

From: [Mourad](#)
To: [Board of Supervisors, \(BOS\)](#)
Date: Thursday, February 01, 2018 8:26:48 PM

Dear SF Board of Supervisors,

I'm writing in support of Saba Poultry on Wallace Street. Their service of providing fresh and healthy food is needed in the area and will be a great addition to San Francisco.

Driving to shop in their Oakland location is a hassle, but its quality and cleanliness makes the drive worthwhile. It's time to have a location for San Francisco and neighboring cities.

My best regards,

Mourad

Sent from my iPhone

From: [mutaher altareb](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Support for Saba Live at 1526 Wallace Street; file no. 180013"
Date: Thursday, February 01, 2018 7:55:34 PM

Im support saba live pottery
Sent from my iPhone

From: [Hameza Musid](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: "Support for Saba Live at 1526 Wallace Street; file no. 180013" please email below
Date: Thursday, February 01, 2018 9:23:36 PM

Dear SF Board of Supervisors,

I'm writing in support of Saba Poultry on Wallace Street. Their service of providing fresh and healthy food is needed in the area and will be a great addition to San Francisco.

Their Oakland location is a good example of their quality and cleanliness. It's time to have a location for San Francisco.

Such neighborhood-oriented business will also hire locals and be run responsibly without causing disturbance to the neighborhood.

I know people that travels all the way to the farms and get live chickens, they take them to their homes and slaughter them in their kitchens. This place will be a great opportunity to save people's time and get their chickens slaughtered professionally and under supervision of health and other government authorities.

Thank you for serving our city and bringing such businesses of exceptional service to operate in the city.

Best Regards,

Hameza Musid
A resident of San Francisco

From: [abdul tinham](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Support for Saba Live at 1526 Wallace Street; file no. 180013
Date: Thursday, February 01, 2018 7:43:29 PM

Hearing this terrible news shook me. With their great support, excellent service, and good fresh quality meet and wanting to close this store down does not make sense at all. This needs a better look at. I am a supporter for the saba live to stay up and open for business.

Sent from my iPhone

From: [Hana Anakeeb](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: "Support for Saba Live at 1526 Wallace Street; file no. 180013"
Date: Thursday, February 01, 2018 8:15:42 PM

“Support for Saba Live at 1526 Wallace Street; file no. 180013”

Greetings

My name is Hana Anakeeb, I live in Modesto CA, I travel 90 miles weekly to Saba live. To buy fresh live poultry. Every time I am there they store is always clean. I used to live in Oakland before moving to Modesto. And for the past two years I have always bought my chicken from them. Please keep this store open. It is one of the best, I was in shock when the owner told me that they have a court date. I asked the owner if there is anything that I could help with, and he said if I want I could send an email. This is the least I could do for a place that this Community needs even though I don't live here anymore I always make a weekly trip!

Please help keep this place open!
Thank you and have a good day.

From: [Salah Sanad](#)
To: [Board of Supervisors, \(BOS\)](#); [Fewer, Sandra \(BOS\)](#); [Peskin, Aaron \(BOS\)](#); [Tang, Katy \(BOS\)](#); [BreedStaff, \(BOS\)](#); [Kim, Jane \(BOS\)](#); [Yee, Norman \(BOS\)](#); [Sheehy, Jeff \(BOS\)](#); hilary.ronen@sfgov.org; [Cohen, Malia \(BOS\)](#); [Safal, Ahsha \(BOS\)](#); [Chicuata, Brittni \(BOS\)](#)
Subject: Support for Saba Live at 1526 Wallace Street, file no. 180013
Date: Thursday, February 01, 2018 8:28:38 PM

We like this place. There is another in the Oakland area, and there real professional. There really clean and organized. They are honest and hard workers. It will give also give the community new opportunities for jobs.

From: [Ibrahim Hugaib](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Saba live business
Date: Thursday, February 01, 2018 10:10:40 PM

Saba Live is a business committed to serving the community in the best possible way. For the last years in business, we have had no issues. On the contrary, Saba Live does clean business with me and everyone else I know. Please reconsider this case.

Sent from my iPhone

From: [Abdul](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Saba live
Date: Thursday, February 01, 2018 10:25:16 PM

Saba Live is a business committed to serving the community in the best possible way. For the last years in business, we have had no issues. On the contrary, Saba Live does clean business with me and everyone else I know. Please reconsider this case.

