

**1. Community Need.**

**1.a. Targeted Community and Brownfield Description.** The 900 Innes Parcel 3A Brownfield Clean-up Project (“Project”) is located in northern California in the City and County of San Francisco (“City”). The City has 852,469<sup>3</sup> living within 47 square miles—equal to 17,397 residents per square mile – making it second only to New York City in population density. The project is located in Bayview Hunters Point (BVHP) neighborhood, now a predominantly industrial and residential district, but transitioning to a mixed-use development pattern. Historically, polluting industries were concentrated in the BVHP neighborhood and left a legacy of contaminated sites and physical blight. During WWII, the U.S. Naval Shipyard at Hunters Point attracted workers, many of whom were African Americans who migrated from the South. During the U.S. Navy’s 35-year operation of the Hunters Point Shipyard, hazardous substances and radioactive wastes were released into the environment. After the Navy closed its in 1971, the site was leased to a private ship repair company that caused additional contamination. The project will remediate the Shipwright’s Cottage, the first dwelling erected by boatwrights in the neighborhood that initiated the development of the boat building community that crafted most of San Francisco’s historically significant scow schooner fleet. This abandoned boat building and ship repair facility that surround the Shipwright’s Cottage, operated for over 120 years. The Shipwright’s cottage building materials are contaminated with asbestos, lead-based paint, and universal waste and the drip line of the Shipwrights Cottage is lead contaminated soils.

**Demographic Information -** The BVHP neighborhood faces multiple challenges, including environmental pollution, blight conditions, significant poverty and concentrations of public housing, high health risk, lack of safe recreational opportunities, residential isolation, at-risk youth, poor performing schools, and high crime rates. These challenges place residents outside the mainstream of San Francisco life. Approximately 4% of the City’s population (Census Tract 023103) reside in the BVHP neighborhood and represent a very diverse population with 79% racial minorities, including 35.1% African American, 28% Asians/Pacific Islander, and 24.8% Latino or Hispanic origin<sup>4</sup> (see Table 1.)

	BVHP	San Francisco	State of California	National
Population	35,309 <sup>1</sup>	852,469 <sup>2</sup>	38,802,500 <sup>3</sup>	318,857,056 <sup>2</sup>
Whites	19.5% <sup>1</sup>	53.8% <sup>2</sup>	73.2%	77.4% <sup>2</sup>
African-Americans	35.1% <sup>1</sup>	5.8% <sup>2</sup>	6.5% <sup>2</sup>	13.2% <sup>2</sup>
Asians	28.9% <sup>1</sup>	34.9% <sup>2</sup>	14.4% <sup>2</sup>	5.4% <sup>2</sup>
Hispanic/Latinos	24.8 <sup>1</sup>	15.3% <sup>2</sup>	38.6% <sup>2</sup>	17.4% <sup>2</sup>
Percent Minority	79% <sup>1</sup>	58.9% <sup>2</sup>	59.9% <sup>2</sup>	26.8 % <sup>2</sup>

Sources: <sup>1</sup> US Census, ACS Demographic and Housing Estimates, 2009-2013 American Fact-finder Survey, ZCTA5 94124. <sup>2</sup> [WWW.Census.Gov/quickfacts](http://WWW.Census.Gov/quickfacts) Beta, California (V2014). <sup>3</sup> US Census, American FactFinder, , 2009-2013 American

Source: <sup>1</sup> U.S. Census Bureau , ACS Demographic and Housing Estimates, 2009-2013 American Fact-finder Survey,  
<sup>2</sup> ibid

Community 5-year estimates, 2013 Poverty Status in the Past 12 Months 4 Bureau of Labor Statistics, Tuesday, July 14, 2015  
 U.S. Bureau of Labor Statistics, Current Population Survey (CPS), Annual Social and Economic Supplement (ASEC).

**Area Population Growth** - Adjacent to the Project Site, are 17.12 acres of privately-owned property that will be developed into an Urban Village and create up to 1,240 housing units. This expected development and migration of San Francisco residents to this part of the City from less-affordable neighborhoods, will continue to increase the demand for recreational space.

**Poverty** – The BVHP is one of the poorest neighborhoods in San Francisco and the Bay region. Minorities represent 79% of the population with Blacks and Hispanics represent the highest population in this Zip Code Area. These racial groups are generally are twice more likely to be among the working poor than are Whites and Asians.<sup>3</sup> In 2013, the working-poor rates of Blacks and Hispanics were 13.3 percent and 12.8 percent, respectively. BVHP is one of five districts in the Bay Area that have a concentration of “extreme poverty,” with 39% of the residents living below 200% of the Census poverty threshold. The hillside area south of the project site includes three San Francisco Housing Authority developments that provide 267 units of low income housing for residents. Increasing housing prices and lack of affordable rental housing contribute to San Francisco’s widening income and poverty disparities in San Francisco. As of August 2015, the average two-bedroom rental unit in San Francisco costs \$3,853 per month.<sup>5</sup> Area poverty is further demonstrated by a significantly lower median household incomes - \$46,322 as compared to \$75,604 citywide. These housing prices lead to overcrowded conditions and lack of mobility for BVHP residents.

**Unemployment** – The neighborhood also experiences higher rates of unemployment when compared to the citywide average. BVHP’s unemployment rate of 16%<sup>6i</sup> is more than four times higher than San Francisco’s average unemployment rate of 3.5% and three times higher than the National Average of 5.3%.

	BVHP	San Francisco	California	National
Median Household Income	\$50,416	\$75,604 <sup>2</sup>	\$61,094 <sup>2</sup>	\$53,046 <sup>2</sup>
Poverty Rate	22.2% <sup>3</sup>	13.8% <sup>2</sup>	16.4% <sup>2</sup>	14.8% <sup>2</sup>
Unemployment	16% <sup>3</sup>	3.5% <sup>4</sup>	6.17% <sup>4</sup>	5.3% <sup>4</sup>

Sources: <sup>2</sup> [US Census Quickfacts Beta, California \(V2014\)](#) <sup>3</sup> US Census, American FactFinder, , 2009-2013 American Community 5-year estimates, 2013 Poverty Status in the Past 12 Months 4 Bureau of Labor Statistics, Tuesday, July 14, 2015 (Unemployment Rates for States Monthly Rankings Seasonally Adjusted Aug. 2015<sup>p</sup>) U.S. Bureau of Labor Statistics, Current Population Survey (CPS), Annual Social and Economic Supplement (ASEC). <sup>1</sup> Ibid., p 3.

