The San Francisco Bay Area is at a crossroads in which the future of its vibrant communities and ecosystems is at stake. As both people and goods in our region travel farther to reach their destinations, rising greenhouse gas and air toxics emissions have led us to reconsider the very systems that enable these transport patterns. Past land use and development decisions have resulted in homes, schools and parks sharing borders with freeways, rail yards, ports, distribution centers, and other freight transport-related land uses, exposing residents in predominantly low-income communities of color to toxic diesel emissions and other health hazards. As a strategy to reduce greenhouse gas emissions and improve regional air quality, infill development may inadvertently expose more people to toxic air pollution if more housing is sited near freight transport infrastructure without accounting for the risks this poses to human health. In deciding how to implement state climate legislation SB 375 in the Bay Area, our region is poised to realign transportation, housing, and land use priorities so as to advance environmental health and quality of life for all communities.

The Ditching Dirty Diesel Collaborative is a regional coalition of over a dozen community groups, health departments, and allied organizations working to reduce diesel pollution in the Bay Area, particularly in low-income communities of color that bear the highest health burden from disproportionate exposure to this pollution. We strongly urge the Metropolitan Transportation Commission, the Association of Bay Area Governments, the Bay Area Air Quality Management District, and other local and regional decision-makers to integrate the following health-protective measures into their planning for our region’s Sustainable Communities Strategy:

- In the spirit of the State’s Health in All Policies initiative, put people’s health first by requiring your staff to do a detailed analysis of proposed Priority Development Areas (PDAs) that determines which portions of these PDAs are healthy for new residential development and which are not. Due to the fact that the health risks from fine particulate matter decrease rapidly the further it is measured from a source, that risk is not homogeneous throughout any given PDA containing a source such as a freeway or distribution center. These distinctions must be made to yield meaningful and useful results when evaluating the health impacts within PDAs for alternative scenarios currently being considered as part of the region’s Sustainable Community Strategy (SCS), including a proposed Social Equity Scenario.
  - Portions of PDAs where new residential development is not advisable have higher health risk from toxic air contaminants like diesel particulate matter. These PDA portions can be determined by applying guidelines developed by the California Air Resources Board (CARB) that recommend that sensitive land uses not be sited within 1000 feet of rail yards, warehouses, and distribution centers. Although the guidelines recommend that sensitive land uses not be sited within 500 feet of freeways, we strongly recommend using 1000 feet instead. PDA portions within 1500 feet of port facilities or within 500 feet of designated truck routes should also be considered as places with higher health risk from toxic air contaminants, and should be included in an analysis of where it is not advisable to build additional housing without appropriate mitigations to minimize this risk.
Support wise infill development by incentivizing the development of housing and sensitive land uses like parks and schools outside portions of PDAs with higher health risk from toxic air contaminants. Encourage siting more suitable land uses such as commercial and light industrial land uses within higher health risk portions of PDAs. Account for anticipated expansions, particularly of freight-related land uses like port facilities, in establishing development priorities for areas near major freight transport corridors and infrastructure. For example, the redevelopment of properties adjacent to existing freight facilities (such as the former Oakland Army Base) should account for anticipated expansions at the Port of Oakland and land use changes in neighboring communities like West Oakland that necessitate the relocation of freight-related and industrial facilities to reduce land use conflicts with existing and proposed residential development.

Encourage local jurisdictions to require mitigation measures for proposed residential developments within portions of PDAs with the highest health risk from toxic air contaminants. The appropriate mitigation measures required to reduce health risk posed by the proposed development should be identified based on detailed modeling and assessment of local conditions at and surrounding the site, including proximity to freight-related hazards and empirically counted amounts of diesel truck and train traffic moving through the area. An example of a health-protective local policy measure is the City of Oakland’s Air Quality Guidelines for Housing (SCA-94), which outlines Standard Conditions of Approval based on inclusion criteria at the time the project developer gets zoning approval. SCA-94 is attached to any project at any address within city boundaries which exceeds the screening criteria set by the Bay Area Air Quality Management District, and identifies seven mitigation measures that can be put in place by the developer to meet the required conditions for zoning approval. These measures range from indoor air filtration and monitoring to site re-design that locates sensitive receptors as far away as possible from sources of air pollution.

To address health impacts associated with freight transport, mitigation measures in proposed housing developments within freight transport buffer zone areas should include:

1) HEPA indoor air filtration systems designed to filter out toxic air contaminants including fine particulate matter (PM 2.5);
2) Triple-paned, sealed, and non-operational windows that reduce the impact of vibrations from freight traffic and minimize outdoor air contaminant flow into indoor spaces;
3) Use of green, healthy building materials that do not off-gas or release air toxins that compromise indoor air quality;
4) Noise barriers such as soundwalls based on soundscaping of the development site to reduce noise pollution related to freight operations;
5) Adequate green space, vegetative planting, and permeable surface area that is well-maintained incorporated into development design and management plans;
6) Minimize parking allocations in the development to reduce congestion and air pollution from additional automobile traffic and stalled freight traffic, and incentivize the use of transit, car-sharing, and zero-emission electric vehicles by integrating chargers into the design of parking garage areas;
7) Design developments to capture polluted runoff from the sides of buildings and other outdoor surfaces that have accumulated diesel soot and other contaminants so that such contaminants do not flow into green spaces in the development;
8) Design developments to equitably distribute the health risk from toxic air contaminants posed by the development across all units in the development (e.g., do not locate affordable housing units in the least desirable areas of the development closest to freight transport facilities and corridors like freeways);
9) On-site air monitoring equipment to measure toxic air contaminants and quarterly provision of monitoring results with residents or users of the development;
10) Annual survey of health conditions of existing residents and reporting of survey results to existing and prospective residents of the development;
11) Notification of prospective residents within the deed or lease document for the property of the hours of operation of freight transport facilities within the buffer zone distance of the development, and of their related noise, air quality, light pollution, and health impacts;
12) Prior notification of existing and prospective residents of proposed expansions and upgrades at freight transport facilities within the buffer zone distance of the development, and of their potential noise, air quality, light pollution, and health impacts.

- Target mitigation-related funding and resources towards portions of PDAs with the highest health risk from toxic air contaminants, particularly in those portions of PDAs that overlap with Community Air Risk Evaluation (CARE) zones. CARE zones are areas designated by the Bay Area Air Quality Management District as being most vulnerable to health risks associated with diesel particulate matter and other air toxics, and include parts of Richmond, Concord, Eastern San Francisco, San Jose, Redwood City and Eastern Palo Alto, and the I-880 Corridor (Berkeley, Oakland flatlands, San Leandro, Hayward).

We thank you for your consideration of public health in planning for a more sustainable Bay Area.

Sincerely,

The following members of the Ditching Dirty Diesel Collaborative:

Catalina Garzón, Pacific Institute
Michael Kent, Contra Costa Health Services Asthma Prevention Program
Diane Bailey, Natural Resources Defense Council
Margaret Gordon, West Oakland Environmental Indicators Project
Karen G. Pierce, Bayview Hunters Point Community Advocates
Christine Cordero, Center for Environmental Health
Anna Yun Lee, Communities for a Better Environment
Wafaa Aborashed, Bay Area Healthy 880 Communities