From: [Musa J](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Case 180013
Date: Thursday, February 01, 2018 8:35:45 PM

Hello,

I'm sending this email to to who is matter about Saba live meat, they are down great fresh meat and more important is very health to everyone

Please Suport this Bussines

Thank you

Sent from my iPhone

From: [Murad Alhmadani](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: Arab poultry and meat shops provide good services and deserve support and encouragement
Date: Thursday, February 01, 2018 8:32:52 PM

Sent from my iPhone

From: [Omar Wahib](#)
To: [Board of Supervisors, \(BOS\)](#)
Subject: 180013
Date: Thursday, February 01, 2018 10:17:18 PM

Greetings,

My name is Omar I live in Oakland Ca, ever since Saba live, opened I've always been their customer. What always brings me back is their quality chicken and their great customer service. But most of all the cleanness of their store. I recently visited their store and the owner told me about the problem's their facing. I asked him, please if their is any way I can help let me know. He said if I want I can email you, and let you know how I feel about their store. In my opinion it's one of the best period!

Sent from my iPhone

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW:
Date: Friday, February 02, 2018 8:56:20 AM

From: Mohamed Dabwan [mailto:dabwanmohamed@icloud.com]
Sent: Thursday, February 01, 2018 10:25 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject:

Saba Live is a business committed to serving the community in the best possible way. For the last years in business, we have had no issues. On the contrary, Saba Live does clean business . with me and everyone else I know. Please reconsider this case

Sent from my iPhone

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW: Saba Live Poultry
Date: Friday, February 02, 2018 8:54:52 AM

-----Original Message-----

From: Selwa Mused [<mailto:selwamused@gmail.com>]
Sent: Thursday, February 01, 2018 10:32 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Saba Live Poultry

Before opening Saba Live Poultry in Oakland I had to go to the farm in order to get the meat I wanted for my family. Sometimes they didn't have the meat I wanted and it was too far to go every time. I had to bring the chicken live home or cut it over there in the farm by myself and it was a lot of work and very messy. Also I didn't the right, sanitized tools. Saba Live Poultry is very sanitized and clean. Saba Live Poultry is one of my favorite place for fresh meat and chicken, it is near me so I don't have to worry about not having meat and I hope they open one in San Francisco.

Sent from my iPhone

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW:
Date: Friday, February 02, 2018 8:52:19 AM

-----Original Message-----

From: Dahrhan Alatali [<mailto:धारहानालातुली@me.com>]
Sent: Thursday, February 01, 2018 11:34 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject:

Dear to whom it may concern,

I am a satisfied customer at Saba Live Poultry! I purchase my poultry from this place every week! They have really good and fresh meat! Haven't had a problem with them, which explains why I have been purchasing my meat from this place for the past 7 years! I recommended Saba Live Poultry to almost every family member and friends! They are also satisfied from what I see! My favorite thing about them is they have a variety of meat and it's all fresh. Just wanted to let you know my experience with them is amazing!

Sent from my iPhone

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW: Saba live
Date: Friday, February 02, 2018 8:51:06 AM

-----Original Message-----

From: Khaled Alammari [<mailto:khaledamari@icloud.com>]
Sent: Thursday, February 01, 2018 11:47 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Saba live

Sent from my iPhone
Saba Live is a business committed to serving the community in the best possible way. For the last years in business, we have had no issues. On the contrary, Saba Live does clean business with me and everyone else I know. Please reconsider this case.

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW: Saba Live
Date: Friday, February 02, 2018 8:50:46 AM

-----Original Message-----

From: Sina Yasir [<mailto:sina.yasir@icloud.com>]
Sent: Friday, February 02, 2018 12:47 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Saba Live

Hello,

Saba Live is a business committed to serving the community in the best possible way. For the last five years in business, we have had no issues. On the contrary, Saba Live does clean business with me and everyone else I know. Please reconsider this case.

Thank you,
Sina A.