**Education Attainment** - The BVHP has one of the lowest levels of educational attainment in San Francisco, with 29.6% of residents having no high-school diploma compared to 14.4% of

<sup>5</sup> <https://www.rentjungle.com/average-rent-in-san-francisco-rent-trends/>

<sup>6</sup> San Francisco Indicator Project source: **American Community Survey, 5-year Estimates, 2005-2009**

residents citywide.<sup>8</sup> Of all the people in the labor force for 27 weeks or more in 2013, those with less than a high school diploma had a higher working-poor rate (19.2 percent) than did high school graduates with no college (8.9 percent)<sup>9</sup>. Education is inversely related to the degree of exposure to indoor and outdoor pollution.

**Crime** - Violent crime and property damage in BVHB exceed the Citywide average with 105.8 violent offenses and 175.4 property crimes per 1,000 residents. There are more than twice the number of violent crimes than the Citywide average, and this type of activity inhibits social interactions and social cohesion. 17 percent of BVHP residents surveyed indicated that felt unsafe both day and night in their neighborhood.<sup>10</sup> Parental concerns about neighborhood crime strongly influence their willingness to allow their children to actively commute (e.g. walk or bike) to school, influencing children's levels of physical activity. Witnessing and experiencing community violence also causes longer term behavioral and emotional problems in youth.

**Brownfields** - The BVHP community has a historic and on-going record of impacts from contaminants. Historically, polluting industries were concentrated in the BVHP neighborhood and left a legacy of contaminated sites and physical blight. The 900 Innes, Parcel 3 site functioned as a boat building and ship repair facility for over 120 years. It is now a fenced-off brownfield with soils contaminated with heavy metals, volatile organic compounds, biocides and cuprous compound. It is located within the India Basin Neighborhood, with residential housing to the north and west of the property, and commercial and open space property to the east of the site. The site is located just east of the Hunters Point Shipyard where hazardous substances and radioactive wastes have been released into the environment. Several areas of the Hunters Point Shipyard were found to be contaminated with polychlorinated biphenyls (PCBs), trichloroethylene and other solvents, pesticides, petroleum hydrocarbons, and metals; and the Shipyard was placed on the National Priorities List as a "Superfund" site in 1989.<sup>iii</sup> Currently, the Shipyard is subdivided into parcels and the U.S. Navy is leading site investigations and remediation with EPA oversight.<sup>iv</sup> As each parcel of the Shipyard is remediated and prepared for reuse, the Navy is transferring the Shipyard in stages to San Francisco for a 700-acre mixed-use redevelopment project that will create 12,000 housing units, as well as retail and commercial space.<sup>v</sup> BVHP has several other brownfield sites.<sup>vi</sup> Based on information from the California Environmental Protection Agency Geotracker and the Department of Toxic Substances Control's EnviroStar databases, there are more than 850 recorded hazardous materials and petroleum release sites, with approximately 180 open cases and 82 sites where the status is unknown.<sup>11</sup> Following are examples of contaminated sites in the BVHP area: This has been a heavily impacted area, and while some actions have been completed but there are still a lot of concern from the community about exposure to hazardous materials.

- PG&E Hunter's Point, 1000 Evans Avenue: Voluntary cleanup is currently in progress.
- Hunter's Point Naval Shipyard, Parcel B (965 acres): Active federal superfund site.
- Yosemite Slough Sediment Site, 1250 Yosemite Avenue
- San Francisco Bay and Islais Creek are both nearby and considered "impaired."

<sup>8</sup> San Francisco Indicator Project, Bayview Neighborhood.

<sup>9</sup> Ibid., p 3.

<sup>10</sup> City and County of San Francisco, Office of the Controller - City Services Auditor. 2015 San Francisco City Survey.

<sup>11</sup> Greenaction, "A Toxic Inventory of Bayview Hunters Point, San Francisco" (2004) describing pollution sources in BVHP. See <http://greenaction.org/hunterspoint/documents/TheStateoftheEnvironment090204Final.pdf>

- 900 Innes Avenue

**Cumulative Environmental Issues** - The project area has been identified as a disadvantaged community by the California Communities Environmental Health Screening Tool (CalEnviroScreen). The California Environmental Protection Agency (CalEPA) use this tool developed by the Office of Environmental Health Hazard Assessment (OEHHA) to identify communities most burdened by pollution from multiple sources and the most vulnerable to its effects based on geographical, socioeconomic, public health, and environmental hazard criteria. The information on Table 3 describes the cumulative impacts on the surrounding population that lead to negative public health effects, exposure or environmental degradation.

Indicators	CT 26100	CT 23102	CT 23103	Indicator Information
Population	6,810	3,478	3,478	
Diesel	71	92	92	Exposure to diesel PM has been shown to have numerous adverse health effects including irritation to the eyes, throat and nose, cardiovascular and pulmonary disease, and lung cancer. Ultrafine Diesel PM is of concern because particles penetrate deeper in the lung. Children and those with respiratory diseases are most vulnerable.
Toxic Release	33	36	37	Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration.
Traffic Density	80	12	7	Health effects of concern from these pollutants include heart and lung disease, cancer, and increased mortality. Exposure to air pollutants from vehicle emissions has been linked to adverse birth outcomes, such as low birth weight and preterm birth.
Cleanup Sites	0	84	96	BVHP has 3.4 active brownfields and 4.1 leaking underground storage tanks per square mile. Some of these “brownfield” sites are also underutilized due to cleanup costs or concerns about liability. These include the storage and disposal of hazardous materials on land and in underground storage tanks at various types of commercial, industrial, and military sites. Each census tract was scored based on the sum of the adjusted weights for sites it contains or is near. A

				demographic 57 CalEnviroScreen 2.0 study of socioeconomic factors in communities in Florida found that census tracts with Superfund sites had significantly higher proportions of African Americans, Latinos and people employed in “blue collar” occupations than census tracts that did not contain a Superfund site (Kearney and Kiros, 2009).
Hazardous Waste Generators and Facilities			Top 30%	Hazardous waste by definition that is potentially dangerous or harmful to human health or the environment
Groundwater Threats	26	40	95	
Solid Waste	38	41	69	Solid waste sites can have multiple impacts on a community. Odors and the known presence of solid waste may impair a community’s perceived desirability and affect the health and quality of life of nearby residents (Heaney et al., 2011).
Asthma	50	95	95	BVHP has a higher prevalence of asthma relative to the country as well
Low Birth Weigh	89	84	100	
EnviroScreen Source: California Communities Environmental Health Screening Tool: CalEnviroScreen Version 2.0 (CalEnviroScreen 2.0). CalEnviroScreen is a screening methodology that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution.				

