



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT

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To Whom It May Concern:

The Alameda County Public Health Department (ACPHD) is the agency within Alameda County Health Care Services that employs a broad range of prevention strategies to protect and improve the health and safety of County residents and the neighborhoods in which they live. Our programs offer a diverse range of services to address and prevent threats to residents' health, from immunizing against disease to building community capacity to eliminate health inequities. In addition to service provision, we work to influence policy decision-making upstream, as the results of such policy and planning decisions strongly determine the social and environmental conditions in the communities we serve.

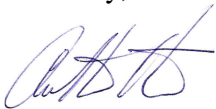
On July 24th, a representative from this office, Alexandra Desautels, attended the federal certification hearing held at the Metropolitan Transportation Commission to voice our concerns regarding MTC's public process. We are writing to urge the Federal Review Committee to seriously consider our concerns as expressed at the July 24th hearing and reiterated in this letter.

- **Ensuring an Empowering and Transparent Public Process:** While MTC has taken steps to comply with Executive Order 12898, it has not demonstrated systematic incorporation of public input in its decision making processes. MTC must make its public process transparent and truly empowering. For instance, any community member should be able to track how public input influences the decisions and investments that impact these "communities of concern."
- **Inequity in MTC's Decision-Making:** We offer two examples as evidence that MTC's public process needs improvement in order to ensure equity in decision making.
 1. **Unequal Funding Distribution:** MTC's reports demonstrate a huge need for improving bus service and that the high cost of fares overburden the bus service dependent, primarily composed of communities of color and low income communities, as well as the elderly, disabled, and youth. However, a recent study revealed that as the percentage of white passengers utilizing a transit service increased, so did the public subsidies the passengers received. Such discriminatory practices make it harder for communities of color, low income communities, and the other marginalized communities previously mentioned to access jobs, education, nutritious food, social supports, services, and a myriad of other social goods essential to maintaining good health. We believe that a truly empowering public process would necessarily result in the end of such discriminatory policies and practices.

2. **Container Movement and Environmental Justice:** The 2003 Federal Certification Review Committee of MTC recommended that MTC, “Work with the Port of Oakland in analyzing the impacts of the anticipated doubling of container movements by 2020 and incorporate these impacts into the environmental justice analysis for the Regional Transportation Plan.” Asthma hospitalizations rates between 2003 and 2005 in the predominantly African American zip code bordering the port are already almost twice the Oakland average and three times the county average, signaling that this is an environmental justice concern. The Federal Certification Review’s recommendation provided MTC with a perfect opportunity to include the public in the process of identifying the impacts of and solution to this long-standing community concern. However, MTC did not capitalize on this opportunity, nor were we able to find evidence that MTC heeded this recommendation. As such, MTC is not fulfilling its responsibility, as stated in the Executive Order, to “prevent those minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.” We believe a meaningful public process, as intended by Executive Order 12898, would have resulted in the marginalized communities impacted by this issue being able to demand and track a sufficient response to the Federal Certification Review’s recommendations.
- **Equity and Empowerment are Health Concerns:** Low income communities and communities of color in Alameda County and throughout the Bay Area experience morbidity and mortality at higher rates than their white, more affluent counterparts. For instance, those living in the most affluent neighborhoods throughout the Bay Area can expect to live more than ten years longer than those living in the most impoverished neighborhoods. Studies reveal that these inequitable health outcomes are predominately explained not by genetics or access to health care or risk behaviors, but by the way power is shared with communities. Historical exclusion from decision-making venues has resulted in communities of color and low income communities that are disproportionately burdened by environmental hazards and deprived of social goods, such as affordable transportation. We believe that decision makers can counter and begin to correct the ill health effects of systematic injustice by creating a truly empowering public process.

It is with the health of the Bay Area’s most vulnerable communities in mind that we ask that MTC is held to fully complying with Executive Order 12898 by creating a transparent and empowering public process. We will know that the public process is truly meaningful when MTC’s decisions reflect a commitment to equity in investments and in the distribution of environmental burdens and benefits among all ethnic, racial and income groups. Thank you for taking our comments into consideration.

Sincerely,



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Alameda County Public Health Department