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [BOS Legislation, \(BOS\)](#)
Subject: FW: "Support for Saba Live at 1526 Wallace Street; file no. 180013"
Date: Friday, February 02, 2018 8:47:19 AM

From: Esihag Al-Murisi [mailto:ealmurisi@mail.ccsf.edu]

Sent: Friday, February 02, 2018 3:59 AM

To: Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; BreedStaff, (BOS) <breedstaff@sfgov.org>; Chicuata, Brittini (BOS) <brittini.chicuata@sfgov.org>; Ronen, Hillary <hillary.ronen@sfgov.org>; Kim, Jane (BOS) <jane.kim@sfgov.org>; Tang, Katy (BOS) <katy.tang@sfgov.org>; Cohen, Malia (BOS) <malia.cohen@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; Fewer, Sandra (BOS) <sandra.fewer@sfgov.org>; ahsha.Safai@sfgov.gov; Sheehy, Jeff (BOS) <jeff.sheehy@sfgov.org>

Subject: "Support for Saba Live at 1526 Wallace Street; file no. 180013"

To whom it may concern:

I'm writing this email with support to Saba Live poultry. I have been buying my meat at this place for a long time. From my experience with those people, they do meet standard health rules with the cleanliness of the store and meat, the professionalism of their job in slaughtering sheep and chicken and I don't see any reason the city doesn't give the owners any licenses required to open more stores throughout the Bay Area to help facilitate people needs who either religiously or traditionally prefer to eat certain types of food, primarily halal meat. I am one of those people who want to have their meat fresh. I would also like to appreciate your understanding and consideration of this support.

Sincerely Yours
Isaac

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors; BOS Legislation, \(BOS\)](#)
Subject: FW: "Support for Saba Live at 1526 Wallace Street; file no. 180013"
Date: Friday, February 02, 2018 8:47:10 AM

From: Sam Abdu [mailto:samabdu39@gmail.com]
Sent: Friday, February 02, 2018 3:59 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: "Support for Saba Live at 1526 Wallace Street; file no. 180013"

They are part of our oakland community we shop alot there their service is great. They are very friendly and they have clean and healthy service it well be more convenient if they have a San Francisco location i give them my support.

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [BOS Legislation, \(BOS\)](#)
Subject: FW: In the subject line, include "Support for Saba Live at 1526 Wallace Street; file no. 180013"
Date: Friday, February 02, 2018 8:46:58 AM

From: Sam Abdu [mailto:samabdu39@gmail.com]
Sent: Friday, February 02, 2018 4:18 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Fewer, Sandra (BOS) <sandra.fewer@sfgov.org>; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Tang, Katy (BOS) <katy.tang@sfgov.org>; BreedStaff, (BOS) <breedstaff@sfgov.org>; Kim, Jane (BOS) <jane.kim@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; Sheehy, Jeff (BOS) <jeff.sheehy@sfgov.org>; Ronen, Hillary <hillary.ronen@sfgov.org>; Cohen, Malia (BOS) <malia.cohen@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Chicuata, Brittini (BOS) <brittini.chicuata@sfgov.org>
Subject: In the subject line, include "Support for Saba Live at 1526 Wallace Street; file no. 180013"

They are part of our oakland community we shop alot there their service is great. They are very friendly and they have clean and healthy service it well be more convenient if they have a San Francisco location i give them my support

From: [Mchugh, Eileen \(BOS\)](#)
To: [BOS Legislation, \(BOS\)](#)
Subject: FW:
Date: Friday, February 02, 2018 8:46:38 AM

-----Original Message-----

From: Board of Supervisors, (BOS)
Sent: Friday, February 02, 2018 8:30 AM
To: BOS-Supervisors <bos-supervisors@sfgov.org>
Subject: FW:

-----Original Message-----

From: Adel Alsharay [<mailto:aalsharay@yahoo.com>]
Sent: Thursday, February 01, 2018 9:12 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject:

Before it was very hard for me to buy meat because there aren't many places that I trust and are sanitized. Ever since Saba Poultry has opened in Oakland it has been the only place I go to buy meat and the place I trust. Opening the same store in San Francisco will be a great way for others to eat healthy clean meat and not worry about anything harmful.