Residents in BVHP suffer from higher rates of several diseases in comparison to San Francisco as a whole: the adult hospitalization rate for diabetes is three times higher; congestive heart failure is almost two times higher; and asthma is two times higher; when compared to citywide rates.<sup>12</sup> The prevalence of asthma in BVHP is still far above those for the rest of San Francisco, and those for California as a whole. BVHP’s African American and Latino residents have a higher prevalence of overweight and obesity rates that are contributing to poor health outcomes. Factors such as limited physical exercise and lack of access to safe outdoor areas for recreational activities, combined with poor eating habits and food insecurity, are leading to higher obesity rates among San Francisco’s poor and minority groups.<sup>13</sup>

**1.b. Impacts on the Targeted Community.** BVHP is disproportionately burdened by

<sup>12</sup> SF Department of Public Health’s Bayview Hunters Point Community Health Status data submitted to SF Environment for the San Francisco Healthy Homes project (Oct. 2011)

<sup>13</sup> SF Department of Public Health, Promotion and Prevention, Shape Up San Francisco, Obesity Fact Sheet (2008), showing percentage of AfricanAmericans in San Francisco had a BMI of 30.0 or higher was almost 3 times higher, at 34.2%, and the percentage of Latinos/Hispanic with BMI of 30.0 or higher was almost 2x higher, at 27.0% compared to 14.8% citywide.

environmental pollution from contaminated sites, industrial facilities and mobile sources traveling on nearby freeways. Stationary pollution sources include the toxic contamination and development work at the former Hunters Point Naval Shipyard site, toxic contamination at the former PG&E Hunters Point power plant, the Southeast Sewage Treatment plant, and many under-regulated and unregulated dirty industries. BVHP is also burdened by impacts of air pollution generated by thousands of vehicles traveling daily on two congested freeways that border the community, US Highway 101 and Interstate 280. These freeways are backed up for hours during the morning and evening commute. More than 5,000 heavy-duty diesel trucks travel daily on these two freeways and approximately 1,000 diesel trucks travel daily on BVHP's local roadways.<sup>vii</sup> Episodes with higher levels of fine particulates contributes more than 85% of total inventoried. There is also evidence that the effect of air and traffic-related pollutants on respiratory illness, including childhood asthma, are more severe in communities with high exposure to Particulate Matter 2.5 and Diesel Particulate Matter.

### **1.c. Financial Need.**

**1.c.i. Economic Conditions.** With a large aging park system, 220 parks and recreation facilities, many more than 50 years old, City park funding must be prioritized to to replace unsafe playgrounds, fix restrooms, improve access for the disabled, and ensure the seismic safety of park and recreation facilities. Capital funding secured through general obligation bonds provide long-awaited investment to our citywide parks; however, even with three park bonds issued (2002, 2008, 2012), there is still more than \$1 billion in deferred maintenance and modernization needs remaining. Also, in general, an educated, vocal public steers the direction of park investment toward their neighborhoods with matching funds secured by donation or professional grant writers. Sadly, disadvantaged communities, like the BVHP, do not have these same resources to present their community needs, which means less investment in these communities. The 900 Innes Park project is unique in that it is the first SFRPD project that involves acquiring contaminated property for development into a park - an acquisition process that took more than ten years.

Southeastern San Francisco was once an economically thriving community and the industrial heart of the city from the 1850's to the mid 1900's, and included manufacturing, industry, power generation, and civilian and military ship and boat building and repair facilities, among other heavy industrial uses. Since its wartime peak and the subsequent closure of the Hunters Point Naval Shipyard (a Superfund site) the surrounding community has experienced disinvestment, persistent crime and violence, negative health impacts, high unemployment, and the physical deterioration of the community. Stigmatization of the neighborhood and the absence of investment by the City, coupled with negative health impacts, have created an air of mistrust and outright anger in the surrounding community.

**1.c.ii. Economic Effects of Brownfields.** San Francisco residents are now negatively impacted by contaminated vacated land that contributes to community blight. The decrepit building that front's the main thoroughfare is constantly assaulted by spray paint and has led to trespassers and vandalism on the property and to adjacent property owners. The area was has been a homeless encampment and the due to illegal dumping and graffiti, the area requires twice as much litter abatement/illegal dumping clean-up calls than the city as a whole (311). For decades, the neighborhood has experienced disinvestment, persistent crime and violence, negative health

impacts, high unemployment and the physical deterioration of the community as described earlier. The environmental conditions burdening BVHP exist concomitantly with other forms of disadvantages that have resulted in poor health outcomes. The neighborhood has limited public spaces where community residents can feel safe and socialize with their neighbors. BVHP has also been a food “desert” with very few stores providing fresh produce. Research has conclusively shown that neighborhoods with limited access to fresh food and recreational amenities have higher rates of premature death and avoidable hospitalizations for chronic disease conditions.

## **2. Project Description and Feasibility of Success**

**2.a. Project Description.** Parcel 3A, the Shipwrights Cottage was acquired in August 2014 and although the site is contaminated, the parcels are highly desirable because they are located adjacent to the San Francisco bay shoreline and between two park properties, India Basin Shoreline Park and India Basin Open Space. The block is 1,873 SF, with the Shipwrights Cottage structure representing 900 SF of the site. Built around 1875, the Shipwright’s Cottage is the oldest known residence in the India Basin neighborhood, which was historically a working-class settlement of shipbuilders. Originally constructed as a residence, the building also served as the boatyard’s office.

