



OCCUPATIONAL & ENVIRONMENTAL HEALTH

September 8, 2003

Paul Maltzer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA, 94103-9432

**RE: Initial Study of 1169 Market Street and 1177 Market Street
Case No 2002.1179E**

Dear Mr. Maltzer:

Our agency has reviewed the proposed projects at 1169 Market Street and 1177 Market Street and would like to request the consideration of the following potentially adverse impacts in the scope of the environmental review required under the California Environmental Quality Act:

1. Potential adverse impacts on population and housing due to displacement of people, including adverse health effects on human beings due to the loss of affordable housing, inadequate housing, or displacement;
2. Conflicts with land use planning and policy including fair-share housing goals, affordable housing goals, transit first policy, and family housing goals;
3. Potential environmental justice impacts.

The San Francisco Redevelopment Agency's mid-market project area committee also raised concerns about the net loss of affordable housing at their meeting of June 11, 2003.

Regulatory Context

CEQA guidelines consider any direct or indirect adverse effects on humans as mandatory findings of significance. CEQA also specifies that *a social or economic change related to a physical change may be considered in determining whether the physical change is significant.* [15382] CEQA further recognizes that significantly adverse effects can be products of indirect and complex causal pathways, including those mediated or modified by social and economic effects.

An EIR [Environmental Impact Report] may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. [California CCR 15131]

As you know, the San Francisco Department of Public health routinely reviews public health, air quality and hazardous materials issues of environmental impact reports for the SF Dept of Planning. Our review has traditionally focused on issues of air quality; contaminated soil and water, and the handling of hazardous materials or wastes. However, land use, housing and transportation decision produce other direct and indirect adverse effects on health and human well being as strong as or stronger than effects due to environmental contamination. [WHO, 2000] For example, land use policies influence the type of housing constructed, housing affordability, and the jobs—housing balance. Inadequate housing has direct impacts on human health and indirect impacts through displacement and changes in community character and cohesion.

Project and Potential Impacts

The project involves the demolition of 377 mostly rent-controlled units at the Trinity Plaza apartment building, 1169 Market St. The new proposal includes 1,410 mostly market-rate units divided among five buildings. The new structure, 1177 Market St., would include 169 affordable units under city law; however, even for the affordable units rents may be greater than rents under rent control. The majority of the units would be studios with one- and two-bedroom units making up the balance.

Our department has witnessed broad spectrum of adverse health effects in San Francisco due to inadequate and unaffordable housing. From a public health perspective housing is affordable, physically safe, stable, spacious, and located in a setting that allows for a meaningful work and community participation. Our Department strongly supports the development of housing including increased housing density in areas well served by transit and mixed use development so long as the development meets city residents' housing needs and helps to achieve an improved city's jobs-housing balance.

However, given the current cost of market rate housing, only a fraction of the current households living at the proposed site would also be able to live at the future site. Other would likely be displaced meaning that they would find housing beyond their means, accept inadequate housing, move out of the city or region, or become homeless. Each of these consequences has significant adverse consequences to health and well being.

Spending more of their household income on rent often means doing without necessities such as food and clothing. Accepting substandard or overcrowded housing conditions affects health conditions such as asthma, personal sense of control, level of stress and children's school performance. People unable to afford housing also work extra hours or at multiple jobs at the expense of personal well-being and family relationships.

Displacement results in the loss of supportive family and community relationships. Changing jobs comes at the expense of career choice, job seniority, or job related health benefits. Frequent family relocation leads to children's grade repetitions, school suspensions, and emotional and behavioral problems. Homelessness is the most severe consequence of unaffordable housing and results in exposure to the elements, disease susceptibility, a decrease in self-esteem, a loss of a sense of control and an ability to care for oneself, and social stigma.

The 2003 Draft Housing Element describes San Francisco's need for a range of housing for all residents. The fair market rent for a two-bedroom apartment is \$1904 which is affordable only to those

who make 90% of the average family's median income of \$86,100. While San Francisco is meeting its market rate housing goal, it is not currently meeting the housing needs of moderate income, low income and very low income communities. According to the Housing Element, the strongest job growth is expected in the service and retail sectors however, much of that growth is represented by low and medium wage jobs including cashiers, waiters and cooks, sales people and clerks, and painters, carpenters and electricians.

The Mayor's Office of Housing estimates that the city needs to build 19,000 units of affordable housing between 2001 and 2005. State law defines our city's fair share housing goals in terms of four categories of affordability. The 2003 State of California General Plan Guidelines further emphasize the need to carefully match employment potential, housing demand by income level and type, and new housing production. Current jobs in the downtown area include a mix of professional, managerial, support services, and retail with a wide range of incomes. Similarly, most of the new jobs projected for our city's economy will work in the service and retail sectors and thus earning incomes insufficient to afford market-value property. The linkage between jobs and housing is also necessary for the city's transit first goals and for sustainable development.

The Housing element also describes a significant demand for family housing. Current residents consider the lack of affordable housing one of the most important reasons for San Francisco not being child-friendly. Economically integrated neighborhoods have significant benefits for the health and development of children. For example, in lower income children benefit from residence in more economically integrated neighborhoods as evidenced by improved measures of school performance and behavior. The proposed project should be assessed with regards to achievement of these policy goals and requirements.

Environmental Justice provides a final rationale for considering these effects under CEQA. California Law defines Environmental Justice as *the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.* (Government Code Section 65040.12) Environmental justice is rooted in the Equal Protection Clause of the U.S. Constitution and can be advanced using NEPA as well as the Civil Rights Act of 1964. In California, Assembly Bill 1553 requires that the principles of environmental justice be incorporated into state guidelines for local general plans. [AB 1553] The 2003 draft General Plan Guidelines include mixed-income housing development as a component of environmental justice. An environmental justice analysis of this project would focus on the potential for disproportionate impacts to low income and minority populations both living in the current units as well as in the surrounding neighborhood.

A number of resources are available to assess the potential impacts described above. In 1994, the U.S. Federal Government published a set of guidelines for Social Impact Assessment (SIA) to compliment the analysis of physical environmental effects. (Inter-organizational Committee on Social Impact Assessment, 1994) The guidelines include social impacts such as population dynamics, political and institutional structures, community assets, personal resources, and health. In the US, transportation agencies such as the California Department of Transportation have guidelines for community impact assessment. Outside the US, public health practitioners have developed a practice of Health Impact Assessment (HIA) that seeks to integrate systematically diverse assessment methods to emphasize the social, economic, environmental, and institutional conditions affecting health.

While the project would provide new market rate housing opportunities for many San Franciscans, the poor and minorities may be disproportionately impacted by displacement. However, given the total number of units in the proposed project is greater than the units being lost, these potential impacts could be mitigated.

I would appreciate your consideration of this request and would be happy to work in partnership with you on methods to evaluate these impacts. Please contact me at 252-3982 if you would like to discuss this request further.

Respectfully,

Rajiv Bhatia, MD, MPH
Director, Occupational & Environmental Health

CC: Carolina Guzman, SFDPH
Lisa King, SF Redevelopment Agency