Sent from my iPhone



File No. 180013
BOS-11
C page

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

2018 JAN 16 PM 1:55

1/12/18

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

RE: Appeal of CEQA Exemption Determination for Saba Live Poultry Conditional Use Permit (2017-010819CUA)

Dear San Francisco Board of Supervisors,

On behalf of our members and constituents in Bayview Hunters Point, San Francisco, we submit the following comments on the CEQA Exemption Determination for the Saba Live Poultry Conditional Use Permit.

Greenaction For Health and Environmental Justice is a multiracial grassroots organization that 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. Greenaction has been involved in environmental health and justice advocacy in Bayview Hunters Point since we were founded in 1997. This low-income community of color continues to be negatively and disproportionately impacted by pollution, gentrification, health disparities, and other forms of environmental, social, economic injustice.

The conversion of an automobile towing and repair shop into a livestock sale and processing facility that will confine up to 500 animals at a time in close quarters, and slaughter hundreds of thousands of animals each year, has significant environmental effects that demand analysis and mitigation under CEQA. Moreover, approving the transport, housing, slaughter, and processing at this location will detract from future economic development of Bayview-Hunters Point, and will unduly burden a community that already suffers from disproportionate environmental impacts. At the very least, a CEQA Exemption is not appropriate for this facility.

The Saba Facility Will Have Significant Environmental Effects

Environmental issues associated with poultry and livestock processing include air emissions from animal transport and confinement, air emissions from diesel exhaust, wastewater and water emissions, solid waste management, socioeconomic and environmental justice, and animal health and welfare.

The Department must consider all of these issues under CEQA prior to granting a conditional use permit.

1. Air emissions from animal transport and confinement

In addition to the diesel emissions caused by these trucks, trucks carrying animals to the facility have the potential to spread pathogens and other matter from the animals, themselves. The nature of live animal transport requires open-sided trucks or ventilatory openings.¹ The Food and Agriculture Organization (FAO) of the United Nations describes live animal transport as “ideally suited for spreading disease,” given that animals are “confined together for long periods in a poorly ventilated stressful environment.”² The immunosuppressive stress of prolonged transport may not only increase a healthy animal’s susceptibility to infection, but it may trigger the emergence of a variety of diarrheal and respiratory diseases caused by endogenous microorganisms that might not normally lead to disease.³ Because no federal laws regulate the long-distance transport of chickens, specifically, it is even more difficult to ensure that flocks do not present disease risk to the communities of residents through which they are transported.⁴

Air emissions from animal confinement, slaughter, and processing that will take place at the facility also present significant environmental concerns. Animal holding areas, processing operations, sanitizing operations, wastewater systems, and heat sources are recognized by the U.S. Environmental Protection Agency as sources of volatile organic compounds, hazardous air pollutants, and other criteria pollutants. In addition to volatile organic compounds, confinement facilities can emit other air pollutants of concern, such as hydrogen sulfide, ammonia, and toxins less than 10 microns in diameter (“PM10”), including endotoxins, bacteria, yeasts, and molds.⁵ They also cause odors from animal housing and waste management, and dust from feed storage, loading and unloading, and waste management activities.⁶ Long-distance live animal transport also may increase the fecal shedding of disease agents: studies have shown that long-distance transport increases the prevalence of Salmonella within animal feces, and the number of contaminated animals.⁷ Long-distance live animal transport may also facilitate the spread of animal pathogens with the potential to cause human disease, such as Avian influenza.⁸

Facilities that confine animals emit air pollutants through the management and disposal of animal manure, the movement of animals and their bedding, and the animals themselves. Ammonia gas and other sources of odor are generated primarily during denitrification of manure and can be released directly into the atmosphere at any stage of the manure handling process, including through ventilation of buildings and manure storage areas.⁹ Ammonia gas levels also may be affected by the ambient temperature, ventilation rate, humidity, stocking rate, litter quality, and feed composition (crude protein). Ammonia gas (NH₃) has a sharp and pungent odor and can act as an irritant when present in elevated concentrations. When deposited into surface waters it may contribute to eutrophication, which depletes water of oxygen and harms aquatic and other water-dependent species.