**2. a.i. Existing Conditions.** Parcel 3A is located at the north corner of the Innes Avenue and Griffith Street intersection. The main street elevation faces the southwest. The northeast rear building façade faces the water. The southeast building façade fronts Griffith Street (a “paper street,” which now is gated at Innes and operates as a driveway rather than a street). The northwest façade looks out on some grasses and otherwise vacant land. The building has been vacant in recent years and has suffered as a result. Structurally, the wood-frame building requires certain upgrades before it can be safely inhabited again. Overall, the Shipwright’s Cottage is in poor condition. Few elements exist in the building that do not require some sort of major maintenance, repair, or replacement. Generally, the exterior is in *poor* condition, with the exception of the recently replaced (2013) roof. The building’s ceiling finish material is acoustical tile and is likely to contain asbestos. Topographically, the property falls away from the elevated Innes Avenue down to the water of India Basin. The first floor of the Cottage meets the road level, with the basement dropping below into the property. The bay-facing northeast elevation is two-stories on this side, and the land continues to slope down to the water beyond the rear stoop. Dry grasses, flowers, and open space with debris and trash ring the building on its parcel. Historic images indicate the yard to the northwest has served as a staging area for building materials or parking area for heavy machinery in recent years.

The Shipwright’s Cottage was designated a San Francisco Article 10 landmark in 2008, at which point the building was found to be a significant cultural resource under Criteria 1 (Events) and Criteria 3 (Architecture) with the period of significance 1870-1930. The building’s designation nomination, based on the 2005 DPR 523A and 523B forms, encompasses only the residence and no surrounding features. In 2015, Page & Turnbull also found the Shipwright’s Cottage to be a contributing feature within the California Register-eligible Anderson & Cristofani Boatyard cultural landscape, a property with a period of significance of 1875-1935. Reuse of a structure involves balancing the historic importance of the building, its current condition and cost of

repair, and the owners' needs and desires for it and/or for the land that it occupies. For the Shipwright's Cottage, as a City landmark, its maintenance on this site is paramount. The expected reuse of the 900 Innes property as a park would allow for this strategy. Reuse in this case would prioritize maintaining the overall character of this structure, sensitively refitting for modern use within their historic layouts, and repairing failed details and features. The best reuse case combines the desired functions within the Shipwright's Cottage historic boundaries. A non-significant later addition would be removed, and lost significant features restored on the exterior. The interior would be manipulated to support the desired functions; including excavation of the basement level to allow for public reuse of this level.

This project is part of a larger vision for the Blue Greenway, an open space system covering 13 miles of trails, and the segment of the regional San Francisco Bay Trail in the city. This plan resulted from the San Francisco Parks Alliance (formerly Neighborhood Parks Council) Areawide Planning Grant (2010), and is supported by the San Francisco Communitywide Assessment Grant (2012). In 2015, Priority Conservation Area (PCA) Grant funding from the California Coastal Conservancy was used to complete environmental studies needed to determine site constraints for planning purposes and for California Environmental Quality Act (CEQA) compliance. In October 2015, a call for qualifications to participate in a design ideas competition for the site was issued. The call was to design a 21st century legacy park in a partly wild, post-industrial, 140-year old historic San Francisco Bay waterfront context, with an emphasis on public access, social equity, recreation, resiliency and habitats. Designers are required to have demonstrated expertise with Coastal Waterfront and Wetlands, Outdoor Recreation and Waterfront Access, contaminated Properties, and Historic Preservation. The resulting conceptual plan will inform the remedial action plan.

**2.a.ii. Proposed Cleanup Plan.** For purposes of a previous EPA grant application, the 900 Innes Avenue property was broken down into three separate Parcels (Parcel 1 through Parcel 3) as shown on Figure 2. This current grant application covers Parcel 3, which was not previously awarded a grant. For purposes of this grant application Parcel 3 has been further broken down into Parcel 3A and Parcel 3B based on differing remedial approaches and contaminant sources. Parcel 3A includes City and County of San Francisco Assessor's Parcel Number (APN) 4646003 which is the Shipwrights Cottage lot. Parcel 3B includes APNs 4646003A, 4646019, 4646002, and 4646001. Remedial activities for Parcel 3A will include abatement of hazardous building materials (asbestos, lead-based paint, and universal waste) from the existing structure as well as lead contaminated soil from the drip line of the Shipwrights Cottage. Remedial activities for Parcel 3B will include excavation and disposal of contaminated soil. This will allow remedial activities of Parcel 3A to be conducted separately from Parcel 3B as the scheduling for the two activities will vary depending on the site redevelopment schedule.

Prior to conducting any remedial activities for Shipwrights Cottage (Parcel 3A), a hazardous materials building survey and building drip line soil investigation will have to be completed to develop a Hazardous Materials Abatement and Clearance Monitoring Plan for the building and a Removal Action Work Plan for lead contaminated soil in the drip line of the Shipwrights Cottage. Because the Shipwrights Cottage is an historical structure, consideration will have to be given to the proposed abatement methods in order to ensure that the historical aspects of the structure are not compromised during abatement of the hazardous materials. It is proposed that the additional Hazardous Materials Building Survey and Building Drip Line Investigation work

will be conducted under the EPA Brownfield Grant currently held by the City and County of San Francisco, Department of the Environment (Grant No. 00T98101).

**Historic Scope** - In order to comply with CEQA and/or Section 106 federal regulations, changes to the Shipwright's Cottage should abide by the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). The restoration of the Site will maintain and restore those character-defining features that are the physical elements that enable the Site to convey its historic identity or significance. The character-defining features for the Shipwright's Cottage are those contributing features that date to the building's period of significance as an individual resource (1870-1930) or as a contributing feature within the Anderson & Cristofani Boatyard cultural landscape (1875-1935).

## **2.b. Task Description and Budget Table**

**Task 1 – Project/Grant Management.** SFRPD staff will perform grant management and reporting, including outputs and outcomes in ACRES. Staff will conduct two procurement processes to 1) Select a technical consult firm to prepare the remedial action plan in accordance with ASTM protocols and consistent with the 900 Innes Avenue Site Analysis of Brownfield Cleanup Alternatives prepared by the U.S. EPA, September 2013 2) Secure a contractor to implement the remediation plan at the site. Staff may also travel to brownfields conferences and workshops. Outputs include ACRES reports, a consultation agreement, and a contract for site remediation.

**Task 2 - Public Outreach and Engagement.** In partnership, non-profit agencies and the Department of Toxic Substance Control (DTSC) will inform the community about the brownfield cleanup effort and document their concerns and incorporate feedback into the remediation plan. Outputs from this task include a minimum of three public meeting or opportunities for public comment on Hazardous Material Abatement and Clearance Monitoring Plan for the Building and the Removal Action Work Plan for the lead contaminated soil.

