Phase I Oakland 2045 General Plan Update

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Hello, Lakshmi—

Thank you for providing the City's 2045 General Plan for review. This email conveys the following recommendations from CGS concerning geologic issues within the General Plan documents:

1. Liquefaction and Landside Hazards

   The General Plan discusses liquefaction as a potential seismic hazard and provides a map of liquefaction susceptibility based on USGS mapping (Figure 4.6-2). The City should supplement this section with a discussion of Earthquake Zones of Required Investigation (EZRI) for liquefaction, and consider providing a map of these zones. The text states "The CGS is in the process of producing official maps based on USGS topographic quadrangles, as required by the Seismic Hazards Mapping Act. The Plan Area lies within the Oakland West Quadrangle and the

Oakland East Quadrangle…"; however, these maps were finalized and released in 2003. Lastly, the Plan text states that projects in a CGS Seismic Hazard Zone for liquefaction or landslide hazards must submit a site-specific geotechnical report "prepared by a registered geotechnical engineer" (SCA 39 – page 4.6-19). CGS notes the text of the Seismic Hazards Mapping Act states "A Certified Engineering Geologist or Registered Civil Engineer with competence in the field of seismic hazard evaluation is required to prepare, review and approve the geotechnical report." Consequently, the City should considered updating the text of the Plan to reflect these changes and the Act requirements.
CGS maps and data are available here:
https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps
https://maps.conservation.ca.gov/cgs/EQZApp/app/
Cities and counties affected by EZRI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) within a mapped hazard zone to disclose at the time of sale that the property lies within such a zone.

2. Fault Hazards

The Safety Element provides a discussion of the probability of large earthquakes in the region on page 4.6-6. This discussion should be updated using earthquake probabilities from the third Uniform California Earthquake Rupture Forecast (UCERF3). A non-technical discussion of this model is available here:
https://pubs.usgs.gov/fs/2015/3009/pdf/fs2015-3009.pdf

Note the 30-year probability for an M>6.7 earthquake in the San Francisco Bay Region has increased to 72%. Individual probabilities for the Hayward, Calaveras, and Northern San Andreas faults are also available.
The City has several maps depicting the locations of Alquist-Priolo Earthquake Fault Zones. They should consider referring readers to the CGS website for a map that is continually updated:
https://maps.conservation.ca.gov/cgs/EQZApp/app/

3. Tsunami Hazards

The CGS has mapped a Tsunami Hazard Area (THA) within the planning area. The purpose of a THA is to assist cities and counties in identifying their exposure to tsunami hazards. It is intended for local jurisdictional, coastal evacuation planning uses only. Additional information can be found at the links below:
https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps
https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Hazard_Area_Map_Alameda_County_a11y.pdf
The City should also discuss that some areas may be within a Tsunami Design Zone determined by the California Building Code (CBC). The CBC requires certain design standards for essential/critical or larger structures. The following website provides additional information regarding Tsunami Design Zones:
https://asce7tsunami.online/.

Please let me know if you have any questions.

@CAgeosurvey

FOLLOW US!

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"A team is not a group of people who work together.
A team is a group of people who trust each other." – Simon Sinek

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SPUR
San Francisco | San José | Oakland

June 23, 2023

Daniel Findley
Planner III, Lead - Safety Element
1 Frank H. Ogawa Plaza
Oakland, CA 94612

RE: City of Oakland General Plan Update — Safety Element Public Review Draft

Dear Daniel Findley and Oakland Safety Element team:

Thank you for the opportunity to provide feedback on the Draft Safety Element of the City of Oakland 2045 General Plan Update. SPUR is a Bay Area public policy non-profit organization with a presence in Oakland, San Francisco, and San José. We work across policy areas and political lines to solve the big problems the region faces and to build a more equitable, sustainable, and prosperous Bay Area. As an organization, our vision is to create a Bay Area where all people thrive; this includes ensuring that all Oaklanders have access to safe homes and neighborhoods, and are protected from environmental hazards like flooding, earthquakes, heat waves, fires, and more.

SPUR commends the Safety Element team on the comprehensive and multihazard framework of the draft safety element. However, we believe there is room for improvement. Our recommendations are as follows:

1) **Make post-disaster recovery planning a goal of the Element.** At present, the draft element lacks language around post-disaster recovery, despite the fact that Oakland's 2021 LHMP says that the City should "develop a post-disaster action plan that includes grant funding and decris removal components." We recommend that the City update its disaster recovery plan (2010 Plan), and include how equity priority communities will be supported through the recovery process. We also recommend that emergency sheltering and short-term interim housing be considered in the updated recovery plan.

2) **Commit to specific language and actions around reducing structural hazards from new and existing buildings.** We appreciate the Element's commitment to Oakland's existing mandatory soft story retrofit program. However, our region is operating on borrowed time and we must move swiftly to retrofit other existing at-risk building types. We recommend that Oakland begin work on determining the number of concrete buildings that are vulnerable to collapse in a major earthquake. We also recommend that new buildings be built to higher than life safety standards, especially housing developments, in order to ensure that these buildings remain functional after a major earthquake. Both of these recommendations are housing preservation and displacement issues.

a) Model Policy language (from Alameda Safety Element 2040): "Building and infrastructure Standards. Maintain up-to-date building codes and encourage or require new and existing buildings and infrastructure to be designed or retrofitted for timely restoration of service (functional recovery) following an earthquake, with particular attention on the effects of liquefaction on buildings and infrastructure."
b) Model Action language (existing buildings): Develop an inventory of **non-ductile and tilt-up** concrete buildings to determine risk in event of a major earthquake with goal of establishing a similar mandatory retrofit program for these at-risk buildings.
c) Model Action language (new buildings): Develop seismic performance targets for new buildings, especially housing developments, that allow the city to recover more quickly.

3) **Update Flooding/Sea Level Rise Policies based on new groundwater rise research:** Recent studies have shown that parts of Oakland, specifically flat neighborhoods with high proportions of residents of color, such as West Oakland, are at risk of groundwater rise, which can lead to hazards such as flooding, liquefaction, movement of contaminants in soil, and damages to roads, building foundations, and utility lines. The current draft of the Safety Element does not adequately capture these risks. The draft must be updated to more explicitly state the risks imposed by groundwater rise and set out a clear plan for how the City plans to mitigate them.

a) Model Policy language: Contaminated Sites. New and/or substantial construction on contaminated sites shall account for impacts of rising shallow groundwater on contaminant mobilization in project design and all steps of the site remediation process. This shall be documented in a vulnerability assessment and adaptation plan, which will also include a groundwater data monitoring plan. Groundwater data from the site should be used for the most accurate water level on-site; however, if groundwater wells are not present at the project site, databases such as GeoTracker71 can be used to access water table elevations nearby, using U.S. Geological Survey, California Department of Water Resources, or other. (ONESHORELINE Planning Guidance)
b) Model Action language: **Shallow Groundwater Rise Vulnerability Assessment.** Coordinate with adjacent jurisdictions as appropriate to establish a detailed understanding of the effects of rising shallow groundwater on people, the built environment, and water supply. This includes buoyancy, seepage, infiltration, liquefaction, corrosion, and contaminant mobilization hazards. This assessment should have an interactive map component that will be updated based on site-specific geotechnical and topographic data submitted by new developments. (ONESHORELINE Planning Guidance)

4) **Decarbonization Policies as tool for reducing post-earthquake fires and improving public health:** While the City of Oakland has banned natural gas in new residential and commercial buildings, and the Safety Element draft mentions building electrification, these actions are not enough to tackle risks of post-earthquake fires caused by the rupture of gas pipelines during intense groundshaking. In accordance with the City's Equitable Climate Action Plan, the Safety Element must include updated, specific building decarbonization policies such as the installation of heat pumps in existing buildings, or the installation of gas shutoff valves during seismic retrofits and other major renovation projects. We also recommend that the Safety Element include a policy on installing gas shut-off valves in existing buildings at time of sale, transfer of title, and

when upgrades are planned for to gas pipes. The City of Alameda adopted this policy as an amendment to their municipal building code.

5) Additional comments on the draft Safety Element.

    a) SPUR would like to see the Safety Element take a more expansive view of safety. We appreciate the section on public safety highlighting the City's efforts to reimagine public safety and to address crime through environmental design. However, we believe that the element could more strongly relate its emergency preparedness policies to day-to-day wellness and health benefits for the community. With this, the safety element will represent not just a document governing emergencies, but also the present-day needs of all Oaklanders. In many ways, the inaugural EJ element considers these day-to-day health and safety issues that Oaklanders face. Due to this overlap, we suggest a stronger tie between the efforts of the Safety Element and the EJ Element (as well as the Housing Element, Climate Vulnerability Assessment, and LHMP).
    b) For *Section 2.2 on* Urban fires. We recommend referencing the impacts of the Ghost Ship Warehouse Fire on the Oakland community and how the city has already taken action and will continue to learn about urban fire and building safety from this tragic event.

Thank you for your consideration of our comments and for your work on the Safety Element. Should you have any questions, please do not hesitate to Sarah Atkinson, satkinson@spur.org.

Sincerely,

Ronak Davé Okoye
SPUR Acting Oakland Director & Chief of Strategic Initiatives

Sarah Atkinson
SPUR Earthquake Resilience Policy Manager

General Plan Safety Element Assessment

Board of Forestry and Fire Protection

Oakland 2023

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Purpose and Background

Upon the next revision of the housing element on or after January 1, 2014, the safety element is required to be reviewed and updated as necessary to address the risk of fire for land classified as state responsibility areas and land classified as very high fire hazard severity zones. (Gov. Code, § 65302, subd. (g)(3).)

The safety element is required to include:

- Fire hazard severity zone maps available from the Department of Forestry and Fire Protection.
- Any historical data on wildfires available from local agencies or a reference to where the data can be found.
- Information about wildfire hazard areas that may be available from the United States Geological Survey.
- The general location and distribution of existing and planned uses of land in very high fire hazard severity zones (VHFHSZs) and in state responsibility areas (SRAs), including structures, roads, utilities, and essential public facilities. The location and distribution of planned uses of land shall not require defensible space compliance measures required by state law or local ordinance to occur on publicly owned lands or open space designations of homeowner associations.
- The local, state, and federal agencies with responsibility for fire protection, including special districts and local offices of emergency services. (Gov. Code, § 65302, subd. (g)(3)(A).)

Based on that information, the safety element shall include goals, policies, and objectives that protect the community from the unreasonable risk of wildfire. (Gov. Code, § 65302, subd. (g)(3)(B).) To carry out those goals, policies, and objectives, feasible implementation measures shall be included in the safety element, which include but are not limited to:

- Avoiding or minimizing the wildfire hazards associated with new uses of land.
- Locating, when feasible, new essential public facilities outside of high fire risk areas, including, but not limited to, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communications facilities, or identifying construction methods or other methods to minimize damage if these facilities are located in the SRA or VHFHSZ.
- Designing adequate infrastructure if a new development is located in the SRA or VHFHSZ, including safe access for emergency response vehicles, visible street signs, and water supplies for structural fire suppression.
- Working cooperatively with public agencies with responsibility for fire protection. (Gov. Code, § 65302, subd. (g)(3)(C).)

The safety element shall also attach or reference any fire safety plans or other documents adopted by the city or county that fulfill the goals and objectives or contains the information required above. (Gov. Code, § 65302, subd. (g)(3)(D).) This might include Local Hazard Mitigation Plans, Unit Fire Plans, Community Wildfire Protection Plans, or other plans.

There are several reference documents developed by state agencies to assist local jurisdictions in updating their safety elements to include wildfire safety. The Fire Hazard Planning, General Plan Technical Advice Series from the Governor's Office of Planning and Research (OPR), referenced in Government Code section 65302, subdivision (g)(3) and available at

1400 Tenth Street
Sacramento, CA 95814
Phone: (916) 322-2318

The Technical Advice Series is also available from the OPR website (**Technical Advice Series link**).*

The Technical Advice Series provides policy guidance, information resources, and fire hazard planning examples from around California that shall be considered by local jurisdictions when reviewing the safety element of its general plan.

The Board of Forestry and Fire Protection (Board) utilizes this Safety Element Assessment in the Board's review of safety elements under Government Code section 65302.5. At least 90 days prior to the adoption or amendment of their safety element, counties that contain SRAs and cities or counties that contain VHFHSZs shall submit their safety element to the Board. (Gov. Code, § 65302.5, subd. (b).) The Board shall review the safety element and respond to the city or county with its findings regarding the uses of land and policies in SRAs or VHFHSZs that will protect life, property, and natural resources from

* https://www.opr.ca.gov/docs/Final_6.26.15.pdf

unreasonable risks associated with wildfires, and the methods and strategies for wildfire risk reduction and prevention within SRAs or VHFHSZs. (Gov. Code, § 65302.5, subd. (b)(3).)
The CAL FIRE Land Use Planning team provides expert fire protection assistance to local jurisdictions statewide. Fire captains are available to work with cities and counties to revise their safety elements and enhance their strategic fire protection planning.

Methodology for Review and Recommendations

Utilizing staff from the CAL FIRE Land Use Planning team, the Board has established a standardized method to review the safety element of general plans. The methodology includes

1) reviewing the safety element for the requirements in Government Code section 65302, subdivision (g)(3)(A),
2) examining the safety element for goals, policies, objectives, and implementation measures that mitigate the wildfire risk in the planning area (Gov. Code, § 65302, subd. (g)(3)(B) & (C)), and
3) making recommendations for methods and strategies that would reduce the risk of wildfires (Gov. Code, § 65302.5, subd. (b)(3)(B)).

The safety element will be evaluated against the attached Assessment, which contains questions to determine if a safety element meets the fire safety planning requirements outlined in Government Code, section 65302. The reviewer will answer whether or not a submitted safety element addresses the required information, and will recommend changes to the safety element that will reduce the wildfire risk in the planning area. These recommended changes may come from the list of sample goals, policies, objectives, and implementation measures that is included in this document after the Assessment, or may be based on the reviewer's knowledge of the jurisdiction in question and their specific wildfire risk. By answering the questions in the Assessment, the reviewer will determine if the jurisdiction's safety element has adequately addressed and mitigated their wildfire risk. If it hasn't, any specific recommendations from the reviewer will assist the jurisdiction in revising the safety element so that it does.
Once completed, the Assessment should provide clear guidance to a city or county regarding any areas of deficiency in the safety element as well as specific goals, policies, objectives, and implementation measures the Board recommends adopting in order to mitigate or reduce the wildfire threat in the planning area.

General Plan Safety Element Assessment

Jurisdiction: Oakland	Notes: 1st Informal Review	CAL FIRE Unit: SCU	Date Received: 3/30/2023
County: Alameda	LUPP Reviewer: FC Kennedy	UNIT CONTACT: BC Alcantar	Date Reviewed: 5/15/2023

BACKGROUND INFORMATION SUMMARY

The safety element must contain specific background information about fire hazards in each jurisdiction.
Instructions for this table: Indicate whether the safety element includes the specified information. If YES, indicate in the comments where that information can be found; if NO, provide recommendations to the jurisdiction regarding how best to include that information in their revised safety element.

Required Information	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 06.16.23
Are Fire Hazard Severity Zones Identified? *CAL FIRE or Locally Adopted Maps*	Yes	Safety Element (SE), p. 2-6, Recommendation: Add language to reference the most current CAL FIRE FRAP Maps. This will allow the SE to remain current if and when maps are updated. SE, p. 2-8 Figure SAF-3, Recommendation: Change the key and colors on the map to match FRAP FHSZ. Local Hazard Mitigation Plan (LHMP), p. 15-8, Figure 15-2: Fire Hazard Severity Zones.	See comment See comment
Is historical data on wildfires or a reference to where the data can be found, and information about wildfire hazard areas that may be available from the United States Geological Survey, included?	Yes	SE, p. 2-6, 2.2 Fire, Wildfire/Wildfire Urban Interface, 1st Paragraph, LHMP, p. 15-5 and 15-6,	
Has the general location and distribution of existing and planned uses of land in very high fire hazard severity zones (VHFHSZs) and in state responsibility areas (SRAs), including structures, roads, utilities, and essential public facilities, been identified?	Partial	SE, described on p. 2-6, LHMP, p. 15-9, Section 15.3 (pp. 15-11 through 15-16) Recommendation: include a map that shows land uses for the VHFHSZ and SRA. This map may already exist within the Land Use Element of the General Plan and would just need to be added to the SE	Check if and where a land use map exists

Required Information	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 06.16.23
Have local, state, and federal agencies with responsibility for fire protection, including special districts and local offices of emergency services, been identified?	Yes	SE, p. 2-11, Responsible Agencies, LHMP, p. 15-3, 15.14 Wildfire Protection Responsibility in California	
Are other fire protection plans, such as Community Wildfire Protection Plans, Local Hazard Mitigation Plans, CAL FIRE Unit or Contract County Fire Plans, referenced or incorporated into the Safety Element?	Partial	SE, p. 1-3, Relationship to Local Hazard Mitigation Plan Recommendation: Add references and links to other Planning Documents if the City has them, such as CWPP, Emergency Operations Plan, Evacuation Plans, etc. Add language to meet AB 2140 requirements *"The **Local Hazard Mitigation Plan (LHMP)** for the City of Oakland planning area was developed in accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's Local Hazard Mitigation Plan guidance. The LHMP incorporates a process where hazards are identified and profiled, the people and facilities at risk are analyzed, and mitigation actions are developed to reduce or eliminate hazard risk. The implementation of these mitigation actions, which include both short and long-term strategies, involve planning, policy changes, programs, projects, and other activities." (Include a link from this language to the current LHMP within the City's website)* and directions on where the information is located.	Follow recommendation and add language where applicable
Are residential developments in fire hazard areas that do not have at least two emergency evacuation routes identified?	Yes	SE, p. 4-5 through 4-8, Emergency Evacuation, SE, p. 4-9, Figure SAF-13b	

Required Information	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 06.16.23
Have evacuation routes and their capacity, safety, and viability under a range of emergency scenarios been identified?	Partial	SE, p, 4-5 and 4-7, Emergency Evacuations, SE, p. 4-6, Figure SAF-13a, SE, p. 4-8; Table SAF-6, SE, p. 4-10, figure SAF-13c, SE, p. 4-11, figure SAF-13d, SE, p. 4-12, figure SAF-13e, SE, p. 4-13, figure SAF-13f Recommendation: Add language to include evacuations under a "range of emergency scenarios" (earthquake, flooding, etc.). Add language to SE to collaborate with other City Officials upon the next update to the LHMP to ensure AB 747 requirements are met within the LHMP.	Follow recommendation

Is there any other information in the Safety Element regarding fire hazards in SRAs or VHFHSZs?
"N/A" If there is additional relevant info in the SE not captured in the assessment - "Yes" AND cite what it is and where to find it (Policy/program/figure/section title, p.#)

GOALS, POLICIES, OBJECTIVES, AND FEASIBLE IMPLEMENTATION MEASURES

The safety element must contain a set of goals, policies, and objectives based on the above information to protect the community from unreasonable risk of wildfire and implementation measures to accomplish those stated goals, policies, and objectives.

Instructions for this table: Critically examine the submitted safety element and determine if it is adequate to address the jurisdiction's unique fire hazard. Answer YES or NO appropriately for each question below. If the recommendation is irrelevant or unrelated to the jurisdiction's fire hazard, answer N/A. For NO, provide information in the Comments/Recommendations section to help the jurisdiction incorporate that change into their safety element revision. This information may utilize example recommendations from Sample Safety Element Recommendations and Fire Hazard Planning in Other Elements of the General Plan below, may indicate how high of a priority this recommendation is for a jurisdiction, or may include other jurisdiction-specific information or recommendations.

Section 1 Avoiding or minimizing the wildfire hazards associated with new uses of land

Questions	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Does local ordinance require development standards that meet or exceed title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (**SRA Fire Safe Regulations**) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (**Fire Hazard Reduction Around Buildings and Structures Regulations**) for SRAs and/or VHFHSZs?	Partial	SE p. 2-10 Fire Safe Development Codes, LHMP, p. 13-16 Provide a roadmap to the intended information. Ordinance No 13401 (2016) and 13577 (2019) Provide a roadmap to where this ordinance can be found. Recommend adding this language to SE or it will need to be submitted to the BOF for the Formal Review Recommendation: Add language that states "local ordinance require development standards that meet or exceed title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (**SRA Fire Safe Regulations**) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (**Fire Hazard Reduction Around Buildings and Structures Regulations**) for SRAs and/or VHFHSZs"	Follow recommendations Unclear; ask CalFire what is meant by this-should the SE reference the LHMP? Here are links on the City's legistar to **Ordinance 13401** and **Ordinance 13577**. Let's add language that briefly describe what the Ordinances do (repeals and reneacts certain sections of the Oakland Fire Code) Follow thus recommendation

Questions	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Are there goals and policies to avoid or minimize new residential development in VHFHSZs?	Partial	SE, p. 2-12, SAF 2.3, SE, 5-2, SAF-A.9 Recommendation: Include Goals or Policies to avoid or minimize new development in the VHFHSZ. SAF 2.3 is good for requirements "If" they allow development in the VHFHSZ.	Planning could consider adding a policy e.g., "Minimize threats to life and property. The City should consider the trade offs to building new residential development in the VHFHSZ." A corresponding action could be something along the lines of the City producing findings, similar to a CEQA Statement of Overriding Considerations
Has fire safe design been incorporated into future development requirements?	Partial	SE, p. 2-12, SAF 2.3, SE, p. 5-2, SAF-A.9 Recommendation: Add Fire Safe Regulations to SAF-A.8 and include it here as a roadmap, it will really strengthen the SE.	Follow recommendation
Are new essential public facilities located outside high fire risk areas, such as VHFHSZs, when feasible?	Yes	SE, p. 4-16, SAF-8.11	
Are there plans or actions identified to mitigate existing non-conforming development to contemporary fire safe standards, in terms of road standards and vegetative hazard?	Partial	SE, p. 2-10 and 2-11, SE, p. 2-12, SAF-2.2, SE, p. 5-2, SAF-A.7, SE, p. 5-2, SAF-A.8 Recommendation: add language to the "Fire Safe Development Codes" to include Fire Safe Regulations	will need to draft language to include Fire Safe Regulations. See CalFire comments on Page 6 (above)

Questions	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
		(recommended in previous comments), this would sufficiently address this.	
Does the plan include policies to evaluate re-development after a large fire?	Partial	SE, p. 5-11, SAF-A.44 Recommendation: Add a Policy to re-evaluate development after a large fire. SAF-A.44 is a good component, but nothing states re-evaluating development.	Will need to add a policy around re-evaulating. Staff could discuss with HCD about drafting a policy addressing how the City reevaluates and prioritizes consideration of rebuilding in the same location after a fire. Could the City produce a similar "statement of overriding considerations" if it insists there are no other options?
Is fuel modification around homes and subdivisions required for new development in SRAs or VHFHSZs?	Yes	SE, p. 2-12, SAF 2.3, SE, p. 5-2, SAF-A.7	
Are fire protection plans required for new development in VHFHSZs?	Partial	SE, p. 2-12. SAF-2.3 They are missing a couple of required components to a Fire Protection Plan. **Main components to a Fire Protection Plan:** 1.) Risk Analysis 2.) Fire Response Capabilities 3.) Fire Safety Requirements – Defensible Space, Infrastructure, and Building Ignition Resistance 4.) Mitigation Measures and Design Considerations for Non-Conforming Fuel Modification 5.) Wildfire Education Maintenance and Limitations Recommendation: Add these components to SAF-2.3	Follow recommendation

Questions	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Does the plan address long term maintenance of fire hazard reduction projects, including community fire breaks and private road and public road clearance?	Partial	SE, p. 5-9, SAF-A.31 Recommendation: Add language to address long term maintenance of fire hazard reduction products, including fire breaks. Add language to SAF-A.31 to include private and public roads.	Follow recommendation
Is there adequate access (ingress, egress) to new development in VHFHSZs?	Partial	SE, p. 2-12, SAF 2.3, SE, p. 5-9, SAF-A.30, SE, p. 5-9, SAF-A.31 Recommendation: Add language to SAF-2.3 to include access and egress and designed with the Fire Safe Regulations as the minimum standard.	Follow recommendation
Are minimum standards for evacuation of residential areas in VHFHSZs defined?	No	SE, p. 2-12, SAF 2.3 Recommendation: Create a policy for minimum standards for evacuation of residential areas in the VHFHSZ	I think staff needs to have a conversation with CalFire about this. The EIR doesn't contemplate evacuation times. What kinds of standards is CalFire looking for? Widths of primary and secondary routes?
If areas exist with inadequate access/evacuation routes, are they identified? Are mitigation measures or improvement plans identified?	Partial	SE, p. 4-9, SAF-13b, SE, p. 4-15, SAF-8.5, SE, p. 5-9, SAF-A.30, is SAF-11 (referenced in SE, p. 5-9, SAF-A-30) supposed to be SAF-13a? SE, p. 5-9, SAF-A.31, SE, p. 5-10, SAF-A.38, SE, p. 5-11, SAF A.43 What is LUTE? If this is a plan, it should be referenced within the SE. Recommendation: Add a map that shows areas with current inadequate access/ evacuation routes.	SAF-A.30 should be revised to reference Figure SAF-13a. Define the LUTE in the narrative and spell out in the SAF-A.43.

Questions	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
			For CalFire: Does Figure SAF-13b: Residential Areas with less than Two Access Points to Evacuation and Combined Hazard Zone satisfy this?
Are there policies or programs promoting public outreach about defensible space or evacuation routes? Are there specific plans to reach at-risk populations?	No	SE, p. 2-12. SAF 2-5 Recommendation: Create a policy or goal to create programs promoting public outreach about defensible space or evacuation routes and specific plans to reach at-risk populations	Consider revising SAF-2.5 to read, "…Identify or develop programs to provide financial incentives or assistance to low-income households for defensible space maintenance, home hardening, and *situational-specific training for evacuation procedures* to reduce risk *to people and property*.
Does the plan identify future water supply for fire suppression needs?	Yes	SE, p. 2-10 Peak load Water Supply, SE, p. 2-12. SAF-2.8	
Does new development have adequate fire protection?	Partial	SE, p. 4-15. SAF-8.1, SE, p. 4-15. SAF-8.2, SE, p. 4-16. SAF-8.11, SE, p. 4-16 SAF-8.12 Recommendation: Create a policy to ensure all new development has adequate fire protection	Consider revising SAF-A.8 to read "…optimal fire-protection standards are used in *new development* and renovation projects."

Section 2 Develop adequate infrastructure if a new development is located in SRAs or VHFHSZs.

Does the plan identify adequate infrastructure for new development related to:	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Water supply and fire flow?	Yes	SE, p. 2-10 Peak load Water Supply, SE, p. 2-12. SAF-2.3, SE, p. 2-12. SAF-2.8	
Location of anticipated water supply?	Yes	SE, p. 2-10 Peak load Water Supply, SE, p. 2-12. SAF-2.8, SE, p. 4-16. SAF-8.11	

Does the plan identify adequate infrastructure for new development related to:	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Maintenance and long-term integrity of water supplies?	Yes	SE, p. 2-12. SAF-2.8	
Evacuation and emergency vehicle access?	Yes	SE, p. 2-12, SAF-2.2, SE, p. 2-12. SAF-2.3, SE, p. 4-15, SAF-8.5, SE, p. 4-16 SAF-8.16, SE, p. 4-16 SAF-8.17, SE, p. 5-2, A.9, SE, p. 5-9. SAF-A.30, SE, p. 5-9. SAF-A.31, SE, p. 5-11, SAF-A.43	
Fuel modification and defensible space?	Yes	SE, p. 2-10 Fire Safe Development Codes, SE, p. 2-12. SAF-2.2, SE, p. 2-12. SAF-2.3	
Vegetation clearance maintenance on public and private roads?	Partial	SE, p. 5-9. SAF-A.31 Recommendation: Add a clear and direct policy or goal to maintain vegetation clearance on public and private roads.	Consider adding a new policy that reads, “Prioritize and maintain vegetation clearance along evacuation routes and public roads, and incentivize property owners to maintain private roadway free from excessive vegetation.” Check in with VMP, OakDOT, Public Works (?)
Visible home and street addressing and signage?	Partial	SE, p. 2-12. SAF-2.3 Does not mention street addressing and does not clarify what the standards are. Fire Safe Regulations would be the minimum or local ordinances the are more stringent than the FSR’s. Recommendation: Create a Policy or Goal that clearly addresses this based on my comments above.	Staff should check with OFD (Fire Prevention Bureau) and Building Services (Alan Lu) about the standards for address signage and see if they follow FSR or if Oakland adopted a more stringent regulation. A new policy could be added that speaks to either continuing this practice if a local ordinance was adopted or consideration of adopting a local ordinance if Oakland uses FSR.

Does the plan identify adequate infrastructure for new development related to:	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Community fire breaks? Is there a discussion of how those fire breaks will be maintained?	Partial	SE, p. 2-12. SAF-2.3, Doesn't address community fire breaks or maintenance plans. SE, p. 5-2 SAF-A.7 Does not apply the way that it is worded. Recommendation: Add language about community fire breaks and maintenance. Add language to include working with local Fire Safe Councils and other Community Organizations	Consider revising SAF-2.3 to address community fire breaks and/or the VMP Follow this recommendation from CalFire

Section 3 Working cooperatively with public agencies responsible for fire protection.

Question	Yes or No	Comments and Recommendations	Staff Comments & Recommendations 5.22.23
Is there a map or description of existing emergency service facilities and areas lacking service, specifically noting any areas in SRAs or VHFHSZs?	Partial	SE, p. 4-2. Figure SAF-12, SE, p. 4-14. Recommendation: Identify areas lacking service. If there are no areas lacking service, this needs to be stated somewhere in the SE	There are no areas lacking services; state this in Chapter 4 of the SE.
Does the plan include an assessment and projection of future emergency service needs?	Yes	SE, p. 4-15. SAF-8.2, SE, p. 5-9, SAF-A.32, SE, p. 5-9, SAF-A.34	
Are goals or standards for emergency services training described?	Yes	SE, p. 4-15, SAF-8.3, SE, p. 4-15, SAF-8.9 What is the CORE Program, and should it be referenced within the SE?	Better describe CORE
Does the plan outline inter-agency preparedness coordination and mutual aid multi-agency agreements?	Yes	SE, p. 2-12, SAF-2.6, SE, p. 5-9, SAF-A.35, SE, 5-10, SAF-A.38, SE, 5-10, SAF-A.42	

Sample Safety Element Recommendations

These are examples of specific policies, objectives, or implementation measures that may be used to meet the intent of Government Code sections 65302, subdivision (g)(3) and 65302.5, subdivision (b). Safety element reviewers may make recommendations that are not included here.

A. MAPS, PLANS AND HISTORICAL INFORMATION

1. Include or reference CAL FIRE Fire Hazard Severity Zone maps or locally adopted wildfire hazard zones.
2. Include or reference the location of historical information on wildfires in the planning area.
3. Include a map or description of the location of existing and planned land uses in SRAs and VHFHSZs, particularly habitable structures, roads, utilities, and essential public facilities.
4. Identify or reference a fire plan that is relevant to the geographic scope of the general plan, including the Unit/Contract County Fire Plan, Local Hazard Mitigation Plan, and any applicable Community Wildfire Protection Plans.
5. Align the goals, policies, objectives, and implementation measures for fire hazard mitigation in the safety element with those in existing fire plans, or make plans to update fire plans to match the safety element.
6. Create a fire plan for the planning area.

B. LAND USE

1. Develop fire safe development codes to use as standards for fire protection for new development in SRAs or VHFHSZs that meet or exceed the statewide minimums in the SRA Fire Safe Regulations.
2. Adopt and have certified by the Board of Forestry and Fire Protection local ordinances which meet or exceed the minimum statewide standards in the SRA Fire Safe Regulations.
3. Identify existing development that do not meet or exceed the SRA Fire Safe Regulations or certified local ordinances.
4. Develop mitigation measures for existing development that does not meet or exceed the SRA Fire Safe Regulations or certified local ordinances or identify a policy to do so.

C. FUEL MODIFICATION

1. Develop a policy to communicate vegetation clearance requirements to seasonal, absent, or vacation rental owners.
2. Identify a policy for the ongoing maintenance of vegetation clearance on public and private roads.
3. Include fuel breaks in the layout/siting of subdivisions.
4. Identify a policy for the ongoing maintenance of existing or proposed fuel breaks.
5. Identify and/or map existing development that does not conform to current state and/or locally adopted fire safety standards for access, water supply and fire flow, signing, and vegetation clearance in SRAs or VHFHSZs.
6. Identify plans and actions for existing non-conforming development to be improved or mitigated to meet current state and/or locally adopted fire safety standards for access, water supply and fire flow, signing, and vegetation clearance.

D. ACCESS

1. Develop a policy that approval of parcel maps and tentative maps in SRAs or VHFHSZs is conditional based on meeting the SRA Fire Safe Regulations and the Fire Hazard Reduction Around Buildings and Structures Regulations, particularly those regarding road standards for ingress, egress, and fire equipment access. (See Gov. Code, § 66474.02.)
2. Develop a policy that development will be prioritized in areas with an adequate road network and associated infrastructure.
3. Identify multi-family housing, group homes, or other community housing in SRAs or VHFHSZs and develop a policy to create evacuation or shelter in place plans.
4. Include a policy to develop pre-plans for fire risk areas that address civilian evacuation and to effectively communicate those plans.
5. Identify road networks in SRAs or VHFHSZs that do not meet title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 2 and 3 (commencing with section 1273.00) or certified local ordinance and develop a policy to examine possible mitigations.

E. FIRE PROTECTION

1. Develop a policy that development will be prioritized in areas with adequate water supply infrastructure.
2. Plan for the ongoing maintenance and long-term integrity of planned and existing water supply infrastructure.
3. Map existing emergency service facilities and note any areas lacking service, especially in SRAs or VHFHSZs.
4. Project future emergency service needs for the planned land uses.
5. Include information about emergency service trainings or standards and plans to meet or maintain them.
6. Include information about inter-agency preparedness coordination or mutual aid agreements.

Fire Hazard Planning in Other Elements of the General Plan

When updating the General Plan, here are some ways to incorporate fire hazard planning into other elements. Wildfire safety is best accomplished by holistic, strategic fire planning that takes advantage of opportunities to align priorities and implementation measures within and across plans.

LAND USE ELEMENT

Goals and policies include mitigation of fire hazard for future development or limit development in very high fire hazard severity zones.
Disclose wildland urban-interface hazards, including fire hazard severity zones, and/or other vulnerable areas as determined by CAL FIRE or local fire agency.
Design and locate new development to provide adequate infrastructure for the safe ingress of emergency response vehicles and simultaneously allow citizen egress during emergencies.
Describe or map any Firewise Communities or other fire safe communities as determined by the National Fire Protection Association, Fire Safe Council, or other organization.

HOUSING ELEMENT

Incorporation of current fire safe building codes.
Identify and mitigate substandard fire safe housing and neighborhoods relative to fire hazard severity zones.
Consider diverse occupancies and their effects on wildfire protection (group housing, seasonal populations, transit-dependent, etc).

OPEN SPACE AND CONSERVATION ELEMENTS

Identify critical natural resource values relative to fire hazard severity zones.
Include resource management activities to enhance protection of open space and natural resource values.
Integrate open space into fire safety planning and effectiveness.
Mitigation for unique pest, disease and other forest health issues leading to hazardous situations.

CIRCULATION ELEMENT

Provide adequate access to very high fire hazard severity zones.
Develop standards for evacuation of residential areas in very high fire hazard severity zones.
Incorporate a policy that provides for a fuel reduction maintenance program along roadways.

June 21, 2023

City of Oakland Planning Department
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612

RE: Comments on the City of Oakland's Draft Environmental Justice Element

Dear Lakshmi Rajagopalan, Khalilha Haynes, and the greater Oakland General Plan Update team,

On behalf of the undersigned organizations, thank you for the opportunity to provide comments on Oakland's Draft Environmental Justice (EJ) Element. We commend the City for including community-identified priorities such as participatory budgeting and community-driven, neighborhood-level planning. However, we strongly urge you to adopt the recommendations set forth in this letter to ensure the Final EJ Element includes the necessary corresponding actions to guide how the proposed policies will be effectively implemented. Our comments focus primarily on the following sections of the Draft EJ Element:

- **Chapter 9** (Implementation Actions and Programs), including **Table EJ-11** (Implementation - Goals, Policies, and Actions) and with a particular focus on:
    - **Goal EJ-8:** Foster Meaningful Civic Engagement and Support Community Power and Capacity-Building
    - **Goal EJ-10:** Prioritize Improvements and Programs That Meet The Needs of Environmental Justice Communities

While the recommendations that follow are specific to the aforementioned sections, we encourage the Oakland General Plan Update team to develop EJ Actions that will effectively implement the Goals and Policies throughout the remainder of the Draft EJ Element.

This letter includes a summary of our recommendations, followed by detailed comments and specific recommendations. Lastly, we've included several appendices with supporting information and resources. Overall, we strongly recommend that Oakland's Final EJ Element include the necessary corresponding EJ Actions and details showing how the City plans to put the following components into practice during implementation:

- Support an ongoing, meaningful and accessible community engagement process;
- Foster trust and accountability with Oakland's EJ communities;
- Strengthen interdepartmental coordination and implementation;
- Evaluate the community engagement and EJ Element implementation process; and
- Support and resource capacity building for communities to anchor community-driven planning, decision-making and implementation processes in their neighborhoods.

SUMMARY OF RECOMMENDATIONS

I. In the Final EJ Element, Chapter 9 (Implementation Actions & Programs) should include more details to strengthen implementation, increase interdepartmental coordination, and foster trust and accountability.

A. Section 9.1: Prioritizing Improvements and Programs that Meet the Needs of EJ Communities

1. Include a detailed overview of the EJ Element's Implementation Plan in Section 9.1.

2. Develop a workflow to facilitate stronger interdepartmental coordination and accountability among lead departments for General Plan implementation.

B. Table EJ-11: Implementation - Goals, Policies and Actions

1. Clarify the specific timelines, responsibility roles and priority levels for each Action in the Final EJ Element.

2. Add cost estimates to each action in the Final EJ Element.

3. Prioritize and plan for funding the implementation of EJ Element Policies and Actions.

C. Policy EJ-10.2 & Action EJ-A.34: Implementation Monitoring and Evaluation Plan

1. Track the implementation status of the EJ Element and provide open access to progress updates.

2. Allocate funding for, and hire a trusted third-party evaluator to annually review the implementation of the EJ Element in partnership with EJ Communities.

II. In the Final EJ Element, Goal EJ-8 (Foster Meaningful Civic Engagement and Support Community Power and Capacity Building) should include the necessary corresponding EJ Actions and strategies to ensure that the EJ Element's implementation process includes ongoing, accessible and meaningful community engagement.

We urge the City to embrace open outcomes and adaptability in the planning and implementation process to ensure Oakland's EJ communities have a meaningful opportunity to shape and inform outcomes, rather than just provide feedback on predetermined outcomes. We strongly recommend that City of Oakland staff and contractors be frank and clear about the process, timeline, constraints, and the ways in which community engagement will be conducted and used throughout the EJ Element adoption and implementation process.

Additionally, we offer the following policy amendments, new policies and new actions for Goal EJ-8 to support an EJ Element implementation process that includes ongoing, meaningful and accessible community engagement.

GOAL EJ-8 POLICY RECOMMENDATIONS	
Policy	**Existing Policy Amendments *[in red]* & New Policy Proposals *[in green]*:**
Policy EJ-8.1	Meaningful, Relevant Engagement. Design and implement public engagement processes and events *in partnership with EJ Communities* that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible[1] and understandable and that provide meaningful opportunities for participants to influence outcomes *during the planning, implementation, and evaluation phases of the policy, project and/or program process.*
Policy EJ-8.5	Community Capacity Building. Empower historically marginalized community members to participate in local decision-making ~~and~~ , engage meaningfully in planning efforts, *advocate for "community and systems improvements…[,] develop their skill sets as community leaders, and advance…their roles as trusted messengers [and decision-makers]."*[2] ~~including through~~ *This includes, but is not limited to,* increased representation in employment and civic life; providing educational/ training workshops and programs about civic involvement and processes, such as through *academies,*

[1] See Appendix A for Accessibility Recommendations
[2] This policy was adapted from Policy EJ-15.3 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-51

	fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.
NEW Policy #1	*Community-Led Initiatives. Support community-driven initiatives that address priorities and needs related to the 10 EJ Element goals through funding, technical assistance, support with grant applications, "data sources, meeting spaces, support services, and other staff resources"*[3]

GOAL EJ-8 ACTION RECOMMENDATIONS	
Action	**Existing Action Amendments *[in red]* & New Action Proposals *[in green]***
EJ-A.32	*Implement the City's roles and responsibilities as they relate to the establishment of the Oakland Climate Action Network (OCAN), a permanent neighborhood organizing support network summarized in Action CL-5 of Oakland's 2030 Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA). This includes–but it not limited to–designating staff within each implementing department to be the/a community engagement partner and interdepartmental liaison; engaging with "neighborhood-based governance bodies"*[4] *(i.e. OCAN committees); and hosting* ~~Host~~ an annual City-wide *OCAN* conference ~~of Neighborhood Empowerment Councils,~~ where ~~councils~~ *community organizations, neighborhood councils, and residents* plan proactively for healthy communities and provide feedback on General Plan implementation.[5]
NEW Action #1	*Actively seek federal, state and philanthropic funding,*[6] *in partnership with EJ communities and develop proposals in alignment with community goals. Reevaluate departmental budgets within all City departments' budgets to support ongoing, meaningful and accessible community engagement for EJ Communities.*[7]
NEW Action #2	*"Provide popular education about rights and resources to all community members. Educational campaigns are a too infrequently used approach for bringing Oaklanders together around shared goals across socioeconomic and racial/ethnic lines. City efforts to increase access to resources for the most vulnerable residents should utilize paid partnerships with CBOS [community-based organizations] to develop and deploy community-based campaigns.*

[3] This policy was adapted from Policy EJ-14.2 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-50

[4] Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.Pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.pdf., 23

[5] See Appendix F for more details about the Oakland Climate Action Network (OCAN)

[6] Such as programs funded through the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)

[7] See Appendix B for Community Engagement Budgeting Recommendations

	Popular education carried out through Oakland resident leadership can help the City meet residents where they are, overcome barriers to understanding, pay respect to existing community knowledge and lived experience, and ensure that everyone has the ability to participate equitably in creating and sharing knowledge."[8]
NEW Action #3	*Integrate community-led and community-driven initiatives into City planning processes, such as other General Plan elements, future action and area plans, the Capital Improvement Program (CIP) process, the adopted City budget, bond measures, and other City investments and resource allocations.*
NEW Action #4	*Establish or leverage a paid community advisory and oversight committee or board to support an equitable and community-driven implementation of Oakland's Environmental Justice Element or overall General Plan. The advisory body should represent Oakland's EJ Communities and diversity, have lived and technical experience in the relevant topic areas, and be adequately compensated, trained, and supported to engage in the City's feedback channels.*
NEW Action #5	"*Improve Citywide community engagement information gathering and sharing practices. Rather than having each City department collect and refer to community input in silos, develop and utilize a 'one-stop shop' platform: a central system for community input with searchable data well organized by topic for use by all City department staff.*"[9]

DETAILED COMMENTS AND RECOMMENDATIONS

I. Chapter 9: Implementation Actions and Programs

We appreciate that the Draft EJ Element contains a chapter and table dedicated to implementation. We also appreciate Chapter 9's Goal EJ-10 to "Prioritize Improvements and Programs That Meet the Needs of Environmental Justice Communities."

However, strong policies and goals are only as good as their implementation plans and actions. Oakland's Draft EJ Element includes sound visions and policies, but there must be advanced planning about *how* the various policies and actions will be implemented. This includes, but is not limited to, developing a comprehensive Goals, Policies and Actions table; creating or mapping out systems for interdepartmental coordination; robust fiscal planning; and establishing strong oversight and accountability mechanisms.

[8] Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.pdf., 29

[9] Ibid., 29-30

We offer the following recommendations for Chapter 9 to strengthen implementation, increase interdepartmental coordination, and foster trust and accountability.

A. Section 9.1: Prioritizing Improvements and Programs that Meet the Needs of EJ Communities

1. **Recommendation:** Include a detailed overview of the EJ Element's Implementation Plan in Section 9.1. We recommend that the overview model the clarity and detail in the implementation chapter of Santa Cruz's Climate Action Plan.[10] Specifically, a detailed overview should include:
    a) the responsible parties for overall implementation
    b) the responsible parties' general roles and responsibilities as they relate to the implementation of the EJ Element
    c) the City's plans for interdepartmental coordination
    d) funding plans and forecasts for implementation
    e) accountability plans for implementation

    Although we recommend more detail and specificity than what Oakland's current Land Use and Transportation (LUTE) Element's Implementation section provides, the "Highlights of the Implementation Program" and "General Plan Administration" sections therein serve as another model and precedent for this recommendation.[11]

2. **Recommendation:** Develop and incorporate the following implementation workflow for City staff to facilitate stronger interdepartmental coordination and accountability:
    a) Once the lead departments for General Plan implementation are established, designate a departmental liaison. This liaison will be responsible for coordinating their department's scope of work as it relates to implementing the General Plan. The liaison will also be responsible for developing an annual work plan for the department.
    b) All departmental liaisons meet on a regular basis. The meeting should allocate time for updates on implementation *and* open-ended time for coordination and collaboration.
    c) Departments annually present their work plans to city council, the General Plan community advisory and oversight committee(s), and the greater community at the City-wide Oakland Climate

[10] "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 133-138
[11] "Implementation Program." Oak035263.Pdf. March 1, 1998. https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/webcontent/oak035263.pdf.

Action Network (OCAN) conference for accountability, participatory planning, and "budgetary considerations."[12]

d) City council, department heads and decision-makers take each departments' General Plan work plans and community priorities into account during their budgeting process.[13]

B. Table EJ-11: Implementation – Goals, Policies, and Actions

1. **Recommendation:** Clarify the specific timelines, responsibility roles, and priority levels for each Action in the Final EJ Element. Specifically, we recommend that the City:
    a) Clearly define the "short," "medium," and "long" timelines, such as with year ranges or target completion years;
    b) Clarify implementing departments' roles by assigning lead or primary department(s) and supporting or secondary department(s) in the "Responsibility" section;
    c) Establish Action prioritization criteria;[14] and
    d) Specify the priority level for each Action

    We recommend modeling South San Francisco's 2040 General Plan Implementation Action Matrix (see Image 1 on the next page).

[12] Sanchez, Marye , Danielle Novokolsky, Nathan Otto, Danielle Knighten, and Kyle Elser. "Performance Audit of the City's Climate Action Plan." 21-009_cap.Pdf. February 18, 2021. https://www.sandiego.gov/sites/default/files/21-009_cap.pdf., 36

[13] This implementation workflow is inspired by a workflow offered by the City of San Diego's Office of the City Auditor in a Performance Audit of the City's Climate Action Plan. We have offered an overview of the annual workflow above, and it is explained in more detail in the document. Ibid.