Airborne dust is another factor. In poultry production and processing operations, dust results from the handling and storage of feed ingredients that may include biological agents (pathogens, bacteria, fungi, mites, and viruses) and particles from grain, mites, fungi, and bacteria, as well as inorganic material such as limestone.¹⁰ Other sources of dust include bird manure and associated bioaerosols.¹¹ Dust can cause respiratory problems and facilitate transport of odors and diseases. Some dusts may contain antigens that can cause severe irritation to the respiratory tract.¹² Acute toxic alveolitis, otherwise known as organic dust toxic syndrome, can accompany even brief, occasional exposures to heavy concentrations of organic dust and moldy feed materials in agricultural environments.¹³ Inadequately ventilated buildings can exacerbate these concerns for workers in the facility, while improper ventilation systems can disperse the risks to nearby businesses and their customers, as well as local residents.

Children, the elderly, and other sensitive populations are particularly susceptible to air emissions, including particulate matter and suspended dust that are linked to asthma and bronchitis. Smaller particles can actually be absorbed by the body and can have systemic effects, including cardiac arrest. Long-term exposure can lead to decreased lung function.¹⁴ Ammonia emissions are rapidly absorbed by the upper airways in the body, causing severe coughing and mucous build-up—and if severe enough, scarring of the airways. Particulate matter may lead to more severe health consequences for workers who are exposed by their occupation.¹⁵

This is especially relevant in Bayview-Hunters Point. Compared to San Francisco as a whole, all of Bayview-Hunters Point is in the top 25 percent of tracts with highest “PM2.5”¹⁶ concentrations; however, the average concentration in Bayview-Hunters Point is about 2 percent higher than the average for all of San Francisco. In 2010, 4.4 percent of Bayview-Hunters Point population lived in an area with a PM2.5 concentration at or above 10 µg/m³, compared to 1.2 percent of citywide populations living in such an area.¹⁷ Likewise, 5.5 percent of Bayview-Hunters Point residents live in an area with total cancer risk greater than 100 cases per 1 million people, compared to 3.3 percent of residents citywide—a disproportionately greater percentage than the surrounding community.¹⁸

Degraded air quality can negatively affect the mental health and quality of life of nearby residents. Odors can cause lifestyle changes for individuals in the surrounding communities and can alter many daily activities. If odors are severe, people may choose to keep their windows closed, even in high temperatures when there is no air conditioning; parents may choose to not let their children play outside nearby. Odors can cause negative mood states, such as tension, depression, or anger, and possibly neurophysiologic abnormalities, such as impaired balance or memory.¹⁹

These effects warrant consideration with regard to the Saba facility, especially, because nuisance odors, traffic density, and asthma hospitalization rates are already environmental justice indicators for Bayview-Hunters Point—meaning this neighborhood already suffers from these adverse environmental circumstances disproportionately compared to San Francisco as a whole or other San Francisco neighborhoods.²⁰ The effect of nuisance odors is already familiar to residents of Bayview-Hunters Point: since publication of the Southeast Plant Odor Control Master Plan in 1998, the San

Francisco Public Utility Commission has recognized that nuisance odors are an issue due to the siting of the treatment plant that processes 80 percent of San Francisco's wastewater.²¹ Plus, the Saba facility will be located less than a half-mile from Drew and Carver Elementary Schools (.4), a half-mile from the Burnett Child Development Center, and under a mile from both Hart Elementary and the Malcolm X Academy (.7). As the members of this community who are most sensitive to airborne emissions, the health of students at these schools must be protected.

2. Air emissions from diesel exhaust

The CEQA analysis should include environmental, health, air quality and cumulative impact information from the California Environmental Protection Agency and the Bay Area Air Quality Management District (BAAQMD) – both of whom have documented that Bayview Hunters Point is a community highly at risk from pollution.

In 2004 BAAQMD initiated the Community Air Risk Evaluation (CARE) program to identify areas with high concentrations of air pollution and populations most vulnerable to air pollution's health impacts. The Bayview Hunters Point community was designated by BAAQMD as a CARE community. In Bayview Hunters Point, the intersection of ports, railways, municipal vehicle yards, concrete batch plants, freeways, and a large waste water treatment facility has contributed to high rates of air pollution and asthma hospitalizations. According to the Bay Area Air Quality Management District (BAAQMD), despite tremendous strides in air pollution reduction, communities such as Bayview Hunters Point, experience higher pollution levels, and more adverse health effects, compared to their counterparts in other parts of the region (http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx). Additionally, according to a report by the Bay Area Regional Health Inequities Initiative (a collaboration of senior officials, managers and staff from eight health departments in the Bay Area), where a person lives helps determine his or her health outcomes: Bayview/Hunters Point residents are expected to live 14 years less than those living in Russian Hill (http://barhii.org/wp-content/uploads/2015/09/barhii_hiba.pdf).

The Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA) created CalEnviroScreen, which is a screening tool that ranks California communities based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. CalEnviroScreen 3.0 ranks Bayview Hunters Point in the 90th percentile. This percentile means that Bayview Hunters Point has a higher pollution burden and pollution vulnerability than 90% of California (CalEnviroScreen 3.0 Data Map, <https://arcg.is/qim5X>).

More specifically, CalEnviroScreen ranks Bayview Hunters Point in the 99th percentile for diesel particulate, 98th percentile for groundwater threats, 98th percentile for asthma, 99th percentile for low birth weight, and 86th percentile for hazardous waste. The community's vulnerability to

pollution is amplified by socioeconomic factors such as poverty, unemployment, and housing affordability. CalEnviroScreen ranks Bayview Hunters Point in the 87th percentile for poverty, 84th percentile in unemployment, and 91st percentile in housing affordability (residents of low-income households with high housing costs may suffer adverse health impacts).

The CEQA Worksheet prepared for this facility incorrectly indicated that it will not emit substantial pollutant concentrations from diesel trucks, nor adversely affect transit. CEQA requires the Department to consider not just emissions and effects from the facility itself, but from the project as a whole—including the trucks and transport that are essential to its operation. If operations at Saba's Oakland facility are any indication, trucks will travel both to and from the Bayview facility each day to deliver birds and an unknown amount of times at unknown intervals to carry waste from the facility. Each of these trips is essential to Saba's operation, and also a direct contributor to air emissions and climate change. In fact, the federal Farm Service Agency recognizes that trucks are a primary source of greenhouse gases produced by the poultry industry.²²

As of 2009, diesel particulate matter emission from trucks and buses made up 23 percent of all air emissions within Bayview-Hunters Point.²³ Over half of these emissions result from activity on the freeways that cut through the neighborhood and disproportionately burden the community with air quality impacts.²⁴ However, diesel trucks also account for over 1.6 million vehicle miles traveled through arterial streets and over 120,000 vehicle miles traveled on local roads in Bayview-Hunters Point, not including idling time.²⁵ Traffic densities in the western portion of the neighborhood exceed the traffic densities of more than 85 percent of the remaining tracts in San Francisco, and this is only expected to increase through 2040.²⁶ Increasing truck traffic on arterial and local streets will continue to decrease local air quality and public health, further burdening this community.

3. Wastewater and water emissions

Wastewater is one of the biggest concerns associated with slaughterhouses nationwide. Poultry operations, specifically, may generate effluents from various sources, including poultry housing, feeding, and watering, as well as from waste storage and management. The siting of the Southeast Plant mentioned above indicates that the Bayview-Hunters Point community already bears a disproportionate burden from the indirect impacts of wastewater.²⁷

Effluents from poultry operations typically have a high content of organic material—and consequently a high biochemical oxygen demand and chemical oxygen demand—as well as nutrients and suspended solids such as fat, grease, and manure.²⁸ The greenhouse gases methane and carbon dioxide are created both in the process of slaughter and by the degradation of wastewater. Wastewater contains a number of organic materials, all of which release methane and carbon dioxide when they decompose. It may also contain residual amounts of growth enhancers and antibiotics, hazardous materials such as disinfecting agents, and pesticides and rodenticides that may be used to control pests within the facility.²⁹

Wastewater from slaughterhouses is also one of the largest sources of nitrate pollution in drinking water nationwide.³⁰ High nitrate levels can cause blue baby syndrome, a fatal condition that impacts babies under six months of age. Nitrogen pollution in waterways can also kill aquatic life, and make it much more difficult for fish, insects, and other water-dependent species to survive.

4. Solid waste management and disposal

Solid waste generated during poultry production includes waste feed, animal waste, carcasses, wastewater, contaminated ventilation filters, and used cleaning materials.