**Task 3 – Surveys, Investigations, and Plans.** A Hazardous Materials Building Survey and Clearance Monitoring Plan for the building and a Removal Action Work Plan (RAWP) for contaminated soil in the drip line of the Shipwright's Cottage, based on the results of the building drip line soil investigation, will be prepared by technical consultant. Outputs include a Hazardous Material Building Survey, Building Drip Line Soil Investigation, Abatement and Clearance Monitoring Plan and Removal Action Work Plan for Contaminated Soils.

**Task 4 - Site Remediation Activities** will be performed by a qualified and licensed contractor(s) procured in accordance with all applicable local, state, and federal requirements. The hazardous material abatement methods implemented will ensure that the historical aspects of the structure are not compromised. The outputs from this task will be Lead-Based paint removal, and building readied for development. The amount is based on consultant estimates. Outputs include Contractual Abatement of Hazardous Building Materials, Contractual Site Work – Soil Excavation and Disposal, Contractual Site Work – Soil Backfilling and Compactions, and Contract Monitoring.

**Task 5 – Abatement and Removal Action Oversight and Reporting** includes field engineering oversight and management of hazardous building materials abatement and soil removal activities to ensure conformance with the approved Abatement and Clearance Monitoring Plans and soil Removal Action Work Plan (RAWP). Activities will also include the collection of building abatement clearance monitoring samples and analysis of soil confirmation samples in accordance with the RAWP as well as required environmental monitoring specified the HASP. After completion of remedial activities a Hazardous Building Materials Abatement Report (HBMAR) and Removal Action Completion Report (RACR) will be prepared documenting the results of the abatement and removal activities. The RACR will be submitted to the lead regulatory oversight agency for review and approval. The outputs from this task will include the number of clearance and confirmation samples collected, amount of environmental monitoring conducted, and HBMAR and RACR prepared.

**Task 6 – Department of Toxic Substance Control Oversight (DTSC)** has lead regulatory responsibility for investigating and remediating hazardous substances release sites in California. DTSC will provide oversight of the RAWP and Site Certification. This involves conducting site inspections, review and commenting on both the the RAWP and preparation of any required CEQA documents, and review of the RACR. *The Bay Area Air Quality Management District (BAAQMD)* regulates the demolition and renovation of buildings and structures that may contain asbestos. A BAAQMD Renovation Notification Form will be submitted to thye BAAQMD. Additionally, the BAAQMD will be notified of the abatement activities a minimum of will be submitted ten days prior to the start of abatement activities.

The cost basis presented for Parcel 3A in this grant application is from the ABCA prepared by AECOM which includes abatement of hazardous building materials and excavation and off-site disposal of contaminated soil from the building drip line above the presented cleanup criteria. Additional costs for the preparation of other documents indicated above have been included in the costs for remediation of each parcel.

Budget Categories	Project Tasks for GCBPH					
	[Task 1]	[Task 2]	[Task 3]	[Task 4]	[Task 5]	[Task 6]
Programmatic costs only	Procurement Process	Public Outreach	Surveys, Investigations, and Plans	Site Remed Activities	Contractor Remed & Oversight Report	Regulatory Oversight & Site Cert (DTSC)
Personnel	\$2,185	\$2,285	\$285	\$285	\$285	\$285
Travel		\$3,000				
Contractual			\$7,000	\$66,235	\$25,800	\$15,285
Total Federal Funding	\$2,185	\$5,285	\$7,285	\$41,991	\$26,085	\$15,285
Cost Share				\$24,529		
Total Budget	\$2,185	\$5,285	\$7,285	\$66,520	\$26,085	\$15,285

**2.c. Cost Share**

<b>Funding Source</b>	<b>Amount</b>	<b>900 Innes Project Contribution</b>	<b>Status</b>
2012 Open Space	\$41,991	The City and County of San Francisco is providing up to \$764,000 in Open Space Acquisition Funds for Site Remediation.	Active

**2.d. Leveraging of Resources.** The EPA’s brownfields Cleanup grant will leverage 1) the Community-wide Brownfield Assessment Grant funds secured by the City in 2012 for additional sampling, 2) the Priority Conservation Fund Grant which will fund biological, historical and cultural resource studies, 3) two U.S. EPA Brownfield Clean-up Grants for Parcel 1 and Parcel 2 of the 900 Innes Site and 4) the City Open Space Acquisition Funds which have been identified as eligible match funds for the Brownfield Cleanup grant (Attachment D). The City will attempt to secure additional grants from the EPA and DTSC for other budget items. The work completed by these identified sources will be used to leverage development funding through the 2018-2020 City Park Bond Program as well as other State and Federal Grant Funding sources for transportation and park improvements.

<b>Funding Source</b>	<b>Amount</b>	<b>900 Innes Project Contribution</b>	<b>Status</b>
2014 Priority Conservation Area Grant	\$500,000	Conceptual Planning, Public Outreach, Environmental Studies, biological resources assessment, geomorphology and landscape hydrology studies	Active
2012 US EPA Communitywide Brownfield Assessments	\$100,000	The City’s Communitywide Brownfield Assessment Grant funded Phase I and Phase II site assessments of the 900 Innes, the DRAFT remediation plan and will fund additional soil sampling at the site.	Active
2015 U.S. EPA Brownfield Clean-up Grant	\$400,000	The City and County of San Francisco was awarded two U.S. EPA Brownfield Clean-up Grants for Parcel 1 and Parcel 2 of the 900 Innes Site.	Active

The work completed by these identified sources will be used to leverage development funding through the 2018 City Park Bond Program and State and Federal Grant Funding sources.

**3. Community Engagement and Partnerships**

**3.a. Target community: Communicating Progress.** The outreach process will be a cooperative effort led by San Francisco Parks Alliance and the Trust for Public Land, with support from Green Action Network and the A. Phillip Randolph Institute, both local non-profits with expertise in engaging this community. These organizations will distribute multilingual flyers and posters to local businesses, schools, community centers, and public housing projects. This method will assure the more isolated residents have an opportunity to learn about the project and meetings. All notices, key documents and meetings will be translated into Spanish and Chinese which reflects the primary demographics of the area. Additional outreach methods include social media, dedicated email lists, local print and e-newsletters. Meeting materials will also be provided for distribution at community events and through a network of non-profit organizations serving the BVHP community. Public meetings will be announced SFRPD

website, <http://sfrecpark.org/project/india-basin-capital-improvements/> and the India Basin Waterfront website, located at [www.ibwaterfrontparks.com](http://www.ibwaterfrontparks.com).

