



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT

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City Council Committee on Community Economic Development
Oakland City Hall
1 Frank H. Ogawa Plaza
Oakland, CA 94612
Via e-mail: jbrunner@oaklandnet.com

RE: Army Base Community Benefits Program Environmental and Green Development Recommendations

Chairperson Brunner:

The Alameda County Public Health Department (ACPHD) is writing to share our comments and recommendations regarding the Oakland Army Base Community Benefits Program Environmental and Green Development Recommendations. As the agency responsible for protecting the public health of Alameda County residents, our department analyzes public health impacts of planning processes for consideration in decision-making. **I write to express our support of the staff recommendations and strongly urge three additions.**

In order to promote the public's health and advance health equity, we recommend the following commitments be included in the Community Benefits Agreement:

- *create a stakeholder group, which the City and its developers will report to on a regular basis about environmental and air quality standards;*
- *monitor air quality regularly and make findings available to the public; and*
- *create an air quality improvement plan that incorporates a public process.*

ACPHD has highlighted the public health crisis confronting West Oakland; an African American resident living near the Port of Oakland can expect to die, on average, 15 years before a White resident of the Oakland Hills. Social determinants of health, such as environmental exposures, contribute to this large disparity.

People living in West Oakland breathe in three times more diesel particles than other Bay Area residents. Relatedly, West Oakland residents experience high rates of diseases influenced by environmental exposures, such as cancer and asthma. West Oakland residents experience 2.5 times greater lifetime cancer risk than Bay Area residents in general and 80% of this excess cancer risk is attributed to diesel trucks.¹ West Oakland residents have one of the highest rates of asthma hospitalization in Alameda County – two times the average – and West Oakland children under five years of age are hospitalized for asthma at a rate 2.7 times higher than the county. Given these public health concerns, it is imperative that measures be taken to ensure that environmental conditions in West Oakland do not further deteriorate during and after the Oakland Army Base development.

¹ The California Air Resources Board completed the West Oakland Health Risk Assessment in 2008 and is available online at: <http://www.arb.ca.gov/ch/communities/ra/westoakland/westoakland.htm>

We are pleased to see that a number of issue areas raised by ACPHD, community-based organizations, and local residents are being recommended for adoption. We do, however, believe that the recommendations should more explicitly highlight the importance of ongoing, publicly available information about air quality in West Oakland and a process to ensure community engagement in improving local air quality.

Historically, communities of color and low-income communities have been excluded from decision-making venues and this has resulted in disproportionate environmental burdens and the associated adverse health outcomes. We believe that communities that will be most impacted should have input to the decisions that will affect their community's health. Impacted communities should have opportunities to be involved in both identifying and problem-solving related to environmental and public health goals. ***We strongly urge the City to incorporate a stakeholder group (including the City, ACPHD, community advocates, Bay Area Air Quality Management District (BAAQMD) and others) in the Community Benefits Agreement. The City and its developers should regularly share information with this group on health and environmental issues, and these stakeholders should have opportunities to make recommendations for action.***

City staff suggests that stakeholder engagement might be accomplished through a forum similar to the Port's Social Justice Committee or some other community stakeholder forum. A thoughtful community engagement process should and can ensure that local health and environmental stakeholders have information and authority to help ensure that air quality in West Oakland improves rather than deteriorates after the Oakland Army Base development. Staff also notes that ongoing air quality monitoring at the Oakland Army Base and in West Oakland is an ongoing and important need. We agree, and urge that ***air quality monitoring reports should be made regularly available to the public.***

We also believe that to effectively reduce overall pollution at the Army Base, the City will need a plan to give policy direction and prioritize actions. Similar to the Port of Oakland Maritime Air Quality Improvement Plan² (MAQIP), the City should develop a plan to improve air quality related to the development of the Army Base. ***We recommend that the City include in the Community Benefits Agreement a commitment to creating an air quality improvement plan, with involvement from key stakeholders (including the City, the Port, community advocates, ACPHD, BAAQMD, and others). The plan should address interim and long-term pollution reduction goals and targets, timelines for implementation, pollution reduction strategies, air monitoring and reassessment, and an enforcement plan.***

ACPHD is dedicated to improving health of Alameda County residents and preventing avoidable health risks. Thank you for considering our recommendations. We look forward to continuing discussions with Council and staff on this very important issue. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

Rebecca Flournoy, MPH
Deputy Director and Director of Planning, Policy, and Health Equity

cc: Councilmember De La Fuente;
Councilmember Kernighan;
Councilmember Nadel

² The Port of Oakland adopted a goal in 2009 to reduce air pollution and health risk from diesel particulate matter by 85% from 2005 to 2020 in the Maritime Air Quality Improvement Plan. This is in alignment with the Air Resources Board's goal of reducing diesel particulate matter (DPM) emissions back to 2001 levels by 2010 and reducing statewide DPM health risk 85% by 2020, compared to 2001 levels.