



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT

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City Council
Oakland City Hall
1 Frank H. Ogawa Plaza
Oakland, CA 94612
Via e-mail: lreid@oaklandnet.com

RE: Army Base Air Quality and Environmental Recommendations

Council President Reid and members of the City Council:

The Alameda County Public Health Department (ACPHD) writes to share our comments and recommendations on the Oakland Army Base Standard Conditions of Approval/Mitigation Measures (SCA) and air monitoring. 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 Standard Conditions of Approval and our appreciation of City staff for their collaboration with us. Given that there are existing public health concerns¹ and CEQA analysis shows air pollution from this project is cumulatively considerable, it is important that actions be taken to ensure that environmental conditions in West Oakland do not deteriorate during and after the Oakland Army Base development. We appreciate that a number of recommendations made by ACPHD and West Oakland Environmental Indicators Project are being considered for adoption in the Community Benefits and CEQA Standard Conditions of Approval/Mitigation Measures.

We recently had a good conversation with City staff regarding our recommendations to create an air quality improvement plan and stakeholder advisory group.² Our understanding is that it is the City's intent to put together a monitoring plan that would involve the Bay Area Air Quality Management District, ACPHD, and community groups. Staff seem committed to a public process for monitoring and enforcing mitigations during the construction and operations phases of this project. We appreciate this, since having a public process to develop and oversee a plan with goals, quantified mitigations, monitoring, and an enforcement plan creates a mechanism and process for air quality and environmental issues to be raised and addressed. **To ensure clarity**

¹ People living in West Oakland breathe in three times more diesel particles than other Bay Area residents, contributing to 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. 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.

² See ACPHD's recommendations for Air Quality and Environmental Health Standards to strengthen the Standard Conditions to Protect Health, January 18, 2012, and ACPHD's comment letters to CEDC on April 24, 2012 and June 12, 2012.

around next steps, we suggest these details be addressed through the Lease Disposition and Development Agreement (LDDA) or some other formal mechanism. We look forward to continued collaboration on this important issue.

Thank you for considering our recommendations for maximizing the public health benefits of this historic opportunity. We appreciate the collaboration thus far and look forward to continuing discussions with Council and staff. 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 Brooks;
Councilmember Brunner;
Councilmember De La Fuente;
Councilmember Kaplan;
Councilmember Kernighan
Councilmember Nadel;
Councilmember Schaaf
