



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT

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Alicia Parker
Strategic Planning Division
City of Oakland Community and Economic Development Agency
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612
Via e-mail: aparker@oaklandnet.com

RE: Notice of Preparation of a Supplemental EIR for the Central Estuary Implementation Guide and Public Health Concerns

Dear Ms. Parker:

The Alameda County Public Health Department (ACPHD) is writing to share our comments and recommendations regarding the Scope of the Supplemental Environmental Impact Review of the Central Estuary Implementation Guide. ACPHD has documented the health inequities in Oakland that continually disproportionately impact low-income communities and communities of color. As the agency responsible for protecting the public health of Alameda County residents, our role is to raise the public health impacts of planning processes' for consideration in decision making.

We appreciate that public health has been a core consideration for the Central Estuary Specific Plan planning process thus far. The City of Oakland took the unprecedented and forward-thinking step of requiring health to be considered in the Central Estuary Specific Plan, which we applauded in our February 9, 2010 letter to City Council. In a letter sent April 20, 2010, we also made recommendations for improving the Plan using the health-related information uncovered as part of the planning process. This letter raises some of the same concerns highlighted in our previous letter and recommends them for study through the Supplemental EIR.

In order to ensure public health is adequately considered in the Supplemental EIR, we recommend including analysis of the following:

- We recommend analyzing exposure to sources of pollution, including air quality, noise pollution and vibration changes on new and existing residents, especially because the plan will put new residential units in close proximity to industrial uses. We recommend using a 1000 foot buffer, at a minimum, for siting new housing near the freeway and other large pollution sources.¹ If development should occur within 1000 feet of a pollution source, we recommend including best available technology and practices for mitigations in the design guidelines for the site, including but not limited to, fine particulate matter air filtration in all units and orienting building away from the freeway, especially in areas where sensitive receptors may spend time to ensure potential health exposures are decreased.
- We recommend analyzing access to transportation options that promote physical activity and social cohesion and that contribute less green house gases to the environment, including access to pedestrian and bike facilities and

¹ Bay Area Air Quality Management District's CEQA Guidelines (May 2011) uses a 1000-foot radius zone of influence from the property line of the source or receptor when siting new sources or receptors. Available at: http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_May%202011_5_3_11.ashx

public transit. It is especially important to examine exposure to risk of ped/bike and car collision, especially because the plan puts new residential units in close proximity to industrial uses and the area does not currently have sufficient transportation infrastructure to support residential uses. Ensure when possible to position the residential areas so as to maximize connectivity to transit, bike, and pedestrian facilities, and when they are not positioned as such, the implementation guidelines include mitigation strategies for improving connectivity.

- We recommend analyzing resident access, particularly low-income residents, to health-promoting and affordable retail and services, particularly in the West subarea. If these services are not pedestrian/bicycle and public transit accessible, we recommend that the implementation guidelines include mitigations such as adding new zoning and/or business attraction strategy for neighborhood serving businesses in new residential areas and adding infrastructure to accommodate these needs.
- We recommend analyzing the jobs displaced, educational/training-requirement and wages. Ensure that land that can support jobs for low-income workers, workers with barriers to employment, and blue collar workers is at least retained and hopefully increased given high unemployment rates among this population. If the land uses will not support employment among those with less than a college education, mitigations should include strategies for job creation for these employee categories (e.g. local hire) and should be included as part of the specific plan implementation guidelines in order to ensure we are not exacerbating health disparities in Oakland.
- We recommend analyzing the existing and proposed housing, owner/ renter, market/ below-market rate, access. In order to promote health equity, ensure the new housing meets the needs of residents at all income levels, and where it does not, that strategies for creating affordable housing be utilized as part of the specific plan implementation guidelines. Mitigations should be made if the affordable housing stock does not increase along with the market-rate housing stock.

Each of these issue areas is related to health. **For a more full explanation of the relationship, please see Appendix A.** Additionally, many of the mitigations will add extra costs and we recommend including the mitigation costs as part of the development impact fees.

Again, ACPHD expresses its appreciation to the City of Oakland for introducing public health considerations as a core component for Central Estuary Specific Plan process thus far. ACPHD is dedicated to improving health of all Alameda County residents and to preventing avoidable health risks. Thank you for your consideration of our recommendations for addressing the health risks we have identified with the current proposal in the Supplemental EIR. Please do not hesitate to contact me with any questions or concerns.

Regards,



Anita Siegel

Director

Alameda County Public Health Department

cc: Alex Briscoe, Health Care Services Agency Director

APPENDIX A

Exposure to Air, Noise, and Vibration Pollution and Mitigation

We believe developing housing in the West subarea is problematic from a public health view because of the potential exposure to particulate matter 2.5 (PM 2.5), noise and vibration pollution. The subarea is adjacent to Interstate 880, which generates over 200,000 vehicle trips daily and contains a vast majority of truck traffic serving the Port of Oakland, and contains two freeway exits. The commingling of industrial and residential land uses proposed also perpetuates these impacts. The area near Owens Brockway and the West subarea are particularly problematic. According to the *Public Health* section of the *Alternatives Report* (2009), building residential in close proximity to industry creates a strong likelihood of residential-industrial conflicts stemming from noise and air quality (page 140). It is unclear how the City proposes to mitigate. Furthermore, if mitigations are not sufficient, it is not clear who will bear the cost of further mitigations that will protect both existing industry and new residents. From a health perspective, no new housing should be placed here unless exposures are mitigated and the value of rezoning the land is recaptured in the form of community benefits. **We recommend analyzing exposure to sources of pollution, including air quality, noise pollution and vibration changes on new and existing residents, especially because the plan with put new residential units in close proximity to industrial uses. We recommend using a 1000 foot buffer, at a minimum, for siting new housing near the freeway and other large pollution sources.² If development should occur within 1000 feet of a pollution source, we recommend including best available technology and practices for mitigations in the design guidelines for the site, including but not limited to, fine particulate matter air filtration in all units and orienting building away from the freeway, especially in areas where sensitive receptors may spend time to ensure potential health exposures are decreased.**