To date, SFRPD has held five public meeting and participated in five public events to engaged communities and neighborhood groups on a variety of levels. We have also launched a Community Task Force comprised of City, regional, non-profits, and Bayview community stakeholders, to guide the Project Site remediation, as well as future site programming and the park design process. The Task Focus is working with RPD on the India Basin Waterfront Study (IBWS), that includes the the Project Site, RPD-owned India Basin Open Space, Build Inc.'s proposed "Big Green" Park located at 700 Innes, the future Northside Park (part of the Shipyard-Candlestick development plan), Heron's Head Park (SF Port property), and the 100' shoreline zone within PG&E's former power plant site. The IBWS is a comprehensive planning and action document that presents a clear vision for the parks, trails and open space system founded on specific data, research, analysis, and technical studies and includes ecological principals, sea level rise planning, programming, access and circulation. The Project Team proposes to conduct three additional formal community meetings, each focusing on iterative stages of the brownfield clean-up as well as the larger site planning process. The public meetings will provide opportunities to discuss site clean-up plan and measures incorporated into the plan to minimize air quality and impacts on sensitive populations, such as those with respiratory conditions and near-by residents and businesses. SFRPD will provide an online portal for reviewing meeting materials, and provide input. During the public process we will explain how clean-up plan will include measures to minimize air quality impacts on those sensitive populations with respiratory conditions such as asthma. This will be achieved by minimizing vehicle trips, reducing idling times of trucks, and dust suppression measures on the site.

**3.b. Partnerships with Government Agencies.** The City and County of *San Francisco*, *Department of Public Health (SFDPH)*, Environmental Health (E-1) will provide environmental regulatory oversight to this part of the City under delegated authority from two branches of the California Environmental Protection Agency - the Department of Toxic Substances Control and the Regional Water Quality Control Board. SFDPH will provide guidance through the clean-up Project. The *Department of Toxic Substances Control (DTSC)* (E-2) will provide cleanup oversight. *SF Environment* has supported this Project by allocating US EPA Brownfields Communitywide Assessment Grant (2012) funds to support the ABCA, sediment testing for Parcel 1 and 2, and the development of the ABCA for the Shipwrights Cottage. The *Port of San Francisco* (E-3), who developed the Blue Greenway Planning and Design guidelines, is providing consultation on sea level rise strategies and wetland development and management. The *San Francisco Bay Coastal Conservancy* (E-4) provided a \$500,000 grant for public outreach, park planning and environmental studies. *The Bay Conservation and Development Commission* (E-5), a long-time supporter of the SF Bay Trail (<http://baytrail.org/>) and the SF Water Trail (<http://sfbaywatertrail.org/>), provides general project support. The proposed park project improves access to both of these trail systems.

**3.c. Partnerships with Community Based Organizations and Non-Profits.** Following is information on our CBO partners with letters of commitment for each partner in Exhibit 4.

- *San Francisco Parks Alliance (SFPA)* formerly Neighborhood Parks Council (E-6): A non-profit organization with more than 30 years of experience in capacity building and

development of playground initiatives. SFPA spearheaded the Blue Greenway project and secured the 2010 USEPA Areawide Planning Grant, that identified this project site for redevelopment. They will coordinate public input, and play a key role in park planning. Contact: Jackie Omotalade, 415-850-5567.

- *Parks 94124 (E-8)*: A trusted organization with deep roots in the community will provide guidance for an effective community planning process within and for the focus community.
- *Trust for Public Land (TPL) (E-9)*: A national non-profit organization with years of experience working with the City on public park projects. TPL will lead the Park planning project. Contact: Philip Vitale (415) 800-5279.
- *Hunters Point Family (HPF) (E-10)*: A grass-roots, community-based organization that provides holistic programs supporting education, leadership and workforce development, arts enrichment, and recreation to at-risk African American youth and young adults living in the Bayview Hunters Point community of San Francisco. RPD will determine if the project can provide opportunities for graduates from the Hunter Point Family Environmental Workforce Development and Job Training Program. (Letter to describe local hire)
- *Eco Center of Herons Head Park (E-11)*: A non-profit organization that will support public outreach efforts by providing a location to host community meetings.
- *A. Philip Randolph Institute (APRI)*: a non-profit organization, has been serving San Francisco and the Bayview-Hunters Point community since 1994 with the mission to support racial equality, economic justice and to advocate for economically disadvantaged communities through community engagement and civic participation.
- *GreenAction for Health & Environmental Justice*, a multiracial grassroots organization, works with low-income and working class urban, rural, and indigenous communities to fight environmental racism and build a clean, healthy and just future for all.

#### **4. Project Benefits**

**4.a.i Health and/or Welfare and Environment.** This site provides a tremendous opportunity to address health and social equity issues in this underserved neighborhood. Converting the brownfield into a regional park and Bay Trail expansion will create usable park and open space for the BVHP neighborhood. Local children and adolescents need a safe, inviting space for active play and exercise. This physical activity can help residents maintain a healthy weight, lowering the risk of heart disease, colon cancer, and Type 2 diabetes, and other health conditions resulting from inactivity and obesity. Studies also show that physical activity increases self-esteem and decreases stress and anxiety. The park design will improve the community's access to this new outdoor space and opportunities for physical fitness. Non-motorized circulation through the neighborhood to existing and planned amenities will be available through the Bay Trail. Interpretive signage will introduce residents of all ages to the history of their neighborhood and local environment, thus instilling the appreciation for their local landscape. The removal of the deteriorated structures on site will eliminate the potential for trespassing, vandalism, homeless encampments and discourage litter and illegal disposal in the area. Rehabilitation of the "blighted" Shipwrights Cottage will acknowledge the historical significance of this part of the area and instill pride in the neighborhood through the improved aesthetics. Greening the space can reduce crime. Evidence suggests that the presence of trees and well-maintained lower understory vegetation can transform barren spaces lands into pleasant, welcoming, well-used

places. Such common spaces serve to strengthen ties among residents, increase informal surveillance, and deter crime, thereby creating healthier, safer urban communities.<sup>14</sup>

**4. a.ii. Environmental Benefits.** With citywide population growth expected to approach 1 million by 2032<sup>15</sup> and more than 12,000 new housing units planned for this section of the City, the conversion of 900 Innes Brownfield Property provides a tremendous opportunity to meet the growing recreational needs of this area. The park design community process taking place in 2016 will prioritize the protection and enhancement of important habitats and ecosystems of this urban open space through the following ecological improvements: 1) Increase livability and local-scale biodiversity by reintroducing native plant species; 2) Develop multi-use trails to connect communities and help reduce GHG emissions from transportation; and 3) Implement a neighborhood stormwater management with Low Impact Development (LID) features, in coordination with adjacent parcel owners to protect residents from potential flooding, while improving water quality in the Bay. The park design will consider the importance of facilitating urban ecosystem processes and innovative adaptation strategies to minimize the effect of climate change on resources and livability. Access to the Blue Greenway (a network of parks, trails, beaches and bay access points along 13 miles of San Francisco's southeastern waterfront<sup>16</sup>) and Regional Bay Trail System (a five hundred mile trail system that will someday encircle the entire San Francisco Bay<sup>17</sup>) creates alternative transit opportunities.