[14] See Appendix C for Action Prioritization Criteria Recommendations

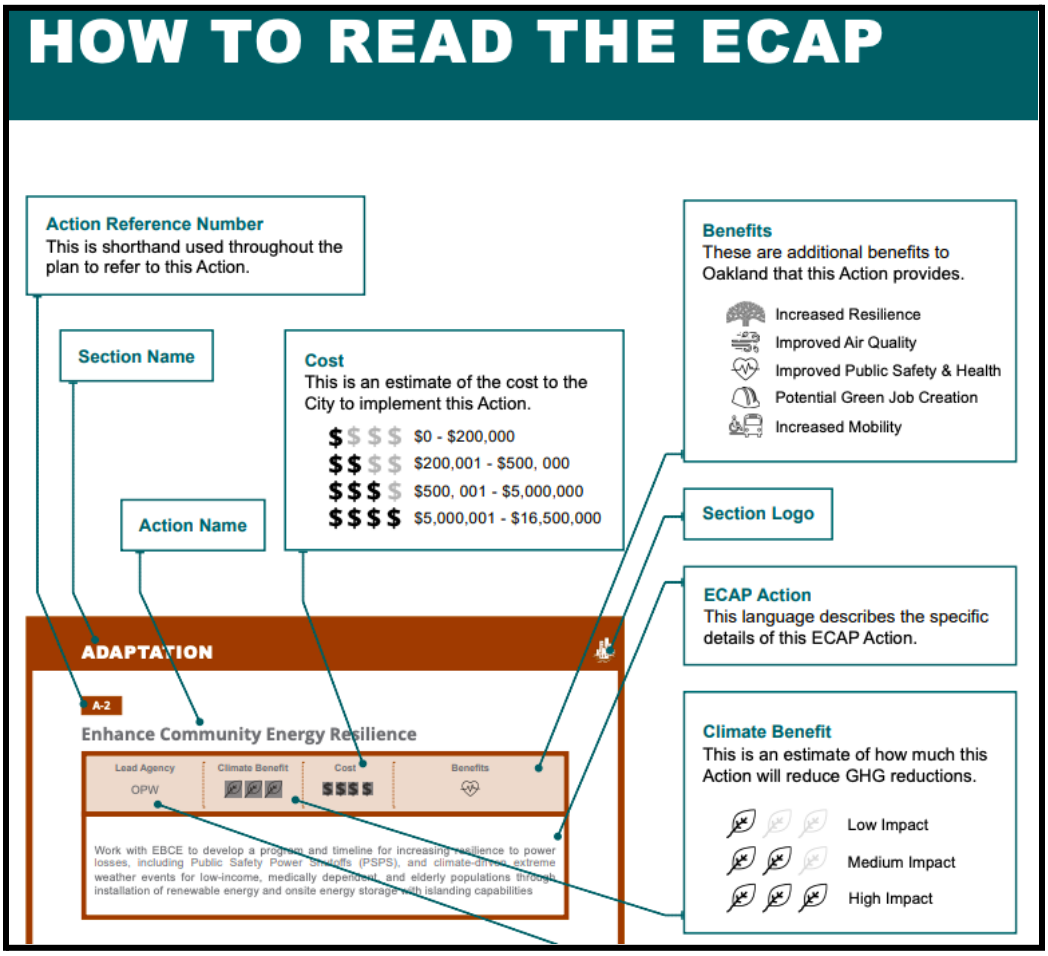
Image 1. Example of a detailed Implementation Action Matrix[15]

Chapter	Implementation Action	Priority	Timeframe	Primary Responsibility	Secondary Responsibility
Community Health and Environmental Justice	Action CHEJ-7.5.2: Provide landlord housing rights education. Provide education and outreach to landlords, property managers, real estate agents, and others on their obligations as they make or manage properties available for housing.	Medium	1-2 years	Economic Development and Housing Division (ECD)	
Community Health and Environmental Justice	Action CHEJ-7.5.1: Provide resident housing rights education. Provide education, outreach, and referral services for residents regarding their rights as tenants and buyers.	Medium	1-2 years	Economic Development and Housing Division (ECD)	
Community Health and Environmental Justice	Action CHEJ-7.2.1: Connect residents to mortgage assistance resources. Provide mortgage assistance to help low-income homeowners at risk of foreclosure with financial or counseling support. Provide residents with resources and connections to HEART of San Mateo County, a countywide homeowner assistance program, and other non-profit homeowner assistance programs.	Medium	1-2 years	Economic Development and Housing Division (ECD)	City Manager

2. **Recommendation:** Add cost estimates to each Action in Table EJ-11. Assigning cost estimates will facilitate longer-term fiscal planning and will give relevant departments and stakeholders more information to adequately budget for the effective implementation of the EJ Element. Oakland's Equitable Climate Action Plan (ECAP) provides an example of this (see Image 2 on the next page).

[15] "Shape SSF 2040 General Plan Implementation Actions." Implementation Actions - Shape South San Francisco. Accessed June 21, 2023. https://shapessf.com/implementation-actions/.

Image 2. Example of cost estimates in an Action Matrix[16]



3. **Recommendation:** Prioritize and plan for funding the implementation of EJ Element Policies and Actions by:
    a) Identifying potential funding sources for each Action in Table EJ-11; and
    b) Connecting revenue sources and budget decisions to EJ Element objectives and policies.

    The City of Santa Cruz's Implementation and Monitoring Plan for their Climate Action Plan provides a model for identifying potential funding tools in an implementation plan (see Image 3 on the next page). We recommend that the City of Oakland provide more specificity, such as by naming specific grants wherever possible. We also recommend that the City prioritize the most equitable funding sources – such as progressive revenue measures – for implementation wherever possible.

[16] "Oakland 2030 Equitable Climate Action Plan." Oakland-ECAP-07-24.Pdf. July 24, 2020. https://cao-94612.s3.amazonaws.com/documents/Oakland-ECAP-07-24.pdf., 26

Image 3. Example of Identifying Potential Funding Tools (Column 4)[17]

ID	Action	Lead Dept.	Potential Funding Tool	Phase	Implementation Notes/Comments
			Grants (Competitive), Grants (Formula), Bonds		*Implementation Memo*, for additional detail.
Action T1.5	Build new infrastructure that provides equitable access to safe bicycle and pedestrian pathways throughout the City, prioritizing frontline neighborhoods.	Public Works	Taxes, Fees, Private, Assessment, Grants, Grants (Competitive), Grants (Formula), Bonds	3	See Appendix H, *Funding and Financing Implementation Memo*, for additional detail.
Action T1.6	Pilot Neighborhood Greenways to slow traffic and improve walking and biking and evaluate piloting time based closures to vehicles primarily in business districts.	Planning, Public Works	Taxes, Fees, Private, Assessment, Grants, Grants (Competitive), Grants (Formula), Bonds	2-3	See Appendix H, *Funding and Financing Implementation Memo*, for additional detail.

Additionally, examples of connecting revenue sources and budget decisions to EJ Element objectives and policies include:

- Applying City-wide revenue from traffic and parking fees towards community-identified mobility improvements in Oakland's EJ Communities
- Following the City of Alameda's example[18] and consulting with Sogorea Te' Land Trust to establish an annual payment of Shuumi Land Tax.[19]
- The additional strategies we detail in our comments on Goal EJ-8[20]

C. Policy EJ-10.2 & Action EJ-A.34: Implementation Monitoring and Evaluation Plan

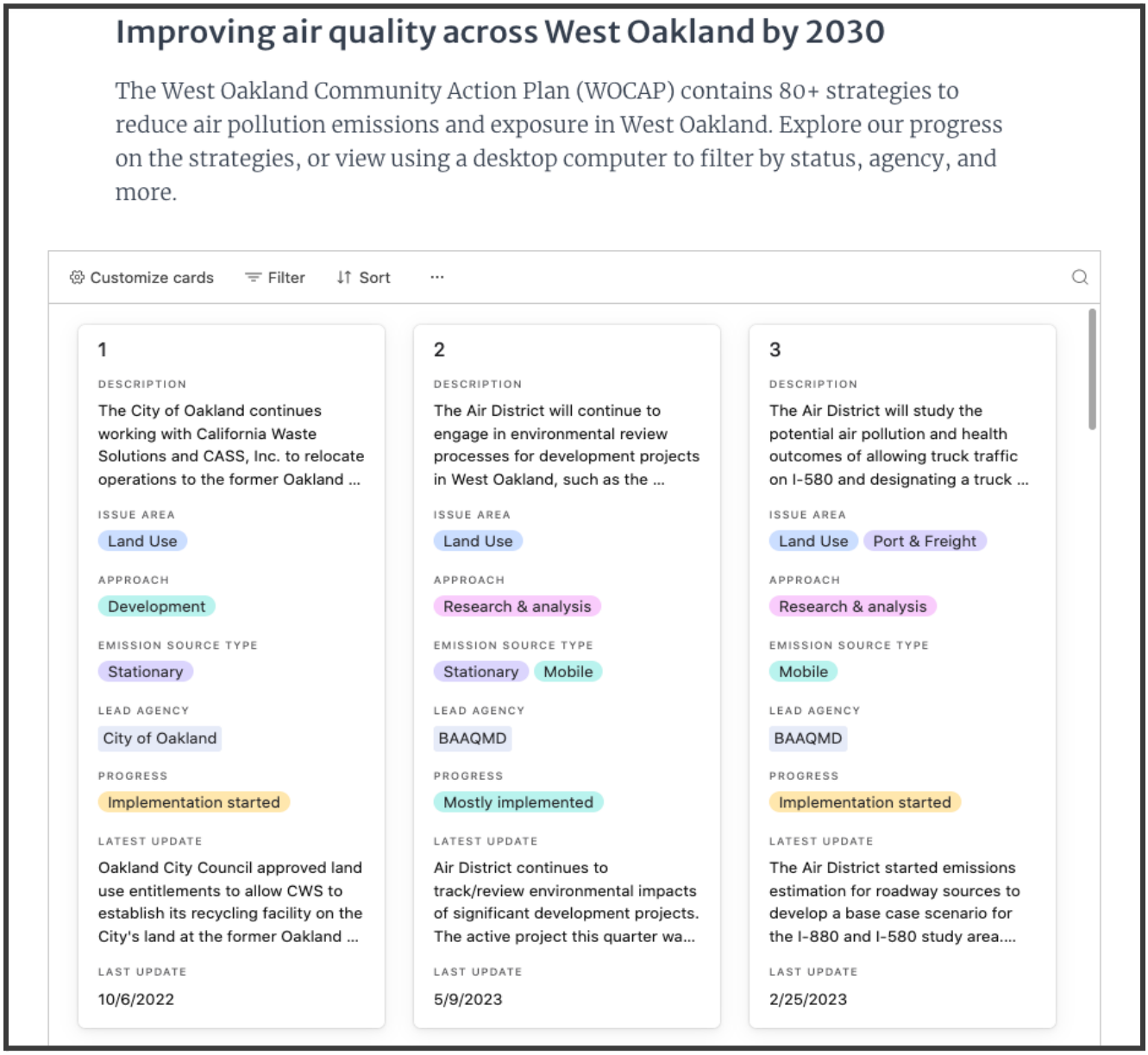
We are supportive of Policy EJ-10.2 to develop an Implementation Monitoring and Evaluation Plan and Action EJ-A.34 to develop the framework and reporting mechanisms for that plan in partnership with community groups. We offer the following recommendations and resources as a potential guide for the evaluation process,[21] but we ultimately defer to what the community collaboratively decides is best.

1. **Recommendation:** The City should track the implementation status of the EJ Element and provide open access to progress updates in a way that's accessible, easy to understand, regularly updated, and easy to navigate. The West Oakland Environmental Indicator Project (WOEIP)'s

[17] "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 353
[18] "Sogorea Te' Land Trust Shuumi Land Tax." Sogorea Te' Land Trust Shuumi Land Tax. Accessed June 21, 2023. https://www.alamedaca.gov/RESIDENTS/Information-for-Residents/Sogorea-Te%E2%80%99-Land-Trust-Shuumi-Land-Tax.
[19] "The Shuumi Land Tax "directly supports Sogorea Te's work of rematriation, returning Indigenous lands to Indigenous people, establishing a cemetery to reinter stolen Ohlone ancestral remains and building urban gardens, community centers, and ceremonial spaces so current and future generations of Indigenous people can thrive in the Bay Area." https://sogoreate-landtrust.org/shuumi-land-tax/
[20] See pages 12-18
[21] See Appendix D for Evaluation Process Resources

West Oakland Community Plan (WOCAP) implementation tracker provides a model for this (see Image 4 below).

Image 4. Example of a publicly accessible implementation tracker[22]



2. **Recommendation:** The City allocate funding for, and hire a trusted third-party evaluator to annually review the implementation of the EJ Element in partnership with EJ Communities.

[22] "WOCAP Strategies Improving Air Quality across West Oakland by 2030." WOCAP Strategies - West Oakland Environmental Indicators Project. Accessed June 21, 2023. https://woeip.org/featured-work/owning-our-air/wocap-strategies/.

II. Goal EJ-8: Foster Meaningful Civic Engagement and Support Community Power and Capacity-Building

We support the Draft EJ Element Policies under Goal EJ-8 and commend the City for including many of the essential components for meaningful civic engagement, such as access, relevant and innovative methods, community partnership and capacity building. We also support the City's partnership with the Deeply Rooted Collaborative and the Collaborative's ongoing and thoughtful engagement with Oakland residents about the General Plan Update.[23]

However, we strongly urge the City to adopt the following recommendations to ensure that Goal EJ-8's Policies and Actions effectively support implementation. We also find it concerning that all three of Goal EJ-8's corresponding Actions are classified as "long." As Policy EJ-8.2 (Sustained Engagement) suggests, community engagement is not a one-and-done process to check off a list after completing a workshop. Community engagement is an ongoing process and essential ingredient for the creation, implementation and evaluation of meaningful policies, plans and programs. Only with EJ community members' leadership, expertise, and capacity can transformative solutions be brought to bear.

We offer the following comments, general recommendations, Policy amendments, and new Policies and Actions for Goal EJ-8 to support an EJ Element implementation process that includes ongoing, meaningful and accessible community engagement.

GOAL EJ-8 POLICY RECOMMENDATIONS		
Policy	**Comments**	**Existing Policy Amendments *[in red]* & New Policy Proposals *[in green]*:**
Policy EJ-8.1	We support the language in Policy EJ-8.1. Our proposed amendment captures the fact that meaningful and relevant engagement should be developed in partnership with EJ Communities and be an integral part of every stage of plans located in, impacting and/or benefitting Oakland's EJ Communities.	Meaningful, Relevant Engagement. Design and implement public engagement processes and events *in partnership with EJ Communities* that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible[24] and understandable and that provide meaningful opportunities for participants to influence outcomes *during the planning, implementation, and evaluation phases of the policy, project and/or program process.*

[23] "Deeply Rooted Community Outreach." COMMUNITY OUTREACH | Deeply Rooted. Accessed June 21, 2023. https://www.deeplyrooted510.org/communityoutreach.
[24] See Appendix A for Accessibility Recommendations

Policy EJ-8.5	The proposed amendment to Policy EJ-8.5 (Community Capacity Building) is adapted from San Diego County's EJ Element Policy EJ-15.3 (Capacity Building and Support) to better align with our shared definition of capacity building.[25] While we appreciate Policy EJ-8.5's language around empowering community members "to participate in local decision-making and engage meaningfully in planning efforts,"[26] we value that San Diego County's policy articulates an intention to support EJ communities' capacity to advance visions and work that may fall outside of the City's decision-making and planning efforts. Examples of this include but are not limited to: ● WOEIP's Oakland Shoreline Leadership Academy;[27] ● Mycelium Youth Network's Climate Resilient Schools and Youth Leadership Council programs;[28] ● East Oakland Neighborhoods Initiative (EONI)'s continued community planning efforts outside of the Transformative	Community Capacity Building. Empower historically marginalized community members to participate in local decision-making ~~and~~ , engage meaningfully in planning efforts, *advocate for "community and systems improvements…[,] develop their skill sets as community leaders, and advance…their roles as trusted messengers [and decision-makers]."*[32] ~~including through~~ *This includes, but is not limited to,* increased representation in employment and civic life; providing educational/ training workshops and programs about civic involvement and processes, such as through *academies,* fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.

[25] We define capacity building as the process of strengthening local leadership, skills, expertise and resources so that communities can meet their needs and achieve self-determination. Against a backdrop of systemic disinvestment and oppression, we must invest in the capacity of local leaders to advance community visions. This work includes uplifting community knowledge, building skills, developing partnerships, identifying and planning for projects, and shifting resources and power.

[26] Dyett & Bhatia, E/J Solutions, and PolicyLink. "Oakland 2045 Oakland Environmental Justice Element Public Review Draft March 2023." EJ-Element_032123-public-review-draft_reduced.Pdf. March 24, 2023. https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf., 9-13

[27] "Oakland Shoreline Leadership Academy." Oakland Shoreline Leadership Academy - West Oakland Environmental Indicators Project. Accessed June 21, 2023. https://woeip.org/featured-work/oakland-shoreline-leadership-academy/.

[28] "Climate Resilient Schools Initiative." Climate Resilient Schools | Mycelium Youth Network. Accessed June 21, 2023. https://www.myceliumyouthnetwork.org/climate-resilient-schools; "Youth Leadership Council (YLC)." Youth Leadership Council | Mycelium Youth Network. Accessed June 21, 2023. https://www.myceliumyouthnetwork.org/youth-leadership-council.

[32] This policy was adapted from Policy EJ-15.3 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-51

	Climate Communities (TCC) project;[29] • Sogorea Te' Land Trust's Himmetka (community resilience center) program;[30] and • Homies Empowerment's Freedom Farm [31]	
NEW Policy #1	This proposed policy supplements Policies EJ-8.2 (Sustained Engagement) and EJ-8.4 (Community Partners) by naming the processes through which the City will support community-led initiatives. While both existing Policies are important, this proposed policy differs from Policy EJ-8.4 because it focuses on how the City can partner with the community to advance community-driven initiatives, while Policy EJ-8.4 focuses on how the City can partner with community-based organizations for City-driven initiatives. Examples of this include, but are not limited to: • The City partnering with the East Oakland Neighborhoods Initiative (EONI) to apply for and win a Transformative Climate Communities (TCC) grant.	*Community-Led Initiatives. Support community-driven initiatives that address priorities and needs related to the 10 EJ Element goals through funding, technical assistance, support with grant applications, "data sources, meeting spaces, support services, and other staff resources"*[33]

[29] "Better Neighborhoods, Same Neighbors! East Oakland Neighborhoods Initiative EONI Community Plan." FINAL-PRINTED-EONI-PLAN.Pdf. Accessed June 21, 2023. https://cao-94612.s3.amazonaws.com/documents/FINAL-PRINTED-EONI-PLAN.pdf; "Transformative Climate Communities (TCC) Grant - Better Neighborhoods, Same Neighbors." City of Oakland | Transformative Climate Communities (TCC) Grant. Accessed June 21, 2023. https://www.oaklandca.gov/topics/transformative-climate-communities-tcc-grant.
[30] "Himmetka: In One Place, Together." Himmetka: In One Place, Together - The Sogorea Te Land Trust. Accessed June 21, 2023. https://sogoreate-landtrust.org/himmetka/.
[31] "Freedom Farm." Freedom Farm - HOMIES EMPOWERMENT. Accessed June 21, 2023. https://www.homiesempowerment.com/freedom-farm.html.
[33] This policy was adapted from Policy EJ-14.2 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-50

	• The City partnering with Friends of Lincoln Square Park to apply for state grant funding to support the Lincoln Recreation Center Resilience Hub. • The City following through on Communities for a Better Environment (CBE)'s request to apply for air filter funding.	

GOAL EJ-8 ACTION RECOMMENDATIONS		
Action	**Comments**	**Existing Action Amendments *[in red]* & New Action Proposals *[in green]***
EJ-A.32	The OCAN provides the necessary infrastructure for the City to implement many of the existing and/or proposed policies and actions within Goal EJ-8. The structure of the OCAN–which is summarized in Oakland's 2030 Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and *Implementation Guide* (REIA)–calls for and details strategies to: • Increase the City's capacity to practice interdepartmental coordination and meaningfully partner with Oakland CBOs and residents (related to Policies EJ-8.2, 8.6 and 8.7) • Establish local, issue-based implementation committees	*Implement the City's roles and responsibilities as they relate to the establishment of the Oakland Climate Action Network (OCAN), a permanent neighborhood organizing support network summarized in Action CL-5 of Oakland's 2030 Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA). This includes–but it not limited to–designating staff within each implementing department to be the/a community engagement partner and interdepartmental liaison; engaging with "neighborhood-based governance bodies"*[35] *(i.e. OCAN committees); and hosting* ~~Host~~ an annual City-wide *OCAN* conference ~~of Neighborhood Empowerment Councils,~~ where ~~councils~~ *community organizations, neighborhood councils, and residents* plan proactively for healthy communities and provide feedback on General Plan implementation.[36]

[35]Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.Pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.pdf., 23

[36] See Appendix F for more details about the Oakland Climate Action Network (OCAN)

	(related to Policies EJ-8.1, 8.3 and 8.5 and Action EJ-A.32)[34] The City staff member(s) assigned to serve as the community engagement partner(s) should be clearly communicated to residents and an accessible point person(s) for questions and feedback. We recommend the assigned City staff member(s) have sufficient understanding of and authority over the relevant issue areas so that residents' questions and feedback are addressed in a meaningful way.	
NEW Action #1	We appreciate Policy EJ-8.4 (Community Partners), Policy EJ-8.6 (Engagement Infrastructure) and Action EJ-A.30's mention of funding for meaningful community engagement. We also acknowledge EJ-A.30 as one of many necessary steps to resource the City's community engagement strategy. However, we strongly recommend that the City adopt this proposed Action and do more to address the urgency of funding an ongoing, accessible and meaningful community engagement process. The Final EJ Element must offer other funding sources to effectively implement the proposed community engagement strategy. As currently written, EJ-A.30's timeline is classified as "long" and only commits to studying the feasibility of establishing a Citywide community engagement	*Actively seek federal, state and philanthropic funding,[37] in partnership with EJ communities and develop proposals in alignment with community goals. Reevaluate departmental budgets within all City departments' budgets to support ongoing, meaningful and accessible community engagement for EJ Communities.*[38]

[34] See Appendix F for more details about the Oakland Climate Action Network (OCAN)
[37] Such as programs funded through the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)
[38] See Appendix B for Community Engagement Budgeting Recommendations

	fund. Further, we recommend that departmental budgets be finalized in partnership with EJ Communities and that relevant information and updates be transparently shared. As mentioned earlier, community engagement is an essential ingredient to create, implement and evaluate meaningful policies, plans and programs that are within or informed by Oakland's 2045 General Plan Update.	
NEW Action #2	This proposed action supports and provides tangible strategies for Policies EJ-8.1 (Meaningful, Relevant Engagement), EJ-8.3 (Innovative Methods) and EJ-8.4 (Community Partners). Popular education campaigns can also help the City spread more awareness about important City services and support Oakland residents to enroll in and take advantage of those services.	*"Provide popular education about rights and resources to all community members. Educational campaigns are a too infrequently used approach for bringing Oaklanders together around shared goals across socioeconomic and racial/ethnic lines. City efforts to increase access to resources for the most vulnerable residents should utilize paid partnerships with CBOS [community-based organizations] to develop and deploy community-based campaigns.* *Popular education carried out through Oakland resident leadership can help the City meet residents where they are, overcome barriers to understanding, pay respect to existing community knowledge and lived experience, and ensure that everyone has the ability to participate equitably in creating and sharing knowledge."*[39]
NEW Action #3	This proposed action corresponds to and supports the new Community-Led Initiatives Policy proposal detailed in the Policy Recommendation table above (New Policy #1).	*Integrate community-led and community-driven initiatives into City planning processes, such as other General Plan elements, future action and area plans, the Capital Improvement Program (CIP) process, the adopted City budget, bond measures, and other City investments and resource allocations.*

[39] Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.pdf., 29

NEW Action #4	This proposed action supports Policy EJ-8.6 (Engagement Infrastructure). Establishing paid community advisory and oversight committees and boards provides a sustained and consistent engagement structure for community leaders to meaningfully engage in and have ownership over the decision-making process.[40] These bodies also support the necessary bridge-building work between local government and the Oakland community. In addition to adopting this action, we recommend that the City continue partnering with Deeply Rooted's Equity Working Group or another similar paid community advisory body throughout the General Plan's implementation process.	*Establish or leverage a paid community advisory and oversight committee or board to support an equitable and community-driven implementation of Oakland's Environmental Justice Element or overall General Plan. The advisory body should represent Oakland's EJ Communities and diversity, have lived and technical experience in the relevant topic areas, and be adequately compensated, trained, and supported to engage in the City's feedback channels.*
NEW Action #5	This proposed action supports Policies EJ-8.2 (Sustained Engagement), EJ-8.6 (Engagement Infrastructure) and EJ-8.7 (Interagency and Interdepartmental Collaboration). As detailed in the REIA for Oakland's EJ and Safety Elements, "[i]mproved data gathering and assessment will improve civic engagement by reducing City blind spots, redundancy, and resident planning fatigue caused by repeated requests for input."[41]	"*Improve Citywide community engagement information gathering and sharing practices. Rather than having each City department collect and refer to community input in silos, develop and utilize a 'one-stop shop' platform: a central system for community input with searchable data well organized by topic for use by all City department staff.*"[42]

[40] See Appendix E for Community Advisory Board and Committee Recommendations

[41] Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.pdf., pg. 29-30

[42] Ibid.

III. Conclusion

Thank you for the opportunity to offer comments on Oakland's Draft Environmental Justice Element. We urge the General Plan Update team, the Planning Department, the Planning Commission, and City officials to incorporate the recommendations outlined above into the Final Environmental Justice Element. We also urge the City to continue engaging, supporting, and partnering with Oakland's Environmental Justice organizations and communities to ensure that the Final EJ Element and implementation process is reflective of their needs and lends to material benefits in their lives and communities.

Please do not hesitate to reach out to Aminah Luqman at aminah.luqman@greenlining.org with any questions or to schedule time to discuss our recommendations further.

Sincerely,

Aminah Luqman
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Janina Turner
Environmental Justice Co-Director, *HOPE Collaborative*

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APPENDIX A

Accessibility Recommendations

In addition to Policy EJ-8.10 (Linguistically Isolated Communities) and Policy EJ-8.11 (Digital Access), we recommend that the City incorporate the following strategies for accessibility:

- Create and/or maintain "a list of access support vendors (i.e. CART [Communication Access Realtime Translation] and ASL [American Sign Language] interpreters, people to do access audits, web designers who practice accessible design,[43] chemical-safe cleaners, caterers who cook for specific food access needs)" and contract with these vendors to support accessible events and City processes[44]
- Plan for meeting times and locations that are accessible and work best for the intended audience
- Disseminate relevant materials and agendas far enough in advance of meetings or events to give participants enough time to review
- Include access information in promotion materials (e.g. indicating that ASL interpreters will be provided) and solicit access requests in advance
- Provide childcare to help caretakers and community members with children attend and participate
- Provide transportation and/or transportation stipends
- Communicate in plain, easy-to-understand language and avoid jargon and acronyms
- Incorporate graphics, clear visual aids and storytelling to convey information
- Use microphones to ensure all attendees can hear and receive the information being presented and discussed

[43] Education and Outreach Working Group (EOWG), and Shawn Lawton Henry. "Introduction to Web Accessibility." Introduction to Web Accessibility | Web Accessibility Initiative WAI. Accessed June 21, 2023. https://www.w3.org/WAI/fundamentals/accessibility-intro/.

[44] Piepzna-Samarasinha, Leah Lakshmi, and Stacey Park Milbern. "Disability Justice: An Audit Tool." Disability Justice: An Audit Tool. Accessed June 21, 2023. https://static1.squarespace.com/static/5ed94da22956b942e1d51e12/t/625877951e18163c703bd0f4/1649964964772/DJ+Audit+Tool.pdf., 19

APPENDIX B

Community Engagement Budgeting Recommendations

In addition to our proposed New EJ-8 Action #1 regarding funding, we offer the following recommendations around adequate budgeting to support a meaningful community engagement process. In addition to allocating adequate time and staff resources, the City must budget to support the other necessary resources for community engagement. This includes, but is not limited to, funding and/or resource allocation for community stipends, contracts and/or partnership agreements for community-based organizations ("CBOs"), interpretation and translation, third-party facilitators and mediators, event space, material development, childcare, food, transportation, and communications equipment.

For community stipends and CBO contracts, we recommend that the City fully fund stipends for residents and CBOs in EJ communities to participate in formal advisory and feedback channels. Given the significant time required to engage in public stakeholder processes, capacity challenges these residents and organizations face, and the value of incorporating the wisdom of their lived experiences into the design of policies and plans that will affect their lives and neighborhoods, the City should compensate community expertise on par with compensation offered for other types of expert consultants, starting at a minimum rate of $100 per hour.

The West Oakland Community Action Plan (WOCAP)–which serves as a strong local example for community-driven planning–also articulates the importance of sufficient time for participatory planning and funding for community outreach, material development and food.[45] In the plan, they reflect that childcare and transportation would have helped members attend meetings more regularly. They also articulate the importance of having neutral and trusted facilitators during a participatory planning process because they "fostered inclusivity and full participation by community members…encourage[d] public comments throughout the planning process…[and] guided the Steering Committee toward consensus on Plan elements and Strategies at critical points during the Plan's development."[46]

We recommend that the funding to support community engagement for EJ Communities be adequate to:

- Contract and appropriately compensate CBOs to lead or partner on community engagement
- Provide paid stipends to EJ Community residents and environmental justice CBOs to participate in advisory and feedback channels around related policies, actions and plans
- Provide language interpretation (which includes ASL) for virtual and in-person events and live captioning for virtual events
- Support material development and the translation of said materials into the prominent languages spoken in Oakland and within Oakland's EJ Communities

[45]"Owning Our Air The West Oakland Community Action Plan - Volume 1: The Plan." WOEIP-research-Owning-Our-Air-full.Pdf. Accessed June 21, 2023. https://woeip.org/wp-content/uploads/2020/11/WOEIP-research-Owning-Our-Air-full.pdf., 3-3 - 3-5

[46] Ibid., 3-4

- Support the provision of childcare services and transportation stipends
- Support the provision of food during meal-time meetings (e.g. offering dinner during evening meetings from 6-8pm)
- Hire third-party facilitators and mediators to address power imbalances, elicit community feedback and solutions, and support consensus-building
- Provide accessible event spaces

Committing to and working to actualize the proposed action around funding will help provide the conditions necessary to achieve the meaningful engagement, community partnerships, community capacity building, and language and digital access, as articulated in Policies EJ-8.1, EJ-8.4, EJ-8.10, EJ-8.11.

APPENDIX C

Action Prioritization Criteria

We recommended above that the Final EJ Element include more details in Table EJ-11 to improve implementation, including establishing prioritization levels for each Action. To implement this recommendation, we recommend that the City establish equitable prioritization criteria in partnership with EJ community groups and organizations to determine and assign priority level for each EJ Action. We've included a few sources below with example criteria for the City's consideration:

- Oakland's Racial Equity Impact Assessment and Implementation Guide (REIA) for the EJ and Safety Elements
    - The REIA includes Detailed Equity Recommendations for the EJ Element's policies and actions (pgs. 34-78) as well as a series of assessment questions (pgs. 32-33) related to the following topics:
        - Resource creation and/or dedication "to address the environmental justice, health, and safety needs of low-income and BIPOC residents of EJ Communities"[47]
        - Accountability, transparency and follow-through to EJ Community residents
        - Participatory decision-making by and codevelopment of solutions with impacted community members
        - Reduction of public health, safety and environmental disparities
        - Preservation or strengthening of local assets and alignment with "broadly shared community values in low-income, BIPOC EJ Communities"[48]
- The Equity Screening Tool criteria in Santa Cruz's Climate Action Plan (pg. 49-53)
    - Santa Cruz' Climate Action Plan includes an equity screening tool that Climate Action Plan actions were evaluated against. The screening tool was developed by the City of Santa Cruz's Community Climate Action Task Force (CATF) in partnership with "equity advisors from nearly a dozen frontline groups and small group conversations with frontline communities."[49]
    - For the evaluation process, the City and CATF "evaluated each of the CAP actions against all criteria categories and questions and assigned a score of

[47] Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.pdf., 32
[48] Ibid., 33
[49] "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 49

positive impact, negative impact, neutral or not applicable. No negative scores were accepted."[50]

- The screening criteria is grouped into the following categories:
  - Community Health and Safety
  - Green Job Facilitation and Creation
  - Cultural Vibrancy
  - Accessibility
  - Accountability
  - Affordability

- The Oakland Climate Action Coalition (OCAC)'s Equity Checklist for the Priority Conservation Area (PCA) Selection Process[51]
  - The OCAC's Equity Checklist includes the following criteria and characteristics:

Economic Equity	Social Inclusion	Good Health for All
➔ Workforce development training and employment ➔ Benefits to residents of low-income housing ➔ Support to Community Land Trusts (CLTs) ➔ Anti-displacement protections ➔ Direct benefits to EJ Communities	➔ Includes leadership by and meaningful participation from members of frontline communities and other impacted communities (e.g. communities of color, people with disabilities, youth, and the LGBTQIA+ community) ➔ Accommodation of disabilities ➔ Improved mobility ➔ Popular education ➔ Resident engagement and decision making	➔ Mitigation of development impacts and improvement of quality of life ➔ Buffers from harmful infrastructure and activity ➔ Placemaking ➔ Creation of a healthy and pleasant local environment

[50] "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 50

[51] "Equity Checklist for the PCA Selection Process Working Draft." Equity Checklist_6_19_15. June 19, 2015. http://oaklandclimateaction.org/wp-content/uploads/2015/06/Equity-Checklist_6_19_15.pdf.

APPENDIX D

Evaluation Process Resources

To strengthen Policy EJ-10.2 (Implementation Monitoring and Evaluation Plan) and the corresponding Action EJ-A.34 to develop the framework and reporting mechanisms for that plan in partnership with community groups, we offer the following resources for consideration in the design of the evaluation process and questions:

- Oakland's Racial Equity Impact Assessment and Implementation Guide (REIA) for the EJ and Safety Elements
    - The REIA's series of assessment questions (pgs. 32-33) related to resource creation and dedication; accountability; codevelopment of solutions; disparity reduction; and local assets could serve as a guide for the evaluation process.
    - The REIA offers the following overarching questions:
        - *"Do the EJ Goal and relevant action(s) create and/or dedicate resources to address the environmental justice, health, and safety needs of low-income and BIPOC residents of EJ Communities, and thereby bridge equity gaps?"*[52]
        - *"Do the EJ Goal and relevant action(s) create a framework for ongoing accountability to EJ Community residents, transparency, and follow-through?"*[53]
        - *"Do the EJ Goal and relevant action(s) commit to co-developing solutions with impacted community members?"*[54]
        - *"Do the EJ Goal and relevant action(s) reduce public health, safety, and environmental disparities?"*[55]
        - *"Do the EJ Goal and relevant action(s) preserve or strengthen local assets and align with broadly shared community values in low-income, BIPOC EJ Communities?"*[56]

[52] Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft_-EJ_Safety-Elements_REIA_3.23.23.pdf., 32
[53] Ibid.
[54] Ibid.
[55] Ibid., 33
[56] Ibid.

- The Innovation Network's Learning and Evaluation Process[57]
    - The Innovation Network, a learning and evaluation partner for the Greenlining Institute, has a practice that consists of the following components:[58]
        - **Evaluation of Complex Systems:** Focusing on evaluation that measures hard-to-measure concepts such as trust, equity, and shared power through both qualitative and quantitative data. In their practice, they facilitate the development of "learning questions," which are intended to be forward-looking and to guide the learning together.
        - **Participatory Planning:** Designing their projects through participatory planning, involving stakeholders in all aspects of the evaluation lifecycle (evaluation planning, data collection, analysis and reflection, and reporting). Identifying what they are trying to achieve, how they plan to achieve it, and how the learning plan supports those goals at the outset provides the opportunity to reflect critically on their goals and intended impact, and then to check in on that progress on a regular basis.
        - **Qualitative and Quantitative Data Collection:** Collecting both qualitative and quantitative data to capture a variety of perspectives and help answer the learning questions. For example, data can be collected in real time through regular reflection meetings and surveys.
        - **Learning Tied to Strategy Development and Implementation:** Importantly, this work is framed as a "learning partnership" and not merely as an evaluation. In practice, learnings are directly connected to ongoing strategy development and support the facilitation team to adjust in implementation. Monthly and quarterly check-ins, plus an annual review, provides opportunities to reflect on learnings and course correct where needed. Check-ins and qualitative data can provide rich and nuanced insights to groundtruth whether policies are meeting their assumptions and intended impact.

- The Greenlining Institute's Guidebook on Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs[59]
    - The Guidebook recommends that evaluation guidelines for policies should:
        - "Develop policy-specific social equity metrics for processes and outcomes. Evaluating both process and outcome will create accountability to ensure social equity is centered and achieved in the implementation of

[57] "Innovation Network Transforming Evaluation for Social Change." Innovation Network | Transforming Evaluation for Social Change. Accessed June 21, 2023. https://www.innonet.org/.
[58] See pages 10-13 for more information on, as well as examples of, the Innovation Network's Learning and Evaluation process https://greenlining.org/wp-content/uploads/2023/06/Greenlinings-Regional-Climate-Collaboratives-RCC-Program-Guidelines-Round-1-Public-Comments-2022.pdf
[59] Mohnot, Sona, Jordyn Bishop, and Alvaro Sanchez. "Making Equity Real In Climate Adaptation and Community Resilience Policies and Programs: A Guidebook." Microsoft Word - GL_R4_ClimateAdaptationReport_Final_081619.Docx. August 16, 2019. https://greenlining.org/wp-content/uploads/2019/08/Making-Equity-Real-in-Climate-Adaption-and-Community-Resilience-Policies-and-Programs-A-Guidebook-1.pdf.

the policy. Policymakers should engage equity stakeholders to define the metrics.

- …[I]dentify and measure progress on economic, social, health, and environmental issues applicable to policy
    - Process metrics can include number of CBO representatives sitting on decisionmaking entities, did community engagement processes change course of projects, was trust built in the process, etc.[60]
    - Outcome metrics can include amount of GHG reduction, the percentage increase of urban tree canopy in a community, etc.
- Conduct regular process and outcome evaluations throughout implementation process
- Integrate community-recommended equity metrics into evaluation guidelines and include indicators that reflect current equity concerns (e.g. race, housing, etc.).
- Create an adaptive process and outcome metrics that reflect the changing equity landscape and develop processes that allow for funding streams to be adapted to current conditions.
- Present findings on the evaluation process to equity stakeholders and develop recommendations to improve [the] process.[61"62]

[60] Carter, V., Pastor, M. & Wander, M. (2018). Measures Matter. Retrieved from https://dornsife.usc.edu/assets/sites/242/docs/M_A_Final_WebVersion_reduced.pdf on April 30, 2019.
[61] Adapted from Carter, V., Pastor, M. & Wander, M. (2018). Measures Matter. Retrieved from https://dornsife.usc.edu/assets/sites/242/docs/M_A_Final_WebVersion_reduced.pdf on April 30, 2019.
[62] Mohnot, Sona, Jordyn Bishop, and Alvaro Sanchez. "Making Equity Real In Climate Adaptation and Community Resilience Policies and Programs: A Guidebook." Microsoft Word - GL_R4_ClimateAdaptationReport_Final_081619.Docx. August 16, 2019. https://greenlining.org/wp-content/uploads/2019/08/Making-Equity-Real-in-Climate-Adaption-and-Community-Resilience-Policies-and-Programs-A-Guidebook-1.pdf., 73

APPENDIX E

Community Advisory Board and Committee Recommendations

In addition to adopting proposed New EJ-8 Action #4 around establishing a paid community advisory board or committee to support implementation, we strongly recommend:

- Establishing membership criteria to ensure representation of Oakland's EJ Communities. The evaluation criteria for membership in Deeply Rooted's Equity Working Group (EWG) is an example of this.[63]
- Compensating members and ensuring that compensation is on par with compensation offered for other types of expert consultants, such as technical consultants.
- Providing members with adequate training and capacity building support to meaningfully participate in and inform the decision making process
- Establishing clear roles and responsibilities, potentially through a MOU or partnership agreement
- Ensuring that the body "maintains sufficient authority and independence so that they can influence final decisions"[64]

[63] "Equity Working Group (EWG)." EQUITY WORKING GROUP | Deeply Rooted. Accessed June 21, 2023. https://www.deeplyrooted510.org/ewg.

[64] Eng, Tiffany, Adeyinka Glover, Jazmine Johnson, Dan Sakaguchi, and Chelsea Tu. "Rethinking Local Control in California Placing Environmental Justice and Civil Rights at the Heart of Land Use Decision-making." CEJA-Report-Rethinking_Local_Control-05_web.Pdf. Accessed June 21, 2023. https://calgreenzones.org/wp-content/uploads/2020/03/CEJA-Report-Rethinking_Local_Control-05_web.pdf., 27-28

APPENDIX F

Oakland Climate Action Network (OCAN)

In addition to our above recommended amendments to EJ-A.32 (regarding hosting an annual city-wide conference), we offer the following details to emphasize how the OCAN provides the necessary infrastructure for the City to implement many of the proposed policies and actions within Goal EJ-8. The structure of the OCAN–which is summarized in Oakland's 2030 ECAP and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA)–calls for and details strategies to:

- Increase the city's capacity to practice interdepartmental coordination and meaningfully partner with Oakland CBOs and residents (*related to Policies EJ-8.2, 8.6 and 8.7)*:
    - "The OCAN city wide network must include not only community organizations and engaged residents but also key partners within City departments. In support of OCAN, each implementing City department should designate a knowledgeable staffer to be the community engagement partner and interdepartmental liaison. These City staff would collaborate and comprise the main line of communication between City departments implementing ECAP actions.
    - This type of organized role would streamline communication and help alleviate the bureaucratic complexities of working across departments. Furthermore, the regular presence of knowledgeable staffers at OCAN meetings builds trust and puts community organizations in a better position to cooperate and collaborate with the City through OCAN —a direct line of communication with all relevant key City partners. Lowering institutional barriers to community engagement and creating an efficient system of inter-departmental communication will directly translate to improved and empowered City-community partnership and co-ownership on ECAP implementation."[65]

- Establish local, issue-base implementation committees (*related to Policies EJ-8.1, 8.3 and 8.5 and Action EJ-A.32)*
    - "To ensure robust implementation of CL-5, the Oakland Climate Action Network (OCAN) should include establishment of decentralized, neighborhood-based governance bodies, envisioned as regularly occurring decision-making forums, held in neutral, community-oriented, and accessible public spaces where people already gather (such as libraries, schools, and recreation or community centers). OCAN committees would focus on implementing the ECAP Actions most relevant to the challenges faced by residents in those neighborhoods."[66]

[65] Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.Pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.pdf., 22

[66] Ibid, 23

- “The Oakland Climate Action Network can integrate existing bodies and forums such as Neighborhood Crime Prevention Councils (NCPCs), neighborhood associations and resident action councils (e.g., Santa Fe Community Association and Neighbors, Sobrante Park Resident Action Council, EBALDC’s Healthy Havenscourt Collaborative), community and recreation centers (e.g., Bushrod, Rainbow and Tassafaronga Rec Centers), [resilience hubs,] engaged congregations and faith groups (e.g., Allen Temple Baptist Church, Kehilla Synagogue), existing place-based community organizations (e.g., Unity Council in the Fruitvale, Black Cultural Zone in East Oakland) and membership-driven, base building organizations (e.g., Communities for a Better Environment in East Oakland, Asian Pacific Environmental Network in Chinatown).”[67]

[67]Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.Pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL_Complete_EF-Racial-Equity-Impact-Assessment_7.3.2020_v2.pdf., 24

June 20, 2023

City of Oakland Planning Department
250 Frank H. Ogawa Plaza
Oakland, CA 94612

Subject: Oakland YLC Letter

Dear Oakland General Plan Update Team,

We are Mycelium Youth Network's Youth Leadership Council (YLC). Here at YLC we fight against climate change and give knowledge to youth and give a future for environmental justice. We also help the animals. We have started talking about the positive and negative parts of the EJ element draft, and we are sending this letter to propose our thoughts on how we can improve the gray areas of your ideas.

Pollution

+ Adding electric stations.
+ Preventing (traffic pollution, emitters/negative or black carbon) hazards.
- Guidelines for graffiti would most likely be broken.
- Have public art/graffiti stations around Oakland so that graffiti would be condensed to allowed spaces.
- Could add more public art supplies that are safer for the environment and does not make such a negative impact to our city.

Sea Level Rise

+ The general plan already talks about sea level rise and water that is contaminated by factories.
- There is no elaboration on how the contamination affects people, what is the source of contamination and there needs to be more information for the people of the community.
- There needs to be more information given to people who are most vulnerable such as: children, people with disabilities, people who take medicines, and people who are pregnant.

Urban Heat Island

+ Partnering with local nonprofits to plant trees that can provide shading in areas where there are no trees.

- The plan is missing where you are actually planning tree installation, it is concerning that there is no actual plan; the plan should include: parking lots, homes, and offices.
- A simple permit process so that school based youth can plant trees in their school gardens and even public areas like Lake Merritt.

Watershed

+ Investing in green infrastructure.
- There are no specifics about green infrastructure and how exactly they can help with algal blooms.
- There are not enough trash cans, especially around Lake Merritt; This plan should focus more on adding trash cans in areas such as Channel Park.
    - One of our interns timed how long it took to find a trash can around Channel Park and it took over 20 minutes to locate a trash can.

In conclusion, we agree with many of the policies in the general plan update. A consensus we have as a YLC is that the city needs to elaborate more in the plan.

Thank you for this opportunity to write to the City of Oakland so you can hear some of our demands and some changes to the city general plan.

Thank you for your time.

Sincerely,

Mycelium Youth Network Youth Leadership Council

SPUR
San Francisco | San José | Oakland

June 21, 2023

Khalilha Haynes
Planner III, Lead - Environmental Justice Element
City of Oakland
1 Frank H. Ogawa Plaza
Oakland, CA 94612

RE: City of Oakland General Plan Update — Environmental Justice Element Public Review Draft

Dear Ms. Haynes and Oakland Environmental Justice Element team:

Thank you for the opportunity to provide feedback on the Draft Environmental Justice (EJ) Element of the City of Oakland 2045 General Plan Update. SPUR is a Bay Area public policy non-profit organization with a presence in Oakland, San Francisco, and San José. We work across policy areas and political lines to solve the big problems the region faces and to build a more equitable, sustainable, and prosperous Bay Area.

SPUR is committed to the success of Oakland's inaugural EJ Element. As an organization, our vision is to create a Bay Area where all people thrive; this includes ensuring that all Oaklanders have access to pollution-free air, clean water, a safe home, and other environmental factors that improve quality of life. However, systemic and structural inequities which fuel Oakland's history of discriminatory urban planning & policy have resulted in communities of color being disproportionately affected by negative environmental externalities. We hope that this inaugural EJ Element can help address these environmental justice issues in Oakland so all residents can live safe and healthy lives.