Increases in Automobile Traffic and Access to Active Transportation and Transit

New, high-density housing will generate additional automobile traffic in the area, as well as a demand for pedestrian and bike facilities and public transit. According to the “Public Health” section (pages 137-150) of the *Central Estuary Plan – Alternatives Report*, the new residents in the West Subarea will generate additional automobile traffic; increased intensity of uses with co-mingling of industrial/residential will increase collision frequencies unless counter measures are instituted; that the density increase will unlikely bring transit improvements to an area already with poor proximity to transit and very poor pedestrian/bicycle network and connectivity to surrounding areas.

As a result, a majority of the Plan Area requires extensive transportation infrastructure improvements, including pedestrian/bicycle and transit improvements to accommodate a growth in the population. These improvements are necessary in order to minimize increases in vehicle miles traveled, decrease air pollution (and associated increases in respiratory and cardio-pulmonary disease), reduce greenhouse gas emissions and increases in pedestrian/bicycle injuries, especially given the commingling of residential and industrial uses. Furthermore, the disjointed residential areas may not facilitate social cohesion without substantial resources put into pedestrian/bicycle pathways and other measures.

It is important to note that there are high violent and property crime rates in this area. One of the primary deterrents to this crime is “ped/bike and streetscape improvements, and increasing population densities throughout the Plan area, [in order to get] more ‘eyes on the street... (Alternatives Report, page 144).” It is important for residential density to be able to support the necessary transportation-related infrastructure improvements, crime may not be effectively deterred, placing both existing and new residents at risk.

We recommend analyzing access to transportation options the promote physical activity and social cohesion and that contribute less green house gases to the environment, including access to pedestrian and bike facilities and public transit. It is especially important to examine exposure to risk of ped/bike and car collision, especially because the plan puts new residential units in close proximity to industrial uses and the area does not currently have sufficient transportation infrastructure to support residential uses. Ensure when possible to position the

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residential areas so as to maximize connectivity to transit, bike, and pedestrian facilities, and when they are not positioned as such, the implementation guidelines include mitigation strategies for improving connectivity.

Access to retail and public services

Locating housing near existing housing, such as in Central West, takes advantage of existing services and infrastructure nearby. Locating new residents in the West subarea raises food access issues. Food security is a large contributor to health outcomes, as is the quality of food that low-income consumers purchase. Malnutrition and obesity are serious and prevalent public health issues in Alameda County that are directly related to household income. In low-income neighborhoods, access to healthy fresh foods is often limited by a lack of transportation options and retail choice. Having health-protective goods and services, such as grocery stores, in their neighborhood reduces VMT and encourages healthy activity. **We recommend analyzing resident access, particularly low-income residents, to health-promoting and affordable retail and services, particularly in the West subarea. If these services are not pedestrian/bicycle and public transit accessible, we recommend that mitigations include adding new zoning and/or business attraction strategy for neighborhood serving businesses in new residential areas and adding infrastructure to accommodate these needs.**

Good and Accessible Jobs to Promote Health

Given the need for good-paying jobs and job training opportunities, it is important to use public policy decisions to increase the availability of these important resources because of their potential for improving health outcomes. Creating job training and permanent, good-paying jobs, is equally important for improving health. Many of the Alameda County residents with the worst health outcomes also suffer from high-unemployment and low-education. These same populations also face barriers to employment, such as a lack of a high-school degree and/or a criminal record. Lower-training/ lower-education required jobs and on-the-job training are important for these populations with few viable options for improving their income, and thus improving their health. Research clearly indicates that one of the best ways to improve health outcomes is to increase income levels or reduce poverty. **We recommend analyzing the jobs displaced, educational/training-requirement and wages. Ensure that land that can support jobs for low-income workers, workers with barriers to employment, and blue collar workers is at least retained and hopefully increased given high unemployment rates among this population. If the land uses will not support employment among those with less than a college education, mitigations should include strategies for job creation for these employee categories (e.g. local hire) and should be included as part of the specific plan implementation guidelines in order to ensure we are not exacerbating health disparities in Oakland.**

Affordable Housing to Promote Health

Housing stability is inextricably linked to health. For instance, studies show that households that are forced to pay more than they can afford on housing often cut back on their food budget, resulting in poor nutrition outcomes. The foreclosure crisis is taking a toll on individual residents' physical and mental health. Chronic stress wears down the immune system and puts people at higher risk for diseases such as hypertension and heart disease. The Bay Area suffers from a severe lack of affordable housing. It is important to make sure that, as the market rate housing stock increases, the affordable housing stock also increases, as the increase in affluent households increases the demand on the local service sector. In order to improve health in Alameda County, all residents must be adequately housed in housing they can afford. The City's chronic lack of affordable housing contributes to food insecurity and poor nutrition, especially among children, families cutting back on childcare, preventative healthcare, and prescription drugs, and increases stress and related diseases such as hypertension. Additionally, a lack of safe, affordable housing can lead vulnerable residents to settle for substandard housing situations. Moldy walls, old carpets and pest infestation are all major contributors to the development of serious respiratory and skin infections that are preventable through implementation of strong housing standards. **We recommend analyzing the existing and proposed housing, owner/ renter, market/ below-market rate, access. In order to promote health equity, ensure the new housing meets the needs of residents at all income levels, and where it does not, that strategies for creating affordable housing be utilized as part of the specific plan implementation guidelines. Mitigations should be made if the affordable housing stock does not increase along with the market-rate housing stock.**