The India Basin Waterfront Study, a public-private initiative born out of the partnership between SFRPD, TPL, SFPA, and Build Inc. (a private, for-profit developer), has created a clear vision for the integrated development of all publicly accessible parks, trails and open space along the India Basin Shoreline. The scope of the Waterfront Study includes programming, public access and circulation, habitat restoration, ecological and sea level rise strategies, public-private funding and stewardship proposals, and public signage and branding. SFRPD and TPL are conducting a design ideas competition for 900 Innes and India Basin Shoreline Park that will result in the selection of a Design Team and subsequent concept design for 900 Innes, including the Shipwright's Cottage, and India Basin Shoreline Park. The project is also located in a *Priority Development Area (PDA)*, an integral part of the regional *Plan Bay Area*, that integrates land use and transportation planning to address accommodating population growth while keeping the region affordable for all our residents, preserving open spaces, protecting our environment, accommodating transportation needs, and reducing greenhouse gas emissions. PDAs require a local commitment to develop more housing and create a pedestrian friendly environment for residents served by transit. PDA have access to regional funding for these developments.

#### **4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

**4.b.i. Policies Planning or Other Tools.** Reuse of a structure involves balancing the historic importance of the building, its current condition and cost of repair, and the owners' needs and desires for it and/or for the land that it occupies. For the Shipwright's Cottage, as a city landmark, its maintenance on this site is paramount. The expected reuse of the 900 Innes property as a park allows for this strategy. Reuse in this case would prioritize maintaining the

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<sup>14</sup> Kuo, F.E. 2003. The Role of Arboriculture in a Healthy Social Ecology. *Journal of Arboriculture* 29, 3:148-155.

<sup>15</sup> Association of BayArea Governments,

<sup>16</sup> <http://www.sfparksalliance.org/our-work/blue-greenway#sthash.vRdiefZF.dpuf>

<sup>17</sup> <http://baytrail.org/>

overall character of this structure, sensitively refitting for modern use within their historic layouts, and repairing failed details and features. As detailed below, the most significant fabric remains in the character of the exterior and the general volume of the interior; as discussed above, the building is also not in good condition at the exterior or interior. These circumstances dictate how the materials would be treated as reuse is being considered. The best reuse case combines the desired functions within the Shipwright's Cottage historic boundaries. A non-significant later addition would be removed, and lost significant features restored on the exterior. The interior would be manipulated to support the desired functions; including excavation of the basement level to allow for public reuse of this level.

**4.b.ii. Integrating Equitable Development or Livability Principles** – The project will be consistent with the livability principles in the following ways:

- (1) The Project will enhance the long-standing BVHP community and the new housing development planned at 700 Innes by creating a public open space on previously contaminated parcels. At build-out, the 700 Innes urban village would contain up to 1,240 housing units, including affordable housing units, 275,330-SF of neighborhood serving retail & commercial space, a community market pavilion, a new charter school, and artist live/work studios distributed across a mix of 3- to 7- story buildings clustered around a fine-grain network of walkable “shared streets” (where auto and pedestrian traffic safely mix) pedestrian-only laneways and traffic-separated bike paths.
- (2) The project will improve non-motorized circulation through the neighborhood to existing and planned amenities by expanding the Blue Greenway and Regional Bay Trail System and create a connection between the India Basin Open Space and India Basin Shoreline Park. The regional Bay Trail System project is a coordinated effort among public and private property owners and the City and County Transportation agencies.
- (3) The project places a high value on the unique characteristics of the communities that make up the BVHP Neighborhood. The City has engaged, informed and encouraged community-based organizations that represent the diverse ethnicity of groups that comprise this community to participation in both the Brownfield Cleanup and larger park planning effort. The physical characteristics and historical structures on the site will be evaluated by historical preservation professionals to determine which structures can be repurposed and incorporated into the park design. Providing opportunities to interpret the historical significance of this area have been the topic of many discussions with the community and are a very high priority.
- (4) The project has leveraged three earlier investments from the EPA - the Brownfield Areawide Planning Grant awarded in 2010 to the SFPA, the Community-wide Assessment Grant awarded to the City in 2012, and two U.S. EPA Brownfield Cleanup Grants for the remediation of Parcels 1 and 2 in preparation of additional public works investments that will make the site a productive open space.. The city also intends to request Federal Transportation Funding from the MAP-21 program for the Bay Trail Improvements upon completion of the conceptual design and cost estimate.

**4.c. Economic/Community Benefits.**

**4.c.i. Economic and Other Benefits.** The development of the Shipwrights Cottage into a regional recreational space will provide employment for local residents in brownfield remediation and construction and maintenance. Many of these will be local jobs, as San Francisco has a local hire ordinance that requires 50% of the construction workforce to be San

Francisco residents, with 25% coming from disadvantaged communities. The Site is likely to attract more customers to the existing businesses on Third Street and the surrounding areas, particularly those that serve food and beverage.