Overall, SPUR commends the EJ Element team on their effective use of disaggregated data and the care shown in the document's spatial analysis, as well as the Equity Analysis undergirding this work. We are impressed with the breadth of topics covered in the element and Oakland's engagement with the complicated issues related to environmental justice that touch the lives of all

city residents. The City's commitment to evidence-based policy is also observed throughout the draft. Our feedback on the Draft EJ Element is as follows:

1) **Groundwater Rise (Chapter 3):** Recent studies have shown that parts of Oakland, specifically flat neighborhoods with high proportions of residents of color, such as West Oakland, are at risk of groundwater rise, which can lead to hazards such as flooding, liquefaction, movement of contaminants in soil, and damages to roads, building foundations, and utility lines. The current draft of the EJ Element does not adequately capture these risks. The draft must be updated to more explicitly state the risks imposed by groundwater rise and set out a clear plan for how the City plans to mitigate them.

2) **Healthy Homes Should Include Specific Decarbonization Policies (Chapter 4):** Buildings account for 26% of greenhouse gas emissions in Oakland, with most of these emissions coming from natural gas usage. Gas appliances in homes also release large amounts of indoor air pollution that can lead to health problems. While the City of Oakland has banned natural gas in new residential and commercial buildings, and the EJ Element draft mentions building electrification, these actions are not enough to achieve equitable health outcomes for all Oaklanders, many of whom live in older homes fitted with natural gas systems and appliances. The EJ Element must include updated, specific building decarbonization policies that reflect the actions for buildings identified in Oakland's Equitable Climate Action Plan. It must also set bold implementation goals for these policies to ensure all Oakland residents and families can live in homes with clean, emission free-air — not just those who live in new construction projects.

3) **Increase Access to Healthy Food Programs (Chapter 5):** The EJ Element should expand its food assistance programs section (EJ-5.6) to support additional programs for retailers, such as grocery stores and farmers' markets, to supplement CalFresh with cash match incentives, healthy food incentives, or fruit and vegetable supplemental benefits. Program examples include Market Match, Fresh Creds, and SPUR's Double Up Food Bucks program.
    a) A subsection of goal EJ-5.6 mentions supplementing CalSNAP. CalSNAP is not a food assistance program and we recommend striking its mention from the EJ Element.

4) **Community Engagement Efforts (Chapter 8):** Environmental Justice is a broad-reaching issue impacting multiple geographies and demographics across Oakland. As this is the

inaugural element for the City, a deep engagement process is required to ensure this foundational and intersectional document accurately captures the specific local contexts and needs of the topic. SPUR commends the City on its community engagement efforts during the EJ Element drafting process. SPUR recently met with a representative from the Deeply Rooted Collaborative and was impressed with the collaborative's efforts to share information and engage with a wide range of Oakland residents at pop-ups and cultural events. SPUR encourages the EJ Element team to push for even further involvement of Oakland residents that goes beyond a physical presence at community events, particularly as we recover from pandemic-era restrictions on gatherings and meetings. For example, partnerships with Oakland Unified School District and other local schools could connect with tens of thousands of families who are impacted by environmental externalities across the city. We would like to see an updated outreach plan in the EJ Element's next iteration that is more robust in its goals to reach community members.

5) **EJ Element Implementation (Chapter 9):** The EJ Element's implementation section lacks specificity and fails to inform the reader of how goals will be achieved in Oakland. More local context is needed to understand how the EJ Element will affect and improve specific Oakland neighborhoods and people groups. Without precision in the named actions and clear metrics for success, we fear that goals realized in the EJ Element will fail to materialize or make it difficult to measure their impact in Oakland. Additionally, there is a lot of overlap between what the EJ Element is recommending and other City Department action plans (such as the Oakland 2030 Equitable Climate Action Plan). More intentional synergy between the goals and policy priorities stated in these existing plans would strengthen the work and mutually reinforcing activities across City governance structures would support achieving stated goals.

Thank you for your consideration of our comments and for your work on the inaugural EJ Element. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Ronak Davé Okoye
SPUR Acting Oakland Director & Chief of Strategic Initiatives

June 22, 2023

To: City of Oakland General Plan Update Team
From: West Oakland Community Action Plan (WOCAP) Steering Committee
Re: Comments on the Draft Environmental Justice Element

This letter of support is submitted on behalf of the West Oakland Community Action Plan (WOCAP) Steering Committee in regards to the City of Oakland's Draft Environmental Justice Element. The WOCAP Steering Committee represents a group of residents, researchers/academics, public agencies, non-profits, and community institutions involved in the implementation of the WOCAP through the AB 617 Community Air Protection Program. The Bay Area Air Quality Management District (BAAQMD) and the West Oakland Environmental Indicators Project (WOEIP) collectively manage the WOCAP, the purpose of which is to identify and reduce pollution exposure in environmental justice communities most impacted by air pollution.

These comments are the result of a crosswalk analysis (see appendix) completed by the WOCAP team to identify opportunities to add additional WOCAP strategies to the EJ Element. We first identified which WOCAP strategies could be supported by relevant language in the general plan EJ element. Then we reviewed the Public Draft Environmental Justice Element and identified policies and actions that already further WOCAP strategies. Next, we identified additional WOCAP strategies that *could be* addressed in the EJ Element and noted whether the concepts were *totally missing* (and should be added) or needed edits to draft EJ policies to fully capture the intention of a WOCAP strategy.

Additionally, we facilitated breakout group discussions/activities at the May and June 2023 WOCAP Steering Committee meetings to hear ideas on Goal 8, 10, and additional air quality/WOCAP-related policies. You can review the May Miro board and June Miro board here. Finally, we had additional conversations with the WOCAP Co-Leads and partner CBOs to refine ideas. The results of these activities are summarized in this letter.

The letter is organized by the following sections:

Overall EJ Element Comments

West Oakland-Specific EJ Concerns to be Included in the Element

WOCAP Strategy-Related Comments

- Land Use Compatibility
- Enhanced Enforcement
- Port-related Policies
- Truck- and Freeway-Related Policies

Comments on Goal EJ-8 Foster meaningful civic engagement and support community power- and capacity-building.

Comments on Goal EJ-10: Prioritize improvements and programs that meet the needs of Environmental Justice Communities.

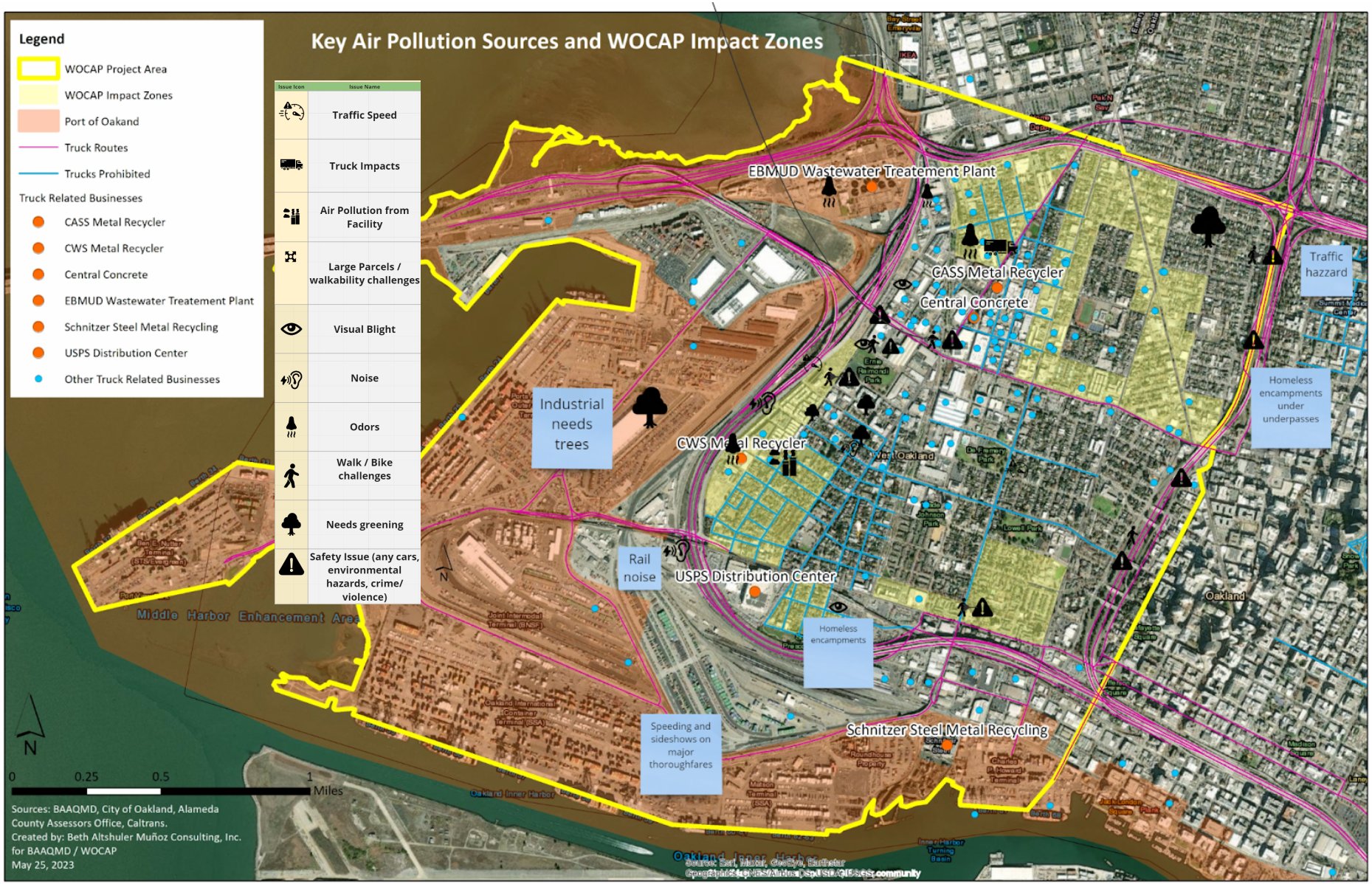
Overall EJ Element Comments

- In the Final EJ Element, Chapter 9 (Implementation Actions & Programs) should include more details to strengthen implementation, increase interdepartmental coordination, and foster trust and accountability.
    - Section 9.1: Prioritizing Improvements and Programs that Meet the Needs of EJ Communities
        - Include a detailed overview of the EJ Element's Implementation Plan in Section 9.1.
        - Develop a workflow to facilitate stronger interdepartmental coordination and accountability among lead departments for General Plan implementation.
    - Table EJ-11: Implementation - Goals, Policies and Actions
        - Clarify the specific timelines, responsibility roles and priority levels for each Action in the Final EJ Element.
        - Add cost estimates to each action in the Final EJ Element.
        - Prioritize and plan for funding the implementation of EJ Element Policies and Actions.
    - Policy EJ-10.2 & Action EJ-A.34: Implementation Monitoring and Evaluation Plan
        - Track the implementation status of the EJ Element and provide open access to progress updates.
        - Allocate funding for, and hire a trusted third-party evaluator to annually review the implementation of the EJ Element in partnership with EJ Communities.
- Would have liked the process to provide more education and orientation of SB 1000 (history, content, requirements, best practices thus far) at the beginning of the process for city staff, consultants, residents, and community groups.
    - Would have liked to have an open line of communication to OPR staff to ask questions about SB 1000 during this process.
    - Because some SB 1000 topical requirements will still be addressed in phase 2 of the General Plan update process, this could still be incorporated into future City / consultant / and Deeply Rooted efforts.
- Expand the "Building Resilience: West Oakland Community Action Plan (WOCAP)" call out box to include a reference crosswalk table of WOCAP strategies addressed in the EJ Element (or other parts of the general plan). This may also apply to the ECAP and EONI.
- Mention and reference the Principles of Environmental Justice as an acknowledgement of the movement's beliefs and to tie this EJ Element to the rich national and local history of EJ work that serves as the foundation for future progress.
- Include a goal and policies about distributional equity - specifically siting of polluting uses across the city (e.g., differences between neighborhoods above vs. below 580). Our vision / goal is for EJ communities (like West Oakland) to have the same air quality as neighborhoods in the non-industrial areas of Oakland.

West Oakland-Specific EJ Concerns to be Included in the Element

At the June 2023 WOCAP Steering Committee a group of attendees discussed West Oakland-specific issues that should be addressed in the EJ Element. The map was blank and they placed the icons on the map to show the locations of various EJ issues. You can see the concentration of issues along the perimeter of West Oakland, especially in the Prescott, Village Bottoms, and Clawson neighborhoods of West Oakland. The location-specific comments below should be factored into policy implementation and prioritization where possible.

- While there is homelessness, garbage, and safety issues throughout, the concentration of challenges are concentrated on the perimeter (near freeways) and the major thoroughfares.
    - Fires of illegally dumped materials create air quality/health risks for housed and unhoused residents.
    - Lots of debris from illegal dumping along the railroads -especially at the city boarders
- The freeway underpasses are particularly challenging and have a myriad of converging challenges such as blight, encampments, safety concerns, noise hazards, odors, mobility issues, and traffic speed.
    - This is particularly troublesome in the highly residential Hoover neighborhood bordering the 980 Freeway, along with Prescott, Oak Center, and the Lower Bottoms.
- More trees and plants are needed everywhere, but the more industrial areas have a very poor tree canopy, which translates to a lack of pollution mitigation, heat island effects, as well as visual blight.
    - Tree and landscape maintenance is a huge issue (particularly along the median strips of the freeways and major thoroughfares) and WOCAP would love to see / help create a program where residents are paid to expand and maintain green infrastructure in West Oakland.
- The Waste Treatment plant has a lot of negative quality of life and health impacts in the neighborhood. These need to be mitigated.
- The odors from the metal recyclers impact residents' health and quality of life
- Railroad tracks are a hazard for pedestrians, people with strollers/wheelchairs, cyclists, and even automobiles. Please assess the safety and comfort of all at-grade crossings and prioritize improvements in areas near homes, schools, parks, and other areas with pedestrian activity.
- The NY Times recently published a wonderful piece on noise and health impacts. WOCAP members identified a number of noise issues in the area. Please address them in the EJ Element as well as the Phase 2 Noise Element Update. Residents share how the noise in West Oakland disrupts their sleep and overall health.
    - Residents can hear noise from rail yards at night - there is no quiet zone policy for Amtrak or rail freight. Add policy to work with rail and the Port re noise mitigation.
    - There are food facilities (27th Street) near residential neighborhoods and they have daily trash pick up at 4am every morning. Please work with Waste Management to update this schedule and to create policy about loud industrial noise during sleeping hours near residential areas.
    - BART noise along 7th Street is a health hazard. Include a policy to advocate for funds to "tube-in" the above ground segment.
    - CARB Research Division is doing a study on noise and associated mental health stresses.
- Sideshows and racing are issues in: Hoover Foster, Army Base, Frontage Road, West Grand, Maritime, and MLK. This causes noise, air quality, traffic, and pedestrian safety impacts. Also mental health impacts of feeling "unsafe".
- Please add a policy and take action to enforce/prohibit the use of fireworks. All summer the noise, odor, and litter from them is a big quality of life issue.


Key Air Pollution Sources and WOCAP Impact Zones
Legend
WOCAP Project Area
WOCAP Impact Zones
Port of Oakand
Truck Routes
Trucks Prohibited
Truck Related Businesses
CASS Metal Recycler
CWS Metal Recycler
Central Concrete
EBMUD Wastewater Treatement Plant
Schnitzer Steel Metal Recycling
USPS Distribution Center
Other Truck Related Businesses
Issue Icon
Issue Name
Traffic Speed
Truck Impacts
Air Pollution from Facility
Large Parcels / walkability challenges
Visual Blight
Noise
Odors
Walk / Bike challenges
Needs greening
Safety Issue (any cars, environmental hazards, crime/ violence)
EBMUD Wastewater Treatement Plant
CASS Metal Recycler
Central Concrete
Traffic hazzard
Industrial needs trees
CWS Metal Recycler
Homeless encampments under underpasses
Rail noise
USPS Distribution Center
Homeless encampments
Speeding and sideshows on major thoroughfares
Schnitzer Steel Metal Recycling
Middle Harbor Enhancement Area
Oakland
N
0
0.25
0.5
1
Miles
Sources: BAAQMD, City of Oakland, Alameda County Assessors Office, Caltrans.
Created by: Beth Altshuler Muñoz Consulting, Inc. for BAAQMD / WOCAP
May 25, 2023

WOCAP Strategy-Related Comments

Some of the suggestions are from this scan of policies.

Land Use Compatibility

(EJ-1.3) Ensure that heavy industrial uses are "adequately buffered"

- Define an "adequate buffer"; recommend applying a buffer of 1,000 feet especially downwind from heavy industrial use areas, freeways or urban roads with 100,000 vehicles/day; See BAAQMD policy guidance for 1,000ft buffer.
- Include wind patterns in buffer definition
- Include recommendations/requirements for green infrastructure/green screens along heavy industrial uses

(EJ-1.15) impose conditions as appropriate on projects to protect public health and safety beyond those in the City's 2020 standard conditions of approval.

- Suggested amendment (to add specificity): Enhanced Development Standards in Buffer/Overlay zones: require landscaping, ventilation systems, double-paned windows, setbacks, barriers, air filters and other measures to achieve healthy indoor air quality and noise levels in the development of new sensitive land uses.

(EJ-1.5) Develop more stringent permitting standards and limit the number of variances approved for new, high-intensity, industrial or commercial land uses near sensitive uses

- Expand this policy or include an additional policy to either prohibit heavy manufacturing near residential uses, or conversely to prohibit housing near heavy manufacturing areas (rather than only requiring "more stringent" permitting standards)
- In Oakland, Conditional Use Permits stay with the property NOT the business. So if a business leaves and a similar (polluting) business moves in, they don't need additional review/approval. Despite West Oakland Specific Plan rezoning, many businesses are still grandfathered in.
    - Prohibit non-conforming truck-related and polluting/hazardous businesses inside West Oakland and other EJ communities.
    - Compile a table that compares existing use vs. zoning use to identify non-conforming uses in West Oakland. This is needed to track "non-confirming" truck-related businesses to ensure that they do not change ownership in alignment with the proposed Planning Code Amendments (section 17.114.050).

(EJ-A-10) Adopt requirements that new commercial and employment uses that generate truck traffic are located along existing truck routes to the extent feasible and work with project proponents to develop preferred truck routing that avoids sensitive land uses, such as schools, hospitals, elder and childcare facilities, and residences wherever feasible

- Existing truck routes bisect and encapsulate West Oakland and areas of East Oakland, thus, locating truck-attracting businesses near existing truck routes perpetuates environmental injustices. What else can be done to more equitably distribute truck attracting businesses along truck routes in EJ communities?
    - Amend policy (add underlined text) "...and residences wherever feasible, and require disclosure of the number and timing of truck trips; require "good neighbor" practices and formalize administrative processes (zoning clearances, etc.) to more carefully

evaluate truck attracting businesses in EJ communities and connect applicants to resources (zero emissions operations and transportation grants) via the Air District.

(EJ-A.5) Study the feasibility of an amortization ordinance

- Rewrite more affirmatively: "Develop an amortization ordinance and set amortization implementation & timeline goals".

Add policies:

- Identify a targeted funding stream to support neighborhood-scale interventions and investments for clean air improvements and community engagement.
- Collaborate with the Air District to conduct annual permit cross-checks for facilities in this community to ensure that any facility with a conditional use permit also has an air district permit, where required.

Enhanced Enforcement

(EJ-1.6) prioritize code enforcement to address illegal land uses and activities that cause pollution and are hazardous to health

- Add additional policy: Develop a targeted pro-active enforcement program to include enforcement "sweeps" at locations of concern (construction sites, known truck idling areas, warehouse clusters, etc.).

- Add a new policy(ies) and/or action(s): Invest funds and staff time to improve the effectiveness of enforcement efforts related to illegal dumping, air quality violations, and truck driving, idling, and parking. Enforcement should be present in the early mornings, late at night and weekends. Communicate enforcement contact information and process to residents so they know how to report violations. Convene regular meetings with various enforcement agencies such as City of Oakland Planning and Building Department Code Enforcement, EPA, CARB, City of Oakland DOT (Parking & Mobility), Caltrans, and BAAQMD,

Port-related Policies

(EJ1.10) Reduce Port operation emissions as part of compliance with CARB regulations

- update ordinances to increase allowable weights for ZE trucks, and investments for needed upgrades.
- Study efficiency gains from increasing the number of ZE trucks hauling loaded containers.

- Add policy reaffirming and calling for the Port Electrification Plan. See WOCAP strategy 19 as an example.
- Add a policy indicating that the City (CAO/OakDOT) will participate in the Sustainable Port Collaborative currently convened by the Port with participation by the Air District and WOEIP. Encourage additional collaboration from California Department of Public Health, Strategic Growth Council, Alameda County Public Health, CARB, CA DOJ, residents, and NGOs. This expanded group could create multisector solutions to health and equity issues from the port.

- Work to remove policy barriers to ZE trucks - Add a policy to lobby Caltrans to increase the weight limit on freeways to support ZE trucks (to get diesel trucks off of neighborhood streets)
- Review policies related to the Port for tone. Ensure that the tone conveys firm policy guidance to achieve environmental justice (rather than upholding somewhat deferential, status quo). In addition to reaffirming Port's emissions reducing electrification and ZE plans, Port should continue to improve good neighbor practices (such as providing meaningful community benefits, etc.)
- Work with BAAQMD, Port of Oakland Board, California Air Resources Board, and Terminal Operators to explore the potential for use of zero carbon or low-emission harbor craft and ocean going vessels and to develop zero carbon trade corridors with other Pacific Rim trading partners.

Truck- and Freeway-Related Policies

(EJ-A.8) As part of the LUTE update in Phase 2, explore modifications to truck routes and truck management in partnership with the Port of Oakland and WEEP.

- Update EJ-A.8:clarify that when the truck route network will be revisited to use the fewest number of residential streets possible and add reference to improved signage for truck operators (WOCAP strategy 38 & 39).
- Add policy related to development of a comprehensive freight management plan to include design guidelines for truck routes (properly design width and turns for trucks on these routes) and plan for retrofitting existing truck routes with green infrastructure.
- Add policy: pursue collaborations with local agencies to identify strategies to address concerns with truck routes, enforcement of truck routes, and feasibility of physical barriers for residential neighborhoods (such as the Sustainable Freight Advisory Committee referenced above).

(EJ- 7.3) maximize safety of transportation network by designing/re-designing streets for lower driving speeds and enforcing speed limits and promoting safe driving behavior. **Establish** pedestrian intervals for crosswalks in EJ communities

(EJ 7.5) Prioritize designs that protect people that are biking and walking, such as improvements that increase visibility of bicyclists and pedestrians, traffic calming, and safer intersection crossings and turns.

- Clarify EJ-7.3 and EJ-7.5 acknowledge that in EJ communities the presence of truck routes presents a unique challenge and that in these situations, City policy is to prioritize bike/ped routes away from truck routes (unless active transportation is separated and safe), and to prioritize pedestrian and bike safety near schools, senior centers and areas with existing or potential high bike use.

Freeways are a tremendous source of pollution and the draft EJ element contains no related policies. Add policies to redress harm caused by the freeways including:

- Establish Air Pollutant Exposure Zones. These zones will be mapped according to the estimated cumulative PM 2.5 concentrations or cumulative excess cancer risk. Requires the submission of an enhanced ventilation proposal.

- Conduct a public information campaign to let residents living within 1,000 feet of a freeway know what the risks are and what mitigation measures they can take.

Comments on Goal EJ-8 Foster meaningful civic engagement and support community power- and capacity-building.

The seventh Principle of Environmental Justice states: *Environmental justice demands the right to participate as equal partners at every level of decision-making including needs assessment, planning, implementation, enforcement and evaluation*.

Our publication *Welcome to the WOCAP: Orientation and Community Engagement Plan*, contains additional ideas for equitable engagement.

Policy #	EJ Public Hearing Draft Policy
EJ-8.1	**Meaningful, Relevant Engagement.** In partnership with EJ communities design and implement public engagement processes and events that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible and understandable and that provide meaningful opportunities for participants to influence each stage of the planning and policy process including scoping/contracting, data collection and analysis, research, writing, implementation, and evaluation~~, outcomes~~.
EJ-8.2	**Sustained Engagement.** Maintain communication channels that allow for ongoing dialogue with neighborhood groups and individual residents; track issues and priorities at the neighborhood level; and foster transparency and accountability. Use this information to inform development of City programs, projects, and services, sharing information across departments to optimize the effectiveness of efforts, and share outcomes with groups. Add action: Require city staff to consult with AB 617 steering committees for related city actions.
EJ-8.3	**Innovative Methods.** Explore innovative strategies for increasing community involvement in civic processes and ownership of outcomes, tailoring strategies to best reach target audiences. Strategies to explore may include participatory budgeting, participatory action research, or other approaches that emphasize the active participation of community members most affected by the questions at issue. ● Consider adding a companion action around building city staff capacity to translate technical documents and concepts into more accessible language and formats.
EJ-8.4	**Community Partners.** Partner with community-based organizations that have relationships, trust, and cultural competency with target communities as to support engagement for local initiatives and issues. Seek opportunities to support community partners in these efforts such as by providing technical assistance, data, meeting spaces, funding and other support services as feasible. ● Work with CBOs and city purchasing / contracting write a new companion action that will address and reduce barriers that may prevent community organizations from partnering with the City
EJ-8.5	**Community Capacity Building.** Empower historically marginalized community members to participate in local decision-making and engage meaningfully in planning efforts, including through increased representation in employment and civic life; providing educational/ training workshops and programs about civic involvement and processes, such as through fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities. ● Write actions to provide more details about the great suggestions in this policy ○ Action: increase the number of city and CBO staff who are long time Oakland residents ■ Consider establishing a “boomerang” program for Oakland natives obtaining

	college degrees elsewhere to encourage them to return to Oakland after graduation. Incentives may include tuition reimbursement, contingency program scholarships, housing assistance and internships that lead to permanent positions through private industry/college collaborations. ○ Action: Create a boards and commissions leadership institute (or work with Urban Habitat to modify their program https://urbanhabitat.org/leadership/bcli) with the goal of building the capacity of residents to participate in leadership roles in the city. Ensure the program provides stipends to participants and has a focus on residents from EJ communities.
EJ-8.8	**Youth-Centered Events.** Seek out opportunities for meaningfully and authentically involving young people – particularly from EJ Communities - in the planning and implementation of youth-centered events that develop confidence and leadership skills. ● Add more detail about which type of events should have a youth focus; reach out to OUSD to see if they can collaborate on this policy (can it be incorporated into social studies classes?)
EJ-8.9	**Events for Older Adults.** Provide greater opportunity for older adults (ages 65 and over), particularly those from EJ Communities, to be integrated into community events and inter- generational exchanges. Involve older adults in the planning and implementation of events that are accessible to older adults. ● Add an action about collaborating with places like healthcare providers, social workers, places of worship, senior centers, etc.
EJ-8.10	**Linguistically Isolated Communities.** Continue to provide interpretation and translation services, assistance in accessing community services and programs, and direct engagement with specific demographic groups. Prioritize EJ Communities as identified in Figure EJ-30. ● CalEPA has active working groups and best practices on language access. CalEPA/CARB could be a resource to connect with on practices for engaging with linguistically isolated communities. Our CARB representative Julia Luongo can provide more information. Julia.Luongo@arb.ca.gov
Action #	**Actions**
EJ-A.30	Establish ~~Study the feasibility of establishing~~ a fund that City departments draw on for community engagement ~~outreach~~, including funding for community group partnerships. The fund would provide a source of funds to supplement departmental budgets and grant funding in order to ensure that City objectives for community outreach can be achieved, and that community groups are fairly compensated for their engagement. ● Write actions that will get us there,including: ○ Study the feasibility of fund by collaborating with local foundations and CBOs; and, ○ Write fund equitable-use guidelines.
EJ-A.31	Add New Policy: The residents of EJ communities shall have influence over how the City allocates EJ investments. Action: Develop a participatory budgeting process for EJ Community investments and explore expansion into other departments. This process should include adequate information about the potential health and environmental benefits and tradeoffs of various investment options so residents can make informed decisions.
NEW	Add new action around training city staff trained in the history, principles, best practices, and local data/issues of environmental justice.

Comments on Goal EJ-10: Prioritize improvements and programs that meet the needs of Environmental Justice Communities.

Policy #	EJ Public Hearing draft Policy
EJ-10.1	**Prioritizing EJ Communities.** Implement topic-specific actions as shown in the Goals, Policies, and Actions table, prioritizing improvements, programs, investments, and partner- ships in Environmental Justice Communities, as shown in Figure EJ-7. Spend or distribute resources to EJ communities in ways that meet the existing community's priority needs and improve resident's quality of life.
EJ-10.2	**Implementation Monitoring and Evaluation Plan.** To increase transparency and accountability, adopt an implementation monitoring and evaluation plan with achievable milestones, periodic evaluation, and a reporting mechanism, such as an online portal or newsletter to track outcomes and keep residents informed. ● The City should track the implementation status of the EJ Element and provide open access to progress updates in a way that's accessible, easy to understand, regularly updated, and easy to navigate. The West Oakland Environmental Indicator Project (WOEIP)'s West Oakland Community Plan (WOCAP) implementation tracker provides a model for this. ● Allocate city staff time or consultant time to create and execute an evaluation process. Community members should be involved in the evaluation. ● Update the EJ Communities indicators in the index every 5 years to adapt to changes.
Action #	**Actions**
EJ- A.34	In partnership with community groups, develop an implementation monitoring and evaluation plan framework and reporting mechanism. ● ECAP mentions the formation of a Climate Action Network. How can we connect to this effort?

The WOCAP Steering Committee would like to express deep appreciation to City staff and the consultant team for all their work on developing the EJ Element. We look forward to the City's continued partnership to implement the WOCAP. We are available to discuss and/or support City staff providing additional research or crafting more detailed language for any of our suggestions.

Sincerely,

The West Oakland Community Action Plan Co-Leads and Steering Committee

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

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Dr. Philip M. Fine
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:

June 22, 2023

City of Oakland Planning Department
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612

RE: Comments on the City of Oakland's Draft Environmental Justice Element

Dear Lakshmi Rajagopalan, Khalilha Haynes, and the Oakland General Plan Update Team,

On behalf of the Bay Area Air Quality Management District (BAAQMD), we are pleased to submit the following comments based on our review of the City of Oakland's draft environmental justice element and pursuant to our involvement as part of the City's General Plan Update Technical Advisory Committee. Overall, we applaud the effort of the City of Oakland staff, consultants, and the community stakeholders for the serious consideration of robust environmental justice policies to address inequitable burdens, including air quality impacts.

We appreciate this opportunity to comment specifically on actions related to air quality as well as other policy areas that directly or indirectly impact air pollution and community health in Oakland's most vulnerable communities. The suggestions below offer recommendations to refine and strengthen these policies and actions. We have also recommended additional policies or actions that might be considered. Many of these recommendations echo similar policies the Air District and our Oakland community partners have been advocating in the ongoing AB617 efforts in West and East Oakland.

We look forward to engaging further with the City of Oakland in the development and finalization of this important and innovative plan. Please reach out to our Planning and Climate Protection Division's Senior Policy Advisor David Ralston (dralston@baaqmd.gov) for any questions on these comments.

Sincerely,

Greg Nudd
Deputy Executive Officer of Science & Policy
Bay Area Air Quality Management District

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
COMMENTS ON THE CITY OF OAKLAND DRAFT ENVIRONMENTAL JUSTICE ELEMENT

The Air District's comments below address several of the Element's environmental justice (EJ) goal areas focusing on Goal Area 1, improving air quality. Several additional policies and actions are suggested based on ongoing AB 617 work in West and East Oakland. Comments are also provided for safe, healthy, affordable homes (Goal 4); equitable public facilities (Goal 6); promoting physical activity (Goal 7); and expanding economic development, income equality, and opportunity (Goal 9).

Note: some of the comments are included as strikeout/underline text edit suggestions, while others are provided as comments or suggested new policy/action for a particular EJ policy goal. We also have included several specific comments to the presented air quality and other maps.

GOAL EJ-1. REDUCE POLLUTION, MITIGATE THE IMPACTS OF POLLUTION ON EXISTING SENSITIVE LAND USES, NAD ELIMINATE ASSOCIATED PUBLIC HEALTH DISPARITIES

PROPOSED POLICIES	
Draft Text (w/ any proposed edits in red)	**Specific Comment/Suggestions**
Policy EJ 1.2 – Truck Emissions and Pollution Exposure. Minimize air pollution and exposure of sensitive uses to truck pollution, particularly in EJ Communities and other areas most burdened by air pollution, while recognizing the Port of Oakland's role as the highest-volume shipping port in Northern California.	Please detail more specifically how minimization of air pollution and exposure from truck emissions will be accomplished. Consider mentioning use of Truck Management Plans (TMP), strengthening development review/development agreement conditions, strengthening policies limiting nonconforming continuances (e.g., code amendments to 17.114.050), and so forth.
EJ 1.3 – Industrial Uses Near Sensitive Land Uses. Ensure that heavy industrial uses are adequately buffered from residential areas, schools, and other sensitive land uses. In new developments, require adequate mitigation of air contaminant exposure and vegetative barriers near large stationary and mobile sources of air pollution.	Provide a definition of "adequately" buffered. The Air District recommends applying a buffer of 1,000 feet, especially downwind from heavy industrial use areas and heavily truck-trafficked roadways. Vegetative buffers should be designed per latest USEPA standards with intention to prevent the dispersion of air pollutants past the fence line (also see vegetative buffer standards cited for policy action EJ A.6 below).
EJ 1.7- Truck-Related Impacts. For new warehouses and truck-related businesses, reduce impacts from truck loading and delivery including noise/vibration, odors, air pollution, and greenhouse gas emissions.	Consider adding specific example measures to address truck attracting businesses. For example, see CA Attorney General's office guidance: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf
EJ 1.8 - Air Filtration. Consistent with the State's Building Energy Efficiency Standards for air filtration in effect as of January 1, 2023,	Consider requiring higher level air filtration systems, e.g. MERV 15 or 16, for any new residential buildings within 1,000 feet of major

require newly constructed buildings of four or more habitable floors to include air filtration systems equal to or greater than Minimum Efficiency Reporting Value (MERV) 13 (ASHRAE Standard 52.2), or a particle size efficiency rating equal to or greater than 50 percent in the 0.3-1.0 µm micrometer range and equal to or greater than 85 percent in the 1.0-3.0 µm micrometer range (AHRI Standard 680).	industrial areas or heavily truck-trafficked roadways (see also EJ 4 below). Additionally, consider including new construction with less than four habitable floors, including "townhouse" style developments (under three stories) and mixed-use developments with first floor retail/commercial uses.
EJ 1.9 - EV Charging. Require industrial and warehouse facilities and truck-attracting businesses to provide electrical connections for electric trucks and transport refrigeration units in support of CARB regulations.	As part of CEQA review and/or land-use entitlements for major projects, require that any new truck-attracting businesses provide EV charging consistent with the most recently adopted version of CalGreen Tier 2. Additionally, see Contra Costa County ordinance for examples of ZEV/clean fleet provisions requiring at the start operations shall have a minimum of a 33% "clean fleet" and a requirement to progress to 100% clean by 2035 for all classes of trucks. This policy should also allow due considerations for independent/small business operators including assistance for operators to secure available fleet change-out incentive funding.
NEW PROPOSED POLICIES	
Work with Caltrans and other regional/state/federal agencies to promote the greening of Oakland's primary goods-movement freeways including equipping the freeways with ZEV truck infrastructure, developing strategic green canopies or lids, as well as installing vegetative buffers alongside freeway corridors.	This policy is based upon inter-agency pilot initiatives the Air District is presently supporting along the I-880 freeway for green land bridges as vegetative buffers.
PROPOSED ACTIONS	
EJ-A.1 – Amend the City's Zoning code to include the following changes:	
• Condition the permitting of heavy industrial uses ~~businesses~~ within five hundred (500) feet of a zone that permits residential activities.	We recommend this is clearly distinguished via a special combining or overlay buffer zone for clarity both for project sponsors and city zoning staff given that there are various types of zones permitting residential (also see also the proposed "IRIZ" policy proposal below A.7).[1]

[1] It would be helpful for the City to issue a "study" map of where this might apply given existing zoning. Mapping would also allow study of how this policy would apply to ensuring a buffer with other "sensitive receptor" focused zones such as those intending or including neighborhood-serving commercial, schools, parks, hospitals, and similar.

	In general, we recommend the EJ element contain policies avoiding land use conflicts between heavy industrial and residential (see Appendix A below).
• Establish special permit criteria for truck-intensive industrial activities located within five hundred (500) feet of any zone that permits residential activities.	It would be helpful to provide more details on these "special permits". We suggest this policy also reference enhanced performance standard and amortization policy action (A.5) below.
• Establish special performance standards and standard conditions of approval for Truck-Intensive Industrial Activities located within five hundred (500) feet of any zone that permits residential activities.	Consider specific performance standards to address truck attracting businesses. For example, see CA Attorney General's office guidance: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf
• Modify the S-19 Health and Safety Protection Combining Zone to prohibit use of diesel generators as the primary source of power within five hundred (500) feet from any Residential, Open Space, or Institutional Zone boundary.	Can this policy address existing generators?
EJ-A.2 Adopt more stringent air quality construction and operations requirements for development near or within industrially zoned land as part of standard conditions of approval.	See the Air District's recently released Dust "White Paper" – https://www.baaqmd.gov/~/media/dotgov/files/rules/regulation-6-particulate-matter---common-definitions-and-test-methods/2023-amendment/documents/20230517_dustwhitepaper_r0601and0606-pdf.pdf?la=en&rev=01adafe25b8546a39a3bb7e1ab977165
EJ-A.3 Work with BAAQMD and other partners in the region to explore creation of a grant program for installation and maintenance of air filtration devices/systems in existing buildings. Develop a list of priority buildings near heavy industrial uses, including schools, nursing homes, and other sensitive uses within EJ Communities, AB617 designated communities, and areas most affected by air quality issues.	
EJ-A.5 As part of a feasibility study implement an amortization pilot in AB617 areas ~~the feasibility of~~ ~~an ordinance~~, which allows the City to identify and prioritize nonconforming land uses (which could include existing polluting industries, truck-intensive uses,	This policy should not be just for a feasibility study but for implementation of at least a pilot study to help assess longer term feasibility. This suggestion acknowledges the calling for amortization approaches in the West Oakland AB617 plan as well as documented existent case study precedents in

autobody uses, recycling uses, etc) to phase out over time prioritizing areas within 1,000 feet of primarily residential impacted areas. The study/pilot should include ~~recommend~~ an implementation plan ~~that includes~~ with criteria to determine which industries to amortize. Criteria should ~~could~~ include total cost of land and improvements; cost of moving and reestablishing the use elsewhere in the city; whether the use is significantly non-conforming; compatibility with existing land use patterns and densities; and possible threat to public health, safety, or welfare.	National City (see BAAQMD policy library - Strategy B). This policy approach already builds off how the City of Oakland has addresses non-conforming alcohol beverage sales, hotels, and rooming houses (deemed approved, sections 17.156 and 17.157 OMC) with the goal of assessing the levels of non-conformity and willingness of owners to abide by interventions and stricter applied conditions against the threat of amortization. Consideration could also be given for "graduated" Levels of Intervention for the "Good" – work with business as a good neighbor; the "Bad" – notify and hold a public evidentiary hearing with an opportunity to mitigate nuisance within a minimum 1-year period; or the "Ugly" – amortize within a minimum 6-month period with potential extension to 1-year with immediate mitigations put in place).
EJ-A.6 - Prioritize and implement vegetative buffer projects, including those between industrial land and sensitive land uses, and along heavy-duty truck/goods movement corridors and freeways as identified in specific plans and community plans, including EONI and WOCAP, and the City's Priority Conservation Area/Sustainable Communities Plan (PCA).	Also reference specific design specifications for such buffers such as a (10) foot minimum, see City of Fontana ordinance 1891 for specific warehouses buffering policy language.
EJ-A.7 - As part of the LUTE update in Phase 2, evaluate residential/industrial conflicts, especially in areas such as West and East Oakland, and evaluate measures, including limiting additional residential development in high pollution areas and ensuring adequate buffering between industrial and residential land uses through land use designations.	Please refer to the Air District's proposed industrial-residential interface overlay zone "IRIZ" policies and the similar approach for addressing residential/polluting freeway conflicts via an "APEZ" overlay zone.[2] These overlays could be applied 1,000 feet downwind from the I-880 and along the I-580 in West Oakland and along the boundaries of general industrial/manufacturing residential interface areas across the city. These overlays could include specific land use regulations/standard conditions to reduce AQ impacts that combine with the underlying residential, commercial, or industrial

[2] For the APEZ, see City/County SF Article 38 APEZ ordinance and collaborate with the County of Alameda who are advocating a similar APEZ approach along the I-880 freeway.

	zones as well as policies for co-benefit investment/incentives (see Appendix A below referencing BAAQMD's Pioneering Policy 1 and Policy 2).
EJ-A.8 As part of the LUTE update in Phase 2, explore modifications to truck routes and truck management in partnership with the Port of Oakland and WOIEP and Communities for a Better Environment.	Oakland should develop a comprehensive freight management approach and guidelines that build off the 2019 West Oakland Truck Management Plan. For example, see City of Seattle's Freight Master Plan.
EJ A.11 - Coordinate with public agencies in the Bay Area region to catalyze the development and deployment of zero emission medium- and heavy-duty fleets and support development of shared charging hubs and resources. Support advocacy efforts for significant additional funding for retrofitting or replacing diesel trucks with zero-emission EV trucks, prioritizing a just transition approach by including economic support for independent truckers.	Also consider including these as appropriate CEQA project mitigations and community benefit agreement actions too.

GOAL EJ-4: COORDINATE RESOURCES TO IMPROVE HOUSING QUALITY AND HABITABILITY

PROPOSED POLICIES	
Draft Text	**Specific Comment/Suggestions**
EJ 4.5 - Improve Indoor Air Quality in Existing Buildings. For new projects and significant rehabilitations of existing buildings, improve indoor air quality and energy efficiency through weatherization and strategies to prevent buildup of mold and mildew.	This should apply also to schools.
PROPOSED ACTION	
EJ A.16 - As part of the LUTE update in Phase 2, explore incentives and strategies to promote health-promoting features in housing projects that are built in EJ Communities	Please describe specific "health-promoting features." This should include air filters, advanced ventilation and other building specific development features such as green open spaces, enhanced protection from external pollution sources, inclusion of bicycle amenities, and so forth.

GOAL EJ-6: SUPPORT A NETWORK OF WELL-MAINTAINED COMMUNITY FACILITIES THAT ARE EASILY ACCESSIBLE, CULTURALLY SUPPORTIVE, AND RESPONSIVE TO COMMUNITY NEEDS.

PROPOSED POLICIES	
Draft Text	**Specific Comments/Suggestions**
EJ 6.1 - Public Facilities Distribution. Ensure the equitable distribution of beneficial public, civic, and cultural facilities, and places for public gatherings, prioritizing new facilities and creative spaces in traditionally underserved areas.	Consider community "Air Centers" and "Resiliency Hubs" as essential public facilities – e.g., placed at local schools or community centers – that are accessible in frontline neighborhoods. Further, promote partnerships with local elementary schools and neighborhood groups to identify appropriate locations for such clean air and resiliency centers.

GOAL EJ-7: CREATE ENVIRONMENTS THAT SUPPORT PHYSICAL ACTIVITY, RECREATION, AND HEALTHY LIFESTYLES THROUGH SAFE AND COMFORTABLE, WALKABLE, BIKEABLE NEIGHBORHOODS, WITH ACCESS TO GREEN SPACE, TREES, PATHS, AND PARKS.

PROPOSED POLICIES	
Draft Text	**Specific Comments/Suggestions**
EJ 7.1 - Complete Neighborhoods. Promote "complete neighborhoods"— where residents have safe and convenient access to goods and services on a daily or regular basis—that address unique neighborhood needs, and support physical activity, including walking, bicycling, active transportation, recreation, and active play.	Prioritize investments (including development mitigations and infrastructure financing mechanisms) to support active transit uses in EJ communities especially where there are existent grey infrastructure and other barriers to realizing "complete neighborhoods."
EJ 7.15 - Urban Forest. Implement the Urban Forest Plan, a comprehensive, area-wide urban canopy and vegetation plan that identifies locations that trees can be added and maintained, such as parks, streets, Caltrans' rights-of-way and develop a plan to protect existing trees that provide shade, reduce urban heat island impacts, and reduce exposure to air pollution emissions in communities most affected by air pollution. This includes partnering with local nonprofit groups, encouraging trees on private property, and working with the community on tree maintenance and (as needed) removal. Prioritize tree canopy in EJ communities with the least amount of canopy.	See the City's adopted 2015 Priority Conservation Area map (part of the City's formal Sustainable Communities Strategy) which suggest "corridor" areas for focused urban canopies esp. along Caltrans right of way (I-880). This plan also highlighted that Oakland's EJ communities be a designated "green zone" to prioritize where the City should begin partnering with local residents on tree investments.

PROPOSED ACTIONS	
EJ A.26 - As part of the LUTE update in Phase 2, include policies that promote a fine-grained neighborhood land use pattern that encourages walking, biking, and getting around without a car.	Develop such land use and infrastructure plans in conjunction with frontline neighborhood groups and existing neighborhood empowerment councils as an on-going part of the LUTE's implementation (e.g., 5-year plan updates). Also see Strategy D **in the BAAQMD Policy Library as an example of highlighting active transit infrastructure within East Oakland.**
EJ A.29 - Prioritize urban greening projects identified in community plans, such as EONI, WOCAP, and others. Implement projects in partnership with community groups in EJ Communities.	Consider identifying a funding stream to support the technical assistance and capital needs for *Neighborhood Air Action Zones "*NAAZ" as a participatory community-based engagement/neighborhood-scale approaches to mobilize co-beneficial (health, air pollution reduction, climate adaptation) urban greening planning, design, implementation, and stewardship.
NEW PROPOSED ACTION	
Support the development of an urban greening network to ensure equitable access to green spaces and outdoor recreational resources for EJ communities that are currently separated from such resources. For example, expand Oakland's waterfront access connection planning project to prioritize Central and East Oakland communities.	See the priority calls for waterfront connections in the East Oakland Mobility Action Plan and EONI Plan.
Develop community-based stewardship models as part of urban greening capital project budgets and partnerships in collaboration with the Peralta Community College District and regional partners as is being piloted with the San Leandro Creek Urban Greenway and Transformative Climate Community project in East Oakland.	These types of community engagement and greening stewardship initiatives are strategies the Air District helped define in our support of these two state-funded grant projects. Also see Appendix B, attached for examples of stewardship programs that the City has been involved in that served as pilot models for the aforementioned state grant projects.

GOAL EJ-9: EXPAND ECONOMIC DEVELOPMENT, INCOME EQUALITY, AND OPPORTUNITY FOR ALL OAKLANDERS.

PROPOSED POLICIES	
Draft Text	**Specific Comments/Suggestions**
EJ 9.6 - Labor Force Skills Development. Partner with educational institutions, employers, and community-based organizations to develop a local labor force with skills to meet the needs of the area's businesses and industries. Continue and expand local-hire initiatives, just transition and clean energy training, apprenticeships, and partnerships with employers.	Include a focus on "just transition" and "clean energy" career workforce opportunities which will be increasingly relevant as the region begins full transition to a resilient post fossil-fuel economy in the coming decades.