With regard to feed, common poultry feed primarily consists of corn and soy, although other grains, materials, and substances of animal origin (e.g. fish meal, meat and bone meal, and milk products) may also be added.³¹ Feed is typically supplemented with amino acids, enzymes, vitamins, mineral supplements, and may contain hormones, antibiotics, and heavy metals.³² Feed can become unusable waste material if spilled during storage, loading, and unloading or during animal feeding.³³

With regard to animal waste, poultry production operations can generate significant quantities. Animal waste management requires collection, transport, storage, treatment, and either use or disposal. Manure is generally stored on-site at poultry processing facilities until it can be transported elsewhere. Poultry manure contains nitrogen, phosphorus, and potentially hormones, antibiotics, and heavy metals that are part of the animals' feed.³⁴ In fact, the U.S. Department of Agriculture has found that poultry manure generally contains two to four times more nutrients than is contained in the manure of other livestock.³⁵ These substances may result in air emissions of ammonia and other gases and may pose a potential risk of contamination to surface or groundwater resources if not properly stored, treated, and disposed of. Manure also contains bacteria and pathogens that may potentially affect soil, water, and food resources.³⁶ Animal carcasses are also a significant source of disease and odors, and can attract disease vectors.³⁷

5. Socioeconomic and environmental justice impacts

CEQA requires the Department to analyze the effects of the Saba facility on the particular community in which it will operate; even if the facility could generally be permitted, it may not be appropriate for the Bayview, specifically. To guide an environmental justice analysis, "indicators" are used to determine what adverse socioeconomic, environmental, health, community, and other circumstances residents of Bayview-Hunters Point experience disproportionately compared to San Francisco as a whole or to other neighborhoods in San Francisco. The U.S. Environmental Protection Agency defines environmental justice indicators as data that "provide information that can be used in an environmental justice assessment to supplement, as appropriate, information more specific to the environmental decision being evaluated (e.g., impacts from a facility being sited or permitted, or potential impacts from a proposed rule) and data required by the statutes and regulations that apply to the particular situation."³⁸

Over half of San Francisco’s industrial zoning is located in Bayview-Hunters Point.³⁹ Ninety-one to 100 percent of residents in the immediate neighborhood around the proposed 1526 Wallace Ave are considered “minority” or non-White.⁴⁰ In the neighborhood as a whole, 19 percent of families and 21 percent of individuals live below the federal poverty thresholds.⁴¹ This community’s designation as an industrial zone should not and does not provide the Department with carte blanche to site facilities that will further reduce the quality of life of its residents.

In June 2017, the San Francisco Public Utility Commission (SFPUC) published an Environmental Justice Analysis for Bayview-Hunters Point as part of its Biosolids Digester Facilities Project. This analysis builds upon previous or concurrent studies that are also relevant to the Department’s environmental justice analysis of the Saba facility.⁴² The recent SFPUC analysis shows that nuisance odors, traffic density, population of children, resiliency to climate change, and asthma hospitalization rates are considered environmental justice indicators for Bayview-Hunters Point—meaning this neighborhood already suffers from these adverse environmental circumstances disproportionately compared to San Francisco as a whole or other San Francisco neighborhoods.⁴³ These indicators are particularly relevant to the permitting of the Saba facility in light of its potential environmental effects explained above.

Conclusion

Animal confinement facilities, slaughterhouses, and processing plants of any scale may have significant environmental effects. The detrimental impact that live animal confinement, slaughter, and processing will have on the Bayview-Hunters Point community, environment, and animals demands a proper CEQA analysis before the Department makes a final decision on the application.

The Department’s approval of this facility without proper analysis of the effects documented herein violates CEQA. Greenaction therefore urges the Commission to reverse the CEQA Exemption for this facility and to properly study its effects on animals, the environment, and the local community.

Submitted,

Bradley Angel, Executive Director

Brian Butler, Community Organizer and Policy Advocate

¹ M. Greger, *The Long Haul: Risks Associated With Livestock Transport, Biosecurity and Bioterrorism: Biodefense Strategy, Practice, and Science* at 305 (2007), available at <http://www.humanesociety.org/assets/pdfs/farm/b-b2007-5-4.pdf>.

² *Id.* at 301.

³ *Id.*

⁴ *Id.* at 304.

