changes in key sources since the 2022 inventory.

- Published emissions data (e.g. PM levels, NOx) of stationary sources are estimated from a complex mix of sources from permitted, registered, and exempt facilities in the Air District's planning inventory. Sources from facilities without a permit, registered, or exempt status with the Air District do not always contribute to the estimation. This is because the engineering analysis is done during the permit/register/exemption application process, and estimates are generated upon that analysis. This means businesses with pending applications are not included. More importantly, businesses that are exempt and decided not to apply for a Certificate of Exemption aren't included in the estimation. For instance, only 284 BVHP businesses are contributing to the emissions estimate, and we estimate there are at least 100 more businesses that contribute to emissions but did not apply with Air District. There are also estimated area-wide emissions that are not included in the emissions inventory.
    - Although the rules {reference here is to Air District Rules} might take into account the fact that some emissions are difficult to mitigate, the rules might fail to take into account the fact that tens or hundreds of facilities under the permitting threshold (exempt or register) congregating within a small area, in combination with the permitted facilities already there, might lead to a significant cumulative impact.
    - Although small sources are more likely to be missing from the inventory, large sources can also be missing.
    - The estimations assume the business/facility is using the maximum emitting source (e.g. the worst paint) allowed by the rules.
    - Vital emissions such as fugitive dust are not always tracked by Air District or CARB.
        i. From the Air District: Some fugitive dust emissions from certain source categories are permitted and tracked (e.g. fugitive dust from transfer points in concrete batch plants are incorporated). The Air District Permit Handbook has details on the calculation methodology for this source on pages 267-274 (baaqmd-permit-handbook.pdf).
    - Off-Road Mobile Sources (esp. Ocean Going Vessels) are a significant source of diesel particulate matter in BVHP.

Emission Inventory
Emission Inventory Summary

3b. Recommendations Related to Emissions/Data Gaps

- We recommend inputting into the CERP the recommendation that the Air District conducts emissions modeling based not only upon facilities that are listed, but also unlisted in its planning inventory. Too many facilities are not listed in the inventory, and in aggregate hundreds of businesses not required to be permitted or registered (or simply avoiding regulation) can add up to very significant amounts of emissions. The estimate can utilize a model based upon a cluster sampling approach, where an under-estimated factor can be extrapolated from the chosen cluster and applied back to the entire Bayview Hunters Point.

- We recommend rulemaking that incorporates cumulative impact in considering whether to grant new permits and in whether to additionally penalize existing but not-in-compliance facilities within high cumulative-impact census tracts (incentivizing a neighbor-to-neighbor enforcement effect). This is not intended to penalize small businesses.

4. Recommendations Involving Other Agencies

Land use & zoning

- The maps of sources of emissions presented to us by the Air District illustrate the fact that there are no buffer zones between residential zones and emission sources, especially in areas with high winds in the afternoons. Also, industrial zones separate multiple residential zones from each other.
- We recommend phasing out industrial zones to create new residential zones, in order to gradually connect residential zones with each other. We also recommend allowing higher density residences, especially when converting industrial zones near transit options like the T, such that residents are less reliant on emissions-heavy autos. The higher concentration of residences will lead to higher prevalence of basic-needs businesses such as grocery stores, leading to lesser emissions from current residents driving far to fulfill their basic needs shopping. Plus, there will be added benefits such as a decrease in the price of housing and green spaces that will accompany the residences.
- For facilities deep within the industrial zones such that conversion to housing is unlikely, we recommend incentives to phase them into less emitting facilities. We also recommend incentives to discourage emissions-heavy facilities from moving into BVHP, especially if the transportation of service or the goods produced from emission-heavy facilities does not generate significant emissions. In other words, we'd like to discourage emissions-heavy facilities where having close proximity of the goods to residents would not reduce overall emissions from the overall production and transportation process of those goods.

Illegal Dumping

- Some data on illegal dumping exists, but the Air District could provide any. The data that exists is likely incomplete in coverage. The CSC and BVHP residents have strong interest in this topic, and the political incentive on addressing this topic is strong, so we recommend the CSC to consider leveraging financial resources from municipal and private sources to complement potential CERP recommendations in addressing this topic.
    i. From the Air District: The Air District does not have jurisdiction or authority over illegal dumping, and therefore does not collect or analyze data on illegal dumping.