Other Comments on presented EJ Element Maps

We note that there appear to be some mismatch problems with the titles and legends on the following maps:

1. **Figure EJ-9** – the title should be "Modeled Diesel PM Concentrations" and the legend should say "DPM Concentrations (micrograms/m3)".

2. **Figure EJ-10** – the title should be "Modeled $PM_{2.5}$ Concentrations" and the legend should say, "PM2.5 Concentrations (micrograms/m3)".

*Neither of these figures show emissions but instead show the *modeled* concentrations that are estimated to result from DPM and $PM_{2.5}$ emissions.

Finally, we note some possible missing map information:

3. **Figure EJ-132** - depicting high wage jobs by census blocks. The larger Port areas of West Oakland (and the former Army base) as well as the Edgewater/Doolittle areas have no color, why is this? The airport area is shown as grey/light lavender with no corresponding descriptor in the legend.

APPENDIX A - DISCUSSION OF PROPOSED "APEZ" AND "IRIZ" OVERLAYS

The Air District has been a strong and consistent supported of innovative uses of overlay zones and other protective measures to clearly define and separate potential health impacting "conflicts" between designated polluting uses and infrastructure and designated sensitive receptor and/or residential areas. This appendix describes two such overlays we have included as part of our SB1000 **Pioneering Policy Library:** https://www.baaqmd.gov/plans-and-climate/planning-for-environmental-justice-sb-1000**.**

The first such policy we have highlighted (Policy 1) is based on what has been already enacted in the Bay Area region - San Francisco's Air Pollution Exposure Zone (APEZ) overlay as part of the City/County Health ordinance Article 38. The APEZ is a focused 500-foot buffer along the freight/goods-movement/freeway corridor of the 101 which conditions both proposed new (and cumulatively impacting) polluting uses as well as new residential uses. We have also sought to define a buffer overlay that could be applied along the interfacing boundaries of general industrial/manufacturing and residential/sensitive receptor areas – an Industrial-Residential Interface Zone (IRIZ, Policy 2) which has been modeled to some extent off existing buffer combing zones like Oakland's S-19 Health and Safety Protection Combining Zone.

The policy and regulatory implications of both are similar with specific distinctions on how they would be applied for each (wherein the IRIZ includes being mapped 500 feet over the industrial side of the interface) as well as how they are treated when both overlays are present together. In general, these overlays should include specific land use requirements/standard conditions to reduce air quality impacts that combine with the underlying residential, commercial, or industrial zones as well as inclusions for health improving public investment and development incentives.

For both the APEZ and IRIZ approach, as increased health protection, we recommend that the overlay should be applied up to 1,000 ft downwind of freeways and industrial areas. The science of pollutant dispersal (esp. for $PM_{2.5}$ and DPM) supports this. We have also heard support for these approaches from our AB 617 stakeholder groups in Oakland.

EJ Element Draft Feedback

Hannah Germonprez <hannah@pvoakland.org>
Thu 6/22/2023 5:04 PM

To:General Plan <generalplan@oaklandca.gov>

[EXTERNAL] This email originated outside of the City of Oakland. Please do not click links or open attachments unless you recognize the sender and expect the message.

Hello,

I am writing to provide the following comments and feedback regarding the Draft Environmental Justice Element on the behalf of myself as an Oakland resident.

1. I would like to echo another comment I read on the online application regarding language access. I appreciate adding the email for accessibility, however, if the plan was only released and available in English, it is inequitable to close the commentary period until language justice is addressed.
2. I appreciate the engagement detailed in this draft. Will there be a citizens and impacted community advisory board to ensure equitable implementation of the plan?
3. Food Access: The City of Oakland's Summer Foods program would be highly beneficial to include in this report, specifically (1) connecting the food served during the summer with local vendors and gardens to reduce emissions and provide higher quality food.
4. The Draft would benefit from including park accessibility (ADA compliant parks)
5. Lack of Public Works Maintenance: The connection between safe use of parks and recreational facilities and unhoused individuals cannot be understated. Unhoused people need not just to be housed, but to have access to basic hygienic services. The city of Oakland as a piece of it's environmental justice plan should invest in more public restrooms and more frequent servicing.

Thank you for your consideration.

In community,

Hannah Germonprez
Pronouns: She/Her/Hers
--
Parent Voices Oakland
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Comments on General Plan

[redacted]

Thu 6/22/2023 12:45 AM

To:General Plan <generalplan@oaklandca.gov>

[EXTERNAL] This email originated outside of the City of Oakland. Please do not click links or open attachments unless you recognize the sender and expect the message.

Dear General Plan Team,

My name is Margie Lewis and I am an East Oakland D6 resident. My comments
are based on my lived experience and my years of advocacy work as a member
of Communities for a Better Environment (CBE). My comments begin below:

Chapter 3
3.2 Goals and Policies

- EJ-1.4 Performance Standards

This section talks about new developments. What is being done to address
existing adverse effects related to air quality, noise or safety?
As a remediation the section states “This could include expansion of S-19 Health
and Safety Protection Combining Zone to include air quality effects”. The wording
should state this will include not could include.

- EJ-1.5 Regulate Polluting Uses

Needs a Community Oversight Board with power to implement findings.

- EJ-1.6 Enhanced Enforcement

Needs a Community Oversight Board with power.

- EJ-1.13 Emissions and Construction Activity

Requires projects to implement “mitigation strategies for all construction sites
to maximum extent feasible”. Question - Who defines what is feasible?

- EJ-1.16 Community Air Protection

Developing plans and initiatives to support air pollution control. Question are
Community organizations considered equal partners at the table? Needs oversight
with power. Community

Chapter 8
8.2 Goals and Policies

- EJ-8.4 Community Partners

Partner with community-based organizations and offer “support services as feasible”.
If you want to build trust the city needs to answer the question, who determines feasibility?
The voice of the community needs to be represented in the answer.

Chapter 9
9.1 Prioritizing improvements and programs that meet the needs of EJ Communities

- EJ-10.1 Prioritizing EJ Communities

Question - Who will make sure that the distribution of spending and resources to EJ Communities happens? What is the mechanism for accountability?

Table EJ-11 Policy

- EJ-1.4 Performance Standards

Develop zoning standards. Question - What to do about existing facilities that pollute
although they seem to meet current standards like the crematorium in East Oakland?

- EJ-1.5 Regulate polluting uses

Develop more stringent permitting standards. Question - What to do with polluting
facilities who have been grandfathered in with old permits like AB&I in East Oakland?
What about the Crematorium whose emissions alone may appear to meet safety standards
but combined with 880 create a toxic atmosphere?

- EJ-1.8 Air Filtration

Speaks about requirements for new construction. Question - What about providing existing
buildings such as schools, community centers and libraries with up to date filtration systems?

- EJ-1.14 Reduced Exposure to Air Pollution for Project Occupants

Speaks about incorporating measures to improve indoor air quality. Community EJ Organizations need to be involved in determining the measures taken and
in creating an accountability mechanism.

Table EJ-11 Action

- EJ-A.1 Amend city's zoning code

Responsibility - Planning and Building

The responsibility should include components of Community Oversight or a mechanism

to being answerable to community.

- EJ-A.5 Study feasibility of an amortization ordinance

Responsibility - Planning and Building(in coordination with BAAQMD)

There needs to be significant community EJ Organization input to this study.

There needs to be an implementation plan.

- EJ-A.7 As part of LUTE update evaluate residential/industrial conflicts

Responsibility - Planning and Building

Question - What criteria will be used for the evaluation?

Community voices need to be a significant part of the evaluation plan.

Comments on EJ Element draft

jennifer easton [redacted]
Thu 6/22/2023 5:22 PM

To:Rajagopalan, Lakshmi <LRajagopalan@oaklandca.gov>
Cc:Diane Sanchez [redacted] Vanessa Whang [redacted]

[EXTERNAL] This email originated outside of the City of Oakland. Please do not click links or open attachments unless you recognize the sender and expect the message.

Hello Lakshmi,
I picked up the Arts Commission Committee tracking the General Plan and recommendations for integration of arts and culture into various elements.

Attached is a link to some notes on the EJ element - not a significant number, just a few ways to expand the thinking about integrating arts, and also ensuring that current dialogue related to cultural districts, and engaging the Cultural Affairs Department are considered. I wanted to provide the comments to you this way on behalf of our working group instead of as personal comments on the electronic site.

https://www.dropbox.com/s/9vune974ppsumre/EJ-Element_032123-public-review-draft_reduced%20je.pdf?dl=0

Congratulations on the draft EJ element - it's very interesting and aspirational for Oakland.

With regards,
Jennifer Easton, Arts Commissioner
[redacted]

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Seuls quelques fragments de nous toucheront quelques fragments d'autrui

Oakland 2045

Oakland Environmental Justice Element

PUBLIC REVIEW DRAFT

March 2023

Prepared by:

DYETT & BHATIA
Urban and Regional Planners

With Contributions From:

E/J Solutions
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Executive Summary

Historical and ongoing governmental and industrial practices have led to, and continue to generate, racially inequitable outcomes, and longstanding environmental injustices in Oakland. This General Plan outlines actions to work toward undoing the impacts of these past practices and create a fair and just city. An environmental justice approach seeks to rectify these issues, improving the environmental health of those most harmed by pollution burdens and impacted by historic disinvestment and disenfranchisement by investing in these communities to create opportunities that will allow its residents to live long, healthy lives.

This document, the Environmental Justice Element of the City of Oakland's General Plan, serves as the foundation for achieving equity and environmental justice when planning for future growth and development in Oakland. The Environmental Justice Element identifies communities that are disproportionately impacted by inequitable and unjust environmental harms, and proposes goals, policies, and objectives to reduce the unique or compounded health risks in these communities, referred to as Environmental Justice Communities.

This document builds upon Oakland's current regulatory setting for equity and environmental justice, including Oakland Municipal Code Section 2.29.170, which specifies that "the City of Oakland will intentionally integrate, on a Citywide basis, the principles of 'fair and just' in all the City does in order to achieve equitable opportunities for all people and communities," as well as City Council Resolution 89249: Declaring Racism A Public Health Crisis, which states "That the City of Oakland declares racism a public health crisis and recognizes the severe impact of racism on the well-being of Oakland residents and the City overall."

California law requires that each city and county adopt a general plan to guide its physical growth and development. A jurisdiction's general plan is its official policy document to create a blueprint for the future of the jurisdiction and guide its development. In California, all cities must adopt a General Plan composed of at least seven elements, including either an Environmental Justice Element or Environmental Justice goals and policies integrated into related elements. Because environmental justice is a cross-cutting topic, Oakland has chosen to adopt a standalone Environmental Justice Element, while integrating environmental justice strategies into policies, goals, and actions across other elements of the General Plan. This approach will enable the City to coordinate interdepartmental efforts to effectively address environmental justice and racial equity. The Environmental Justice Element, as do the other General Plan Elements, uses an equity lens throughout its analysis and focuses on burdened census tracts in the development of its goals, policies, and actions. Therefore, the Environmental Justice Element is rooted in an equity framework in accordance with the General Plan's Vision Statement and Guiding Principles.

The Environmental Justice Element contains nine chapters. Following the introduction and history sections, the Environmental Justice Element summarizes baseline conditions within Oakland's communities through the lens of six environmental factors. In general, each of these six chapters contains an overview of an environmental condition, a summary of disparities and communities vulnerable to the factor, and a set of goals and policies specific to that factor. The communities that are highlighted in

each chapter are the highest-scoring census tracts identified by the Environmental Justice Communities screening analysis and Environmental Justice Element Racial Equity Impact Assessment processes as the places that experience the greatest disparities and/or vulnerabilities. Chapter 9 concludes with a comprehensive table of actions to achieve the goals and policies set forth in the preceding chapters. Below are brief descriptions of the contents under each chapter:

- **Chapter 1, "Introduction,"** presents the background and purpose of the Environmental Justice Element, including statutory requirements. It also outlines the City of Oakland's process and community engagement efforts undertaken to develop the Element. Further, the chapter outlines the racial equity goals of the Environmental Justice Element and considers the Element's relationship to other elements of the City's General Plan and guiding principles.
- **Chapter 2, "Environmental Racism and Health Inequities in Oakland,"** provides an overview of the historical development and planning decisions of Oakland which have shaped current conditions of environmental disparities. This chapter includes a description of health inequities that have resulted from past planning decisions and defines Oakland-specific Environmental Justice Communities (disadvantaged communities).
- **Chapter 3, "Reducing Pollution Exposure and Improving Air Quality,"** analyzes the pollution burden, especially on sensitive land uses, in Oakland from air pollution, water contamination, hazardous materials and toxics, and illegal dumping.
- **Chapter 4, "Safe, Healthy, and Affordable Homes,"** details housing disparities in the City of Oakland, including code enforcement, age of housing stock, and indoor air quality.
- **Chapter 5, "Expanding Healthy Food Access,"** analyzes Oakland's food network, including availability of food outlets, food availability, and food quality.
- **Chapter 6, "Equitable Public Facilities,"** details the distribution of and investment in Oakland's public facilities, such as infrastructure, school facilities, parks, and transportation and emergency services.
- **Chapter 7, "Promoting Physical Activity,"** analyzes the barriers to physical activity and health in the city, such as mobility and safety, park access maintenance, and urban forest and greening.
- **Chapter 8, "Engaged Communities,"** details the City of Oakland's community engagement efforts and challenges experienced, including an overview of the community engagement spectrum, linguistic isolation, internet access, and employment.
- **Chapter 9, "Implementation Actions and Programs,"** provides a summary table of the goals, policies, and actions relevant to each of the environmental factors that address the unique needs of Environmental Justice Communities as identified in this Element.

1. Introduction

Oakland strives to be a city where all neighborhoods thrive and community members have what they need to lead healthy and productive lives. This includes clean air, land, and water; quality, affordable housing located near jobs and amenities; an enjoyable, accessible network of parks, recreation, and community facilities; access to nutritious food; and other community assets distributed equitably throughout the city. To achieve this goal, the city must respond effectively to the resounding consequences of institutional and systemic discrimination that are reflected in Oakland's uneven geography of opportunity. This has largely meant that predominantly lower-income neighborhoods and communities of color unfairly and disproportionately experience higher exposure to pollution, greater negative health impacts, and less access to health-promoting resources.

To chart a path forward toward a more equitable city, Oakland has created its first Environmental Justice Element (EJ Element) for the Oakland 2045 General Plan Update. The Environmental Justice movement arose to address our history of unjust governmental actions, find remedies to disproportionate impacts, and builds decision-making power among groups most affected by these harms. Consistent with State requirements, the EJ Element addresses community-identified environmental justice issues related to reducing pollution exposure and improving air quality; promoting safe, healthy, and affordable homes; providing equitable public facilities; expanding healthy food access; promoting physical activity; improving civic engagement; and prioritizing improvements and programs that meet the needs of Environmental Justice Communities (EJ Communities).

1.1 PURPOSE AND REQUIREMENTS

STATUTORY REQUIREMENTS

The City of Oakland is updating its General Plan, a visionary blueprint for the City's future over the next 20 years. Senate Bill (SB) 1000,[1] the Planning for Healthy Communities Act, requires general plans to "identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities" by means that include, but are not limited to:

- Reducing pollution exposure, including the improvement of air quality;
- Promoting equitable access to public facilities,[2] healthy food, safe and sanitary homes, and physical activity;
- Reducing barriers to inclusive engagement and participation in the public decision-making process; and
- Prioritizing improvements and programs that address the needs of disadvantaged communities.

1 SB 1000 is an act to amend Section 65302 of the California Government Code.

2 As defined in subdivision (d) of California Government Code Section 66000, "public facilities" includes public improvements, public services, and community amenities.

How are "Disadvantaged Communities" defined?

SB 1000 defines a "disadvantaged community" as "an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."[3]

Further, SB 1000 defines "Low-Income" as "an area with household incomes at or below 80 percent of the statewide median income or with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093.

What is Equity?

In Oakland, equity means all people have full and equal access to opportunities that enable them to attain their full potential. It means that identity—such as race, ethnicity, gender, age, disability, sexual orientation or expression—has no detrimental effect on the distribution of resources, opportunities, and outcomes for Oakland's residents. Equity differs from equality, which focuses on giving everyone the same thing, regardless of outcomes.

3 Leyva, Connie M. SB-1000 Land use: general plans: safety and environmental justice., Government Code § 65302 (2016). *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1000*

SB 1000 requires that jurisdictions with "disadvantaged communities" adopt environmental justice goals, policies, and objectives as either a stand-alone Environmental Justice Element or as a set of objectives and policies integrated into other elements. In recognition of the cross-cutting nature of environmental justice topics and the interaction between various elements of the General Plan, the City of Oakland has opted to pursue a combination of both options by creating a standalone element as well as interweaving environmental justice into the policies, goals, and actions of all elements.

While State law uses the term "disadvantaged communities," the City of Oakland has opted to use the term "Environmental Justice Communities," (or "EJ Communities") in line with recommendations from the California Environmental Justice Alliance.[4] This is based on the recognition that, in addition to identifying the problems and areas that are unfairly impacted (i.e., "disadvantaged") by cumulative burdens, gaining equitable access to environmental benefits, investments, and other resources for low-income communities and communities of color is also an important aspect of environmental justice.

RACIAL EQUITY GOALS FOR THE CITY OF OAKLAND + PREVIOUS ONGOING EFFORTS

A guiding principle of Oakland's General Plan update is to advance the City's mission to "intentionally integrate, on a City-wide basis, the principle of 'fair and just' in all the City does in order to achieve equitable opportunities for all people and communities."[5] This means working to eliminate the root causes of inequity, understanding barriers to achieving greater equity in communities, and working with these communities to develop solutions for long-term and systemic changes. That process begins by undertaking a full acknowledgment of the systemic racial inequities that have shaped the City of Oakland.

The EJ Element builds on the City's ongoing efforts to achieve racial equity in Oakland. It is based on the frameworks established by the City's 2018 Oakland Equity Indicators Report, the 2020 Racial Equity Impact Assessment and Implementation Guide for Oakland's 2030 Equitable Climate Action Plan (ECAP), and other previous studies that have laid the foundation to ensure that the City integrates equity and social justice into its policies, practices, and actions.

In 2016, the City established the Department of Race and Equity to advance racial equity, with a mission "to create a city where diversity has been maintained, racial disparities have been eliminated, and racial equity has been achieved."[6] The Department of Race and Equity is particularly concerned with making a difference in the determinants of equity that lead to creation of a fair and just society – including community economic development, community and public safety, the law and justice system, early childhood development, education, equity in City practices, food systems, health and human services, healthy built and natural environments, housing, job training and job opportunities, neighborhoods, and parks and natural resources. The Department of Race and Equity's goals are:

1. Eliminate systemic causes of racial disparities in City government;
2. Promote inclusion and full participation for all residents of the City; and
3. Reduce race-based disparities in Oakland's communities.

4 California Environmental Justice Alliance/PlaceWorks, SB 1000 Implementation Toolkit: Planning for Healthy Communities, October 2017, available for download at *http://www.caleja.org/sb1000-toolkit*.

5 Oakland Municipal Code Section 2.29.170.1

6 City of Oakland, "Learn More About the Department of Race and Equity," January 20, 2021, *https://www.oaklandca.gov/resources/race-matters*, accessed February 2022.

These goals are based on the following race and equity working assumptions. These assumptions are adapted from the Annie E. Casey Foundation's Race Matters Toolkit,[7] and lay the framework for the Department of Race and Equity's Race and Equity Change Process.[8]

- Race matters: Almost every indicator of well-being shows troubling disparities by race.
- Disparities are created and maintained through institutionalized policies and practices that contain barriers to opportunity.
- It's possible, and only possible, to close equity gaps by using strategies determined through an intentional focus on racial disparities and their root causes.
- If opportunities in all key areas of well-being are equitable, then equitable results will follow.
- Given the right message, analysis, and tools, people will work toward racial equity.

The City recognizes that determinants of equity are the drivers of achieving a fair and just society. Access to the determinants of equity is necessary to have equity for all people regardless of race, class, gender, or language spoken. Inequities are created when barriers exist that prevent individuals and communities from accessing these conditions and reaching their full potential.

RELATIONSHIP TO OAKLAND'S GENERAL PLAN ELEMENTS

The City of Oakland's General Plan Update project is being undertaken in two phases. Phase 1 focuses on the creation of this new EJ Element, as well as updates to the Housing and Safety Elements, and preparation of a Racial Equity Impact Assessment, Zoning Code and Map update. Subsequently, Phase 2 will update the Land Use and Transportation; Open Space, Conservation and Recreation; and Noise Elements, as well as create a new Infrastructure and Facilities Element. Phase 2 is slated to be completed by 2025.

Because environmental justice topics touch all aspects of Oaklanders' daily lives, the EJ Element serves as a foundational roadmap to the city becoming a more equitable and healthier place for all. The EJ Element will also inform and give direction to all other elements. The following **Table EJ-1** illustrates the EJ topics included in Phase I elements and those that will inform policies in the Phase 2 elements. This means Phase 2 is an opportunity to develop additional implementation actions and programs, as well as conduct more in-depth analysis on EJ issues as they relate to the Phase 2 elements and refine the policies in the EJ Element with further study. For example, this Element identifies community needs for additional healthy food outlets, solutions to address pedestrian collisions, and ways to reduce impacts of industrial pollution. In addition to the goals and policies in this EJ Element, the Land Use and Transportation Element could include several additional policies and actions to incentivize grocery store development, improve roadway safety through specific design, and address land use compatibility to protect residents and reduce pollution.

While the EJ Element will be adopted in Phase 1, any additional EJ issues or solutions that arise during Phase 2 can be addressed through follow-up amendments to the EJ Element in Phase 2.

7 The Annie E. Casey Foundation, Race Matters Toolkit: User's Guide, December 12, 2006, https://assets.aecf.org/m/resourcedoc/aecf-racemattersusersguide-2006.pdf.

8 City of Oakland, "Race & Equity Change Process," August 31, 2018 (last updated January 20, 2021): *https://www.oaklandca.gov/resources/race-equity-theory-of-change*, accessed December 2022.

Table EJ-1: Relationship of other Element Policies to Environmental Justice Topic Areas

ELEMENT	SAFE AND SANITARY HOUSING	PUBLIC FACILITIES AND PHYSICAL ACTIVITY	HEALTHY FOOD ACCESS	AIR QUALITY, WATER QUALITY, AND POLLUTION EXPOSURE	CIVIC ENGAGEMENT, INVESTMENT PRIORITIZATION, AND IMPROVED HEALTH OUTCOMES
Housing (Phase I)	• Building more affordable housing • Addressing homelessness • Avoiding displacement and keeping people in their homes • Affirmatively furthering fair housing • Improving housing quality issues • Encouraging climate-resilient and earthquake-resilient housing	• Encouraging new affordable housing in higher resource areas	• Encouraging new affordable housing in higher resource areas	• Protecting against smoke and wildfire • Studying options to provide financing for remediation of contaminated sites • Eliminating methane gas combustion in all homes by 2040	• Protecting residents from displacement • Preserving and improving existing housing stock • Promoting neighborhood stability and health • Provide accountability measures for housing programs
Safety (Phase I)	• Protecting housing from environmental and human-made hazards	• Improving bicycle and pedestrian infrastructure • Roadway improvements and auto safety • Augmenting urban greening and urban forestry to mitigate flooding, heat, and pollution	• N/A	• Reducing exposure to toxic air contaminants • Protecting the public from hazardous materials • Promoting green infrastructure and climate resilience measures • Addressing climate change inequity	• Encouraging coordination across departments and with community groups to support community safety • Creating a responsive, inclusive emergency response network • Coordinating with existing groups on sea level rise planning
Land Use and Transportation (LUTE) (Phase 2)	• Finding more locations and facilitating additional housing in Oakland • Creating complete, walkable, bikeable, and transit-accessible neighborhoods, with access to everything people need close to home • Locating homes away from pollution sources	• Making it safer, easier, and more comfortable to walk, bike, and get around without a car • Improving connectivity between important community destinations including public facilities	• Creating incentives, finding more locations, and facilitating food access in Oakland	• Ensuring land use compatibility between polluting uses and sensitive populations • Reducing number of cars on the road, improving other means of getting around	• Shaping economic development and future of jobs • Creating cultural districts corridors • Creating complete neighborhoods with access to healthcare and health-promoting services and facilities

Table EJ-1: Relationship of other Element Policies to Environmental Justice Topic Areas

ELEMENT	SAFE AND SANITARY HOUSING	PUBLIC FACILITIES AND PHYSICAL ACTIVITY	HEALTHY FOOD ACCESS	AIR QUALITY, WATER QUALITY, AND POLLUTION EXPOSURE	CIVIC ENGAGEMENT, INVESTMENT PRIORITIZATION, AND IMPROVED HEALTH OUTCOMES
Open Space, Conservation, and Recreation (OSCAR) (Phase 2)	• Ensuring all housing has adequate, equitable access to open space and recreational facilities	• Creating a comprehensive network of accessible, well-maintained parks and facilities for all neighborhoods	• Supporting and providing access to more community gardens	• Preserving natural spaces and habitat that also supports cleaner air, water, land, and soil	• Ensuring culturally appropriate parks and recreation programming • Investing in existing parks and recreational facilities in EJ Communities
Noise (Phase 2)	• Protecting homes from excessive noise and improving community noise environments	• Ensuring public spaces do not experience excessive noise while also supporting community events	• N/A	• Reducing noise pollution and exposure	• Prioritizing investments in EJ Communities that reduce noise
Infrastructure and Facilities (Phase 2)	• Ensuring homes have adequate, equitable access to quality infrastructure and facilities	• Supporting infrastructure financing mechanism for improvements identified in other elements	• N/A	• Building climate-resilient infrastructure • Adding additional green stormwater infrastructure to the City's storm drainage network to clean and infiltrate stormwater • Reducing embodied carbon in infrastructure and facilities	• Prioritizing infrastructure investments in EJ Communities • Promoting industries and businesses that support a local circular economy, including repair and reuse businesses/activities

CONNECTION TO VISION AND GUIDING PRINCIPLES

The Environmental Justice Element seeks to create a city where all people have a chance to live a healthy and opportunity-filled life, no matter their identity. The purpose of this Element ties closely with the following portions of the General Plan's Vision Statement:

We are housed, healthy, and safe. Oakland has high-quality accessible housing for everyone who needs it, and each person is housed with dignity. Every neighborhood, home, school, and park has clean air and fresh water, and Oakland's children breathe that fresh, clean air as they run, play, and grow. Cool shade from mature trees, scents of flowers, and sounds of birds chirping and bees buzzing enrich lush residential areas. The city's many grocery stores, farmer's markets, and garden farmstands offer fresh, healthy food to nurture tables and bodies in all different cultural traditions. Oakland's homes and communities have healed from historic violence, and crime-free, clean streets and public spaces are safe for people to walk and linger.

We see ourselves reflected in Oakland. Residents shape and craft the City's processes and outcomes through equitable, transparent, and inclusive processes. The City of Oakland works for its residents, prioritizing their quality-of-life concerns, recognizing and celebrating the contributions of Oakland's multiple distinct communities of color, including Black, Latinx, Asian, and Indigenous peoples, and actively partnering with community groups and residents. Youth, elders, people with disabilities, immigrants, and people who speak different languages actively participate in government and are empowered to craft a city that meets the needs of all residents; community members can see progress towards their goals through continuous monitoring and feel a sense of ownership of their culturally rich city. The built environment responds to and reflects this richness: its public art, play spaces, and buildings showcase Oakland's unique diversity and multicultural histories.

We support meaningful opportunities for residents and businesses to prosper and contribute. Oakland is a beautiful city where people want to live and work, with thriving local businesses and a growing equitable economy that offers high-quality, climate-positive jobs for many different skillsets. New businesses are welcome, and Oakland is a hub for entrepreneurs and companies attracted to Oakland's skilled workforce and its location at the geographic center of the Bay Area. The city is an incubator of new ideas and green solutions, training the next generation of business leaders through robust workforce development programs. Throughout Oakland, flourishing neighborhood commercial streets are lined with trees and greenery, small businesses, restaurants, and services residents patronize daily, and visitors come from all over to enjoy the local food, art, sports, natural environment, and culture.

We are rooted in Oakland and all neighborhoods have what we need to grow. Oakland's public facilities are hubs of community activity, as schools, libraries, parks, and open spaces spark connections and inspiration and bring people together for learning, play, growth, and resilience. Children play in clean, safe and accessible parks and spend summers splashing in sparkling lakes, pools, and beaches. Neighborhoods thrive as small villages within the city, where neighbors can support each other, children grow up, elders age in place, and those that were displaced return to their communities. Diverse arts and culture flourish in Oakland, from art and music to food and festivals, and a sense of belonging permeates public spaces filled with gatherings, celebration, and wellness. As residents walk down the street they can hear many languages, see different places of worship, and feel the swell of many people coming together to build something greater. The City's roots grow stronger every day.

The EJ Element furthers the following General Plan Guiding Principles:

We are housed, healthy, and safe.

1. Facilitate housing production and maintenance throughout Oakland to meet the housing needs of people at all income levels including low- and very-low incomes, workforce and moderate-income households, and shelter for the unhoused.
2. Ensure that every home, neighborhood, school, and park has clean air, water, and land.
3. End community violence and crime through a collaborative and community-led public health approach to violence and healing.
4. Design streets that are safe for walking, biking, rolling, and playing.
5. Ensure that people have access to fresh food, water, and restrooms.
6. Foster quiet neighborhoods that are not impacted by excessive noise from streets, highways, and machinery.

We see ourselves reflected in Oakland.

7. Use equity and results-based accountability to drive decision-making and investments in Oakland, working to overcome intentional and unintentional barriers to fairness, justice, and opportunity.
8. Co-develop solutions with community groups, community members, and the Ohlone people, such that all people of Oakland feel ownership of the city.
9. Fully integrate youth, elders, and persons with disabilities into the community, ensuring that they can access resources and represent their own interests.

We support meaningful opportunities for residents and businesses to prosper and contribute.

10. Promote a thriving and sustainable economy that attracts and retains a diversity of jobs and future-oriented industries that provide opportunities for all Oaklanders.
11. Foster local small businesses as the heartbeat of Oakland.

We are rooted in Oakland and our roots run deep.

12. Strengthen schools, libraries, childcare, and community spaces to support, inspire, and partner with families.
13. Cultivate lush active parks, recreation areas, and quiet green spaces that are accessible, safe, clean, drought-resistant, and well-maintained.
14. Foster Oakland's neighborhoods as villages within the city that enrich residents with resources, culture, and strong social ties.
15. Work toward a reversal of historic and ongoing displacement.
16. Promote Oakland's diverse cultural richness, allowing it to thrive and grow through its people, music, gardens, art, history, murals, languages, food, and festivals.

1.2 ENVIRONMENTAL JUSTICE PLANNING PROCESS

ENVIRONMENTAL JUSTICE AND RACIAL EQUITY BASELINE REPORT

The City of Oakland prepared an Environmental Justice and Racial Equity Baseline (EJ Baseline Report) to identify and delineate existing social, economic, and environmental disparities by race and geography that can be influenced directly or indirectly by the General Plan. The findings of the EJ Baseline Report serve to establish a baseline of existing conditions pertaining to environmental justice and racial equity to inform conversations throughout the General Plan Update process between City staff and members of the public, particularly those in communities most impacted by racial inequities that make them vulnerable to the consequences of climate change and other environmental effects.

The EJ Baseline Report is consistent with Oakland's Results-Based Accountability framework, "a disciplined way of thinking and taking action" to create measurable change in people's lives. "Results-Based Accountability" is a data-driven decision-making process oriented toward actionable outcomes. This framework starts by defining desired results or goals and works backwards, step by step, toward those means to set a clear path to achieve those outcomes. Indicators measure the extent to which a result is being achieved and help keep track of the City's progress over time.

The Results-Based Accountability framework is an important aspect of the City's Race and Equity Change Process, which requires establishing baseline disparity data, targets/benchmarks, and processes to track and report outcomes. The EJ Baseline Report synthesizes recent efforts to paint a comprehensive picture of where the City currently stands along its trajectory toward environmental justice and racial equity and helps to define where policies in the EJ Element can further those objectives.

EJ ELEMENT RACIAL EQUITY IMPACT ANALYSIS

The City of Oakland conducts a racial equity impact analysis (REIA) alongside all emerging or revised plans and policies to support development of equitable, concrete, data-driven, outcome-oriented, and problem-solving actions. The REIA educates about racial disparities; informs about root causes of disparities; engages impacted communities; provides a set of specific recommendations for achieving equitable outcomes; and includes a framework for evaluating the equity impacts of implementation over time.

A REIA has been prepared in parallel with the EJ Element to guide practices and inform policies that effectively advance racial equity in Oakland. The first stage of the EJ Element REIA focused on the SB 1000 Screening Analysis methodology and results of the EJ Baseline Report. The assessment grades the indicators included in the screening analysis from A, most equitable, to F, most disparate/inequitable to highlight the issues with the most racially disparate outcomes and the neighborhoods facing the greatest disparities within each issue. Applying the REIA to the screening analysis resulted in recommendations for refining the methodology and adjusting indicators to better reflect:

- The City's top equity issues,
- Community priorities that have been identified through the outreach process,
- Actionable metrics that directly inform planning decisions, and
- Availability of data.

Further, the REIA and recommendations helped determine a more suitable threshold for identifying EJ Communities, as discussed in the following section.

REVISION OF EJ COMMUNITIES MAPPING

Identifying low-income communities most impacted by environmental justice issues (EJ Communities) is a core component of SB 1000 and one of the primary objectives of an EJ Element. The EJ Baseline Report was an important first step in presenting a preliminary screening methodology to identify EJ Communities. This kicked off the iterative process of modifying and refining the methodology to ensure that the final EJ Communities map in this Element is representative of the on-the-ground conditions people experience in their daily lives. In addition, the methodology has been revised using the recommendations from the REIA (described above). The changes that have been incorporated into the final analysis include minor adjustment or replacement of certain indicators from the preliminary screening analysis in the EJ Baseline Report, addition of new indicators, restructuring of indicators into new categories or topics, and removal of two indicators due to data inconsistencies. Section 2.3: Identifying Environmental Justice Communities describes the final methodology and provides a full discussion of the changes that were made to the indicators. A full description of the final indicators is included in **Appendix A**.

In addition, the criteria and threshold for identifying EJ Communities were expanded to increase the final number of EJ Communities. Using recommendations from the REIA and based on community feedback, including from the West Oakland Community Action Plan (WOCAP) Steering Committee, EJ communities include: (1) census tracts in the top quartile (25 percent) of the screening methodology composite score; (2) census tracts in the top decile (10 percent) of the Pollution Burden, Climate Change, Sensitive Population, and Built Environment category scores; and (3) any Disadvantaged Communities designated by CalEPA pursuant to SB 535. More than one of these criteria may apply to an EJ Community. The results of the EJ Communities mapping process are presented in Section 2.3: Identifying Environmental Justice Communities.

Note: The Bay Area Air Quality Management District (BAAQMD), in partnership with Communities for a Better Environment and community members from East Oakland, initiated the first Community Steering Committee meeting for the East Oakland AB 617 Community Emissions Reduction Plan (CERP) process on September 15, 2022. The committee will meet monthly to develop a CERP to improve air quality and public health in the impacted communities of East Oakland. Once the community boundary for the East Oakland CERP is defined by the committee, the EJ Communities Map will be updated to include those communities.

Environmental Justice Communities: A Note on Terminology

The State defines "disadvantaged communities" as "an area identified by the California Environmental Protection Agency, pursuant to Section 39711 of the Health and Safety Code, or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."

In this EJ Element, we opt to use the term "Environmental Justice Communities" to refer to "disadvantaged communities."

Although "Environmental Justice Communities" are identified and mapped in the EJ Element to help the City focus on where and how to implement EJ policies and actions, this distinction does not mean EJ issues do not exist in communities elsewhere in the city. The term "EJ Communities" is used in this Element to refer only to census tracts that have been identified as EJ Communities through the SB 1000 screening analysis. Communities that experience EJ issues (and may or may not be an EJ Community) are separately referred to as "impacted communities" in this Element.

1.3 COMMUNITY OUTREACH

Proactive and meaningful community engagement from the start of a planning process to the implementation of goals and policies is critical to achieving the goals of environmental justice. A key environmental justice (EJ) principle is involving the communities most impacted by environmental justice issues, and those who could be adversely impacted from policy implementation, so that they can have a say in the decisions that impact their health and well-being. Community engagement in developing this Element included a range of activities intended to meet people where they were. In many instances, community members shared their firsthand knowledge of environmental issues in their neighborhoods, as well as existing community-led efforts and strategies to address these issues. Engagement activities included:

- **Community Organization Interviews.** Equity facilitators from E/J Solutions interviewed 12 environmental justice advocacy organizations for input on draft actions and the Environmental Justice Element's topic areas of focus:

  1. Asian Pacific Environmental Network (APEN)
  2. Communities for a Better Environment (CBE)
  3. Cocina del Corazón
  4. The Greenlining Institute (GLI)
  5. New Voices Are Rising (NVR)
  6. Oakland Parks & Recreation Foundation (OPRF)
  7. Oakland Climate Action Coalition (OCAC)
  8. Saba Grocers Initiative
  9. Save the Bay (STB)
  10. Sugar Freedom Project (SFB)
  11. The Village in Oakland (The Village)
  12. West Oakland Environmental Indicators Project (WOEIP)

- **Neighborhood Workshops.** On April 30 and May 28, 2022, staff held General Plan open houses in East and West Oakland. At the East Oakland workshop, participants discussed environmental justice concerns in small groups with staff or added sticky notes to boards addressing environmental justice, safety, and housing. At the West Oakland workshop, participants marked up maps with stickers representing key environmental justice issues and discussed EJ issues in small groups with a facilitator.
- **EJ Hub and Online Survey.** City staff created an online, interactive, educational platform ("GPU Environmental Justice Hub" or "EJ Hub") to support community engagement and data ground-truthing process for the EJ Element. The EJ Hub showcases information from the EJ and Racial Equity Baseline through an interactive and engaging platform. Using the EJ Hub, residents explored the initial draft Map of Potential Environmental Justice Communities, shared their visions for a healthy neighborhood, and documented local environmental justice issues and solutions. The EJ Hub can be accessed here: *https://arcg.is/00iuLT*
- **Community Tours.** On August 29, 2022, Ms. Margaret Gordon, Co-founder and Co-director, and Brian Beveridge, Co-director, of the West Oakland Environmental Indicators Project (WOEIP), led the planning team on a tour of West Oakland, a special and instructive opportunity to learn from WOEIP's extensive community knowledge of environmental justice conditions in West Oakland.
- **Cultural Events and Pop-Ups.** Between November 2021 to March 2023, the GPU team conducted community events in Eastmont, Fruitvale, San Antonio, Chinatown, West Oakland porch chats, Hoover Elementary in West Oakland, and at the Oakland Asian Cultural Center's (OACC) Asian Pacific New Year Celebration and the Black Joy parade. Information about these events can be found on the General Plan Update website (*https://www.oaklandca.gov/topics/meetings-and-events*) and the community engagement collaborative's website (*https://www.deeplyrooted510.org/*). Eleven organizations within the collaborative have hosted and conducted community engagement and outreach with their networks at large outdoor or virtual events and pop-ups

in addition to through social media, with a focus on reaching individuals from communities of color.

- **Equity Working Group.** The Equity Working Group (EWG) is comprised of individuals who have been highly engaged in Oakland housing, safety and environmental justice, land use issues and solutions. The EWG met 9 times to provide input on the 2023-2031 Housing Element. At 17 meetings throughout 2022, the EWG discussed equity considerations for the Safety and EJ elements. See *https://www.deeplyrooted510.org/ewg* for more information.
- **Stakeholder Interviews.** At eight discussion groups held in May 2022, representatives from over 50 agencies, businesses, and community groups participated in small group discussions with project staff.
- **Neighborhood Councils.** Staff are working with Neighborhood Service Coordinators to present and receive feedback at Neighborhood Council (NC) meetings on topics including housing, environmental justice, industrial lands, and safety and natural hazards.

Some of the key themes from community outreach included the following:

- **Industrial Land Use and Air Pollution.** One of the most pressing environmental justice issues in Oakland is the disproportionate pollution burden that West and East Oakland neighborhoods face, largely due to proximity to the Port of Oakland, industrial land, and its associated uses, such as truck transport. Coupled with Oakland's economic history, these land use patterns were created by zoning choices, racial exclusion, and urban renewal. This has resulted in a legacy of polluting uses right next to sensitive uses such as homes, schools, and parks. In times of growing wildfire threat, smoke has also become another burden that adds to existing pollution. A growing body of research indicates that these polluting industrial land uses increase rates of asthma, cancer, and other health issues, as well as decreased life expectancy. The impacted communities are disproportionately communities of color. Related to industrial land uses, input also indicated a lack of enforcement of nonconforming or unpermitted uses, desire for change to zoning or shortening of conditional use permitting timelines, and recommendations for a moratorium on polluting facilities, phasing out certain uses, urban greening, greener employment replacements for these industries, and provision of air filters for existing neighbors. Many of the strategies suggested have greenhouse gas reduction and climate resiliency co-benefits.
- **Exposure to Toxics and Hazardous Substances.** Even after industrial land uses are discontinued, they may leave behind toxic chemicals and other hazardous substances. There are several Superfund or brownfield sites throughout areas of West Oakland as well as along I-880 that are either undergoing or still require cleanup, known as "remediation." Active remediation may directly expose on-site and nearby inhabitants to hazardous substances through land, air, and water contamination. Such activities and intermediary uses of Superfund and brownfield sites should consider both the short- and long-term potential for harmful health effects on current and future users.

- **Transportation Safety and Noise.** Urban renewal and past land use decisions have also resulted in disproportionate impacts due to freeways and railroads. I-880 and I-980 differ vastly from I-580 in terms of truck traffic and subsequent pollution and road safety because of decisions regarding goods movement that were largely influenced by the more affluent residents living in the hills. Community members voiced concerns about pedestrian and bicyclist safety in neighborhoods near I-880 and I-980, citing traffic collision hot spots like Chinatown as places that need immediate improvement. In addition to air pollution emitted by vehicles along these roadways, noise pollution is another key concern impacting the communities living near freeways and railroads.

- **Housing Issues.** Some of the top housing issues identified by community members included the homelessness crisis, housing quality issues, and housing affordability. Groups suggested a wide variety of strategies to house the unhoused community, including treating unhoused populations with dignity; stopping the current encampment management policy; facilitating more flexible building types, temporary units, permanent supportive housing, RVs/safe parking zones, tiny homes, manufactured housing; and working with the unhoused community to understand their needs and priorities. The disproportionate representation of Black Oaklanders among unhoused individuals was also emphasized as a key equity issue. Producing new affordable and deeply affordable housing options was identified as a key strategy to prevent displacement. Groups discussed a wide range of strategies to build more inclusive neighborhoods and add more affordable housing units in Oakland, including legalizing existing nonconforming housing units, adopting inclusionary zoning, increasing density in primarily single-family areas such as Rockridge, supporting homeowners in the construction of accessory dwelling units (ADUs), acquiring land to build new permanently affordable housing and community land trust-managed projects, and reducing the amount of discretionary review required for new housing projects. Finally, many Oaklanders described facing housing quality issues such as overcrowding and unsafe building conditions, as well as lack of maintenance resulting from landlord neglect, lack of funds for upkeep, or fear of reporting these issues. Inequitable lead paint risks were also identified as part of the 2021 Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland and Alameda County. Community-recommended strategies to address these issues included programs/grants to landlords and homeowners to make repairs; universal design improvements to allow all Oaklanders to remain in their homes as they age and to help mobility-impaired residents; and tax credits or programs to address other housing habitability concerns such as indoor air quality. Other issues and recommended strategies are summarized in Chapter 2 of the 2023-2031 Housing Element.

- **Equitable Climate Resilience.** Oakland's frontline communities are hit first and worst by environmental injustice and the climate crisis. Although these communities vary in vulnerability to climate issues such as sea level rise, flooding, and energy cost burden, many of these same people and places experience the compounded effect of other environmental justice issues such as lack of access to healthy food, affordable homes, or well-maintained parks. Several community members have emphasized that there is immediate need to implement solutions that strengthen frontline communities' climate resilience.

- **Gentrification and Displacement.** Concerns about gentrification and displacement associated with new investment were top of mind for many Oaklanders, especially in light of a significant loss (30 percent) of Oakland's Black population from 2000 to 2019. People who have generational roots in Oakland have been displaced but continue to come to Oakland to work and be with community. While displacement issues relative to housing costs are discussed in the Housing Element, community members also expressed alarm at displacement of Oakland's cultural institutions and local businesses, an essential part of Oakland's culture. Others indicated that this displacement was not new; for example in West Oakland, construction of the BART Station, post office distribution center, and freeway construction destroyed existing black businesses along the 7th Street corridor. Several community members suggested providing targeted support to existing small businesses, and establishing cultural or arts districts to prioritize, promote, and preserve Oakland's culture.

- **Cultural Spaces and Art.** Preservation of community culture and diversity was one of the most frequently referenced goals among community members. More than half of all Oakland Visioning Survey respondents mentioned Oakland's diversity—including race, culture, economics, gender, neighborhoods, and perspectives—as one of its greatest strengths, and around a quarter of respondents also mentioned the Oakland's wealth in terms of culture, including diversity in art, music and creative spirit. Focus groups and popup interview input also reflect this priority. Oakland is home to a wide array of cultures, and the City seeks to ensure that these diverse practices, expression,

and creativity are seen, respected, and supported. A central goal of environmental justice is to allow everyone to prosper in a healthy community, not by removing the differences between the city's communities but rather, by fostering welcoming environments for people of all identities and backgrounds to thrive. Community members recommended that the City promote and/or support public and community spaces, programs, and events for cultural learning and acceptance throughout Oakland, and create policies that support Oakland artists, culture makers, and organizations.