⁵ Declaration of Professor Steven B. Wing, Ph.D., (Sept. 3, 2015), available at <http://buffaloriveralliance.org/Resources/Documents/Ex.%205%20-%20Wing%20declaration%20FINAL%20w%20Exhibits%20-%20reduced%20size.pdf>.

⁶ Int'l Finance Corp., Environmental, Health, and Safety Guidelines for Poultry Production at 6 (Apr. 30, 2007), available at <http://www.ifc.org/wps/wcm/connect/26baaf004886581fb43ef66a6515bb18/final+-poultry+production.pdf?mod=ajperes> (hereinafter "IFC Guidelines").

⁷ Greger, *supra* note 30, at 301.

⁸ *Id.* at 302.

⁹ IFC Guidelines, *supra* note 35, at 6.

¹⁰ *Id.* at 11.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ Carrie Hribar, Nat'l Ass'n of Loc. Boards of Health, *Understanding Concentrated Animal Feeding Operations and Their Impact on Communities* at 6 (Mark Schultz, ed., 2010), available at http://www.cdc.gov/nceh/ehs/docs/understanding_cafos_nalboh.pdf.

¹⁵ *Id.*

¹⁶ PM2.5, also called "fine particulates," consists of particles with diameters that are less than or equal to 2.5 microns in size. PM2.5 is a more serious health concern than PM10, since smaller particles can travel more deeply into our lungs and cause more harmful effects. SFPUC Analysis, *supra* note 29, at 4-24.

¹⁷ *Id.*

¹⁸ *Id.* at 4-28, 4-29.

¹⁹ Wing Decl., *supra* note 34, at ¶ 15.

²⁰ SFPUC Analysis, *supra* note 29, at 4-2.

²¹ *Id.* at 4-29.

²² United States Dept. of Agric. Farm Serv. Agency, Draft Environmental Assessment (Oct. 2017), at 3-10, available at https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/State-Offices/Arkansas/env-docs/draft_ea_tracypoultry_20171025.pdf; *see generally* Humane Soc'y of the United States (HSUS), Green Gas Emissions from Animal Agriculture, available at <http://www.humanesociety.org/assets/pdfs/farm/hsus-fact-sheet-greenhouse-gas-emissions-from-animal-agriculture.pdf>.

²³ San Francisco Dept. of the Env't, Bayview Hunters Point Community Diesel Pollution Reduction Project at 10 (Feb. 2009), available at

https://sfenvironment.org/sites/default/files/fliers/files/sfe_ej_bvhp_diesel_pollution_reduction_project_report.pdf (hereinafter “Diesel Pollution Report”).

²⁴ *Id.* at 12, 17.

²⁵ *Id.* at 14.

²⁶ San Francisco Pub. Utils. Comm’n, *Envtl. Justice Analysis for Bayview-Hunters Point* at 4-30 (June 2017), available at <http://sfwater.org/modules/showdocument.aspx?documentid=10879> (hereinafter “SFPUC Analysis”).

²⁷ SFPUC Analysis, *supra* note 29, at 4-29.

²⁸ IFC Guidelines, *supra* note 35, at 5.

²⁹ *See id.* at 5, 6-7.

³⁰ *See* *Envtl. Working Group, Meat Processors/Slaughterhouses* (2011), <https://www.ewg.org/meateatersguide/interactive-graphic/meat-processorsslaughterhouses>.

³¹ IFC Guidelines, *supra* note 35, at 2.

³² *Id.*

³³ *Id.*

³⁴ *Id.* at 3.

³⁵ The PEW Env’t. Group, *Big Chicken: Pollution and Industrial Poultry Production in America* at 13 (July 27, 2011), available at <http://www.pewtrusts.org/~media/legacy/uploadedfiles/peg/publications/report/pegbigchickenjuly2011pdf.pdf>.

³⁶ IFC Guidelines, *supra* note 35, at 3.

³⁷ *Id.* at 4.

³⁸ SFPUC Analysis, *supra* note 29, at 1-8.

³⁹ *Id.* at 4-39.

⁴⁰ *Id.* at 4-6.

⁴¹ *Id.* at 4-7.

⁴² *See id.* at 4-10 – 4-22.

⁴³ *Id.* at 4-2.