**4.c.ii. Job Creation Potential: Partnerships with Workforce Development.** All work completed on the site will be subject to San Francisco’s Local Hire Ordinance. The local hiring ordinance applies to contracts for public work or improvement projects in excess of \$400,000 and workers targeted by program are defined as a local resident who (i) resides in a census tract within the City with a rate of unemployment in excess of 150% of the City unemployment rate; or (ii) at the time of commencing work has a household income of less than 80% of the AMI, or (iii) faces or has overcome at least one of the following barriers to employment; being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma; participation in a vocational English as a second language program; or having a criminal record or other involvement with the criminal justice system. SFRPD also is reaching out to the Hunters View Family who has received an EPA Job training Grant with the intent to provide employment opportunities for graduates of their program. (Attachment C)

## **5. Programmatic Capability and Past Performance**

**5.a.i. Programmatic Capability.** Performance of the brownfields cleanup grant will be ensured through the City’s project and financial management teams. The City has stringent monitoring evaluation and reporting requirements. All City programs and expenditures are subject to an audit by the City Controller and the City’s financial system is subject to an independent audit annually. Thus, extensive and comprehensive program and financial records are maintained. City staff assigned to this project is fully committed to performing and completing the brownfields cleanup funded by EPA. However, in the case of staff turnover, the City has standard and fair recruiting processes where jobs are posted on the City website. SFRPD Capital Division is responsible for project development, definition, direction and implementation and has successfully managed large-scale facility renovations most of which involve hazardous material abatement and/or soil remediation. The City’s Capital Improvement Division will hire an experienced firm to oversee the Brownfield Clean-up Activities thru the proper procurement process.

### **Project Team**

- *Nicole Avril*, Project Director, SFRPD, manages the site analysis, environmental studies, brownfield cleanup implementation and the conceptual park plan and strategies the park at 900 Innes. She has experience working on remediation, design and rehabilitation of historical buildings through her work with the Geneva Car Barn and Power House project. She will be responsible for overseeing reporting of outputs and outcomes on ACRES, and financial reporting. The City will follow EPA procurement regulations in seeking consultants and adhere to the City’s strict bidding processes for construction and contract monitoring.
- *Anne Eng*, Environmental Justice Program Manager, will continue to serve as the project manager of the Brownfield community-wide assessment grant. Ms. Eng is experienced with the City’s competitive procurement system, and will solicit bids and proposals to contract with a professional technical consultant to perform any site assessments in accordance with ASTM standards.

- *Toni Moran*, Grants Manager, has more than 20 years of experience managing grants from local, state and federal sources. She will oversee grant reporting and compliance.
- *Katharine Petrucione*, Director of Administration and Finance, has managed all budget, finance and accounting functions for the Recreation and Park Department since 2004. Her role includes supervising review of the grant agreement, and understanding scope of project and eligibility requirements to assure expenditures are accurate and eligible prior to preparing payment requests.

**5.a.ii. No Adverse Audits.** There have been no adverse audit finding for the City’s SFRPD, who will be managing the grant.

**5.a.iii. Past Performance.** The 900 Innes Project is the result of work completed by a previous U.S. EPA Communitywide Brownfields Assessments Grant awarded to the City in 2012.

Award Year	U.S. EPA Grant Program	Amount
2012	Communitywide Brownfield Assessment Grant	\$400,000
2015	Brownfield Cleanup Grant – 900 India Basin Parcels 1 and 2	\$400,000

In mid-2012, the City’s Department of the Environment (SF Environment) was awarded a federal grant (#00T98101) from the EPA, for a brownfields communitywide assessment project in support of the development of an open space corridor that spans along the City’s southeastern waterfront, called the Blue Greenway. The brownfields assessment grant term officially started on October 1, 2012. SF Environment conducted two competitive RFP processes and assembled the project team, which includes a professional environmental services firm to conduct Phase I and Phase II assessments and a local non-profit group to perform community outreach services. The start of the project activities was delayed until the fall of 2013, and EPA approved a 1-year extension for SF Environment to complete all of the tasks outlined in the workplan. The grant term will end by October 1, 2016. During the grant term, SF Environment compiled an inventory of brownfield sites and identified candidate brownfield sites for assessments. SF Environment also worked with a local community group to conduct public outreach. Currently, San Francisco is experiencing significant development pressures, particularly true in the southeast area of the City where land is considered more reasonably priced and available. Several originally identified brownfield sites considered for Phase I assessments are locations of new mixed-use development projects and are no longer candidate sites for brownfields assessment work. These sites have been evaluated and subject to improvements in the developing real estate market in this area. SF Environment’s technical team completed a Phase I assessment for a brownfields site at Napoleon Street in the Bayview community. The project’s technical team also performed an evaluation of sediments at 900 Innes Avenue, to provide a supplemental Phase II site assessment for the SF Recreation and Parks Department. SF Environment is continuing to identify brownfield sites in the Southeast area, and plans to conduct additional site investigations (Phase I and Phase II) during 2015-2016. They plan to complete the brownfields assessment project during the next year.

<sup>i</sup> San Francisco Indicator Project, Source: American Community Survey, 5-year Estimates, 2005-2009

<sup>ii</sup> 2010 Census data, from U.S. Census Bureau, [www.census.gov](http://www.census.gov), unless otherwise noted.

<sup>iii</sup> <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/Hunters+Point+Naval+Shipyard!OpenDocument>

<sup>iv</sup> <http://www.bracpmo.navy.mil/basepage.aspx?baseid=45&state=California&name=hps>

- <sup>ii</sup> 2010 Census data, from U.S. Census Bureau, [www.census.gov](http://www.census.gov), unless otherwise noted.
- <sup>iii</sup> <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/Hunters+Point+Naval+Shipyard!OpenDocument>
- <sup>iv</sup> <http://www.bracpmo.navy.mil/basepage.aspx?baseid=45&state=California&name=hps>
- <sup>v</sup> <http://www.hunterspointcommunity.com/>; [http://www.oewd.org/Development\\_Projects-Candlestick\\_Park\\_-\\_Hunters\\_Point\\_Shipyard.aspx](http://www.oewd.org/Development_Projects-Candlestick_Park_-_Hunters_Point_Shipyard.aspx).
- <sup>vi</sup> Greenaction, “A Toxic Inventory of Bayview Hunters Point, San Francisco” (2004), describing pollution sources in BVHP. See <http://greenaction.org/hunterspoint/documents/TheStateoftheEnvironment090204Final.pdf>
- <sup>vii</sup> ICF/Jones & Stokes, “BVHP Diesel Pollution Reduction Project”, prepared for SF Environment (2009). This study found that freeway diesel-fueled traffic accounted for 23% of the diesel air pollution in BVHP with more than 5 million vehicle miles traveled (VMT) annually within BVHP. See [http://www.sfenvironment.org/downloads/library/bayview\\_diesel\\_pollution\\_reduction\\_project.pdf](http://www.sfenvironment.org/downloads/library/bayview_diesel_pollution_reduction_project.pdf).