- **Illegal Dumping and Lack of Public Works Maintenance.** Community input also indicated that presence of trash, blight and illegal dumping, and infrequent trash collection and other lack of maintenance were other important environmental justice issues. Beyond being a visual eyesore, community members indicated that illegal dumping has larger public health consequences, forcing some to veer off sidewalks into dangerous roadways, raising concerns about hazardous materials, blocking creeks and worsening flooding, starting fires, and leading to general feelings of neglect and abandonment by the City. Illegal dumping and lack of waste receptacles or maintenance in public areas such as parks and sidewalks also reduce people's ability to enjoy public spaces and to access them for physical activity that promotes health and well-being. Recommended strategies included more stringent enforcement of illegal dumping, more frequent pickup in "hot spots," amnesty programs such as free disposal days for bulky and hazardous waste, and incentives for recycling, education, and community ambassador programs.
- **Pedestrian and Bicyclist Comfort and Safety.** Some community members indicated that they or someone they knew had been involved in a collision with a vehicle as a pedestrian or bicyclist. Others noted that roads in some areas are poorly maintained and suffer potholes. Potential solutions included a suite of transportation improvements, including speed bumps, more bike lanes and stations, improved public transit, street improvements to make walking and biking safer, reducing car traffic overall, and maintaining roads.
- **Need for Health-Promoting Resources in Neighborhoods.** Many community members pointed out the inequitable investment in community health assets, such as high-quality parks, clean and well-maintained public restrooms, schools, and community facilities; local retail that meets daily needs; arts and cultural facilities; affordable and quality housing; and accessible healthcare. They also pointed to inequitable distribution of health harms, such as polluting facilities, proximity to freeways or truck routes, and illegal dumping. Consistent with SB 1000 guidance and the City's racial equity goals, community members emphasized that City improvements, investments, and policies should specifically focus on prioritizing needs of communities that have suffered the most harm due to past planning decisions.
- **Tree Canopy and Green Infrastructure.** The importance of addressing equity in Oakland's urban tree canopy was emphasized, as well as the urban forest's role in mitigating negative effects of climate change. Urban forestry resources have many co-benefits including providing shade and reducing urban heat, filtration of some air pollutants, serving as visual and sound buffers, supporting natural habitats and ecosystems, and boosting economic value of neighborhoods. Tree canopy can vary substantially due to tree species, age, and maintenance. Lack of proper maintenance can hinder a tree's ability to provide its many benefits. Additionally, urban greening projects have been identified as the highest priority in the East Oakland Neighborhoods Initiative Community Plan. Recommended considerations include development of a maintenance plan for all public trees along streets and sidewalks and in parks, as well as expansion of urban greening projects in EJ Communities, and equitable implementation of the Green Stormwater Infrastructure Plan.
- **Food Access.** An absence of affordable options for healthy, nutritious food in combination with a concentration of retailers such as liquor stores and fast food outlets that do not offer such choices can lead to an unhealthy food environment that limits the ability to make healthy food choices. The high cost of food was identified as one of the biggest barriers to good nutrition. Community members voiced a need for an equitable distribution of affordable grocery stores, farmers markets, and community gardens to enable food sovereignty in all neighborhoods. Participants also spoke of need to support smaller independent grocers, smaller vendors, and other organizations who are already located in communities underserved by food retail.
- **Accountability and Community Empowerment.** While Oakland has made strides in addressing racial equity and adopting policy to remedy environmental justice issues, many community members felt like the City could do better in building and maintaining relationships with community groups. Some felt distrustful that an institution that perpetuated past harms would seek to truly turn community input into action. Others emphasized the importance of developing solutions *with* community, rather than just *for* the community, as a power-building mechanism. Solutions included active, paid partnerships with community organizations; feedback loops during outreach processes that communicate any current City limitations and identify actions to reduce/remove these barriers; and mechanisms to track how effective policies are and how they are being implemented.

2. Environmental Racism and Health Inequities in Oakland

2.1 HISTORICAL CONTEXT / ROOT CAUSES

ENVIRONMENTAL RACISM AS A HISTORICAL PROCESS

Past land use planning and zoning decisions have played a large role in shaping current environmental justice problems. Setting a course from the present to the future calls for an understanding of our current conditions, which in turn requires an understanding of historical trends in population change, land use, housing, economic opportunity, transportation, and other factors that have made Oakland the city it is today.

Oakland was founded in 1852 on unceded land of the Chochenyo-speaking Ohlone people, who were stewards of the land for thousands of years. After arrival of Spanish missionaries in the 1760s, Ohlone peoples were forced into labor camps at missions and baptized into the Catholic faith. During and after this time, Oakland expanded and urbanized at the further expense of the Ohlone people, their sacred sites, tribal cultural preservation, and tribal political status.[1] Nevertheless, this land continues to be of great importance to the Ohlone people.[2]

Disparities in social, physical, and economic environments and conditions continued in eras of industrial growth, which brought about significant change to the urban environment and increased residential segregation. Oakland was historically a destination for working people and immigrants due to the abundant industrial jobs and relatively affordable neighborhoods. Many neighborhoods often became cultural and ethnic enclaves when residents of color were barred from living in other parts of the city by segregationist policies, enforced with violence.

In Oakland, as in cities across the nation, communities of color were impacted by the 1930s, 1940s, and 1950s federal housing redlining policy, the practice of identifying majority-white areas as sound and profitable real estate investments and heavily subsidizing them through the Federal Housing Administration (FHA), while simultaneously refusing to insure mortgages in and near majority-Black neighborhoods and other communities of color. These areas were rated as “D”, or “Hazardous,” and color-coded as red on the infamous “Residential Security” maps created by the Home Owners’ Loan Corporation (HOLC). Residents of these “redlined” neighborhoods, including West Oakland and East Oakland, were denied access to credit, resulting in a cycle of disinvestment and poverty and creating the circumstances for long-term racial segregation. To prevent their own neighborhoods from being redlined, majority-white private developers, realtors, and homeowners were encouraged to write racially restrictive covenants into their deeds that further inhibited Black residents and other residents of color from moving into these areas.

Research shows that neighborhoods that were historically redlined are today more likely to suffer greater poverty, increased heat, lower life expectancy, higher incidences of chronic diseases, increased prevalence of poor mental health, and lower life expectancy at birth.[3]

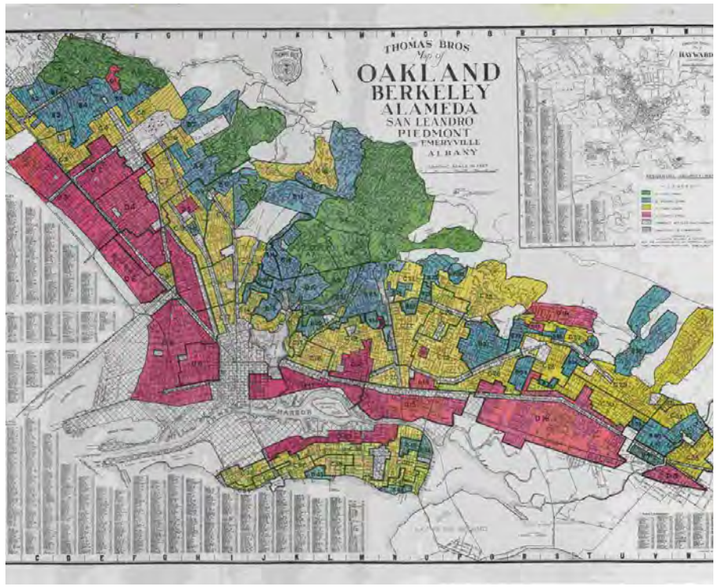
1 Mitchell Schwarzer, Hella Town: Oakland’s History of Development and Disruption, (Oakland: University of California Press, 2021).

2 Lisjan (Ohlone) History and Territory. Sogorea Te’ Land Trust. Accessed at *https://sogoreate-landtrust.org/lisjan-history-and-territory/*.

3 The Lasting Impact of Historic “Redlining” on Neighborhood Health: Higher Prevalence of Covid-19 Risk Factors (Washington, D.C.: National Community Reinvestment Coalition, 2020). *https://ncrc.org/holc-health/*

Using Redlining to Help Identify EJ Communities

The City can begin to redress the inequities brought about by discriminatory actions and practices by acknowledging the harm they have caused and perhaps more importantly, by recognizing that they continue to cause harm especially to low-income communities and people of color. For this reason, redlining is an indicator used in the SB 1000 Screening Analysis methodology to help identify EJ Communities in Oakland. Specifically, the methodology uses the grades that the Home Owners Loan Corporation assigned to various neighborhoods throughout Oakland in the 1930s to compare the places that benefited most from their grade A ("Desirable", shown in green on the image to the right) versus the areas that continue to face the repercussions of redlining (grade D, "Hazardous", shown in red on the image to the right).



Industrial growth during the World War II era further established Oakland as a hub for economic opportunity and jobs, which attracted an influx of Black and African American populations from the South (one of the waves of "Black migration"), many of whom settled in neighborhoods near their jobs, such as by the railroad in West Oakland. Following the war, federal policies like the GI Bill sponsored returning white veterans to settle into suburbs by providing low interest mortgages and loans, enabling what is known as "white flight." These same financial incentives were denied to veterans of color, and the continued practice of redlining and racially restrictive covenants further delineated economic disparity and racial segregation.[4]

In the 1950s, eminent domain, a process in which local redevelopment agencies condemned areas as "blighted" and seized properties from homeowners and tenants to facilitate demolition, severely undermined and led to drastic displacement in major centers of Black culture and community, such as West Oakland, in addition to other historic communities settled in the 19th century such as Chinatown. These communities were devasted in the 1950s and 1960s by the demolition and construction associated with freeways, Bay Area Rapid Transit (BART) facilities, and urban renewal. When neighborhoods were divided, families lost their homes, businesses closed, and neighbors left – all of which undermined a community's ability to thrive.[5]

4 Just Cities, East Oakland Displacement Status and Impacts from the BRT Project Summary: A Racial Equity Planning and Policy Justice Report for OakDOT's East Oakland Mobility Action Plan, June 2021, *https://drive.google.com/file/d/1sGCZt1uGPaFLroOm8BkGczV_vXOGsFTk/view*, accessed March 16, 2022.

5 Montojo, Nicole, Eli Moore, and Nicole Mauri. "Roots, Race, & Place: A History of Racially Exclusionary Housing in the San Francisco Bay Area." Berkeley, CA: Othering and Belonging Institute, 2019. *https://belonging.berkeley.edu/rootsraceplace#footnote197_73poucc*.

Spotlight: Urban Renewal in West Oakland

By 1958, the Oakland Planning Commission had declared that all of West Oakland was blighted. This action set the stage for the displacement and reconstruction of predominantly Black neighborhoods. Many West Oakland residents did experience poor housing conditions. However, these conditions directly resulted from systemic racism, disinvestment, and discriminatory lending practices that restricted access to home improvement and maintenance loans.[6]

In West Oakland alone, government agencies used eminent domain to build the West Oakland Bay Area Rapid Transit (BART) station, elevated tracks along 7th Street, three major interstate highways (the Nimitz/I-880, Grove Shafter/I-980, and MacArthur/I-580), and a sizeable postal facility. While the plans for the highways were designed by the State Department of Public Works, the Oakland City Council selected the exact routes. Clearing land for those projects destroyed entire blocks of homes and thriving commercial districts, displacing many residents and small business owners permanently.[7]

About 8,000 housing units were razed in West Oakland between 1960 and 1966, contributing to the displacement of nearly 14,000 low-income residents from this historic center of Black culture and community.[8]

6 Montojo, Nicole, Eli Moore, and Nicole Mauri. "Roots, Race, & Place: A History of Racially Exclusionary Housing in the San Francisco Bay Area." Berkeley, CA: Othering and Belonging Institute, 2019. *https://belonging.berkeley.edu/rootsraceplace#footnote197_73poucc*.

7 Ibid.

8 Brandi T. Summers, "Untimely Futures," Places Journal, November 2021. Accessed 02 Oct 2022. *https://doi.org/10.22269/211109*

While greater areas of East and North Oakland became open to Black, Hispanic/Latinx, and Asian families beginning in the 1950s, many of these same areas were experiencing disinvestment and deterioration of housing and public spaces, along with a massive loss of employment in nearby industrial sectors. This disinvestment led to innumerable abandoned and underutilized business properties along Oakland's main corridors, which suffered greatly as purchasing power fell and consumers, particularly wealthier white residents, went elsewhere to live and shop.

Lack of investment was Oakland's dominant economic story from the 1950s into the 1990s. Through waves of plant and store closures and redevelopment sites standing vacant for decades after demolition, the City searched for private investment wherever it could be found. Most of the major projects that were built, whether downtown high-rises or in transportation infrastructure, were led by the public sector. At the same time, disinvestment in Oakland's flatlands neighborhoods became apparent in the high levels of abandonment of single-family homes in the 1970s, deterioration of public housing developments, persistent redlining, and denial of loans or insurance in communities of color. This period of public and private disinvestment also reflected in communities' physical and social infrastructure—such as crumbling streets, under-resourced schools, lack of jobs, limited healthcare infrastructure, and increases in crime—alongside growing social unrest. Contemporary hardship and tensions escalated as serious health problems were sensationalized by the War on Drugs and the crack cocaine epidemic that disproportionately targeted Black Oaklanders.[9,10] During this period, resistance to oppression also shaped the city, and community groups born in the 1960s such as the Black Panther Party, Oakland Community Organizations (OCO), Unity Council, Intertribal Friendship House, and many others continued to organize and demand protections and equal access to jobs, housing, employment, transportation and services.[11]

Since the late 1990s, Oakland has seen an increase in real estate investment, which has had both positive and negative effects. In the years leading up to the 2008 housing crash and Great Recession, banks engaged in a process referred to as "reverse redlining" through which predatory lending practices and subprime loans were targeted in the same neighborhoods that were once marked as off-limits for borrowers.[12] This resulted in waves of foreclosures in East and West Oakland. A significant number of these foreclosed properties were then acquired by investors, and once-affordable and stable homes were flipped overnight into market-rate rentals.

An influx of private capital, partly due to efforts like the City's 10K Initiative to revitalize the urban core, has reinvigorated downtown and uptown.[13] At the same time, rising housing prices and a lack of new affordable options created waves of residential and commercial gentrification, especially in North and West Oakland and Chinatown, with a growing pattern of displacement in East Oakland.[14] Massive regional job growth, particularly in the technology sector, coupled with inadequate housing supply in other cities, sent waves of new residents to the East Bay in search of more affordable homes.[15] The impacts of the lack of regional housing supply rippled through other residential areas of the city, where communities of color faced greater vulnerability to rising housing costs than white residents.[16]

Types of Neighborhood Change: Gentrification and Displacement

The relationship between gentrification and displacement is complex.

Gentrification is a type of neighborhood change that occurs when new investments in a historically disinvested neighborhood lead to socioeconomic change.[17] When policies and community involvement adequately support the process, these investments can be a positive force of change such as more housing, increased home values for those who are able to be homeowners, and improved amenities like street trees and lighting that enhance safety and comfort in public spaces. Gentrification can also be a negative force, however, when the economic and cultural changes that come with gentrification make existing residents and local businesses unable to afford increased taxes or feel uncomfortable or unwelcome among new neighbors.

Displacement, or the forced relocation of residents and businesses,[18] can occur when lack of investment in sufficient housing in neighborhoods creates competitive pressure that leads new residents to displace existing ones rather than move into new homes. There are also different types of displacement, as explained by the Uprooted Project[19]:

- Direct displacement: Residents can no longer afford to remain in their homes due to rising housing costs or other actions like lease non-renewals, evictions, landlords not maintaining homes, etc.
- Indirect displacement: Units being vacated by low-income residents are no longer affordable to other low-income households (also known as 'exclusionary displacement').
- Cultural displacement: Changes in the aspects of a neighborhood that have provided long-time residents with a sense of belonging and allowed residents to live their lives in familiar ways.

9 King, Ryan. "Disparity by Geography: The War on Drugs in America's Cities." The Sentencing Project, 1 May 2008, *https://www.sentencingproject.org/wp-content/uploads/2016/01/Disparity-by-Geography-The-War-on-Drugs-in-Americas-Cities.pdf*

10 Fryer, Roland G. Jr., et al. "Measuring Crack cocaine and its Impact." Economic inquiry, Apr. 2006, scholar.harvard.edu/files/fryer/files/fhlm_crack_cocain_0.pdf

11 Zinn, Howard (2003). A Peoples History of the United States. Haper-Collins. P. 126-210. ISBN-0-06052842-7

12 "East Oakland Displacement Status and Impacts from the BRT Project Summary." n.d. Oakland: Just Cities. https://cao-94612.s3.amazonaws.com/documents/EOMAP-Appendix-2.pdf.

13 Ibid.

14 See generally Owens, Darrell, Discourse Lounge, "Where Did All the Black People in Oakland Go?", September 8, 2021. https://darrellowens.substack. com/p/where-did-all-the-black-people-in?utm_source=url, accessed February 21, 2022. See also City of Oakland, "Economic Trends and Prospects, Baseline Analysis for Oakland General Plan", Commute Trends and Workforce Characteristics, pp. 9-16. Access available at https:// https://cao-94612.s3.amazonaws.com/documents/Economic_Trends_Prospects_EPS_2022.06.02.pdf

15 Mitchell Schwarzer, Hella Town: Oakland's History of Development and Disruption (University of California Press, 2021).

16 "East Oakland Displacement Status and Impacts from the BRT Project Summary." n.d. Oakland: Just Cities. https://cao-94612.s3.amazonaws.com/documents/EOMAP-Appendix-2.pdf.

17 Urban Displacement Project, "What Are Gentrification and Displacement," 2021, https://www.urbandisplacement.org/about/what-are-gentrification- and-displacement/, accessed February 17, 2022.

18 Planetizen, "What is Displacement?" Planopedia, https://www.planetizen.com/definition/displacement, accessed February 21, 2023.

19 The Uprooted Project, University of Texas at Austin, https://sites.utexas.edu/gentrificationproject/gentrification-and-displacement-in-austin/, accessed December 16, 2022.

The direct and indirect displacement of residents, driven by the inequitable housing market, threatens not only households but the cultural identity and viability of existing communities. Nowhere has the impacts of these changes been more visible than on Oakland's streets, as homelessness increased 83 percent between 2017 and 2022 (from 2,761 to 5,055 individuals).[20] The Black/African American racial group has continued to be disproportionately represented, making up about 60 percent of all sheltered homeless individuals – nearly three times the proportion that Black/African Americans represent in Oakland's total population.[21] Although the individual causes for homelessness are complex, there are key structural reasons why Oakland has one of the worst homelessness crises in America, namely a catastrophic shortage of deeply affordable homes on top of salient issues including structural racism, unstable rental markets for tenants, systemic barriers to housing for the formerly incarcerated, a lack of living wage job opportunities, and inadequate mental health services.

From 2000 to 2019, Oakland lost nearly 30 percent of its Black population and significant numbers of long-time Asian communities residing in ethnic enclaves including Chinatown.[22] The COVID-19 pandemic has highlighted and exacerbated racial and economic disparities in housing security; the pandemic has also shown the public health outcomes of Oakland's housing disparities.[23] **Figures EJ-1** and **EJ-2** map the geographic change in racial and economic makeup of Oakland through time. It is noted that the definitions of race/ethnicity and measures of income have also changed to reflect social changes; these maps are limited to available data by census tract. **Figure EJ-1** shows how patterns of racial segregation have evolved, with increasing diversity along I-580, but have also maintained a majority-white concentration in the western Oakland hills and majority-non-white concentrations in the flatlands. This map also demonstrates how the makeup of communities of color have changed; majority Black neighborhoods in West and East Oakland (in blue) have turned majority Hispanic/Latinx (in orange) between 2000 and 2019, which is especially true in East Oakland. **Figure EJ-2** shows how median household income also follows a similar spatial pattern. The areas in light green represent neighborhoods with the highest income, which generally overlap with areas that have white majorities. In the same manner, areas with the lowest income shown in dark blue are generally clustered in West Oakland, San Antonio, and East Oakland. These patterns of inequity are further demonstrated by the disparity in current (2019) poverty level by race shown in **Figure EJ-3**.

20 EveryOne Home, Oakland 2022 Point-In-Time Count: Unsheltered & Sheltered Report, 2022, https://everyonehome.org/wp-content/uploads/2022/05/Oakland-PIT-2022-Infographic-Report.pdf, accessed December 16, 2022.

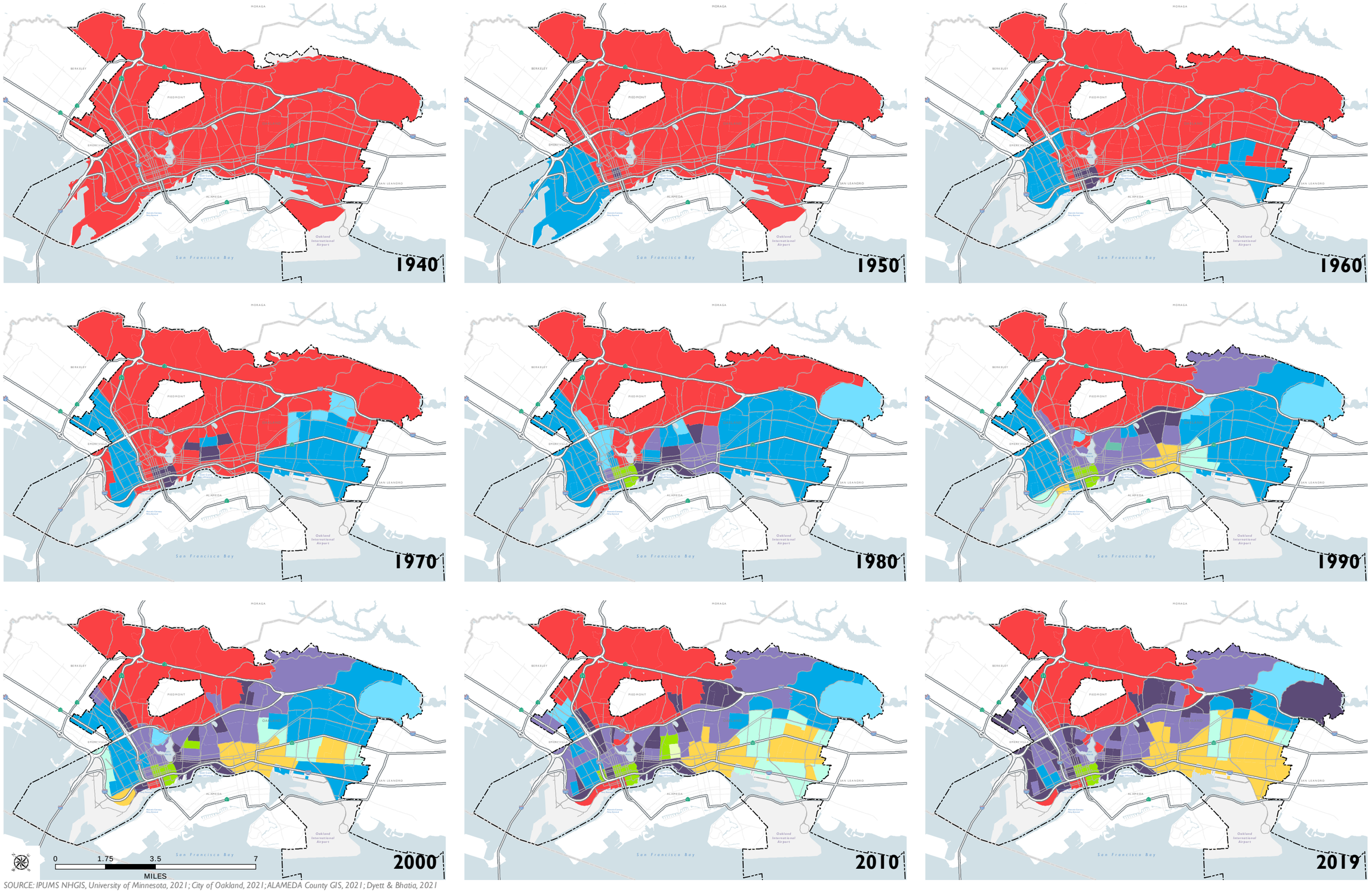
21 Ibid.

22 American Community Survey (ACS) (2014-2018); U.S. Census 2000, 2010; Urban Displacement Project, 2021.

23 "City of Oakland HCD 2021-2023 Strategic Action Plan City of Oakland Housing & Community Development Department 2021-2023 Strategic Action Plan." n.d. Accessed May 9, 2022. https://cao-94612.s3.amazonaws.com/documents/HCD.final.21-21Strategic-Plan.pdf.

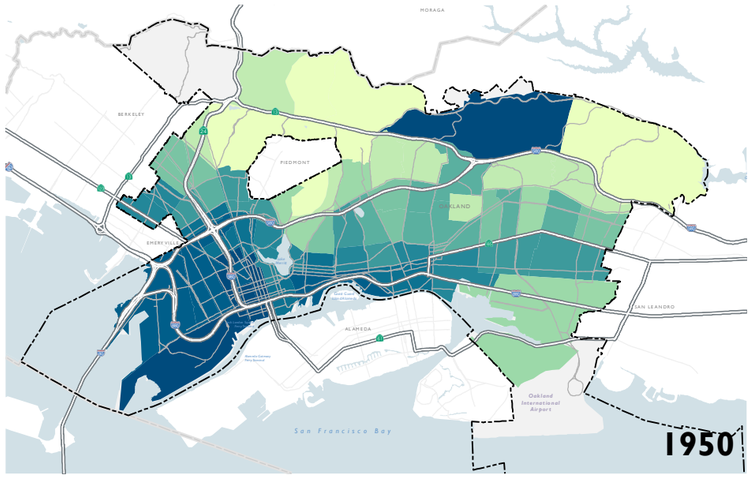
Figure EJ-1: Racial Concentration 1940-2019

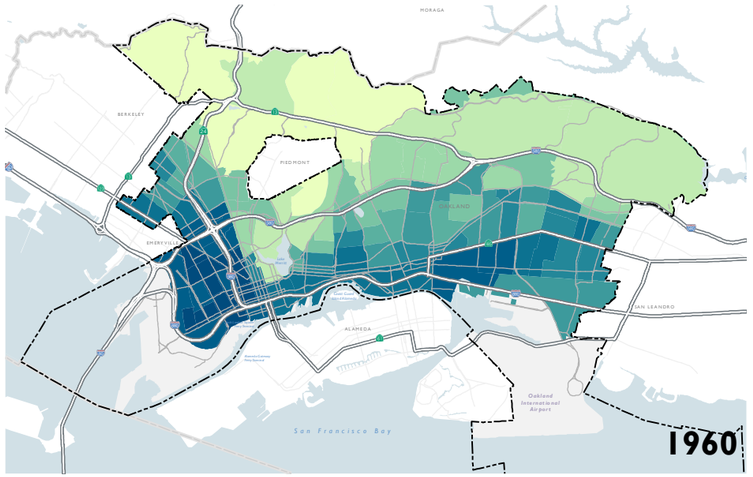
Notes: Historic Census Tracts from Decennial Census. All other features (e.g., streets, city limits) are as existing (2021). Asian/Pacific Islander and Hispanic/Latinx populations were not distinguished from "other" races until 1980, and Asian and Pacific Islander were not separated until 2000. Tracts mapped by racial plurality (majority or greatest proportion). Port of Oakland/OAK airport areas masked out from 1960 onwards as low population areas.

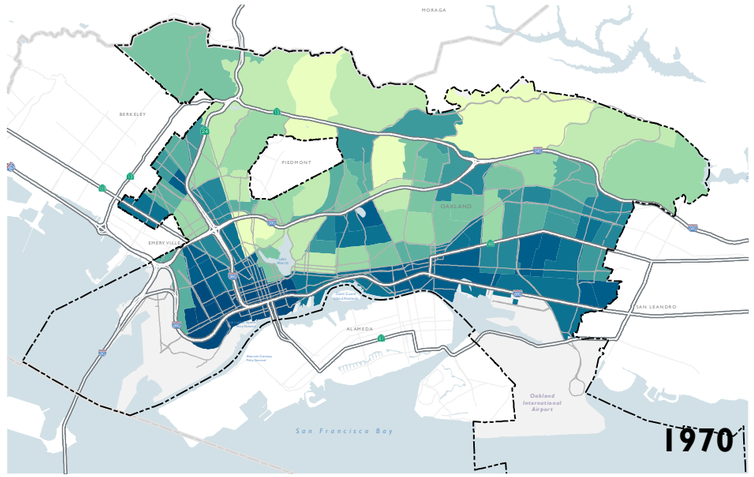


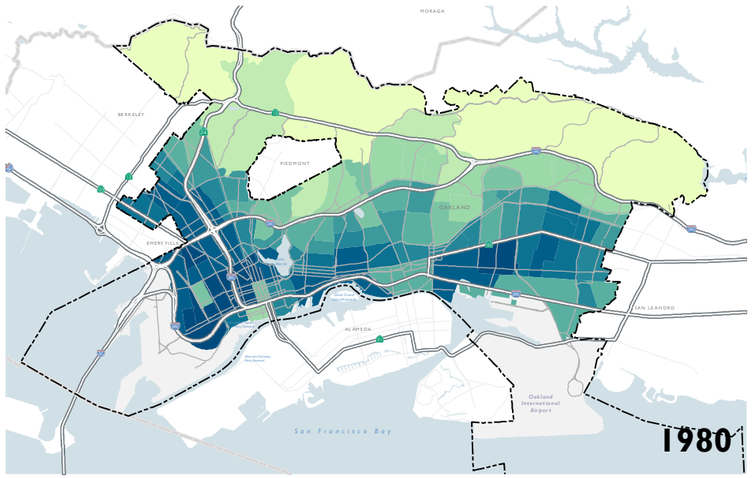
SOURCE: IPUMS NHGIS, University of Minnesota, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

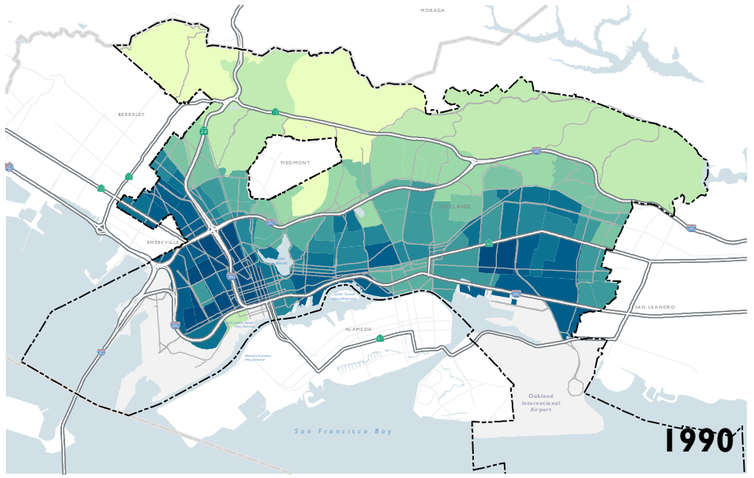
Figure EJ-2: Median Household Income 1940-2019

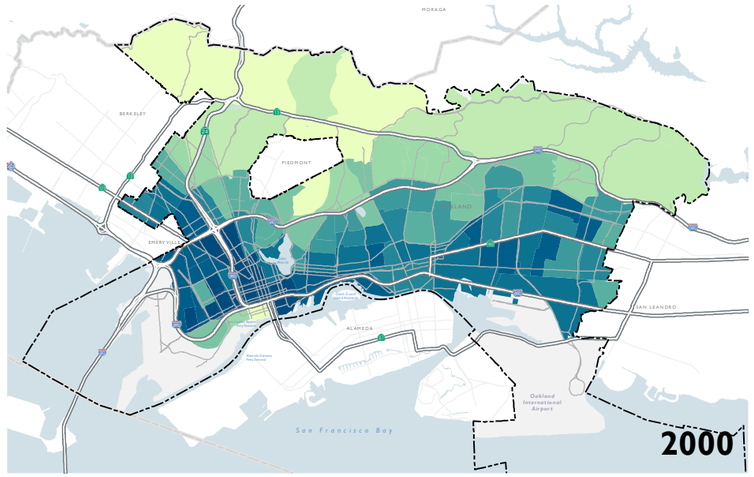


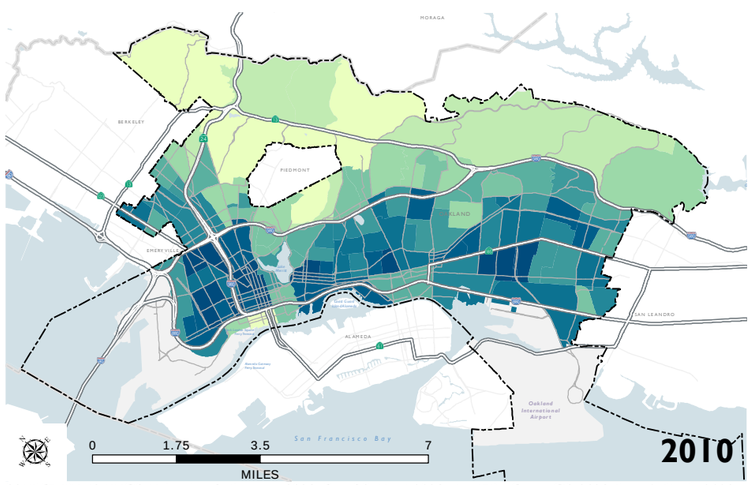


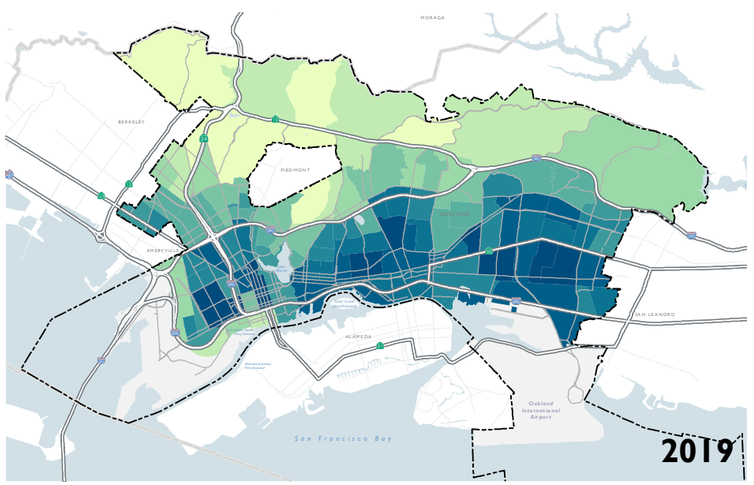












Distribution of Median Household Income*

Percentile Range

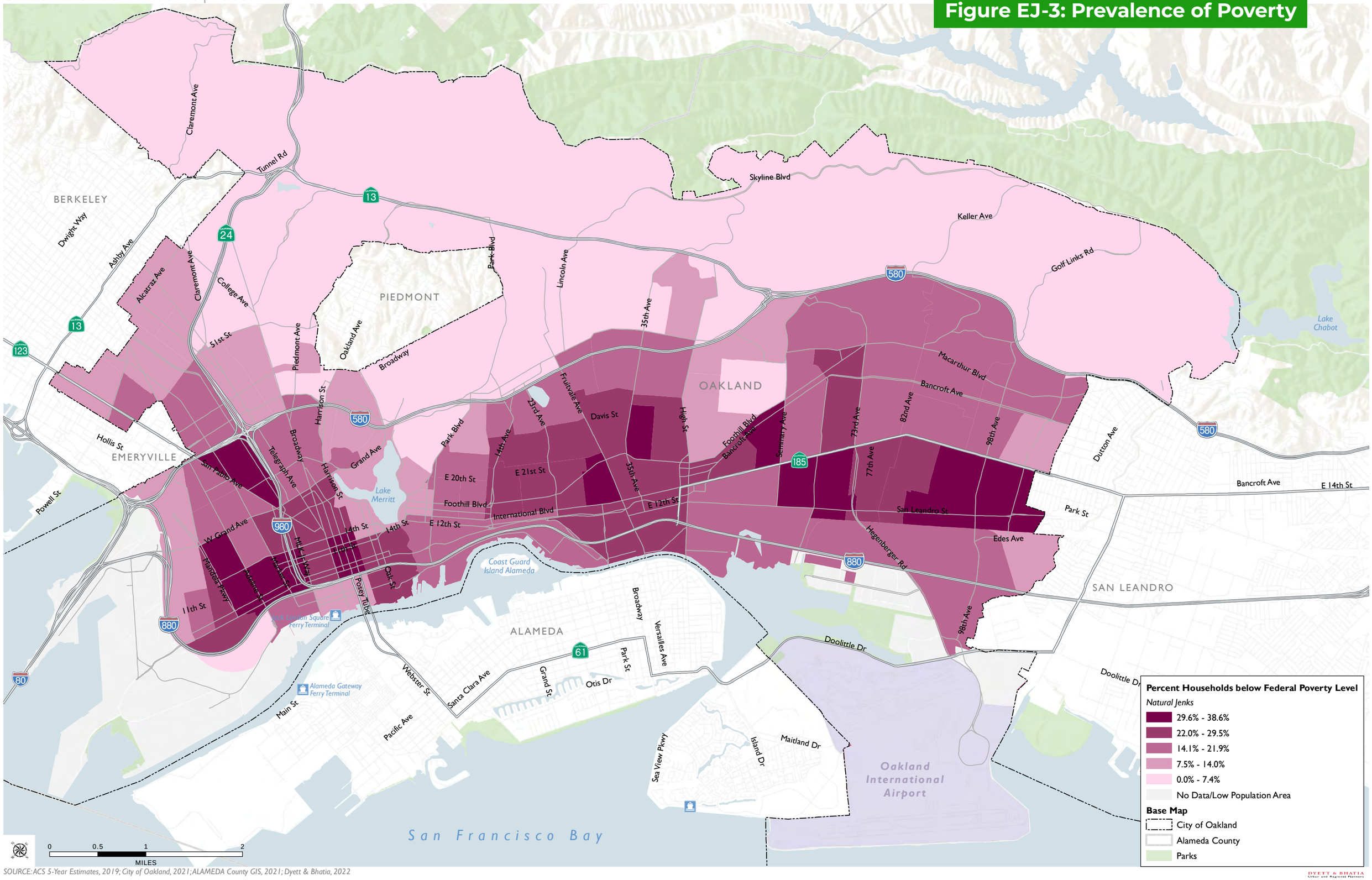
- Top 10% (Highest Income)
- 80-90%
- 70-80%
- 60-70%
- 50-60%
- 40-50%
- 30-40%
- 20-30%
- 10-20%
- 0-10% (Lowest Income)
- No Data/Low Population Area

**1960 and 1970 reflect average household (families and unrelated individuals) incomes rather than median due to data limitations.*

SOURCE: IPUMS NHGIS, University of Minnesota, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Notes: Historic Census Tracts from Decennial Census. All other features (e.g., streets, city limits) are as existing (2021). Port of Oakland/OAK airport masked out from 1960 onwards as low population areas.

Figure EJ-3: Prevalence of Poverty



SOURCE: ACS 5-Year Estimates, 2019; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

2.2 LAND USE AND HEALTH

HEALTH INEQUITIES

"There is increasing recognition that the environments in which people live, work, learn, and play have a tremendous impact on their health. Re-shaping people's economic, physical, social, and service environments can help ensure opportunities for health and support healthy behaviors. [Because] health and public health agencies rarely have the mandate, authority, or organizational capacity to make these changes, … responsibility for the social determinants of health falls to … housing, transportation, education, air quality, parks, criminal justice, energy, and employment agencies."

*- **Adewale Troutman and Georges C. Benjamin**, American Public Health Association*

Health in All Policies: A Guide for State and Local Governments, 2013

Health inequities are differences in health outcomes "that are a result of systemic, avoidable, and unjust social and economic policies and practices that create barriers to opportunities."[24] As described the previous section, a history of structural racism has contributed to persistent inequities that are exacerbated by an increasing gap in social and economic inequalities.

Varying levels of access to opportunities and resources across neighborhoods, combined with disproportionate exposure to threats such as air pollution, soil contamination, traffic congestion, substandard housing, and increased social and generational trauma, comprise what SB 1000 refers to as "unique or compounded health risks." To a large extent, land use decisions determine how both environmental health threats and public health resources are distributed. For example, adjacent incompatible land uses, such as industrial and residential, can expose residents to higher levels of pollution and noise. Such proximity can increase the risk of asthma or other respiratory diseases, while constant, excessive noise can increase stress, anxiety, depression, high blood pressure, heart disease, and more.

24 Rudolph, L., Caplan, J., Ben-Moshe, K., & Dillon, L. (2013). Health in All Policies: A Guide for State and Local Governments. Washington, DC and Oakland, CA: American Public Health Association and Public Health Institute.

What are "unique or compounded health risks"?

A "health risk" is a hazard to human health. Some hazards (such as lead, asbestos, floods, and heat waves) may be dangerous enough to harm human health on their own. Other hazards are less acute on their own but become harmful when they coincide with other health risks. This is a compounded health risk.

Today, people are often exposed to multiple health risks, such as asbestos and air pollutants, while experiencing poverty and living in neighborhoods with poor access to fresh and affordable foods. These overlapping conditions are experienced more often by EJ Communities. The inequitable distribution of resources that promote health, coupled with the concentration of environmental pollution and other hazards, is what SB 1000 refers to as the unique or compounded health risks that impact EJ Communities.

The Link Between Racism and Poor Health Outcomes

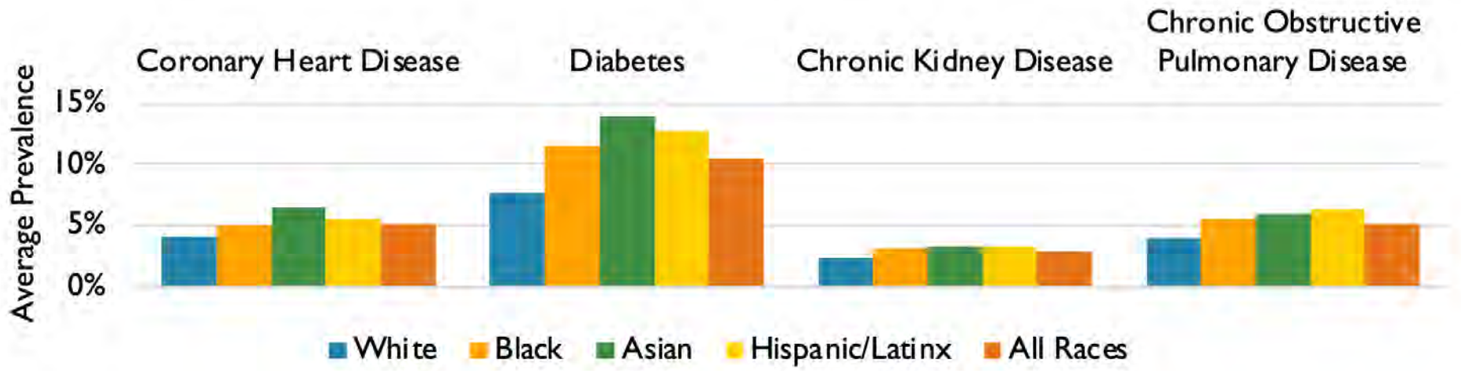
On June 7, 2022, the Oakland City Council adopted Resolution 89249 officially recognizing and declaring that "racism is a public health crisis in the City of Oakland and throughout the United States and the world." The Resolution also accentuated the City's commitment to address and alleviate the ongoing impacts of racism. In doing so, the City of Oakland joined the Centers for Disease Control and Prevention, the American Medical Association, and the American Public Health Association in explicitly recognizing racism as a threat to public health.

The Resolution reaffirms a growing body of research on the problematic relationship between systemic racism and the social determinants of health. Structural racism shapes the distribution and quality of the social determinants of health, such as housing, neighborhood conditions, income, employment, public safety, and education, which significantly impact individual and community health. Thus, racial and ethnic health disparities are primarily due to inequities in exposure to environmental risk factors and access to health-promoting resources rather than biological differences between racial groups.[25]

25 Introduced by City Attorney Barbara J. Parker, City Administrator Edward D. Reiskin, President Pro Tem Sheng Thao, and Councilmembers Carroll Fife, Treva Reid, and Loren Taylor. Resolution Declaring Racism a Public Health Crisis and Reaffirming the City's Commitment to Advancing Racial Equity., Resolution Number 89249 § (2022). https://oakland.legistar.com/LegislationDetail.aspx?ID=5648415&GUID=3302DDAA-B81D-44B8-A3FC-CA542C19B1D9&Options=&Search=.

As described in Section 2.1, a history of discriminatory policies and land use decisions has also shaped who lives where in the city, creating differences in health outcomes that are correlated with (or follow similar patterns to) race. **Chart EJ-1** shows how white populations have a much lower average rate of coronary heart disease, diabetes, chronic kidney disease, and chronic obstructive pulmonary disease than Black, Asian, and Hispanic/Latinx populations. In fact, the average incidence of these health outcomes for white people is lower than the population-wide average, while Black, Asian, and

Chart EJ-1: Citywide Differences in Health Outcomes by Race, 2020



Hispanic/Latinx populations experience higher rates than the citywide average. These findings are also supported by data from the Alameda County Public Health Department (ACPHD), which show that there are racial disparities in health outcomes for cancer-related deaths, rate of low-birth-weight infants, and life expectancy at birth.

These factors, along with others, affect life expectancy overall based on geography: data from the Alameda County Public Health Department (ACPHD) show a nearly 20-year difference between the Oakland census tract with the highest and lowest life expectancy at birth. As shown in **Figure EJ-4**, tracts in East Oakland generally have lower life expectancies, and the tracts with the lowest life expectancies are Fitchburg/Hegenberger and Brookfield Village, both at less than 72 years – more than 10 percent lower than the citywide average.

HOW PLANNING AND LAND USE IMPACT HEALTH

Land use regulation is an essential determinant of health because it shapes the physical environment of neighborhoods, and in turn, can expand or restrict access to opportunities for everyday physical activity, healthy foods, economic growth, social connections, and more. Further, the protection of residents' public health, safety, and welfare is the legal basis for land use regulation.

The section below summarizes how land use planning and the built environment influence health outcomes.

Reducing Pollution Exposure, Improving Air Quality

In virtually every community, people may be exposed to pollution daily through direct contact with air, food, water, and soil contaminants. This is especially true for those who live near highly polluting land uses. Certain types of pollution exposure disproportionately impact those with higher risk factors such as age or underlying health conditions. Socioeconomic conditions that increase stress, decrease access to health care, or make healthy living difficult further compound the adverse health effects of pollution. In times of growing wildfire threat, smoke is another burden added to existing pollution.

Exposure to multiple sources of pollution, such as freeway traffic, the Port, and industrial sites, disproportionately burden many EJ Communities in Oakland. These communities are also on the front lines facing the challenges associated with adapting to the impacts of climate change. Identifying the sources, types, and quantities of pollution across Oakland neighborhoods, as well as their change over time, is essential to determine the best solutions.

Promoting Safe and Healthy Homes

Many homes in Oakland, particularly in lower-income areas where renovations have either not occurred or are substandard, are likely to contain lead-based paint, mold, mildew, asbestos, unvented biproducts of methane ("natural") gas combustion, and other toxic materials. These conditions put adults and children at risk of conditions including lead poisoning and asbestosis, which can result in lifelong detrimental health impacts. Despite the risks, many low-income families cannot afford to move out of or remediate these conditions.

Housing location is as impactful as structural conditions. For example, proximity to pollution sources, such as freeways or industrial facilities, worsens indoor air quality. In addition, some housing may not have adequate access to economic opportunities or public services and facilities.

Promoting Healthy Food Access

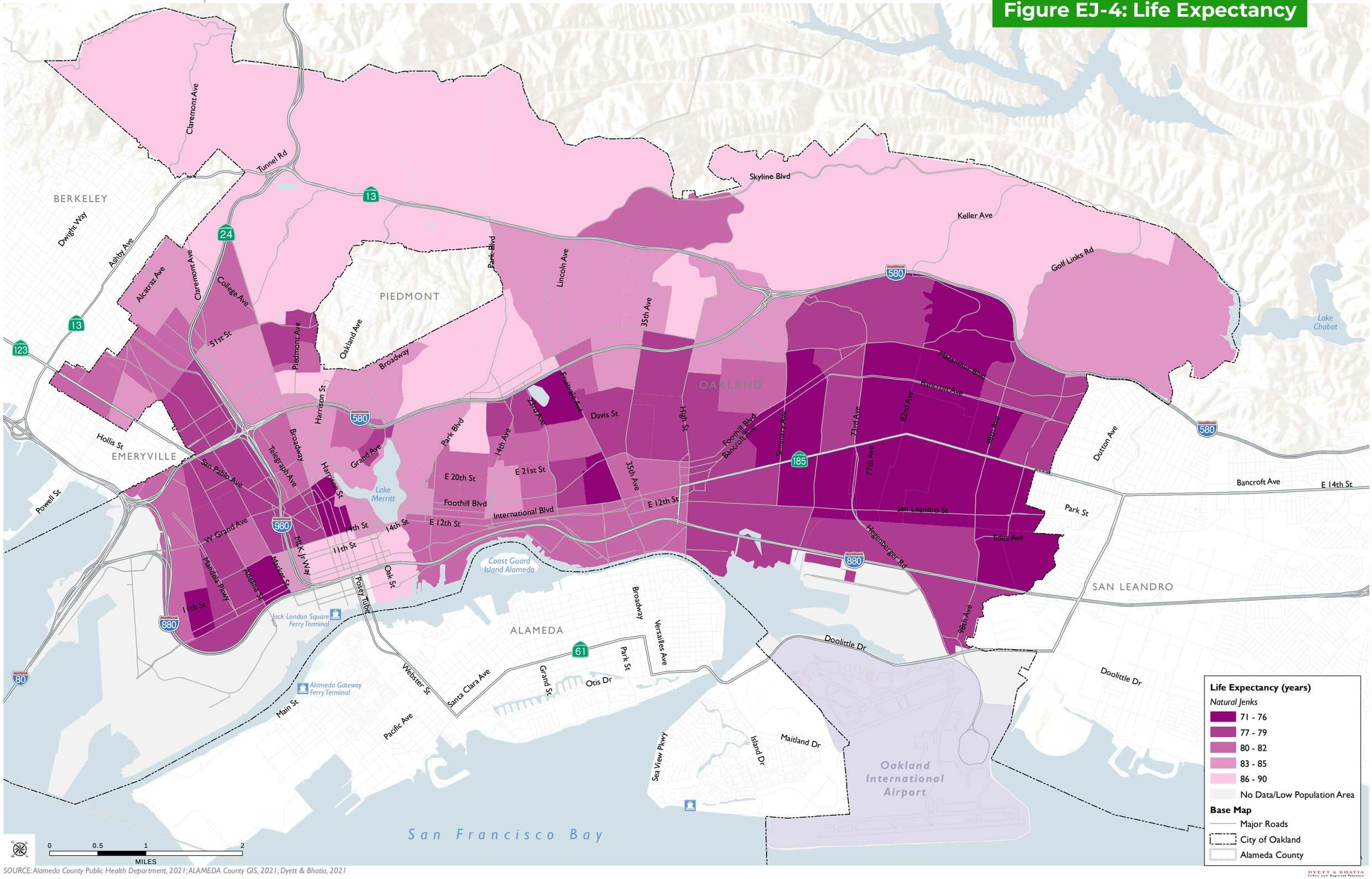
Food access refers to a person's ability to access nutritionally adequate, culturally appropriate, and affordable food. Having a sufficient income to purchase healthy food and the proximity or ability to travel to a food source that offers nutritionally adequate, culturally appropriate, and affordable food are essential elements of equitable access.

Promoting Physical Activity

Differences in the quality of and access to safe and well-maintained places to walk, play, and exercise in Oakland's communities lead to a range of adverse health outcomes. Land use choices that do not consider how far jobs, parks, schools, healthy food resources, and other community facilities are from neighborhoods can result in increased reliance on cars and less active transportation, which in turn contributes to higher rates of diabetes, obesity, and heart disease.

Environmental justice policies must promote physical activity and address the equitable distribution of active transportation (i.e., pedestrian and bicycle) networks and the distribution of parks, open spaces, and urban green spaces.

Figure EJ-4: Life Expectancy



SOURCE: Alameda County Public Health Department, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Promoting Public Facilities

Many EJ Communities in Oakland do not have adequate access to a wide range of essential facilities such as libraries, health centers, or parks. If the facilities exist, they may be neglected or in poor conditions, creating safety hazards.

SB 1000 refers to "public facilities" as "public improvements, public services, and community amenities." These may include transit facilities, public restrooms, parks, open spaces, health centers and clinics, schools, daycare centers, libraries, museums, community centers, community facilities, and recreational facilities (such as senior or youth centers).

Civic Engagement/Reducing Barriers to Inclusive Engagement and Participation

Ensuring that all community members—especially those most impacted by environmental pollution and other hazards—can meaningfully participate in any civic decision-making process is key to planning for environmental justice.

Creating accessible and culturally appropriate opportunities for low-income, underrepresented, and linguistically isolated stakeholders to engage in local decision-making will help identify and resolve EJ issues.

Prioritizing Improvements and Programs in EJ Communities

Environmental justice seeks to improve the environmental health of those most harmed by pollution burdens by intentionally investing in the most impacted communities to create opportunities for their residents to live long, healthy lives.

EJ Communities may have specific needs requiring singular actions to ensure that existing conditions are improved and not exacerbated. In addition, effective prioritization would ensure that policies and programs benefiting EJ Communities are implemented promptly.

Lastly, prioritizing improvements and programs for EJ Communities may also help the City access public funding dedicated to benefitting EJ Communities.

2.3 IDENTIFYING ENVIRONMENTAL JUSTICE COMMUNITIES

PURPOSE AND DEFINITION

Environmental Justice (EJ) Communities (referred to as "disadvantaged communities" in SB 1000) are low-income areas that are disproportionately impacted by environmental pollution and other hazards that can lead to adverse health effects. EJ Communities are eligible for special funding considerations, as well as targeted environmental justice efforts and investments. EJ Communities should also be recognized by the City and uplifted in order to equitably allocate opportunities and resources.

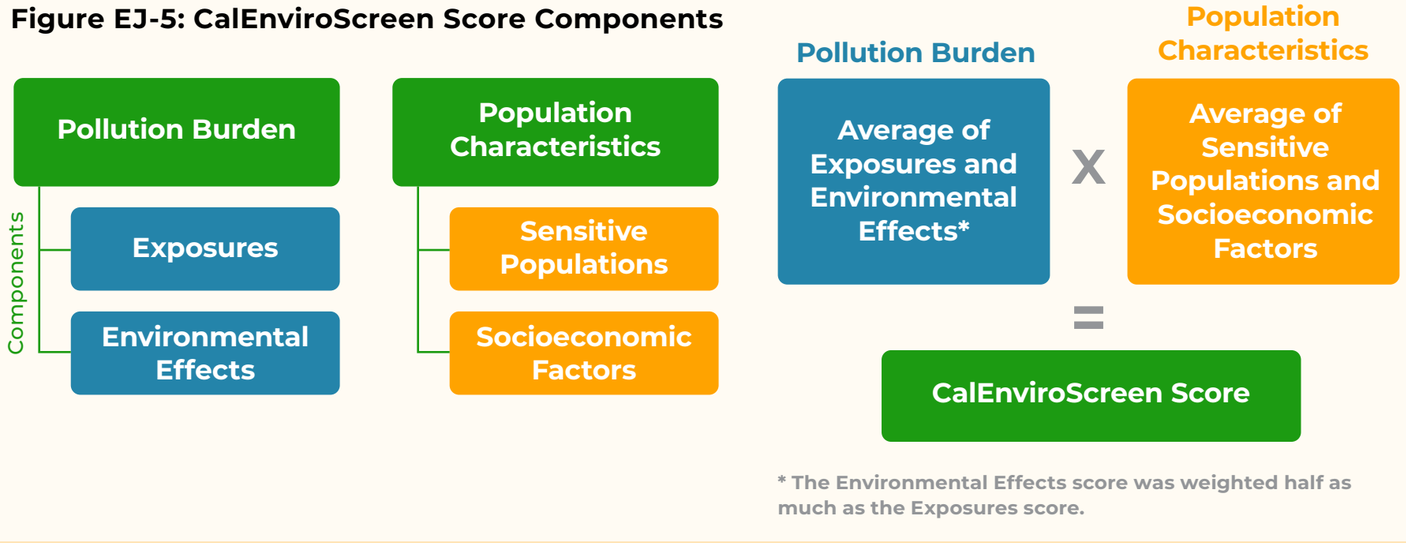
State law (SB 1000) requires jurisdictions to identify EJ Communities. This can be as simple as identifying the census tracts that the State designates pursuant to SB 535, which relies on the CalEnviroScreen methodology developed by the California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA). Alternatively, local jurisdictions have the option to refine this process using a more locally responsive methodology such as by including local and hyperlocal datasets. Oakland has chosen to take this second approach to identifying EJ Communities.

CalEnviroScreen

The California Communities Environmental Health Screening Tool, or CalEnviroScreen, is a mapping tool developed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) to help identify California communities that are disproportionately burdened by multiple sources of pollution. Last updated in October 2021, the methodology currently uses 21 indicators measuring cumulative pollution burden and population characteristics that make communities particularly vulnerable to pollution. As illustrated below, each of the indicators fall under one of four components that are grouped, weighted, and combined to calculate the final CalEnviroScreen score.

The overall CalEnviroScreen score is often used to describe the interaction between cumulative pollution burden and population vulnerability, but each of the indicators that make up the score are also important pieces of information. Some of these topics are mapped and discussed in this Element to show how individual EJ issues affect communities throughout Oakland.

Figure EJ-5: CalEnviroScreen Score Components



* The Environmental Effects score was weighted half as much as the Exposures score.

METHODOLOGY

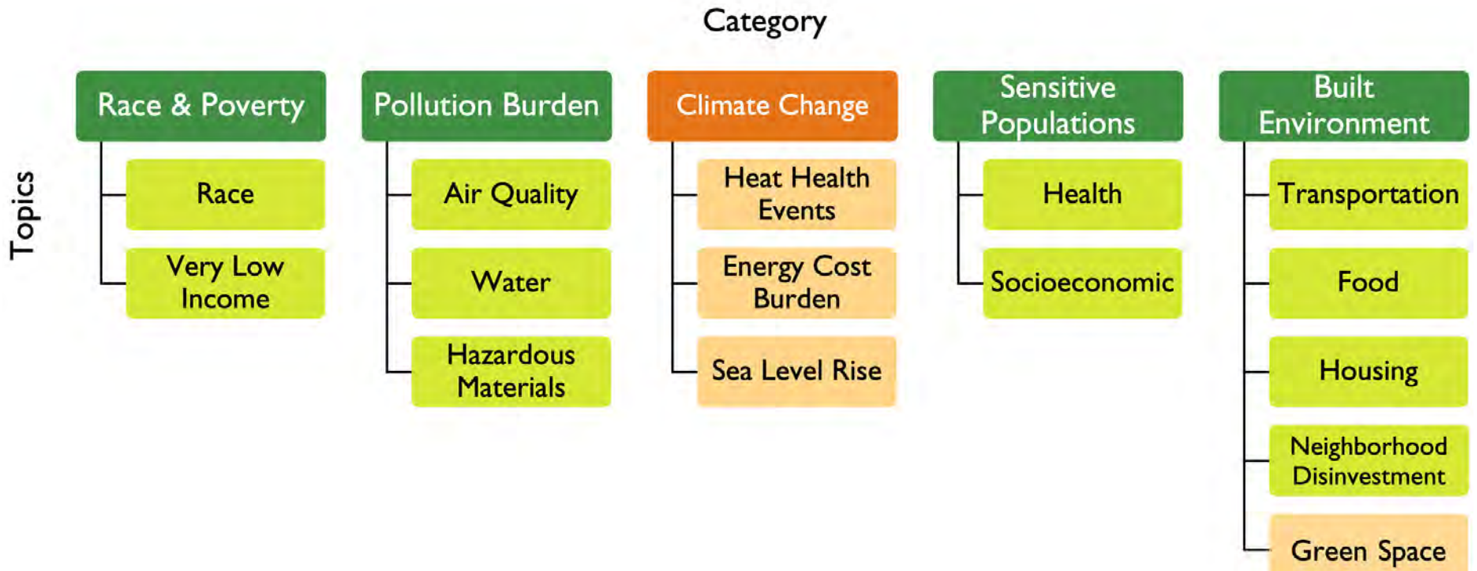
[Note: This section has been written from the perspective of the final EJ Element. The EJ Communities Screening methodology will continue to be receptive to feedback gathered during the Public Review Draft period, and this section will be updated as the resulting EJ Communities Map is updated.]

The first step in the process of identifying and mapping Oakland's EJ Communities began with the EJ Baseline Report. In line with State law requirements and objectives, the EJ Baseline Report included a preliminary screening analysis that evaluated whether low-income areas are disproportionately affected by environmental pollution and other hazards that can lead to adverse health effects, exposure, or environmental degradation. It does this by broadly analyzing possible disproportionate burdens according to all topic areas required by SB 1000. The screening analysis also considers issues unique to Oakland, such as illegal dumping, and issues not reflected in CalEnviroScreen, such as local vulnerability to climate change and redlining.

As mentioned, the preliminary screening analysis combined a series of indicators, or quantitative metrics that evaluate environmental justice issues, to identify disproportionate impacts across each of the eight SB 1000 topic areas: (1) pollution exposure, (2) public facilities, (3) food access, (4) safe/sanitary homes, (5) physical activity, (6) unique/compounded health risks, (7) civic engagement, and (8) prioritization of environmental justice communities' needs. From there, each of the indicators were scored using a methodology that ranks all 113 census tracts in the City from highest (1.00, representing the most burdened) to lowest (0.00, representing the least burdened). This is referred to as a "percentile ranking" because the relative rank of each tract corresponds with a composite score on a scale of 0.00 (0 percent, or 0th percentile) to 1.00 (100 percent, or 100th percentile). By calculating the relative ranks/scores, this methodology is suitable for highlighting the places that are comparatively most burdened by environmental justice issues in the City.

The preliminary methodology from the EJ Baseline Report used 50 indicators grouped into four categories: race and poverty, pollution burden, sensitive populations, and built environment. Each category is made up of two to four topics, as illustrated in green below. Revisions to the preliminary methodology are shown in orange and are discussed in the following section.

Figure EJ-6: Structure of EJ Communities Screening Indicators



Note: Climate Change was a topic under the Pollution Burden category in the preliminary methodology but has been revised as a separate category in the updated methodology.

Individual indicator scores were calculated using the percentile ranking methodology described above. Topic scores are calculated from the sum of the individual indicators that make up the topic. For example, the Water topic is comprised of the Groundwater Threats and Impaired Water Bodies indicators, which are added together and translated into another percentile score for Water. The same process is repeated at the topic-level to calculate category scores, and category scores are combined using this method to calculate the overall composite score. In other words, each level of the hierarchy "rolls up" to the final composite score. Finally, this score was used to identify the top 25 census tracts with the highest cumulative burden scores as potential EJ Communities in the EJ Baseline Report.

An initial REIA assessed this methodology, highlighted gaps in the analysis, and provided recommendations for improvement. The final methodology used to identify EJ Communities in this Element has consequently been refined based on these recommendations, including the removal, addition, and adjustment of indicators to better align them with a focused set of selection guidelines, including the following considerations:

- How well does the indicator measure an SB 1000 topic, such as health disparities?
- Does the indicator/metric reflect community priorities for change?
- Is the indicator actionable, and can City policy directly or indirectly impact it?
- Is the data currently available?

The final methodology includes 53 indicators, maintaining many of the same categories and topics as the preliminary screening analysis. Since the Baseline Report, the following changes have been made to the set of indicators which include revisions in response to REIA recommendations:

- The following indicators have been replaced:
  - **Low-Income Area Indicators.** The preliminary screening analysis included low-income area indicators that aligned with State definitions of "low-income areas." These categorical indicators undermined the percentile ranking system used to compare Oakland's census tracts because of the limited number of categories. In other words, areas with similar median household incomes all received the same score even if the proportion of low-income households differed. The new low-income indicator was created to better illustrate the concentration of low-income households in each census tract. The new indicator measures the percentage of households making less than 30 percent of the U.S. Department of Housing and Urban Development (HUD) Area Median Family Income (HAMFI).[26]
  - **Asthma Indicators.** The preliminary analysis included two indicators for asthma: a "Pediatric Asthma Attributable to Nitrogen Dioxide (NO2)" indicator and a "Rate of Adult Asthma" indicator. The former indicator was sourced from the West Oakland Environmental Indicators Project (WOEIP) and Environmental Defense Fund (EDF) partnership studying hyperlocal air quality in West Oakland.[27] The latter indicator was sourced from the National Centers for Disease Control and Prevention (CDC) PLACES dataset. To more comprehensively capture the health impacts of air pollution on asthma outcomes for all ages, the updated analysis replaced these two indicators with "Asthma Emergency Department Visits" data from CalEnviroScreen (version 4.0). It is noted that hyperlocal data is used in the screening analysis when the data is currently available and complete for the entire city. The indicator "Mortality Attributable to NO2" (within the Health topic) is one such hyperlocal indicator.
  - **Urban Heat Island Indicators.** The preliminary screening analysis included an "Urban Heat Island Index" indicator developed by California Environmental Protection Agency (CalEPA) in 2015. To use a more locally specific dataset for a period relevant to the 2040 General Plan, the updated analysis replaced this with an indicator on "Projected Average Maximum Temperature during Future Heat Health Events" from the California Heat Assessment Tool (CHAT). The CHAT was developed as part of California's Fourth Climate Change Assessment published in 2018. The new indicator is a more understandable metric over which the City has direct influence through changes to the built environment.
  - **Park Access.** The preliminary analysis measured low park access as the percentage of population that is not within a 10-minute walking distance of a park. This indicator was revised to account for updated information regarding park access such as including regional parks and removing parks that are closed or not publicly accessible. In addition, the updated indicator is more spatially precise because it measures the number of housing units by parcel that are located outside a 10-minute walking distance of publicly accessible, open parks instead of estimating the percentage of population by census block group. See Appendix A for full data dictionary and more information about data sources.
- The following indicators have been added:
  - **Proximity to Industrial Zones.** Represents how close certain communities live to industrially zoned areas, which are common sources of pollution.
  - **Proximity to Farmers' Markets.** Measures how far communities live from farmers' markets, which can be an alternative source of food as well as a cultural asset through its function as a community gathering space.
  - **Proximity to Existing Community Gardens.** Measures distance to the closest community garden, which not only serves as a local food source but also helps provide access to green spaces in the city.
  - **Energy Cost Burden.** Measures how much of their income a household spends on energy costs. It represents vulnerability to the impacts of climate change, which can increase energy costs such as greater need for air conditioning as temperatures increase.
  - **Extreme Commutes.** Measures the percentage of workers whose commutes are 90 minutes or longer. It represents a low-level of jobs-housing fit (lack of affordable housing near jobs) as well as increased transportation burden.
  - **Incomplete Plumbing or Kitchen Facilities.** Measures the percentage of households that lack complete plumbing or kitchen facilities. Both of these indicators are used by HUD as a proxy for substandard housing conditions.
  - **Free or Reduced Price Meals (FRPM).** Measures the proportion of students enrolled at each school receiving FRPM, representing food insecurity.
- The following indicators and topics have been restructured:
  - **Redlining.** The Redlining indicator, previously under the Neighborhood Disinvestment topic of the Built Environment category, has been moved to the Race topic in the Race and Poverty category. Because the Race topic has fewer indicators than Neighborhood Disinvestment contributing to its score, moving Redlining into Race places greater weight to the indicator – meaning that it has more impact on the overall composite score.

26 Every year, HUD sets income limits that determine eligibility for assisted housing programs such as Section 8 Housing Choice Voucher. These income limits are based on HUD's estimates for Median Family Income and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

27 Hyperlocal data used in this study uses measurements taken by a car equipped with an air monitoring sensor that was driven along certain roads in West Oakland, East Oakland, and freeways in Oakland in 2017. Due to data gaps for areas that were not included in the routes (such as the Oakland hills), citywide comparisons cannot be made for this EJ screening analysis.

- **Climate Change.** The Climate Change topic was promoted to a category, independent of the Pollution Burden category. The methodology now accounts for five distinct, equally weighted categories rather than four.
- **Green Space.** The indicators for Park Access and Lack of Tree Canopy were grouped into a new topic, outside of the Neighborhood Disinvestment topic, but still part of the Built Environment category.
- **Toxic Releases.** This indicator was moved from the Hazardous Materials topic to the Air Quality topic (both within the Pollution Burden category) after closer review of the CalEnviroScreen 4.0 measure for toxic releases from facilities, which measures the extent to which facilities that make or use toxic chemicals can release these chemicals into the air.
- **Lead Exposure.** This indicator was moved from the Air Quality topic (Pollution Burden category) to the Housing topic (Neighborhood Disinvestment topic, Built Environment category) after closer review of the CalEnviroScreen 4.0 measure for children's lead risk from housing, which estimates the percentage of low-income households with children in older housing structures that have a higher likelihood of containing lead-based paint hazards.

Other revisions made in response to REIA recommendations include "flipping" some indicators, including Life Expectancy, Median Household Income, Active Commutes, and Community Facilities so that they measure negative outcomes. **This means that higher scores indicate greater burden/impact for all indicators.** Additionally, the evictions indicator was revised to measure the number of evictions per renter rather than for all residents to better control for areas that are predominantly owner-occupied.

A few indicators were removed entirely from the EJ Communities screening methodology: Distance to Healthcare Facilities and Lack of Vehicle Ownership. Distance to Healthcare Facilities was omitted because of the complexity of factors that contributed to its anomalous outcomes. In particular, tracts with the farthest distances to healthcare facilities were predominantly located in the Oakland hills, which tend to have higher median incomes, less populations of color, and lower rates of negative health outcomes. Rather, the geographic distribution of low-density neighborhoods increases distances to services such as healthcare facilities that are generally located closer to civic centers like Downtown. Moreover, inequitable access to healthcare is often impacted by financial rather than geographic barriers. For example, mapping lack of health insurance generally aligns with patterns of poor health outcomes (according to the CDC's PLACES dataset), both of which have higher values in lower-income areas despite nearby health facilities. Similarly, the Lack of Vehicle Ownership indicator was initially revised to measure households that do not own two or more vehicles (i.e., own zero or only one vehicle) to help account for voluntary lack of vehicle ownership, which tends to occur in places well-served by transit such as Downtown; however, this metric was ultimately removed due to its interdependence with transit access and in light of the City's climate objectives to reduce reliance on driving. Nevertheless, inclusion of certain indicators over others does not preclude them as issues that should be considered in the EJ Element. The Element explores a robust range of topics that are all assessed in combination with the findings of the EJ Communities mapping process. Ultimately, this approach allows the EJ Element to serve as the keystone and guiding resource for integrating environmental justice in the General Plan, especially for elements that will be prepared in subsequent phases (as noted in Section 1.1).

After calculating scores for all 53 indicators and combining these into the topic, category, and overall composite score, criteria and cutoff thresholds were applied to determine which census tracts are formally identified as EJ Communities. These criteria and thresholds have been informed by the REIA. Similar to the CalEnviroScreen methodology, which identifies the most impacted communities as those in the top 25th percentile of census tracts statewide, the EJ Baseline Report identified preliminary EJ Communities as the top 25 highest-scoring census tracts in Oakland (corresponding to the top 22nd percentile in the city) by overall composite score. Community input voiced concerns that this initial approach did not capture enough areas to reflect the on-the-ground conditions and lived experiences of the most impacted and burdened communities in the city. Based on this feedback and recommendations from the REIA, the number of identified EJ Communities has increased from 25 census tracts to 48 census tracts, based on the following, in order of consideration:

1. Is the census tract among the top 25th percentile of overall composite scores (i.e., greater than or equal to 0.75)?
2. Is the census tract among the top 10th percentile of any of the category scores (i.e., scoring 0.90 or higher for Race/Low Income, Pollution Burden, Climate Change, Sensitive Population, or Built Environment)?
3. Is the census tract designated as a Disadvantaged Community per SB 535?

If any of these criteria are met, the census tract is included in the final list of EJ Communities, presented in the next section.

RESULTS

As summarized in **Table EJ-2**, there are 48 total census tracts that have been identified as EJ Communities in the City of Oakland: 29 are in the top 25th percentile by composite score, 12 additional census tracts are in the top 10th percentile of any one of the category scores, and seven additional census tracts have lower scores, but are designated by CalEPA as SB 535 Disadvantaged Communities (as of May 2022). These census tracts are mapped on **Figure EJ-7**.

Among EJ Communities, the top contributing category is Sensitive Populations, for which there are 26 census tracts that score among the top 25th percentile, and the average score is 0.74. Meanwhile, the individual indicators that have the greatest number of EJ Communities scoring in the top 25th percentile include Very-Low Income (26 tracts, 0.734 average), Proximity to Industrial Zones (26 tracts, 0.729 average), and Lack of Health Insurance (23 tracts, 0.731 average).

While the purpose of the screening tool is to identify the most cumulatively burdened census tracts, each indicator on its own reveals geographic disparities. Each section of this Element lists the neighborhoods (by census tract) that score in the top decile for related indicators, and EJ Communities included among these neighborhoods are prioritized for related City action and investment.

A full table of scores for each indicator is included in **Appendix A**.

Table EJ-2: Environmental Justice Communities Summary

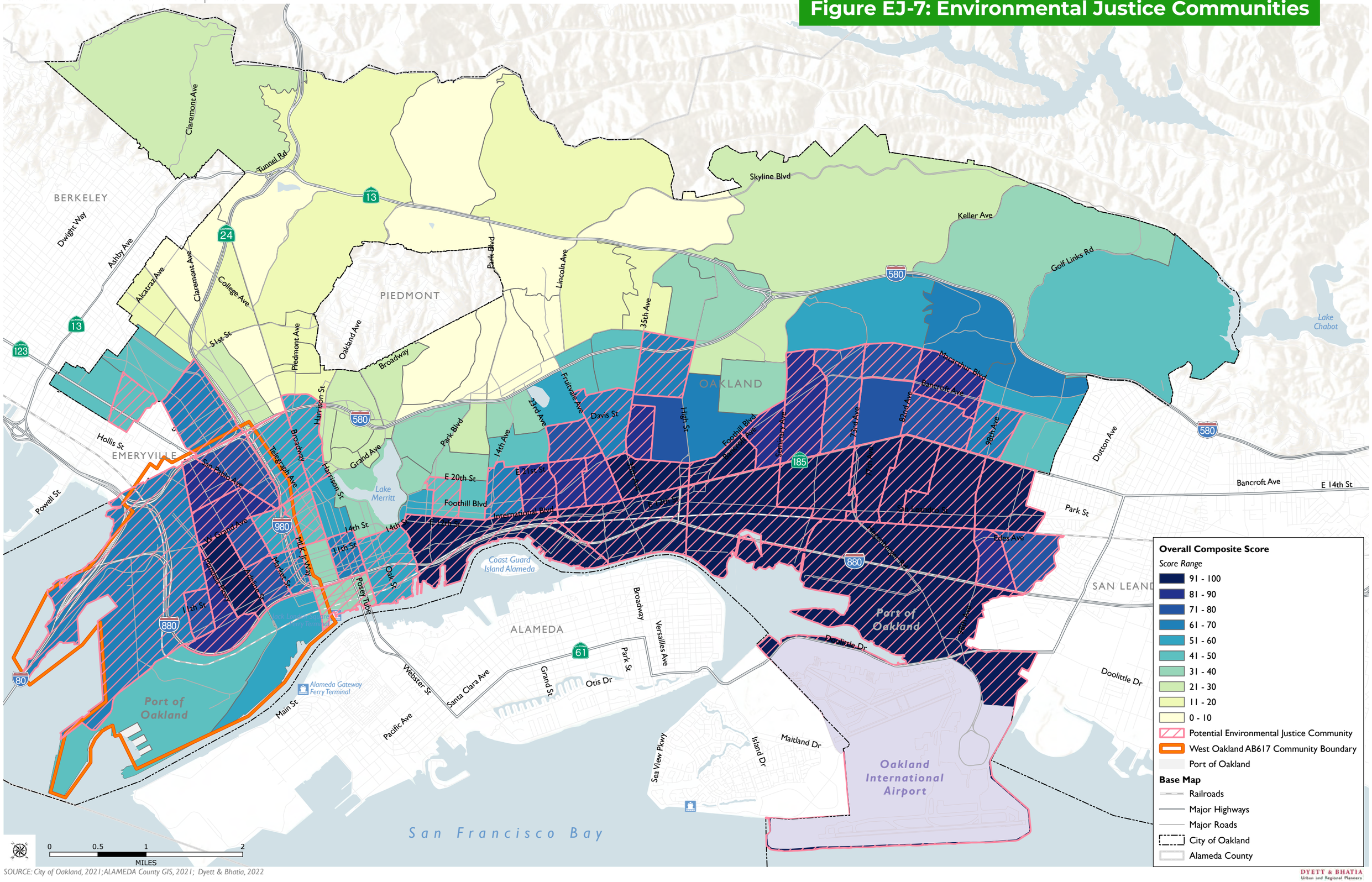
CENSUS TRACT NAME	EJ COMMUNITY CRITERIA[1]	CATEGORY SCORE					
		Composite Score	Race & Poverty	Pollution Burden	Climate Change	Sensitive Population	Built Environment
Lockwood/ Coliseum/ Rudsdale	Top 25% Composite	**1.00**	1.00	0.88	0.97	1.00	0.79
Fitchburg	Top 25% Composite	**0.99**	0.93	0.79	0.96	0.98	0.91
Brookfield Village/ Hegenberger	Top 25% Composite	**0.98**	0.68	0.96	0.94	0.99	0.92
Melrose	Top 25% Composite	**0.97**	0.85	0.93	1.00	0.56	0.98
New Highland	Top 25% Composite	**0.96**	0.96	0.70	0.96	0.96	0.75
Jingletown/ Kennedy	Top 25% Composite	**0.96**	0.80	0.97	0.99	0.66	0.84
Fremont District	Top 25% Composite	**0.95**	0.77	0.62	0.95	0.85	0.95
Oakland Estuary	Top 25% Composite	**0.94**	0.79	0.98	0.71	0.71	0.86
Elmhurst	Top 25% Composite	**0.93**	0.97	0.66	0.41	0.95	1.00
DeFremery/Oak Center	Top 25% Composite	**0.92**	0.96	0.85	0.84	0.91	0.43
Stonehurst	Top 25% Composite	**0.91**	0.98	0.58	0.46	0.94	0.94
Fruitvale	Top 25% Composite	**0.90**	0.82	0.71	0.90	0.76	0.67
Clawson/Dogtown	Top 25% Composite	**0.89**	0.61	0.90	0.98	0.75	0.61
Seminary	Top 25% Composite	**0.88**	0.95	0.49	0.47	0.89	0.99
Reservoir Hill/ Meadow Brook	Top 25% Composite	**0.88**	0.88	0.54	0.86	0.80	0.68
Fruitvale/ Hawthorne	Top 25% Composite	**0.87**	0.71	0.72	0.82	0.86	0.60
Prescott/Mandela Peralta	Top 25% Composite	**0.86**	0.63	0.87	0.83	0.59	0.76
Brookfield Village	Top 25% Composite	**0.85**	0.54	0.77	0.50	0.88	0.97
McClymonds	Top 25% Composite	**0.84**	0.69	0.89	0.78	0.61	0.70
Sobrante Park	Top 25% Composite	**0.83**	0.62	0.75	0.88	0.65	0.73
Bancroft/ Havenscourt West	Top 25% Composite	**0.82**	0.67	0.31	0.81	0.92	0.89
Harrington/ Fruitvale	Top 25% Composite	**0.81**	0.86	0.45	0.92	0.74	0.63
Castlemont	Top 25% Composite	**0.80**	0.90	0.09	0.87	0.78	0.96
Lower San Antonio East	Top 25% Composite	**0.79**	0.94	0.63	0.53	0.68	0.82
Bancroft/ Havenscourt East	Top 25% Composite	**0.79**	0.84	0.32	0.49	0.90	0.96

Table EJ-2: Environmental Justice Communities Summary

Bunche/Oak Center	Top 25% Composite	**0.78**	0.83	0.74	0.77	0.79	0.37
Hoover/Foster	Top 25% Composite	**0.77**	0.56	0.95	0.70	0.51	0.78
Arroyo Viejo	Top 25% Composite	**0.76**	0.87	0.37	0.43	0.84	0.93
Acorn	Top 25% Composite	**0.75**	0.99	0.76	0.25	0.97	0.45
Prescott	SB 535 Disadvantaged Community	0.74	0.64	0.73	0.79	0.71	0.51
Cox/Elmhurst	Top 10% Category	0.71	**0.92**	0.29	0.39	0.82	0.88
Peralta/Hacienda	Top 10% Category	0.71	0.75	0.51	**0.91**	0.54	0.54
Jack London Gateway	Top 10% Category	0.70	**0.91**	0.79	0.20	0.83	0.53
Chinatown	Top 10% Category	0.69	0.72	0.94	0.10	**0.96**	0.52
Eastmont	Top 10% Category	0.68	0.73	0.03	0.80	0.78	**0.90**
Webster	Top 10% Category	0.67	0.89	0.22	0.44	**0.93**	0.72
Lower San Antonio West	SB 535 Disadvantaged Community	0.66	0.88	0.61	0.29	0.68	0.69
Port Upper	Top 10% Category	0.65	0.39	**0.99**	0.66	0.34	0.71
Chinatown/Laney	Top 10% Category	0.62	0.71	**0.96**	0.55	0.59	0.15
Oakland/Harrison West	Top 10% Category	0.60	0.42	0.81	**0.93**	0.47	0.30
Longfellow	SB 535 Disadvantaged Community	0.59	0.50	0.82	0.65	0.53	0.44
Bunche/MLK Jr	SB 535 Disadvantaged Community	0.52	0.66	0.84	0.15	0.46	0.49
Pill Hill	Top 10% Category	0.51	0.43	**0.91**	0.07	0.77	0.39
Eastlake Clinton West	SB 535 Disadvantaged Community	0.50	0.57	0.55	0.21	0.49	0.66
Uptown/ Downtown	SB 535 Disadvantaged Community	0.49	0.44	0.88	0.00	0.88	0.29
Gaskill	SB 535 Disadvantaged Community	0.47	0.49	0.68	0.63	0.55	0.05
Jack London Square	Top 10% Category	0.44	0.09	**1.00**	0.47	0.36	0.47
Downtown/Old Oakland	Top 10% Category	0.38	0.29	**0.92**	0.02	0.43	0.50

1. Some census tracts may meet more than one criterion, but table shows only the first one met, in order of: (1) Top 25% Composite (Top 25%), (2) Top 10% Category (Category), and (3) SB 535 Disadvantaged Community (SB 535).

Figure EJ-7: Environmental Justice Communities



Overall Composite Score

Score Range

- 91 - 100
- 81 - 90
- 71 - 80
- 61 - 70
- 51 - 60
- 41 - 50
- 31 - 40
- 21 - 30
- 11 - 20
- 0 - 10
- Potential Environmental Justice Community
- West Oakland AB617 Community Boundary
- Port of Oakland

Base Map

- Railroads
- Major Highways
- Major Roads
- City of Oakland
- Alameda County

SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

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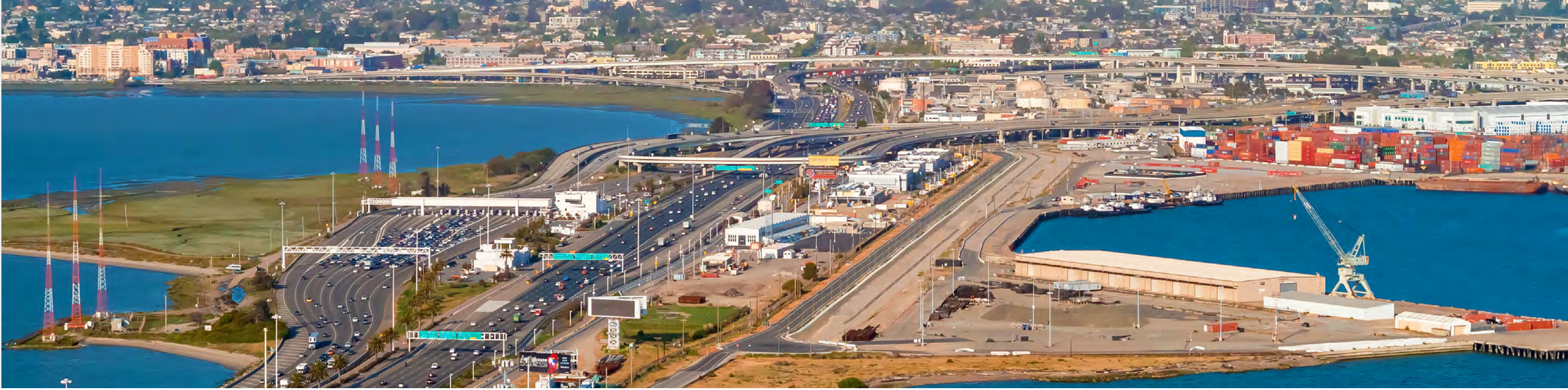


3. Reducing Pollution Exposure and Improving Air Quality

Clean air, water, and land are some of the building blocks for healthy neighborhoods. However, Oakland's urban setting, economic history, and past policy and land use choices mean that communities in West and East Oakland, primarily communities of color, experience some of the highest pollution levels in the state. As discussed in Section 2.2, high pollution exposure has a direct impact on human health, leading to disproportionate levels of negative health outcomes like asthma, cardiovascular disease, or cancer in communities burdened by pollution. This section covers existing environmental factors such as pollution and other natural and human-made environmental hazards that affect Oakland residents. It identifies baseline conditions related to the SB 1000 topics of pollution exposure, air quality, and unique or compounded health risks. In addition to environmental justice, these topics correspond most closely with the Land Use and Transportation, Open Space, Conservation, and Recreation (OSCAR) and Safety Elements of the General Plan.

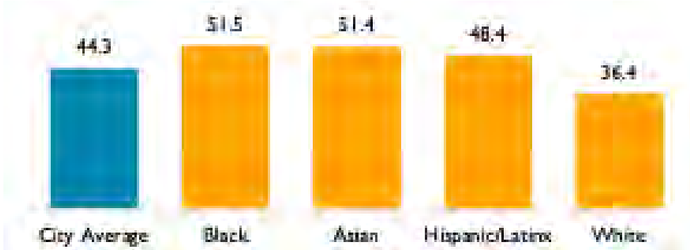
3.1 ISSUES AND DISPARITIES

POLLUTION BURDEN

Oaklanders experience pollution of various kinds: air pollution, water contamination, and exposure to hazardous materials. Exposure to these pollutants varies significantly, with higher concentrations in EJ Communities. Pollution exposure occurs when people come into direct contact with air, food, water, and soil contaminants. While Oakland has a relatively lower CalEnviroScreen 4.0 Pollution Burden score than the rest of California, this relatively low citywide value hides the disproportionate pollution burden experienced by some Oakland communities. **Chart EJ-2** below shows that there are higher concentrations of Black, Indigenous, and people of color (BIPOC) communities living in census tracts that have higher pollution burden scores, meaning that they are more at risk than white populations. Residents living in EJ Communities often live close to polluting industrial uses or adjacent to freeways and major truck routes. This disproportionate exposure directly impacts the health of vulnerable populations.

On average, census tracts in Oakland have an overall CalEnviroScreen 4.0 Pollution Burden percentile score of 44.3, meaning that census tracts in the city are less impacted by environmental effects and exposures than more than half of tracts in California. However, four of Oakland's tracts rank in the top 10th percentile in the entire state for pollution burden: Port Upper, Jingletown/Kennedy, Melrose, and Brookfield Village/Hegenberger – all of which are identified as EJ Communities in this Element.

Chart EJ-2: Citywide Census Tract Average of CalEnviroScreen 4.0 Pollution Burden Score by Race, 2021



Note: Race is assigned to the racial group with the plurality (highest proportion) within a census tract.

Source: CalEnviroScreen 4.0, CalEPA, 2021

SENSITIVE LAND USES

The California Air Resources Board (CARB) defines sensitive receptors as "children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution," and the locations where these sensitive receptors congregate, such as schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities, are considered sensitive receptor locations (also referred to as sensitive land uses).[36] In the short and long term, an individual's exposure to pollution of any kind (air, water, or land) in their community can lead to chronic conditions or negative health outcomes including asthma or increased risk of cancer. Communities of color are at higher risk for exposure to pollution and hazards in neighborhood environments at an early age. Exposure to these conditions, particularly during sensitive developmental stages, contributes to health disparities later in life.[37] As discussed earlier in Section 2.1, a history of racially discriminatory policies and practices have created inequitable development patterns in Oakland that expose BIPOC communities and low-income communities to greater concentrations of pollution and other health risks.

Data from the Alameda County Public Health Department shows that residents of West Oakland and Downtown Oakland have higher rates of asthma emergency room visits as well as stroke and congestive heart failure compared to the rest of the city. On the other hand, residents of the Oakland hills are expected to live up to seven years longer than those from the flatlands in West Oakland and downtown.[38] These outcomes are not a coincidence; legacy land use decisions based on racially discriminatory practices (discussed in Section 2.1) have resulted in and perpetuated environmental injustices such that Oaklanders with the least ability to pay for and recover from environmental health threats are also the most impacted.

Land use incompatibility is one of the most important contributors to environmental burdens on an EJ Community. Mixing sensitive land uses with known or foreseeable pollution or natural hazards can create or compound health risks. According to WOEIP's 2002 report, "Neighborhood Knowledge for Change", 10 percent of sensitive sites in Oakland, like schools, hospitals, and homeless shelters were located within one-eighth of a mile of industrial facilities at high risk for chemical accidents. **Figure EJ-8** maps the location of existing sensitive land uses in Oakland, with residential areas shown in yellow. Since 2002, the proportion of sensitive uses other than residentially zoned areas shown in **Figure EJ-8** that are within one-eighth of a mile of high- or very-high hazard ranking industrial facilities has increased to over 30 percent.

AIR QUALITY

Outdoor air pollution comes from many sources, such as vehicle exhaust, construction and industrial activities, smoke from fireplaces and wildfires, and pollen from local plants. Transportation and industrial sites can release exhaust and chemicals that contribute to increased rates of asthma, congestive heart failure, and stroke. These pollution sources exacerbate health impairments and increase the economic burden from hospitalizations and healthcare. In Oakland, the concentration of sites that release chemical pollution is four times higher in high-poverty neighborhoods than that of more affluent neighborhoods.[39] Census tracts in West and East Oakland are particularly affected by air pollution due to their proximity to traffic and industrial uses.

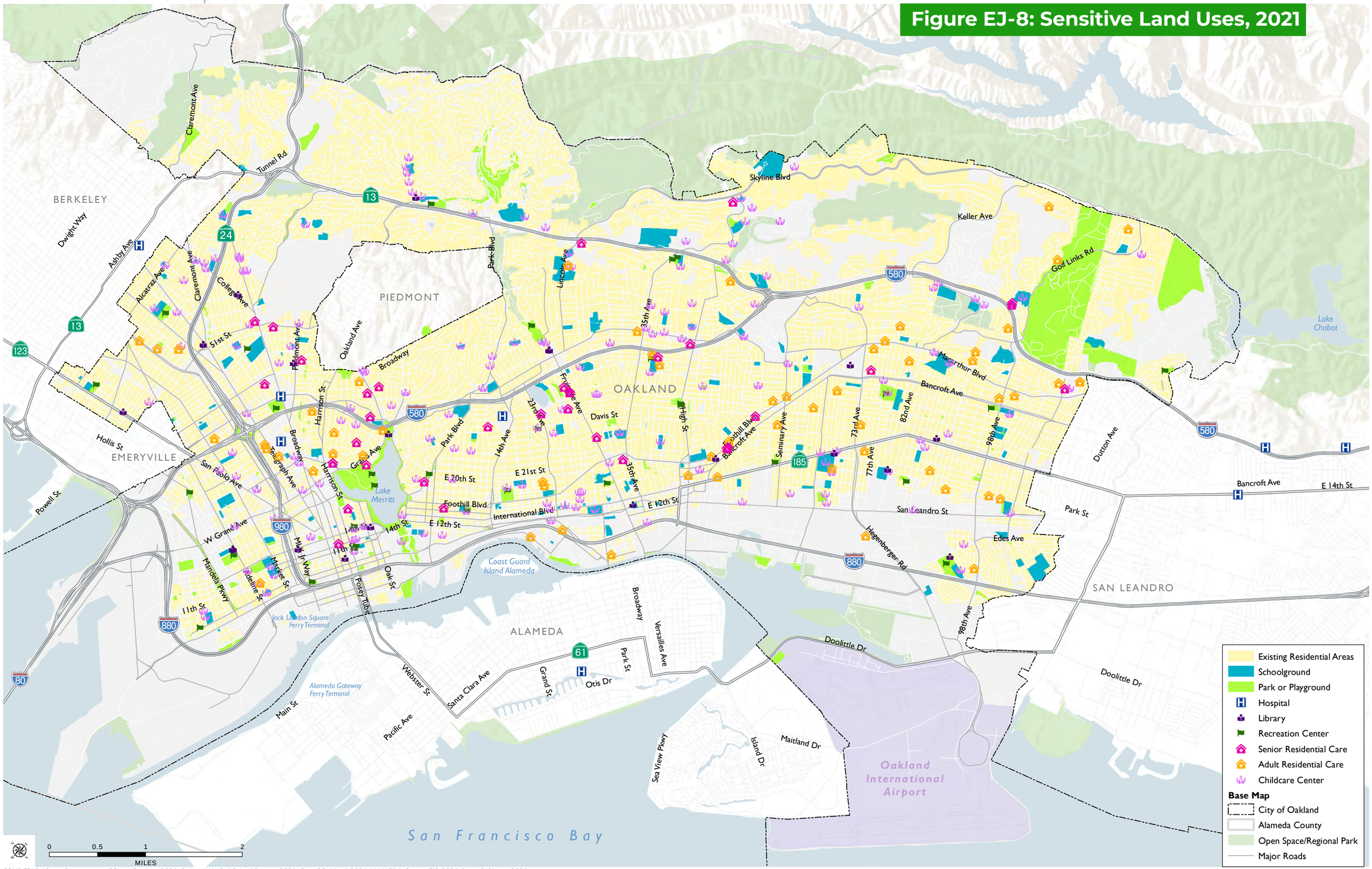
36 California Air Resources Board, "Sensitive Receptor Assessment," https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment, accessed February 21, 2023.

37 Chenghao Wang, et. al, "Rethinking the urban physical environment for century-long lives: from age-friendly to longevity-ready cities," *Nature Aging* 1 (2021): 1088-1095, https://doi.org/10.1038/s43587-021-00140-5, accessed March 8, 2022.

38 Environmental Defense Fund, "How pollution impacts health in West Oakland," 2019, https://www.edf.org/airqualitymaps/oakland/pollution-and-health-concerns-west-oakland, accessed February 15, 2022.

39 City of Oakland, Oakland 2030 Equitable Climate Action Plan, July 2020, https://cao-94612.s3.amazonaws.com/documents/Oakland-ECAP-07-24.pdf.

Figure EJ-8: Sensitive Land Uses, 2021



SOURCE: California Department of Social Services, 2021; Oakland Unified School District, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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Types of Air Pollutants

Following the Clean Air Act, the U.S. Environmental Protection Agency (EPA) tracks six common air pollutants, called "criteria air pollutants" that are found all over the U.S. and have been shown to harm human and environmental health as well as cause property damage. These criteria air pollutants are ground-level ozone, particulate matter, carbon monoxide (CO), lead, sulfur dioxide (SO2), and nitrogen dioxide (NO2). EPA calls these pollutants "criteria" air pollutants because it sets National Ambient Air Quality Standards (NAAQS) for them based on the latest scientific information regarding their effects on human health or welfare. In addition to the NAAQS, criteria air pollutants in California must meet State standards established by the California Air Resources Board (CARB). Both the national and State standards help protect the public from harmful pollutants.

Of criteria air pollutants, particulate matter finer than 2.5 micrometers in size (PM2.5) poses the greatest health risk because they can penetrate deep into the lungs or even get into the bloodstream, resulting in a wide range of health effects.[40] PM2.5 commonly comes from combustion sources of all fuel types, including diesel, along with particulates such as from road dust.

Certain air pollutants are known to increase the risk of cancer and/or other serious health effects. These are classified as "toxic air contaminants" (TACs, known federally as "hazardous air pollutants"), some of which do not have a safe level of exposure (i.e., any amount of exposure is considered substantially harmful). One of the most concerning TACs is diesel particulate matter (DPM), which a type of PM2.5 that is emitted as exhaust from diesel fuel combustion.

The West Oakland Community Action Plan (WOCAP) identifies 89 potential community-level strategies and control measures intended to reduce criteria pollutant and TAC emissions and decrease West Oakland residents' exposure to TAC emissions.

40 United States Environmental Protection Agency, "How Does PM Affect Human Health?" EPA Region 1, last updated February 3, 2023, https://www3.epa.gov/region1/airquality/pm-human-health.html, accessed February 21, 2023.

Mobile Sources

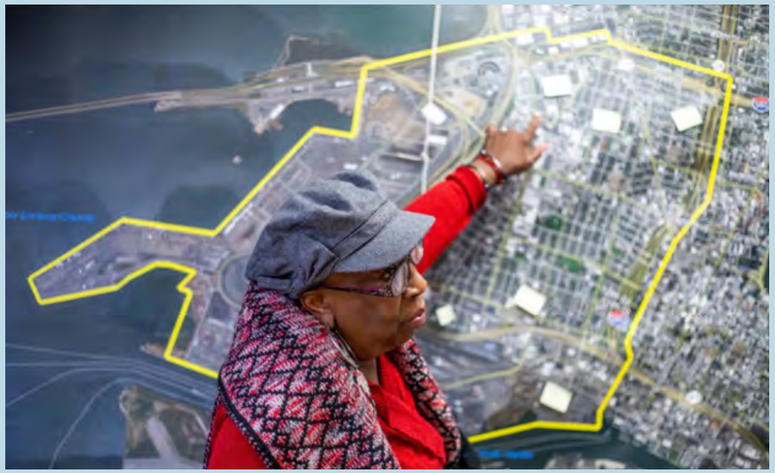
Mobile air pollution sources include on-road motor vehicles (cars and trucks) and off-road vehicles and equipment (such as aircraft, trains, and ocean-going vessels) and are Oakland's primary source of air pollution. Exhaust and chemical outputs from the transportation and industrial sectors, including the Port of Oakland, contribute to the climate crisis and increased rates of asthma, congestive heart failure, and stroke, as well as increased economic burden from hospitalizations and health care.[41] Ocean-going vessels and trucks serving the Port bring disproportionate levels of diesel pollution and fine particulate matter to West Oakland and communities living along the I-880 and I-980 freeway corridors. In addition to degrading local air quality, these toxic pollutants are absorbed in soils and contaminate groundwater. Heavy rains and floods bring pollutants to the surface, contaminating streets and waterways.

New regulations from CARB will require, starting in January 2023, that every vessel coming into a regulated California port, such as the Port of Oakland, use either shore power (e.g., plug in to the local electrical grid) or a CARB-approved control technology to reduce harmful emissions, such as diesel particulate matter and nitrogen oxides (NOx). The Port of Oakland is also in the beginning stages of designing infrastructure that would help transition to carbon-free, heavy-duty trucks and cargo-handling equipment, including the replacement of a substation and electrical infrastructure for generating solar power.

Stationary Sources

Stationary air pollution sources include industrial facilities, gasoline stations, power plants, dry cleaners, waste disposal, and sites of other commercial and industrial processes. Stationary sources resulted in 26 percent of the city's total PM2.5 emissions in 2018. The Bay Area Air Quality Management District (BAAQMD or "Air District"), is the local air pollution control district for the San Francisco Bay Area Air Basin and regulates stationary sources of air pollution. Permitted stationary sources of TACs in Oakland include industrial facilities, gasoline stations, power plants, dry cleaners, waste disposal facilities (such as landfills and wastewater treatment plants), and other commercial and industrial processing sites (such as metal processing and chemical manufacturing facilities).

41 City of Oakland, 2030 Equitable Climate Action Plan, July 2020.



Utilizing Local Data to Map Block-by-Block Air Pollution

Conventional air monitoring is conducted by a network of stationary air quality monitors dispersed throughout an area. Agencies such as CalEPA and BAAQMD operate their own networks. Private and non-profit partners can help supplement air quality monitoring data by providing additional monitors throughout their communities. However, estimating local levels of pollution is difficult because air monitoring stations are typically located many miles away from each other, and the data from these stations has to be averaged and/or estimated at a level that can mask out significant levels of pollution in certain neighborhoods.

Community groups in West and East Oakland have partnered with researchers at the Environmental Defense Fund and the University of Texas at Austin and technological companies like Google and Aclima to map, measure, and analyze pollution data at the neighborhood level, where pollution can be eight times higher at one end of a block compared to the other.

The Planning and Building Department has partnered with WOEIP to incorporate data from this study into this EJ Element. The EJ Communities screening analysis and maps included in the Baseline Report and this Element have utilized this hyperlocal data wherever feasible. This EJ Element directs the City to further incorporate more finer-grained community data to inform City programs and policies.

Diesel particulate matter, primarily emitted by industrial sources such as container ships and ocean-going vessels, cargo-handling equipment, railyards, trucks, and industrial operations of Port tenants, is concentrated in the industrial areas of West Oakland and along western portions of I-880, as shown in **Figure EJ-9**. Many of these industrial uses depend on truck transport on designated routes, which bring disproportionate levels of diesel pollution, fine particulate matter, and black carbon to West and East Oakland along the I-880 and I-980 freeway corridors due to the truck ban on I-580. As a result, PM2.5 is concentrated primarily along the I-980 and I-880 freeways in the southern half of the city, as shown in **Figure EJ-10**. Nitrogen oxides (NOx), a precursor to ground-level ozone (a criteria air pollutant tracked by CARB), are also generally concentrated in the industrial parts of West Oakland and the Oakland International Airport. Policies in the EJ Element seek to reduce concentrations of particulate matter and air pollutants and protect sensitive uses from pollution's existing effects. In partnership with the West Oakland Environmental Indicators Project (WOEIP), the Environmental Defense Fund (EDF) conducted a Health Impact Assessment of Oakland that further refined the localized health risks of nitrogen dioxide (NO2) concentrations to Oakland residents.[42] Using data from this study, **Figure EJ-11** shows where the mortality (proportion of annual deaths) attributable to NO2 is greatest in Oakland. **Figure EJ-12** shows how Oakland neighborhoods are affected by air quality overall, with the census tracts in blue and dark blue being the most burdened according to our Air Quality topic indicators. The Air District is leading a coordinated regional effort to generate community-based solutions for improving air quality and public health in impacted communities, pursuant to Assembly Bill (AB) 617. AB 617 requires local air districts and CARB to reduce air pollution in the most impacted communities through several methods, including development of Community Emissions Reduction Plans in collaboration with community members. In 2018, West Oakland was selected for this program. WOEIP partnered with BAAQMD to develop the West Oakland Community Action Plan, which focused on reducing exposure to pollutants from sources such as Port-related activities, trucks, industrial sources, road dust, and residential burning. In 2021, East Oakland was selected for the program. The Air District, in partnership with Communities for a Better Environment and the East Oakland community, initiated the first Community Steering Committee meeting for the East Oakland AB 617 Community Emissions Reduction Plan process on September 15, 2022. The committee will meet monthly to develop a Community Emissions Reduction Plan to improve air quality and public health in the impacted communities of East Oakland.

The City will support these efforts through land use or zoning changes to limit additional air quality burden in EJ Communities shown in **Table EJ-3**; prioritizing air quality improvements, such as distribution of air filters, priority urban greening or buffering, or other strategies to protect existing residents; using BAAQMD tools in assessing impacts and requiring higher air filtration ratings in new development, continuing to implement recommendations in the 2030 ECAP, and coordinating with community groups.

Table EJ-3: Top 10th Percentile Tracts by Indicator — Air Quality

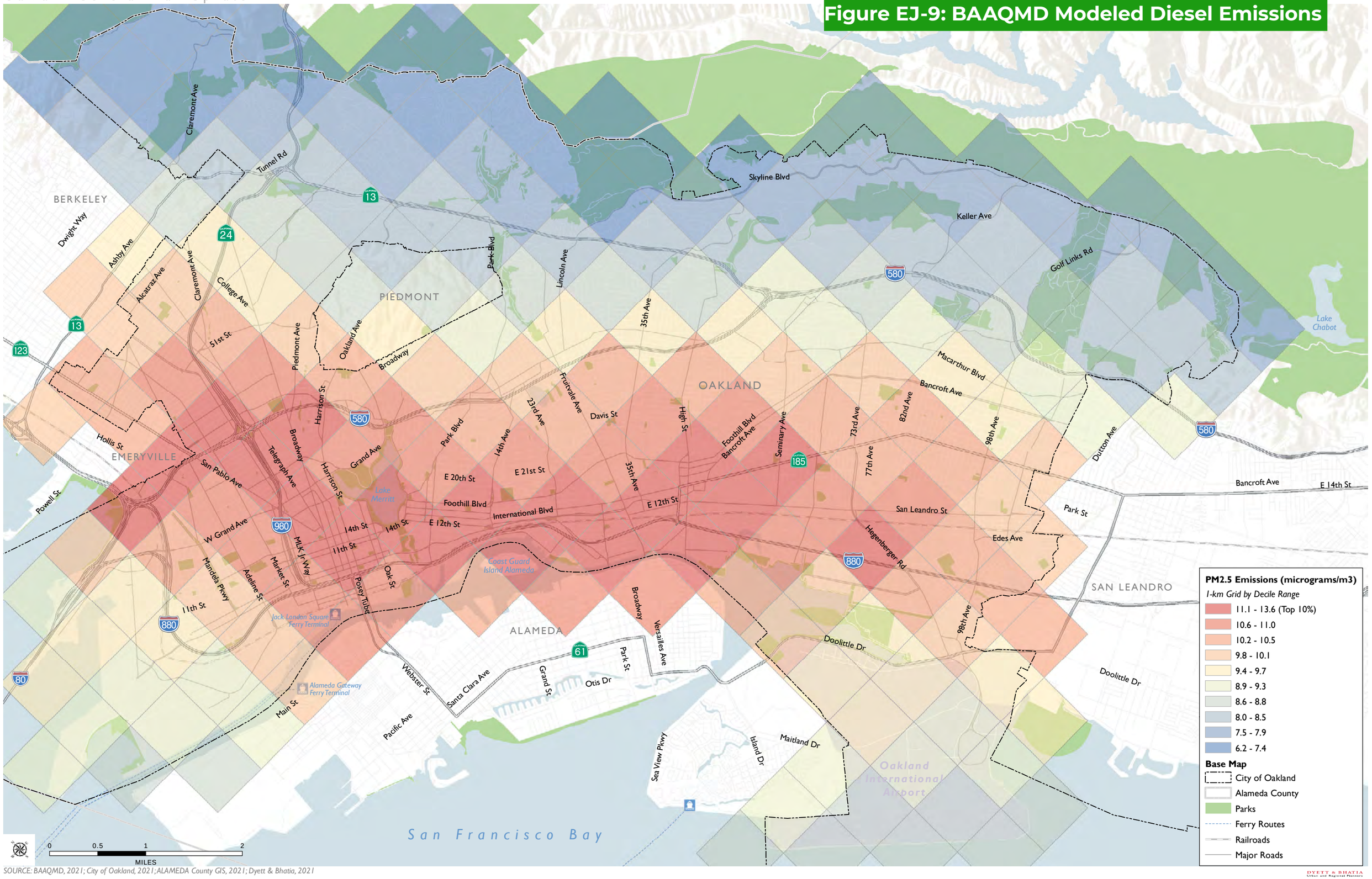
PM2.5		DIESEL		TRAFFIC		TOXIC RELEASES	
Tract Name	**Score**	**Tract Name**	**Score**	**Tract Name**	**Score**	**Tract Name**	**Score**
Jingletown/Kennedy	**1.00**	**Jack London Square**	**1.00**	**Sobrante Park**	**1.00**	**Fitchburg**	**1.00**
Chinatown	**0.99**	Acorn Industrial*	0.99	**Brookfield Village**	**0.99**	**Lockwood/Coliseum/ Rudsdale**	**0.99**
Fruitvale/Hawthorne	**0.98**	**Jack London Gateway**	**0.98**	**Port Upper**	**0.98**	Paradise Park/Golden Gate	0.98
Pill Hill	**0.97**	**Acorn**	**0.97**	Eastmont Hills	0.97	Bushrod/North Oakland	0.97
Downtown	0.96	**Chinatown/Laney**	**0.96**	Adams Point North	0.96	Panoramic Hill	0.96
Oakland Estuary	**0.96**	Port Lower*	0.96	Adams Point East	0.96	**Brookfield Village/ Hegenberger**	**0.95**
Chinatown/Laney	**0.95**	**Port Upper**	**0.95**	Laurel/Upper Peralta Creek	0.95	Santa Fe/North Oakland	0.95
Fruitvale	**0.94**	**Chinatown**	**0.94**	Foothill Square/Toler Heights	0.94	Upper Telegraph/ Fairview Park	0.94
Hoover/Foster	**0.93**	Downtown/Old Oakland	0.93	Mills College	0.93	**New Highland**	**0.93**
Uptown/Downtown	**0.92**	**Prescott/Mandela Peralta**	**0.92**	Trestle Glen	0.92	Bushrod/Childrens Hospital	0.92
Melrose	**0.91**	**Oakland Estuary**	**0.91**	**Jingletown/ Kennedy**	**0.91**	**Sobrante Park**	**0.91**
Eastlake	0.90	**Prescott**	**0.90**	Temescal West	0.90	Rockridge	

Note: Bolded census tracts in blue are EJ Communities.

** Indicates census tract with low population.*

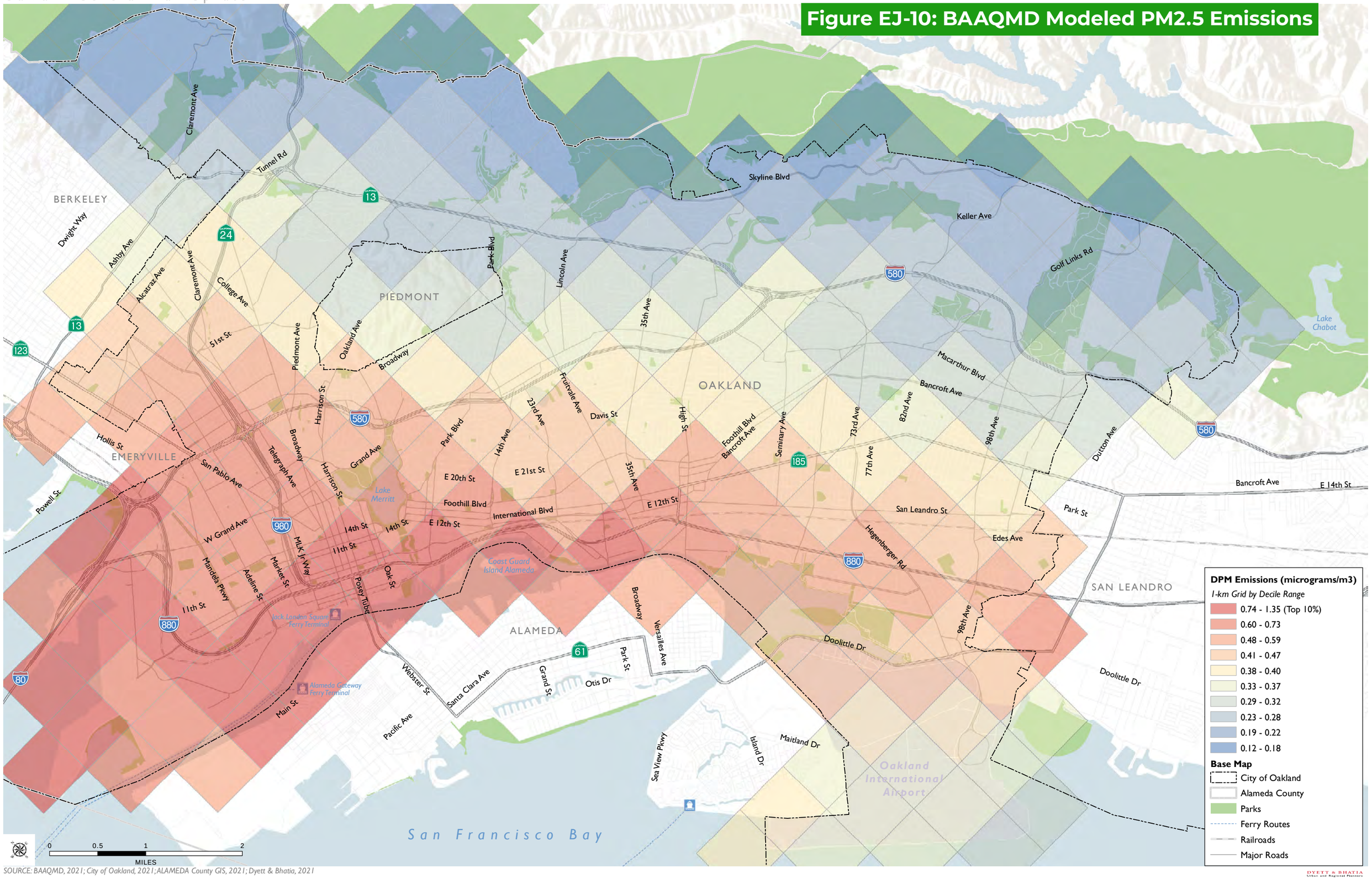
42 Veronica A. Southerland, et al., "Assessing the Distribution of Air Pollution Health Risks within Cities: A Neighborhood-Scale Analysis Leveraging High-Resolution Data Sets in the Bay Area, California," *Environmental Health Perspectives* 129, no. 3 (March 2021), https://doi.org/10.1289/EHP7679.

Figure EJ-9: BAAQMD Modeled Diesel Emissions



SOURCE: BAAQMD, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Figure EJ-10: BAAQMD Modeled PM2.5 Emissions



SOURCE: BAAQMD, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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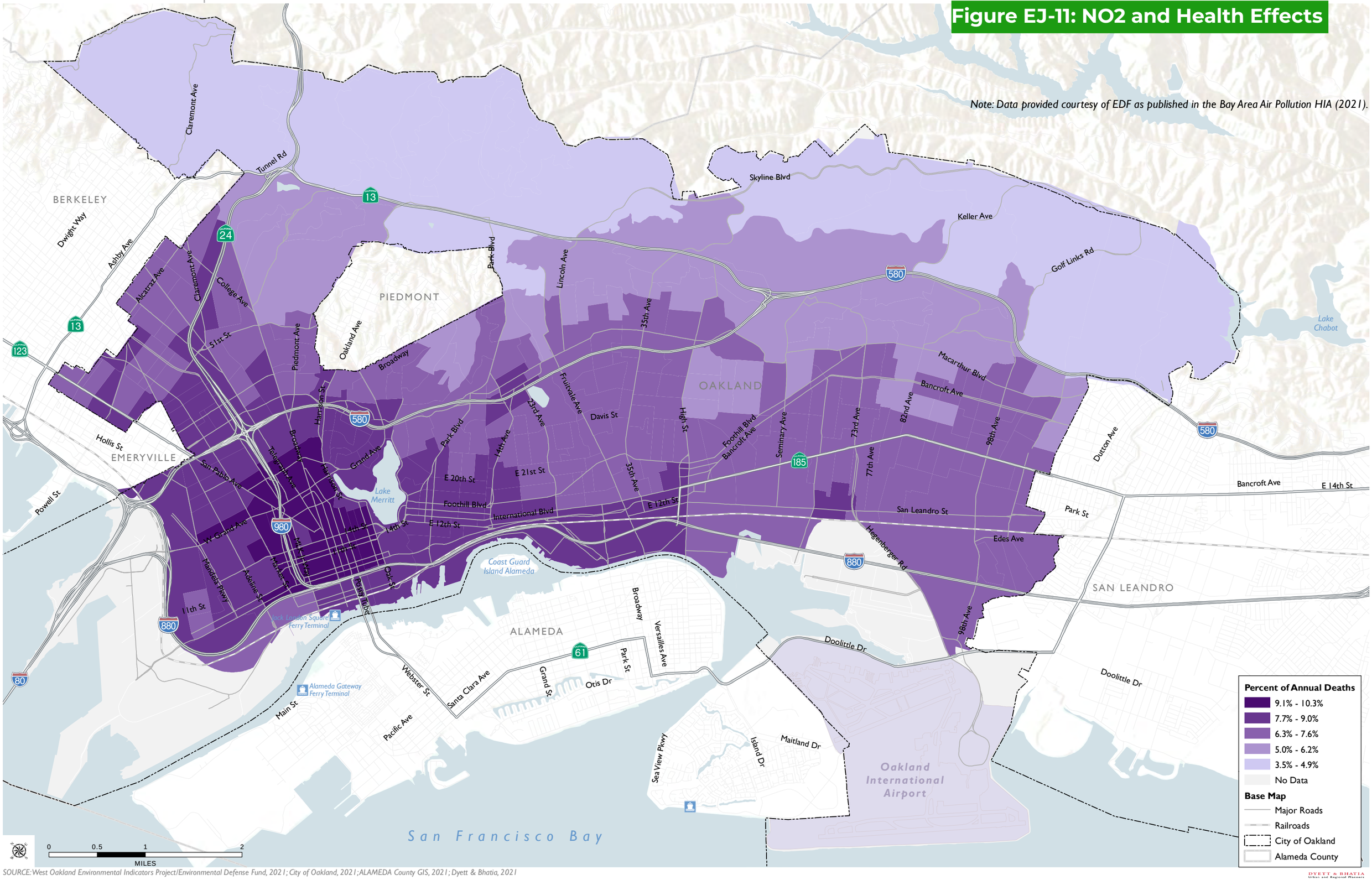
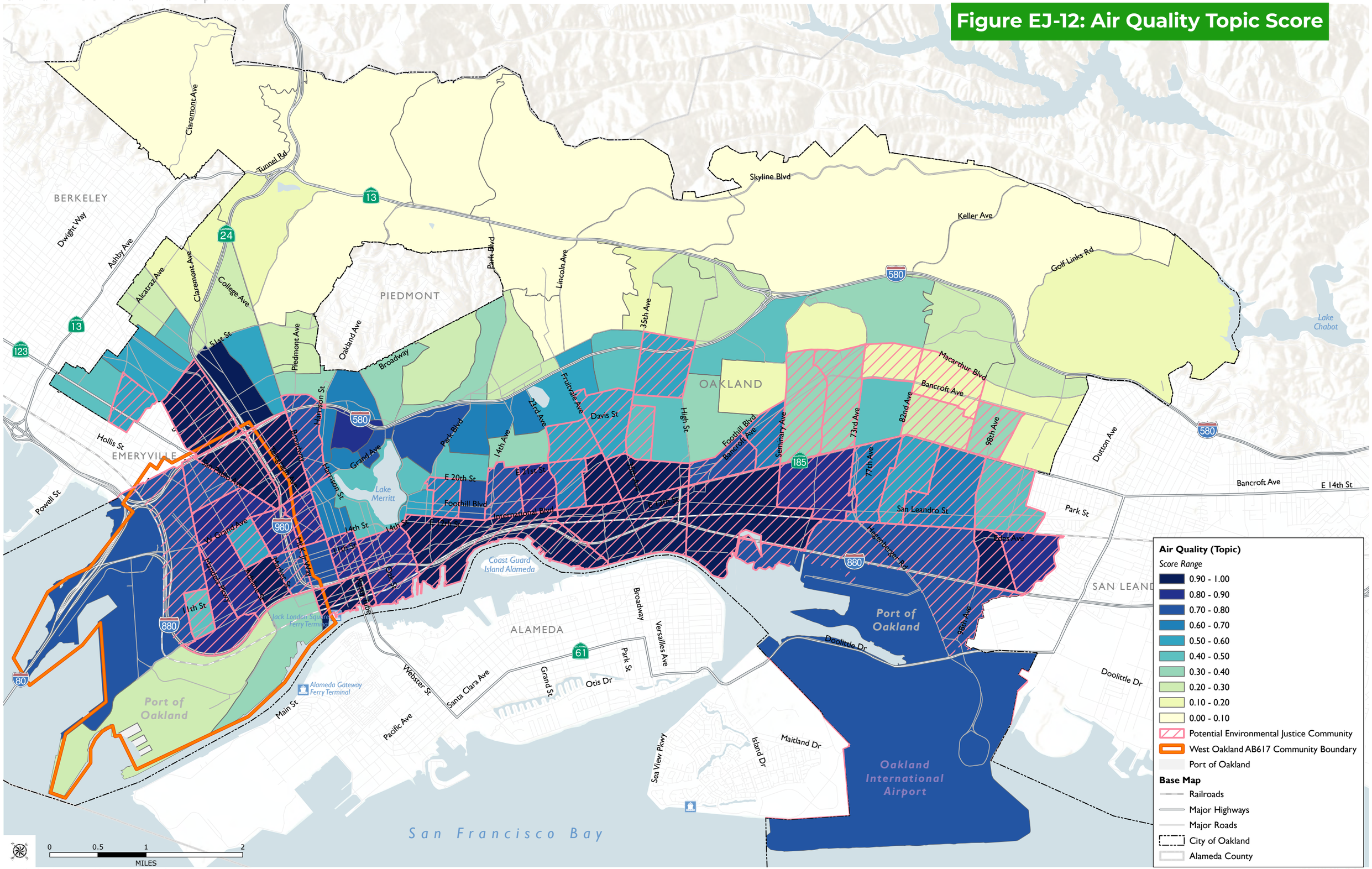
Figure EJ-11: NO2 and Health Effects

Note: Data provided courtesy of EDF as published in the Bay Area Air Pollution HIA (2021).



SOURCE: West Oakland Environmental Indicators Project/Environmental Defense Fund, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Figure EJ-12: Air Quality Topic Score



Air Quality (Topic)

Score Range

- 0.90 - 1.00
- 0.80 - 0.90
- 0.70 - 0.80
- 0.60 - 0.70
- 0.50 - 0.60
- 0.40 - 0.50
- 0.30 - 0.40
- 0.20 - 0.30
- 0.10 - 0.20
- 0.00 - 0.10
- Potential Environmental Justice Community
- West Oakland AB617 Community Boundary
- Port of Oakland

Base Map

- Railroads
- Major Highways
- Major Roads
- City of Oakland
- Alameda County

0 0.5 1 2
MILES

SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

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Building Resilience: West Oakland Community Action Plan (WOCAP)

In 2018, WOEIP partnered with BAAQMD to develop the West Oakland Community Action Plan (WOCAP): "Owning Our Air." The plan was adopted by BAAQMD and CARB in 2019 and set ambitious goals to protect the community's health. The WOCAP sets targets to reduce disparities in air quality and ultimately achieve improvements that match today's cleanest air quality for all neighborhoods in West Oakland by 2030.

The 2020 Annual Report highlights progress on implementation, including 29 replacements for low-emission equipment, four Minimum Efficiency Reporting Value (MERV) 16 air filters installed at schools, and incorporation of relevant strategies in the West Oakland Truck Management Plan, among other early implementation wins.

The EJ Element includes several policies that support implementation of the WOCAP to continue reducing air emissions in the West Oakland AB 617 Community. The Element also directs the City to support similar processes and outcomes in other areas of the city that are disproportionately affected by air pollution.

WATER QUALITY

The quality of the water that people drink, use, and play in has a direct effect on their health, and when the sources of this water are compromised, the contamination can make people sick. The quality of water infrastructure—or the services through which residents obtain their water—also plays a pivotal role in public health. However, all too often, infrastructure investments align with the geography of wealth, resulting in underinvestment and disinvestment in low-income communities and communities of color. As a result, people of color are more likely to live in areas with higher rates of contaminated water, stormwater and wastewater overflows, and increased risks of flooding.[43]

GeoTracker is a statewide data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. This database contains records for sites that require cleanup, such as leaking underground storage tanks (LUSTs), Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including irrigated lands, oil and gas production, operating permitted underground storage tanks, and land disposal sites. Additionally, the State Water Resources Control Board (SWRCB) maintains the California Integrated Water Quality System (CIWQS) to monitor and regulate environmental places of interest such as agricultural facilities and operations that may affect water quality. CalEnviroScreen assesses threats to groundwater quality based on these two databases.

While most Oakland residents have access to high-quality drinking water, groundwater threats like LUSTs, gasoline stations, military cleanup sites, and industrial sites including the airport are some of the water quality issues that affect many parts of Oakland. According to CalEnviroScreen 4.0, more than half of Oakland's census tracts score in the 80th percentile or higher for groundwater threats. As mapped in **Figure EJ-13** these census tracts are generally located closer to the waterfront, whereas census tracts with lower scores (i.e., that are less exposed to groundwater threats) are generally located in the Oakland hills. As sea level rise and climate change affect Oakland into the future, rising groundwater tables could worsen groundwater contamination threats.[44]

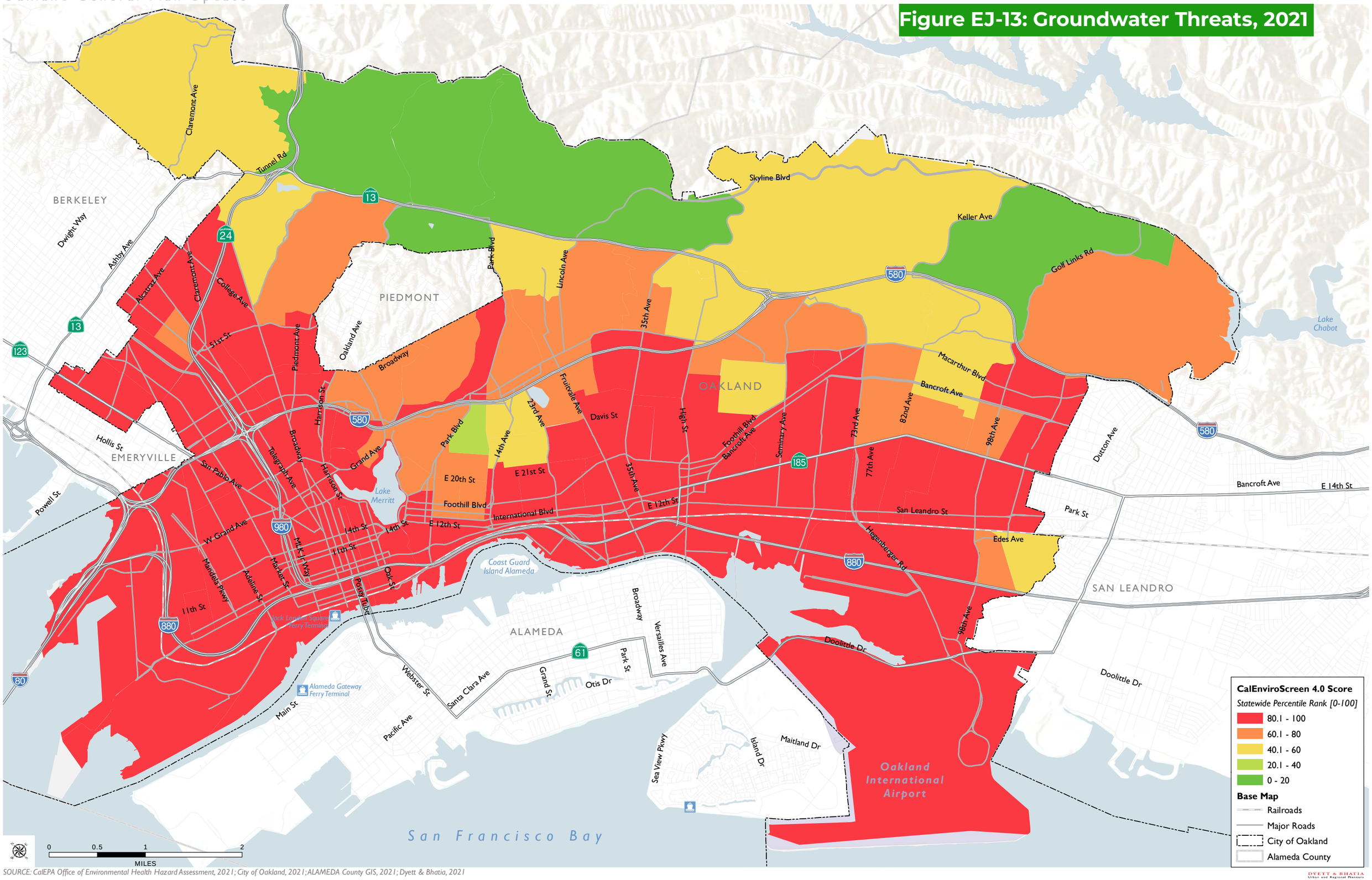
An example of recent local groundwater contamination occurred in 2020, when the Oakland Unified School District shut down McClymonds High School in West Oakland for a week after officials found trichloroethylene, a cancer-causing chemical, in the groundwater under the school. The source was likely the five active cleanup sites within half a mile of the school. The City will continue to support the San Francisco Regional Water Quality Control Board and California Department of Toxic Substances Control (DTSC) to assess cleanup sites in EJ Communities with high groundwater contamination threat.

A consortium of cities and agencies, including Oakland, work to protect water quality in the county through the Alameda Countywide Clean Water Program. This program regularly monitors and conducts special studies of the county's creeks, wetlands, and the San Francisco Bay to assess the watershed; inspects industrial and commercial business facilities; provides public information and engages the public; ensures municipal maintenance; regulates new construction development; and prevents stormwater pollution from illicit discharges, pollutant spills, and construction activities.

43 Pacific Institute, A Twenty-First Century U.S. Water Policy, Chapter 3: Water and Environmental Justice (2012), http://pacinst.org/wp-content/uploads/2013/02/water_and_environmental_justice_ch3.pdf. (via *Clean Water For All, Water, Health, and Equity: The Infrastructure Crisis Facing Low-Income Communities & Communities of Color – and How to Solve It,* October 23, 2018, http://protectcleanwater.org/wp-content/uploads/2018/10/FINAL-CWC_Report_Full_report_lowres-003-3.pdf. Accessed February 14, 2022.)

44 Policies on sea level rise are found in the Safety Element.

Figure EJ-13: Groundwater Threats, 2021



SOURCE: CalEPA Office of Environmental Health Hazard Assessment, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

DYETT & BHATIA
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In 2019, the City of Oakland developed a Green Stormwater Infrastructure Plan[45] that complies with SWRCB's Municipal Regional Stormwater Permit[46], helps implement the Alameda Countywide Clean Water Program, and seeks to protect and restore Oakland's watersheds. "Green stormwater infrastructure" refers to a variety of practices and engineered facilities designed to detain and clean, capture and reuse, or infiltrate stormwater runoff to reduce the volume of runoff and improve water quality. In accordance with the City's Resilient Oakland Playbook, Oakland will use green stormwater infrastructure to manage stormwater and reduce minor localized flooding risks, as well as provide urban greening benefits, such as improved air quality and reduced urban heat island effects, especially for neighborhoods that have limited access to parks and green space.

To address water quality issues, the City will continue to collaborate with water providers, support residents and businesses in avoiding stormwater and groundwater contamination, and prioritize implementation of green stormwater infrastructure projects in EJ Communities shown in **Table EJ-4** in partnership with community groups. EJ Communities are shown bolded and highlighted in **Table EJ-4**.

45 City of Oakland, Green Stormwater Infrastructure Plan, September 30, 2019, https://cao-94612.s3.amazonaws.com/documents/Oakland-GSI-Plan-Final-20190930_sm.pdf.

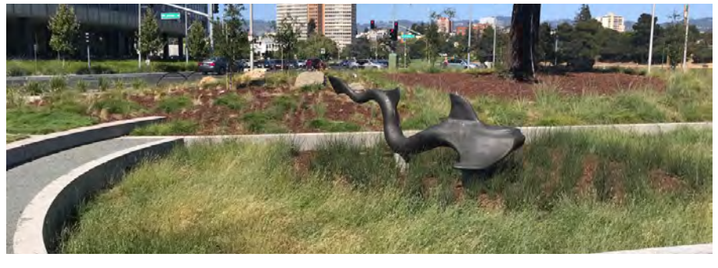
46 California Regional Water Quality Control Board, San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (Order No. R2-2022-0018; NPDES Permit No. CAS612008), May 11, 2022, https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/MRP/mrp5-22/R2-2022-0018.pdf.

Table EJ-4: Top 10th Percentile Tracts by Indicator — Water Quality

GROUNDWATER THREATS		IMPAIRED WATER BODIES[1]	
Tract Name	**Score**	**Tract Name**	**Score**
Port Upper	**1.00**	**Oakland Estuary**	**1.00**
Chinatown	**0.99**	Jingletown/Kennedy	0.99
Fruitvale/Hawthorne	**0.98**	**Melrose**	**0.98**
Pill Hill	**0.97**	**Brookfield Village/ Hegenberger**	**0.94**
Downtown	0.96	**Lower San Antonio East**	**0.94**
Oakland Estuary	**0.96**	Eastlake Clinton West	0.94
Chinatown/Laney	**0.95**	**Eastlake Clinton East**	**0.94**
Fruitvale	**0.94**	**Ivy Hill**	**0.94**
Hoover/Foster	**0.93**	Lower San Antonio West	0.93
Uptown/Downtown	**0.92**	**Jack London Square**	**0.91**
Melrose	**0.91**	**Chinatown/Laney**	**0.91**
Eastlake	0.90	-	**0.90**

Note: Bolded census tracts in blue are EJ Communities.

1. Only includes 11 tracts in top decile due to ties. Next highest score for Impaired Water bodies is 0.68.



HAZARDOUS MATERIALS AND TOXINS

Industrial activities and related transportation and logistics infrastructure, including freeway and rail corridors, have been a central part of the city's economic history and development. Though regulation and oversight of these sites have become more stringent over time, the historic and current use, storage, or transport of hazardous materials as part of these industrial and commercial operations have resulted in soil and groundwater contamination from spills or leaks of hazardous materials or petroleum products, even recently.

People may be exposed to hazardous materials through three possible pathways:

- Breathing: When contaminants attach to small dust and soil particles or occur as a vapor, breathing can expose people.
- Eating or Drinking: Exposure can happen when people eat or drink contaminated water, food, specks of dust, or soils. Children that suck their fingers or chew toys contaminated with dust or soils may be exposed.
- Direct Contact: Skin can absorb some contaminants from direct contact with contaminated dust and soil particles, the contaminants themselves, or vapors.

There are several types of hazardous sites in Oakland: cleanup sites, hazardous waste sites, and solid waste sites. Toxic release sites and threats to groundwater may also result in exposure to hazardous materials and are described in the preceding sections.

The Safety Element includes goals, policies, and actions related to hazardous materials and toxins, such as review of proposed facilities, enforcement of standard conditions of approval for investigation of remediation, and coordination with other agencies. The EJ Element expands on these policies and actions to help further reduce impacts of hazardous materials on sensitive receptors.

Cleanup Sites

Superfunds are sites that are part of an environmental program established to address abandoned hazardous waste sites. Superfunds have levels of contamination that may pose a threat to human life. Superfund cleanup involves placing sites in a National Priorities List and establish an appropriate cleanup plan. The EPA is responsible for removal actions, enforcement, and community involvement.

Other cleanup sites that are not federally owned are regulated by a cleanup program conducted by SWRCB or any of the nine Regional Water Quality Control Boards. Examples include rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, landfills, and some brownfields. Unauthorized releases detected at cleanup sites vary but could include hydrocarbon solvents, pesticides, perchlorate, nitrate, heavy metals, and petroleum constituents, among others.

A brownfield is a property where contamination is present and may complicate future use of the site. Generally, these sites are cleaned up by the owner, previous owner, or state governments. Brownfields can indirectly and directly impact public health in many ways. Brownfields can affect community cohesion and morale, for example, due to the presence of abandoned and derelict structures, especially in EJ Communities that suffer from a disproportionate number of brownfield sites. Brownfields can also have negative economic impacts if continued operation of existing on-site infrastructure including roads, sewer, and electricity diverts City funds that could be used for services elsewhere.[47] Brownfields can also directly impact public and environmental health due to contamination that can pollute soil, air, and water resources on- and off-site.[48] Contaminants often found at brownfield sites include lead, petroleum, asbestos, arsenic, and volatile organic compounds from manufactured chemicals such as degreasers and paint strippers. These contaminants can cause serious health problems, including mesothelioma, lung cancer, kidney damage, and birth defects.[49]

Cleaning up and reinvesting in these properties can help reduce disparities in adverse health outcomes by preventing exposure to hazardous substances. Revitalizing brownfield sites also offers opportunities to bring jobs back into an area, clean up blight in a neighborhood, increase community connectivity, restore local ecologies, reduce the effects of urban heat islands, and promote physical activity and recreation.

Hazardous Waste Sites

Hazardous waste sites may contain chemicals that are harmful to health. Only certain facilities are allowed to treat, store, or dispose of this type of waste. Hazardous waste can range from used automotive oil to highly toxic waste materials produced by factories and businesses. The Department of Toxic Substances Control (DTSC) maintains data in the EnviroStor Hazardous Waste Facilities Database and Hazardous Waste Tracking System on permitted facilities that are involved in the treatment, storage, or disposal of hazardous waste as well as information on hazardous waste generators. Although this database includes information about illegal and abandoned sites, it is noted that it may not necessarily capture all incidences of potential exposure to hazardous materials in a community.

According to EnviroStor and GeoTracker as of March 2022, there were approximately 1,700 documented hazardous materials sites throughout Oakland, mainly located near the southern half of the city and in West Oakland (**Figure EJ-14**). While more than half are "closed" cases (e.g., have been cleaned up or taken other corrective action), numerous hazardous materials sites may still contain contaminants that pose a threat to the public and environment if these sites were disturbed without appropriate protective or remediation measures. Almost a quarter of all sites are actively being remediated and five percent of sites are currently operational and certified to handle hazardous materials. In tandem with the Safety Element, which includes several policies to minimize health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials, policies in the EJ Element support improving land use compatibility, performance standards to avoid health and safety impacts to sensitive uses, and changes to conditional use permitting that phase out incompatible uses more quickly. Impacted communities most burdened by hazardous materials are shown in **Table EJ-5**.

Credit: Environmental Protection Agency

47 Center for Creative Land Recycling. "White Paper: Community Transformation Through Brownfields Redevelopment." July 2021. Accessed December 27, 2022, https://www.cclr.org/wp-content/uploads/2021/07/25.community-transformation-through-brownfield-redevelopment.pdf

48 Minnesota Department of Health, "Brownfields and Public Health," Accessed October 5, 2022, https://www.health.state.mn.us/communities/environment/places/brownfield.html#health.

49 US Environmental Protection Agency, "Environmental Contaminants Often Found at Brownfield Sites," Accessed October 5, 2022, https://www.epa.gov/sites/default/files/2019-10/documents/environmental_contaminants_often_found_at_brownfield_sites.pdf.

SOLID WASTE SITES

Solid waste sites are places where garbage from homes, factories, or businesses is collected, processed, or stored. These include landfills and composting or recycling facilities, most of which require permits to operate. As of July 2021, there were 14 solid waste facilities in Oakland, with the largest concentration in East Oakland, north of the Coliseum. According to CalRecycle's Solid Waste Information System (SWIS) database, six of the 14 solid waste facilities in Oakland are active: two facilities operated by Bee Green Recycling & Supply, one operated by Asphalt Shingle Recyclers, one by Independent Recycling Services in the Coliseum Industrial Complex, and two by California Waste Solutions facilities in West Oakland. The number of solid waste sites and facilities in predominantly Latinx census tracts is over seven times higher than in predominantly Asian census tracts, and nearly five times higher than predominantly white census tracts. The census tracts with the most solid waste sites and facilities include Melrose, Port Upper, and Lockwood/Coliseum/Rudsdale, while 63 census tracts in the city have none at all.

Institutional Framework and Responsibilities

There are a number of federal, State, regional, and local agencies that are responsible for addressing hazards. These agencies are described in detail in Section 3.1 of the Safety Element. Facilities that are subject to cleanup, permitting, enforcement, and investigation efforts are tracked by the Department of Toxic Substances Control (DTSC)'s EnviroStor database and include sites such as Federal Superfund (National Priority List) and State Superfund sites, military facilities, voluntary cleanup sites, and school sites being evaluated for possible contamination. The State Water Resources Control Board (SWRCB) maintains the GeoTracker database to regulate leaking underground storage tanks (LUSTs); Department of Defense facilities; spills, leaks, investigations, or cleanups; and landfills. As described in the Safety Element, the City will work closely with agencies responsible for monitoring, enforcement, and cleanup, in addition to community-based organizations working on environmental justice issues.

ILLEGAL DUMPING

Abandoned trash, or illegal dumping, also contributes to an unhealthy and unsafe living environment and has a negative impact on neighborhood quality. Illegal dumping can contribute to land, water, and air pollution in a neighborhood and may contain harmful substances. Accumulation of illegal dumping can also be fire hazards. Figure EJ-15 shows the rate of service requests received by the Oakland Call Center (OAK 311) for illegal dumping per 1,000 people in each census tract. In general, tracts along the freeways, particularly I-880 and I-580, have higher rates of illegal dumping and geographically correspond with the West Oakland and East Oakland neighborhoods (with some exceptions). Tracts in the Oakland hills to the northwest have very few reports of illegal dumping in comparison. Environmental Justice Communities most burdened by illegal dumping are shown in **Table EJ-5**.

City efforts to tackle illegal dumping include the creation of Oaktown PROUD, a campaign by and for Oaklanders, to Prevent & Report Our Unlawful Dumping. The campaign's strategy for reducing illegal dumping organizes City and community efforts into the three E's (focus areas): Education, Eradication, and Enforcement. As a part of the Oaktown PROUD outreach campaign to reduce littering and dumping, the City is working with Oakland Unified School District (OUSD) high school students, teachers and administrators to manage the Oaktown PROUD Student Ambassador Program, detailed below. Students take the knowledge they have gained to educate people about the problem of litter and dumping in Oakland and provide resources and guidance on what they can do to help.

The City has also taken steps to eradicate illegal dumping. The Public Works Department proactively sends Garbage Blitz teams to clean up known hot spots and illegal dumping. In 2019, the City established an Environmental Enforcement Officers (EEOs) unit, a team of civilian investigators who monitor heavy dumping sites and refer cases for legal action when necessary. EEOs enforce and keep illegal dumpers accountable by contacting suspected dumpers, encouraging them to abate blight using available services, and issuing citations when adequate evidence is found. Since its inception, the Oaktown PROUD campaign has continued to be implemented in partnership with the City Council, neighborhood advocates, community-based organizations, and businesses.[50]

50 City of Oakland, "City of Oakland and Community Leaders Launch 'Oaktown PROUD' Action Campaign to Combat Illegal Dumping," posted January 14, 2020, last updated July 28, 2020, https://www.oaklandca.gov/news/2020/city-of-oakland-and-community-leaders-launch-oaktown-proud-action-campaign-to-combat-illegal-dumping#:~:text=Oaktown%20PROUD%20is%20a%20campaign,promote%20community%20pride%20and%20volunteerism., accessed December 21, 2022.

Table EJ-5: Top 10th Percentile Tracts by Indicator — Hazardous Materials/Illegal Dumping

CLEANUP SITES		HAZARDOUS WASTE SITES		SOLID WASTE SITES[1]		INDUSTRIAL ZONES[2]		ILLEGAL DUMPING	
Tract Name	**Score**	**Tract Name**	**Score**	**Tract Name**	**Score**	**Tract Name**	**Score**	**Tract Name**	**Score**
Port Upper	**1.00**	Acorn Industrial*	1.00	**Melrose**	**1.00**	**Melrose**	**0.92**	Acorn Industrial*	1.00
Prescott/Mandela Peralta	**0.99**	**Jack London Square**	**0.99**	**Port Upper**	**0.99**	**Port Upper**	**0.92**	**Port Upper**	**0.99**
Oakland Estuary	**0.98**	Paradise Park/Golden Gate	0.98	**Lockwood/Coliseum/ Rudsdale**	**0.98**	**Brookfield Village/ Hegenberger**	**0.92**	**Melrose**	**0.98**
Acorn Industrial*	0.97	Piedmont Ave South	0.97	**Brookfield Village/ Hegenberger**	**0.97**	**Fitchburg**	**0.92**	**Oakland Estuary**	**0.97**
DeFremery/ Oak Center	**0.96**	**Brookfield Village/ Hegenberger**	**0.96**	**Prescott**	**0.96**	**Sobrante Park**	**0.92**	Foothill Square/Toler Heights	0.96
McClymonds	**0.96**	**New Highland**	**0.96**	Chabot Park	0.95	**McClymonds**	**0.92**	**Fitchburg**	**0.95**
Clawson/Dogtown	**0.95**	**Oakland/Harrison West**	**0.95**	Sequoyah	0.95	**DeFremery/Oak Center**	**0.92**	**McClymonds**	**0.95**
Prescott	**0.94**	**Acorn**	**0.94**	**Fitchburg**	**0.94**	**Jack London Square**	**0.92**	**Hoover/Foster**	**0.94**
Melrose	**0.93**	**Port Upper**	**0.93**	**Prescott/Mandela Peralta**	**0.93**	Port Lower*	0.92	**Clawson/ Dogtown**	**0.93**
Jingletown/ Kennedy	**0.92**	**Pill Hill**	**0.92**	**Jingletown/ Kennedy**	**0.92**	Acorn Industrial*	0.92	**Chinatown**	**0.92**
Hoover/Foster	**0.91**	**Jack London Gateway**	**0.91**	**New Highland**	**0.91**	**Prescott/Mandela Peralta**	**0.91**	**Jingletown/Kennedy**	**0.91**
Jack London Square	**0.90**	**Downtown/Old Oakland**	**0.90**	-	0.90	**Jingletown/Kennedy**	**0.91**	Golf Links	0.90

Note: Bolded census tracts in blue are EJ Communities.

** Indicates census tract with low population.*

1. Only includes 11 tracts in top decile due to ties. Next highest score for Solid Waste Sites is 0.88, and next highest for Illegal Dumping is 0.66.

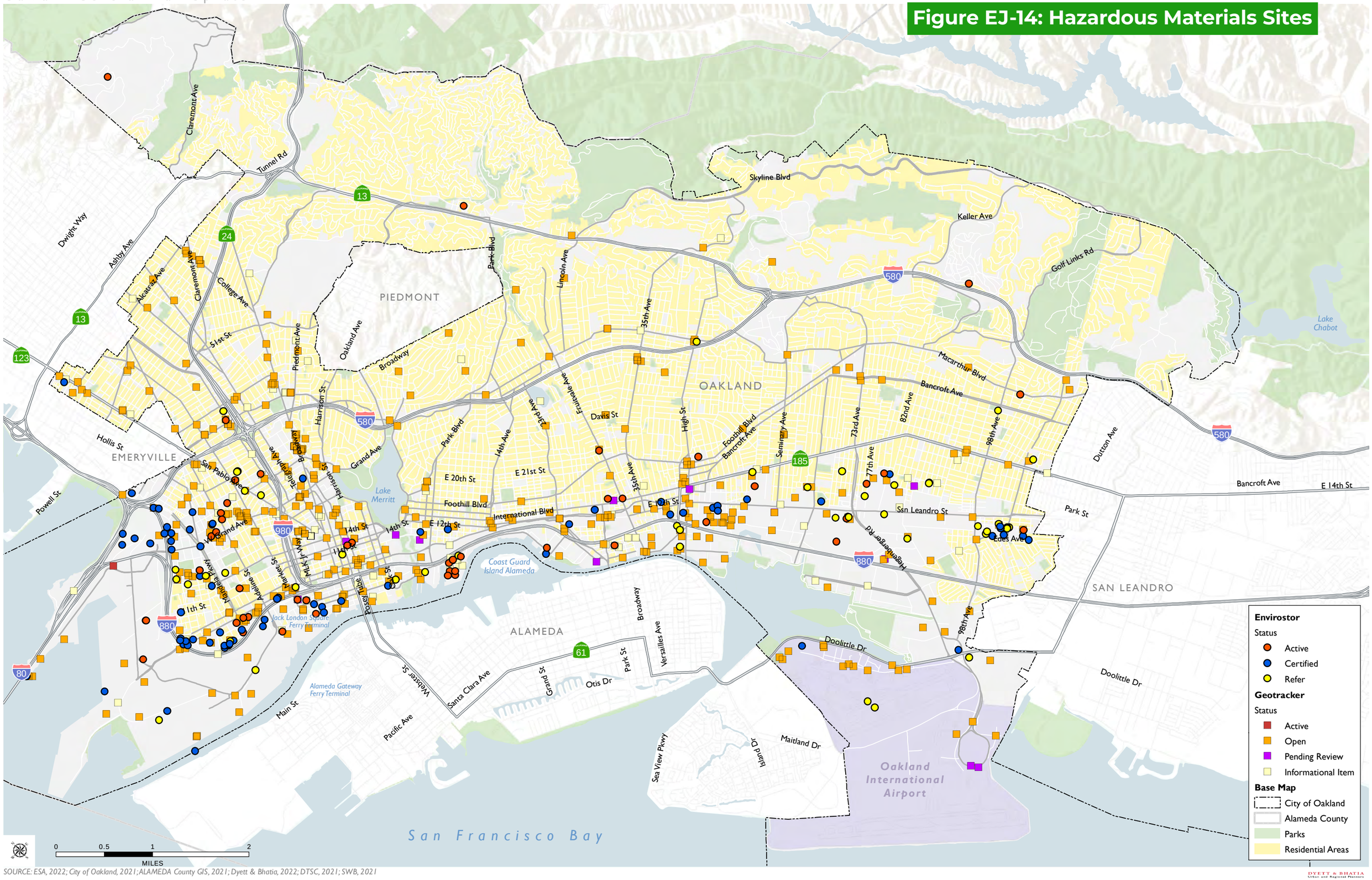
2. Maximum score is 0.92 due to ties.

Building Resilience: Oaktown PROUD

Oaktown PROUD is a campaign by and for Oaklanders to reduce illegal dumping and improve our neighborhoods. The campaign name contains an urgent call to action for all Oaklanders to "Prevent & Report Our Unlawful Dumping (PROUD)." The Oaktown PROUD campaign uses the City of Oakland's Three E's strategy to reduce illegal dumping by organizing City and community efforts into three focus areas: Education, Eradication and Enforcement. As a part of the Oaktown PROUD outreach campaign to reduce littering and dumping, the City of Oakland is working with OUSD high school students, teachers, and administrators to manage the Oaktown PROUD Student Ambassador Program. This program was sparked by ideas from Oakland students and currently operates at Oakland and Skyline high schools. The focus of the students' work is to take the knowledge that they gain through a summer program and use that information to educate people about the problem of litter and dumping in Oakland and provide resources and guidance on what they can do to help.

Source: Oaktown PROUD website

Figure EJ-14: Hazardous Materials Sites



SOURCE: ESA, 2022; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022; DTSC, 2021; SWB, 2021

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Figure EJ-15: Calls for Illegal Dumping

Includes Open, Referred, Work Order Created, Evaluated (No further action), Unfunded, and Closed cases.

BERKELEY
EMERYVILLE
PIEDMONT
OAKLAND
ALAMEDA
SAN LEANDRO
Claremont Ave
Tunnel Rd
Dwight Way
Ashby Ave
Alcatraz Ave
College Ave
51st St
Piedmont Ave
Oakland Ave
Broadway
Park Blvd
Lincoln Ave
35th Ave
Harrison St
Hollis St
Telegraph Ave
Grand Ave
Lake Merritt
14th Ave
23rd Ave
Fruitvale Ave
Davis St
High St
Foothill Blvd
Bancroft Ave
Seminary Ave
73rd Ave
77th Ave
82nd Ave
98th Ave
Dutton Ave
Skyline Blvd
Keller Ave
Golf Links Rd
Lake Chabot
Macarthur Blvd
Bancroft Ave
E 14th St
Park St
San Leandro St
Edes Ave
Hegenberger Rd
Doolittle Dr
Powell St
San Pablo Ave
W Grand Ave
Mandela Pkwy
Adeline St
Market St
MLK Jr Way
11th St
14th St
E 20th St
E 21st St
Foothill Blvd
International Blvd
E 12th St
Oak St
Posey Tube
Webster St
Santa Clara Ave
Grand St
Otis Dr
Park St
Versailles Ave
Broadway
Main St
Pacific Ave
Coast Guard Island Alameda
Jack London Square Ferry Terminal
Alameda Gateway Ferry Terminal
Sea View Pkwy
Island Dr
Maitland Dr
Oakland International Airport
San Francisco Bay
13
24
580
980
880
123
80
61
185

Calls per 1,000 Tract Residents
Natural Jenks
- 370 - 1,175
- 162 - 369
- 88 - 161
- 45 - 87
- 0 - 44
- No Data/Low Population Area

Base Map
- Railroads
- Major Roads
- City of Oakland
- Alameda County

0 0.5 1 2
MILES

SOURCE: City of Oakland, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

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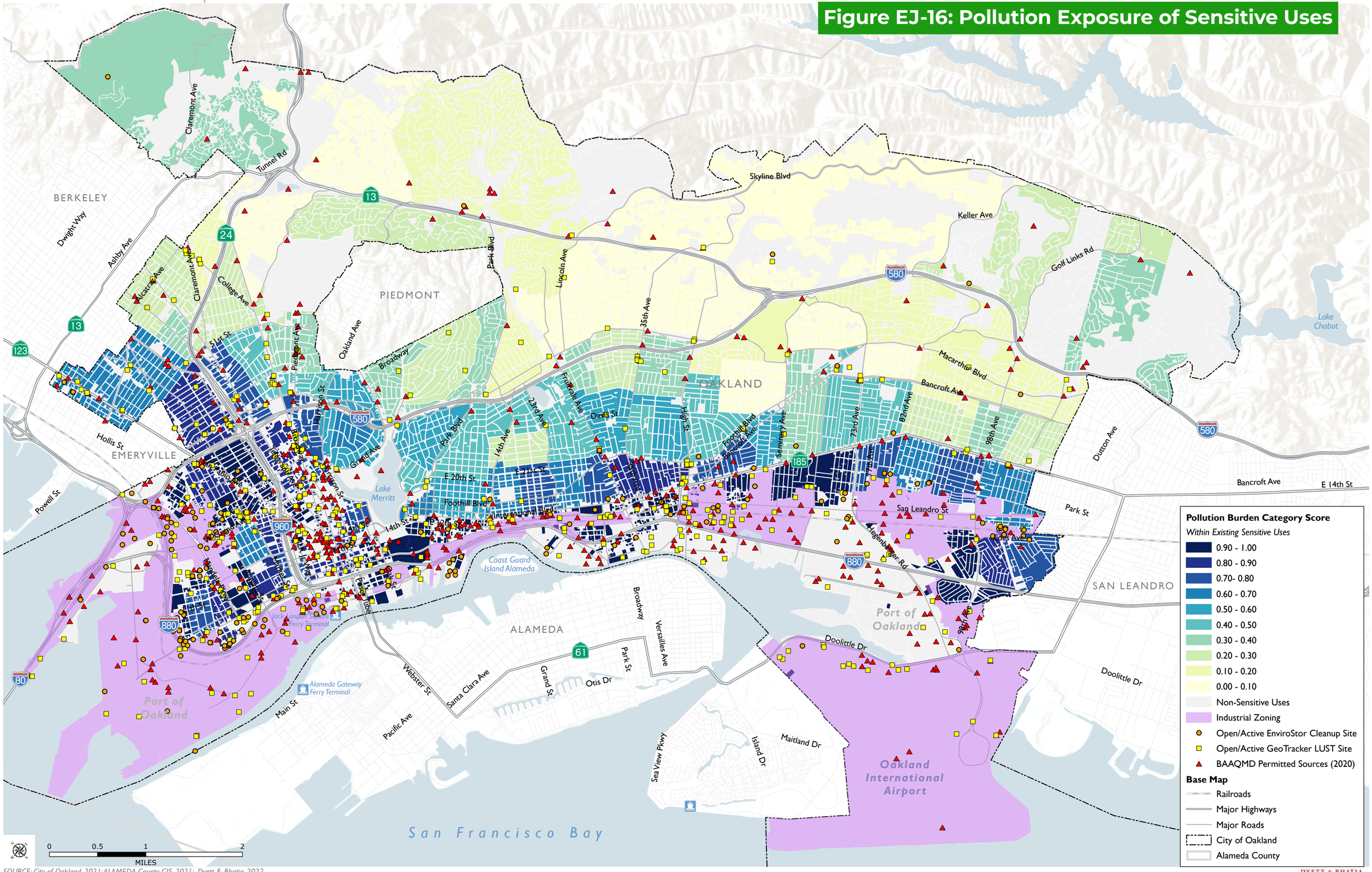
Figure EJ-16: Pollution Exposure of Sensitive Uses



Pollution Burden Category Score

Within Existing Sensitive Uses

- 0.90 - 1.00
- 0.80 - 0.90
- 0.70- 0.80
- 0.60 - 0.70
- 0.50 - 0.60
- 0.40 - 0.50
- 0.30 - 0.40
- 0.20 - 0.30
- 0.10 - 0.20
- 0.00 - 0.10
- Non-Sensitive Uses
- Industrial Zoning
- Open/Active EnviroStor Cleanup Site
- Open/Active GeoTracker LUST Site
- BAAQMD Permitted Sources (2020)

Base Map

- Railroads
- Major Highways
- Major Roads
- City of Oakland
- Alameda County

SOURCE: City of Oakland, 2021;ALAMEDA County GIS, 2021;, Dyett & Bhatia, 2022

Sensitive uses include existing residential uses, schools/educational facilities, religious/institutional uses, and hospitals.

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3.2 GOALS AND POLICIES

GOAL EJ-1 REDUCE POLLUTION, MITIGATE THE IMPACTS OF POLLUTION ON EXISTING SENSITIVE LAND USES, AND ELIMINATE ASSOCIATED PUBLIC HEALTH DISPARITIES.

Toxic Air Contaminants

EJ-1.1 **Toxic Air Contaminants.** Reduce the public's exposure to toxic air contaminants through appropriate land use and transportation strategies, particularly in Environmental Justice Communities and other areas most burdened by air pollution, as identified in **Figure EJ-12.**

EJ-1.2 **Truck Emissions and Pollution Exposure.** Minimize air pollution and exposure of sensitive land uses to truck pollution, particularly in EJ Communities and other areas most burdened by air pollution, while recognizing the Port of Oakland's role as the highest-volume shipping port in Northern California.

Industrial/Sensitive Land Use Compatibility

EJ-1.3 **Industrial Uses Near Sensitive Land Uses.** Ensure that heavy industrial uses are adequately buffered from residential areas, schools, and other sensitive land uses. In new industrial developments, require adequate mitigation of air contaminant exposure and vegetative barriers near large stationary and mobile sources of air pollution.

EJ-1.4 **Performance Standards.** Develop performance standards in the zoning code applicable to new industrial and commercial developments to minimize or avoid the potential for adverse effects related to air quality, noise, or safety on adjacent existing residential uses. This could include expansion of the S-19 Health and Safety Protection Combining Zone to include air quality effects.

EJ-1.5 **Regulate Polluting Uses.** Develop more stringent permitting standards and limit the number of variances approved for new, high-intensity, industrial or commercial land uses near sensitive uses in Environmental Justice Communities. *See also Policy SAF-5.1.*

EJ-1.6 **Enhanced Enforcement.** Prioritize code enforcement to address illegal land uses and activities that cause pollution and are hazardous to health in EJ Communities.

Air Filtration and Reducing GHG

Many of the strategies to reduce GHG will be included in the forthcoming Land Use and Transportation Element (LUTE) update (including mixed land uses and transportation policies).

EJ-1.7 **Truck-Related Impacts.** For new warehouses and truck-related businesses, reduce impacts from truck loading and delivery including noise/vibration, odors, air pollution, and greenhouse gas emissions.

EJ-1.8 **Air Filtration.** Consistent with the State's Building Energy Efficiency Standards for air filtration in effect as of January 1, 2023, require newly constructed buildings of four or more habitable floors to include air filtration systems equal to or greater than Minimum Efficiency Reporting Value (MERV) 13 (ASHRAE Standard 52.2), or a particle size efficiency rating equal to or greater than 50 percent in the 0.3-1.0 micrometer range and equal to or greater than 85 percent in the 1.0-3.0 micrometer range (AHRI Standard 680).

EJ-1.9 **Electric Vehicle Charging.** Require industrial and warehouse facilities to provide electrical connections for electric trucks and transport refrigeration units in support of CARB regulations.

EJ-1.10 **Reduce Emissions from Port Operation.** Support Port of Oakland's efforts to reduce emissions as part of operation and compliance with CARB regulations. This could include:

- Support of zero-emission drayage truck operations through appropriate local ordinance amendments, including allowable weight limits for single-axle, zero-emission trucks on local streets, and developing an investment plan for needed upgrades.
- Provision of data or staff time to study of the effects on truck flow and congestion due to increasing visits from larger container ships, the feasibility of an off-terminal container yard that utilizes zero-emission trucks to move containers to and from the marine terminals, and the potential efficiency gains from increasing the number of trucks hauling loaded containers on each leg of a roundtrip to the Port.

Construction and Building Emissions

EJ-1.11 **Building Electrification.** Continue to enforce compliance with Oakland's Building Electrification Ordinance, which requires new buildings to be natural gas-free and support the transition of existing buildings to natural gas alternatives in order to improve safety and air quality and reduce health risks. This could include:

- Ensuring that all new developments reduce on-site natural gas combustion through electrification of heating and cooking technologies.

EJ-1.12 **Construction Site Impacts.** Through standard conditions of project approval, code enforcement, and other regulatory mechanisms, require new development to minimize disturbances of natural water bodies and natural drainage systems caused during construction and to implement measures to protect areas from road dust, erosion and sediment loss.

Credit: Amir Aziz

EJ-1.13 **Emissions from Construction Activities.** Require projects to implement construction air pollution and greenhouse gas emissions controls and applicable mitigation strategies for all construction sites to the maximum extent feasible. Refer to Best Construction Practices and Best Available Retrofit Control Technology (BARCT) recommended by BAAQMD.

EJ-1.14 **Reduced Exposure to Air Pollution for Project Occupants.** Incorporate measures to improve indoor air quality and reduce exposure to air pollution in new development projects.

Air Quality Monitoring and Assessment

EJ-1.15 **Sensitive Uses.** Coordinate with BAAQMD and community partners in evaluating human exposure to toxic air contaminants, particularly in Environmental Justice Communities, and impose conditions as appropriate on projects to protect public health and safety beyond those in the City's 2020 standard conditions of approval.

EJ-1.16 **Community Air Protection.** On an ongoing basis, support BAAQMD, community members, businesses, and other stakeholders in developing and implementing Community Air Monitoring Plans, Community Emissions Reduction Plans, and other air pollution control initiatives pursuant to AB 617. Supportive City actions may include:

- Participation on steering committees and technical advisory committees.
- Co-investments that leverage additional funding for actions in EJ Communities.
- Utilization of community-collected air quality data in policy development and evaluation.
- Contracts with community partners and other air pollution monitoring organizations to obtain more granular pollution data.

EJ-1.17 **Data-Informed Efforts.** Collaborate with BAAQMD, community organizations, and other stakeholders to use air quality monitoring data to inform area-specific improvement actions outside of AB 617-related efforts. Such actions may include:

- Prioritizing areas for capital investments with co-benefits for air quality, such as the planting of trees and installation of EV charging infrastructure.
- Integrating air quality improvement actions into planning efforts, such as new specific plans, master plans, or area plans that will guide development in impacted areas.
- Limiting the establishment of new sources of air pollutants in areas with elevated levels of pollutant concentrations unless appropriate mitigation is implemented.
- Obtaining and using hyperlocal data along with community ground-truthing to more accurately inform development of air quality improvement strategies that are most effective and responsive to the needs of EJ Communities.
- Seeking opportunities to enhance existing air monitoring efforts, such as by working with BAAQMD and helping to expand the current monitoring network, especially where sensitive uses are within close proximity (within 500 feet) of pollution sources.
- Partnering with industrial and warehouse facility owners, community-based environmental and energy justice organizations to install rooftop solar PV systems to power EV charging stations.

EJ-1.18 **Impact Assessment and Mitigation.** Continue to use BAAQMD modeling tools and guidance documents as appropriate to identify and mitigate air quality impacts from proposed development projects.

EJ-1.19 **Regional Coordination.** Support air quality planning efforts led by other local, regional, and State agencies while simultaneously leveraging City authority and resources to focus on reducing air pollution burden in EJ Communities.

GOAL EJ-2 PROTECT OAKLAND WATER SUPPLIES FROM CONTAMINATION.

Water Quality

EJ-2.1 **Clean Water Programs.** Promote environmental stewardship and pollution prevention activities with outreach, assistance, and incentives for residents and businesses, particularly in EJ Communities and areas with impaired surface and groundwater, as identified in **Figure EJ-13.**

EJ-2.2 **Water Quality Hazard Prevention.** Remediate and clean up sites with known or potential contamination, as mapped in **Figure EJ-14** or identified on GeoTracker, that impact or potentially impact water quality. Continue to support the San Francisco Regional Water Quality Control Board and California Department of Toxic Substances Control to assess cleanup sites, leaking underground storage tanks, and gasoline stations in EJ Communities with high water contamination threat.

EJ-2.3 **Protect and Restore Creeks and Wetlands.** Protect, enhance, and restore riparian corridors and wetlands, increasing biodiversity and access for residents to existing creeks and wetlands. Collaborate with environmental justice organizations and EJ Community residents to co-develop environmental stewardship and pollution prevention programs with outreach, assistance, and incentives for residents and businesses.

EJ-2.4 **Stormwater Management.** Reduce stormwater runoff by implementing the Green Stormwater Infrastructure Plan to help conserve water, protect water bodies, and mitigate localized flood risk from large storm events.

GOAL EJ-3 PREVENT, REDUCE, AND CLEAN UP ILLEGAL DUMPING.

Illegal Dumping and Blight

EJ-3.1 **Design for Graffiti Reduction.** Establish guidelines based on Crime Prevention Through Environmental Design (CPTED) standards and other best practices that decrease opportunity for graffiti.

EJ-3.2 **Blight Control and Prevention.** Control and mitigate impacts of blight-producing industrial and commercial activities with a high tendency of attracting trash and litter, such as recyclers, fast food restaurants, warehouses and industrial sites, vacant lots, and other businesses that may attract blight.

EJ-3.3 **Proactive Illegal Dumping Cleanup.** Support the expansion of proactive cleanup crews that target illegal dumping “hot spot” areas in EJ Communities, as identified in **Figure EJ-15.**

EJ-3.4 **Illegal Dumping Enforcement.** Continue to enforce dumping as an illegal activity, including surveillance of hot spots, ticketing, and expansion of Environmental Enforcement Officers. Periodically assess enforcement efforts to ensure discriminatory patterns do not emerge.

EJ-3.5 **Community Education on Illegal Dumping.** Expand community campaigns in EJ Communities to prevent dumping, inform neighbors about affordable services, and support youth leadership. Examples include education about Bulky Block parties and engagement of the Oaktown PROUD Student Ambassadors.

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4. Safe, Healthy, and Affordable Homes

A safe and healthy home is a fundamental component of a healthy quality of life, supporting both mental and physical health as a source of shelter and peace of mind. Housing with proximity to quality facilities such as open space and recreation, public transportation, and employment also promotes good health. However, a history of inequitable investments and discriminatory practices, compounded with the rising cost of living in the Bay Area, disproportionately threatens the ability of low-income and BIPOC communities to afford to stay in their communities. As described in Chapter 3, certain neighborhoods and communities in Oakland also face pollution exposure due to their proximity to polluting facilities, such as the Port of Oakland, industrial land, and truck routes. Pockets of concentrated housing inequity may also be isolated from essential health resources such as improved recreational spaces, quality pharmacies, clinics, and hospitals, and healthy food options.

The City of Oakland recently updated its Housing Element for the 2023-2031 housing cycle. As part of the Housing Element update, the City conducted a thorough evaluation of the previous (2015-2023) Housing Element; an analysis of housing needs, constraints, resources, and opportunities; and an assessment of fair housing. The 2023-2031 Housing Element includes more information and detail about Oakland's housing needs and the City's plan for protecting and supporting existing neighborhoods while accommodating new residents. The 2023-2031 Housing Element also discusses issues related to homelessness, housing affordability, and displacement. This section of the EJ Element describes additional issues and opportunities related to housing quality and habitability, as well as identifies appropriate locations for housing to minimize exposure to pollution.

4.1 ISSUES AND DISPARITIES

COST BURDEN AND EVICTIONS

Household income is one of the most significant factors affecting housing choice and opportunity. Income largely determines a household's ability to purchase or rent housing. While higher-income households have more discretionary income to spend on housing, lower- and moderate-income households are limited in the range of housing they can afford. Typically, as household income decreases, cost burdens, overcrowding, and vulnerability to displacement and houselessness increase. Households that are housing cost burdened and do not receive housing assistance or own their home outright are considered precariously or insecurely housed. These households are at greater risk for eviction, displacement, overcrowding and homelessness.

A housing cost burdened household is defined as a household that spends more than 30 percent of their monthly income on housing, while severely cost burdened households spend more

than 50 percent of household income on housing costs. Most extremely low-income households in Oakland (over 60 percent) are severely cost burdened. Oakland's predominantly Latinx/Hispanic neighborhoods are the most housing cost burdened with over double the number of severely housing burdened households as predominantly White neighborhoods.

According to the California Department of Finance, in 2021 there were 178,207 housing units and 167,680 households in Oakland. Most of these households are renters (59 percent), while 41 percent are homeowners.[1] This means that homeownership in Oakland is significantly less than Alameda County as a whole, where the majority (54 percent) of units are owner-occupied and 46 percent are renter-occupied. In Oakland, more renters are low-income than homeowners and tend to have higher rates of housing cost burden than homeowners - 46.5 percent of all renters experience some level of housing cost burden while 31.8 percent of homeowners do. Today, the vast majority of Oakland's Black/African American residents are renters (67.83 percent). When housing costs are high, residents may be forced to make tradeoffs that affect housing habitability.

1 United States Census Bureau, 2019: American Community Survey 5-Year Estimates Subject Tables – Households and Families (S1101), December 10, 2020, https://data.census.gov/cedsci/table?q=oakland,%20ca%20housing&g=1600000US0653000&tid=ACSST5Y2019.S1101, Accessed February 16, 2022.

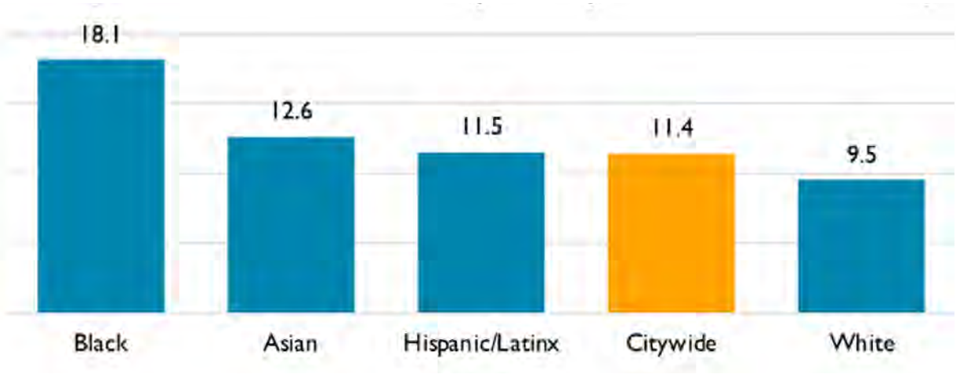
There are an average of 85 evictions per 1,000 residents in predominantly Black census tracts and 72 per 1000 in predominantly Asian tracts, compared to 34 evictions per 1,000 residents in predominantly White census tracts. Evictions in predominantly Black census tracts are nearly 2.5 times higher than in predominantly White census tracts, corroborating other evidence of higher displacement rates in the Black community. The disparity gap between the most and least impacted census tracts is far larger than the averages. For instance, Prescott/Mandela Peralta in West Oakland experiences 30 times more evictions per 1,000 people than Montclair North in the north Oakland Hills, and Port Lower in West Okaland experiences 365 times more evictions than Upper Piedmont Ave.

CODE ENFORCEMENT

The 2018 Oakland Equity Indicators Report found that housing quality (comprised of the housing habitability complaints, complete kitchen facilities, and overcrowding indicators) is not equitable, with an average score of 33 out of 100. **Chart EJ-3** shows how the number of code enforcement complaints (for blight, zoning, and housing habitability) per 1,000 residents differ by census tract racial majorities.

Specifically, majority-white tracts have the lowest rate of code enforcement complaints per 1,000 residents and tracts that are majority people of color are all higher than the overall citywide rate. Oakland's most impoverished neighborhoods with the highest proportion of renters are most likely to suffer from substandard housing conditions. These neighborhoods disproportionately house Latinx, Black, immigrant, and refugee communities, low-income renters with children, undocumented residents, residents receiving public assistance and elderly renters. Substandard housing conditions such as pest infestation, mold, asbestos, lead paint, faulty plumbing, and overcrowding can lead to increased health problems such as asthma, lead poisoning, cardiovascular disease, and neurological disorders. Residents in predominantly Black census tracts are 1.9 times more likely than predominantly White census tracts to report code enforcement complaints due to substandard housing conditions. It is important to note however, that many residents of substandard housing do not report their complaints for fear of retaliation from their landlord and some landlords take advantage of this, a practice called "predatory habitability." **Figure EJ-17** maps the distribution of all three types of code enforcement complaints for 2020 (the most recent year with complete data) throughout Oakland.

Chart EJ-3: Code Enforcement Complaints by Census Tract Racial Majority, 2020



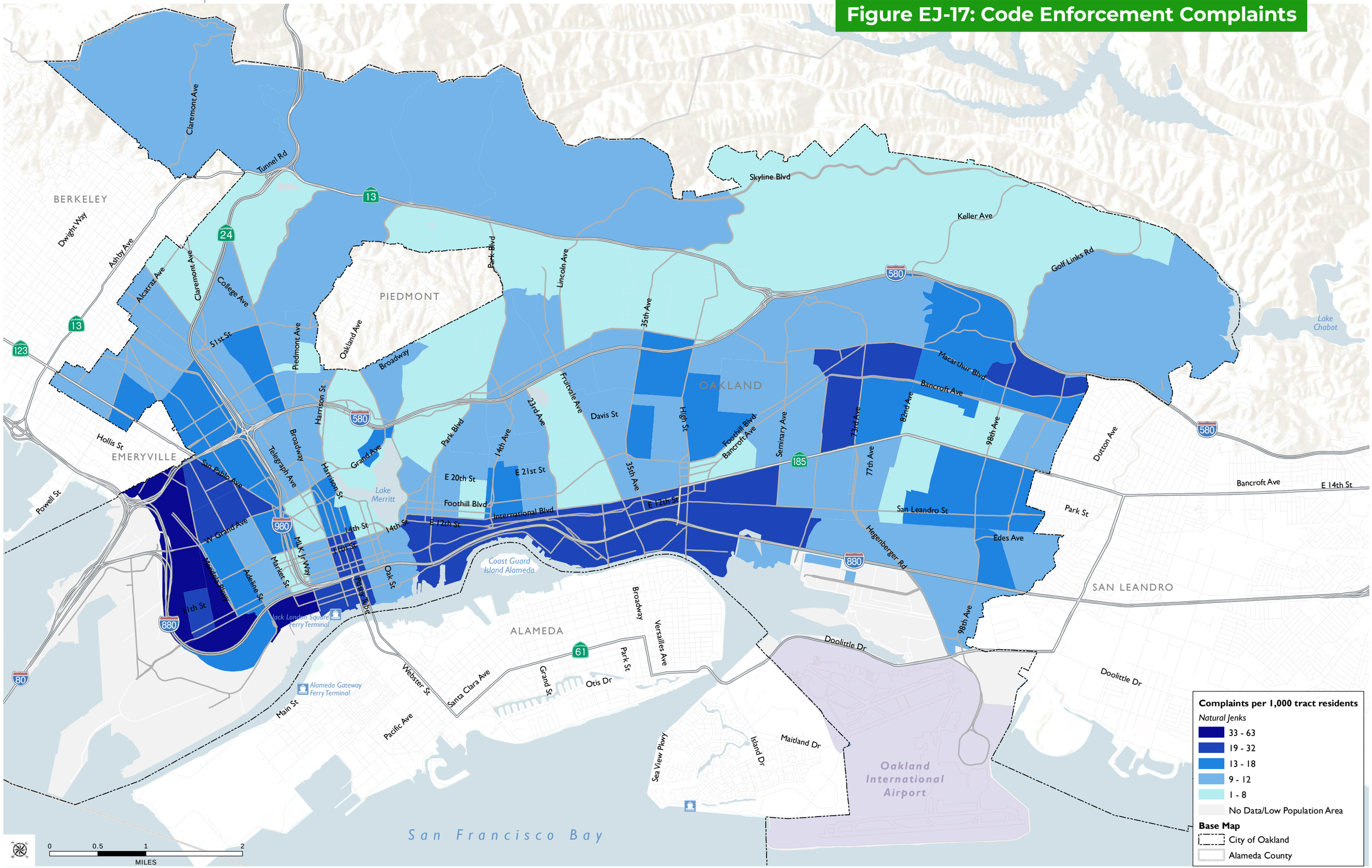
Includes code enforcement complaints received by the Planning & Building Department regarding blight (activity/facility), housing habitability, or zoning of rental housing during 2020.

OLDER HOUSING

Age of housing can also be an indicator of substandard housing conditions, particularly for buildings built over 30 years ago. More than 80 percent of Oakland's housing stock was constructed prior to 1980 and is now over 40 years old. Without proper maintenance or rehabilitation, older buildings can fall into disrepair, subjecting residents to conditions such as inadequate sanitation, structural hazards, hazardous mechanical systems, and other issues that the State has determined to be below the minimum standards of living (as defined by Government Code Section 17920.3). Based on the City's 2020-2021 Consolidated Annual Performance and Evaluation Report, the Oakland Housing Authority (OHA) administered programs that supported the rehabilitation of 317 existing affordable housing units in fiscal year 2020/2021.[2] However, the City's ability to meet the need for rehabilitation assistance is limited, and it can be difficult to accurately identify substandard units in need of rehabilitation, especially since not all households living in substandard conditions may actively seek assistance.

2 City of Oakland Department of Housing and Community Development, Draft 2020/2021 Consolidated Annual Performance and Evaluation Report, November 24, 2021, https://www.oaklandca.gov/services/2020-21-consolidated-annual-performance-and-evaluation-report-caper, accessed February 16, 2022.

Figure EJ-17: Code Enforcement Complaints



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Includes blight, housing habitability, and zoning complaints filed between January and December 2020.

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LEAD

Housing that was built before 1978 when the residential use of lead-based paints was banned is likely to contain some lead-based paint. When the paint peels and cracks, lead paint chips and dust can spread throughout indoor environments and be ingested or breathed in, increasing risk of lead poisoning particularly in young children. Residents living in older neighborhoods who cannot afford to renovate or repair their homes are especially at risk of exposure – up to 96 percent of households in both east and west Bancroft/Havenscourt census tracts based on data from CalEnviroScreen. Tracts with the greatest risk of lead exposure to children are shown in **Figure EJ-18**. About sixty percent of the census tracts in Oakland are in the top statewide percentile rank of children's lead risk from housing. In addition, there are notable disparities by race: The percentage of low-income children at risk for lead poisoning is over 1.5 times higher in predominantly Latinx census tracts than in predominantly white census tracts. Census tracts south of Lake Merritt, bounded by I-880 and I-580, are at greatest risk of lead pollution, as well as census tracts near the Port of Oakland, including Port Upper, Port Lower, Prescott/Mandela Peralta.

INDOOR AIR QUALITY

Although outdoor air pollution is most commonly the focus of conversations about air quality, the indoor environment also has a significant impact on health, especially considering that Americans spend an average of 90 percent of their time indoors.[3] Homes can expose people to air pollutants such as nitrogen oxide, particulate matter, moisture, and mold. Older buildings that are not well-maintained can lack proper ventilation or have deteriorated building infrastructure that exacerbates exposure to these indoor pollutants.

Several major appliances including water heaters, space heaters, clothes dryers, and stoves are fueled by natural (mostly commonly methane) gas, which is also a source of indoor air pollutants and a major contributor to poor health outcomes. In fact, when gas stoves are on, indoor air pollutants can spike to levels that would be considered illegal by EPA standards if those same levels occurred outside. In light of this fact, the City has set a target of no more gas in Oakland buildings by 2040. However, replacing gas with electric energy may not be feasible for all residents. That is, lower-income areas, areas with older housing stock, and areas with high rates of renters are more likely to have higher proportions of poorly maintained or poorly ventilated homes, absent or nonfunctioning range hoods, and higher competition in demand for repair/upgrade funds, making electrification both that much more urgent and that much more cost-prohibitive, and therefore a major environmental health and equity issue. The City's 2030 ECAP includes actions to develop a policy roadmap to achieve decarbonization of the existing building stock by 2040, without additional cost burden or displacement risk to frontline communities (those hit first and worst by climate change effects). The City will also continue to support property owners in building electrification, energy efficiency and resilience, and housing maintenance programs through grants and technical assistance.

In addition to policies and actions in Oakland's Housing Element, additional policies in the EJ Element support resource coordination across City departments and partners, seek to improve the City's ability to inspect and screen for health and safety issues in homes, and incentivize ways to include health-promoting features in affordable housing.

Environmental Justice Communities most burdened by quality issues, income burden, evictions, and lead exposure are shown in **Table EJ-6**.

Spotlight: Racial Equity Impact Analysis: Eliminating Lead Paint Hazards in Oakland & Alameda County

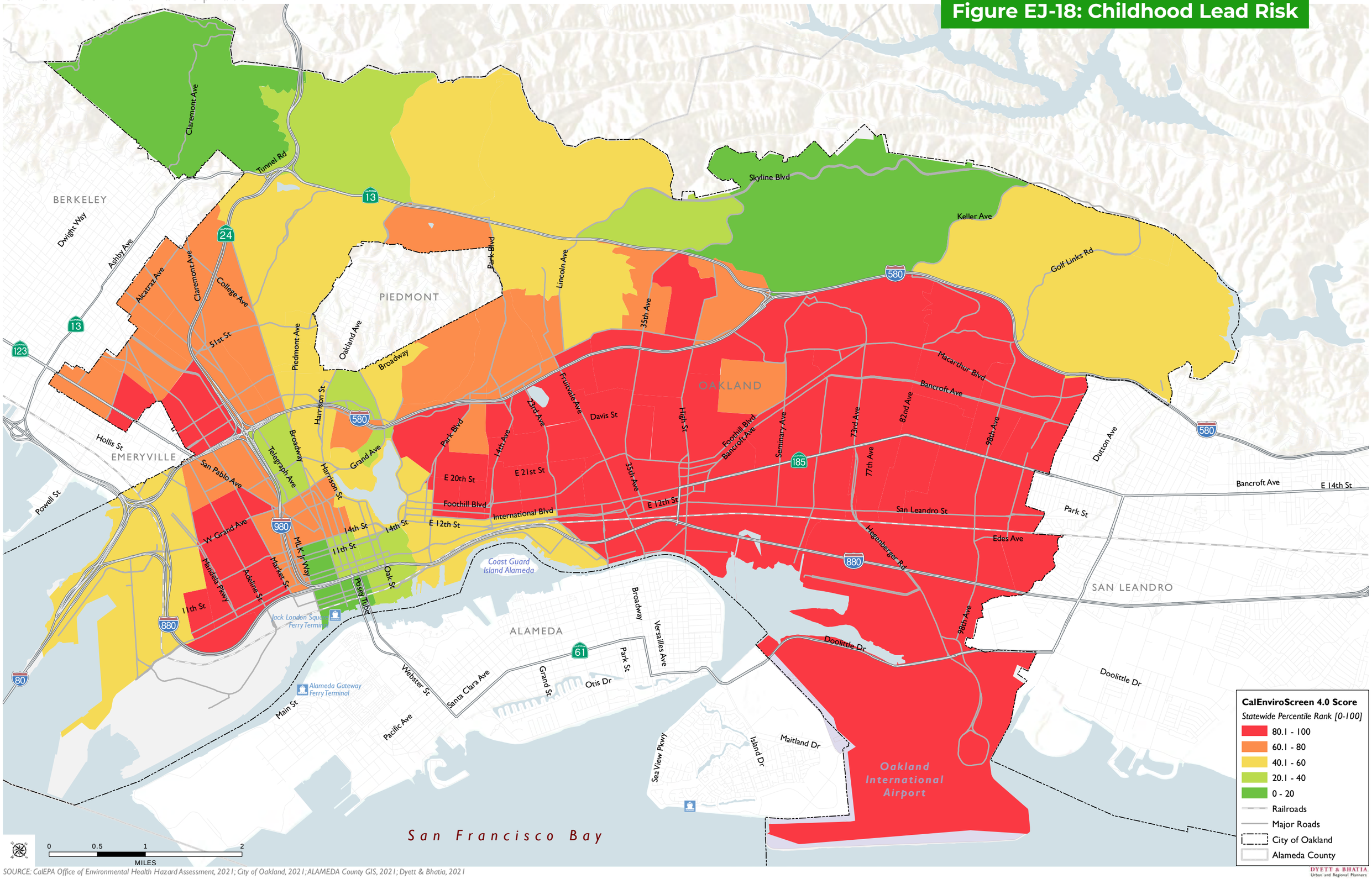
Lead is a material with properties that make it useful in industrial and commercial products and was once added to everything from gasoline, paint, solder, water pipes, and cosmetics, among others. Despite this widespread use, lead is an extremely potent toxin and dangerous to health, particularly for young children. Although corporations in the lead paint industry were well aware of lead's toxicity and its risks to public health by the early 20th century, lead paint was not banned until 1978, and many homes built before this era are at high risk of containing this dangerous substance.

In July 2019, various California counties and cities entered into a landmark $305 million Settlement Agreement with lead paint manufacturers. Under the Lead Settlement Memorandum of Understanding, Alameda County and the City of Oakland received 10 percent of the settlement abatement funds to be paid out over seven years (approximately $24 million).

In Oakland, "the problem is so large that the rate of lead poisoning in some Oakland zip codes is higher than in Flint, Michigan at the height of its lead in the water crisis." Lead paint hazards disproportionately affect low-income and Black, Indigenous, and Latinx communities due to the prevalence of older, dilapidated housing, which exposes children in poverty to lead paint hazards at the greatest rates. In 2021, Environmental/Justice Solutions conducted a Racial Equity Impact Analysis to guide the City of Oakland in partnering with Alameda County to develop and implement an equitable lead hazard abatement program. The report recommends policies that prioritize at-risk communities, address barriers to resources, ensure lead hazards are expeditiously removed from homes in vulnerable communities, and bolster local economic resilience. This EJ Element includes policies that support implementation of REIA recommendations with an emphasize on primary prevention.

3 United States Environmental Protection Agency, "Report to Congress on indoor air quality: Volume 2," Washington, DC (1989): EPA/400/1-89/001C, [as cited on https://www.epa.gov/report-environment/indoor-air-quality].

Figure EJ-18: Childhood Lead Risk



SOURCE: CalEPA Office of Environmental Health Hazard Assessment, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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HEALTHY HOUSING LOCATIONS

Oakland's geography has been shaped historically by zoning, one of the primary purposes of which is to protect residential, commercial, industrial, and civic areas from the intrusion of incompatible uses. However, in the past, zoning was often used as tools to perpetuate racism, effectively working to keep property values higher for White residents in more affluent areas by locating incompatible uses in predominantly BIPOC communities. As described in the Housing Element REIA, "While affluent neighborhoods are protected from industrial uses and the intrusion of lower-priced housing into their neighborhoods, the public health, character, and culture of lower income, BIPOC neighborhoods do not receive equivalent levels of protection. In effect, higher standards are presumed and upheld for predominantly White and affluent neighborhoods than are for lower income neighborhoods that are majority BIPOC." Single-family zoning (detached unit residential) was largely designed to have a similar effect as racially restrictive housing covenants. This legacy continues to this day, as "[continued utilization] of single-family zones, acts to bar the development of housing affordable to residents earning moderate- to low-incomes, who are more likely to be BIPOC, across swaths of the city" where there is more access to health-promoting resources, employment, and opportunity. The Housing Action Plan includes zoning and height changes across the city and in specific sites in Rockridge, single-family dominated neighborhoods, along corridors, transit proximate areas and high resource neighborhoods to affirmatively further fair housing. The HAP also implements an Affordable Housing Overlay Zone, where 100 percent affordable projects will be granted by-right approvals. The AHO will largely apply citywide. Any projects located on sites with at least 20 percent affordable units within the City's Housing Sites Inventory Overlay Zone will be granted by-right approvals.

Oakland's Housing Element

Oakland's 2023-2031 Housing Element sets forth the City's housing priorities and goals—as well as its vision for both short- and long-term development—to create a fair and just city. State law mandates that the Housing Element be updated every eight years to reflect changing conditions, community objectives, and goals. The 2023-2031 Housing Element identifies a foundational framework of five overarching goals in Chapter 4: Housing Action Plan to comprehensively address the housing crisis and needs of Oaklanders. The goals seek to significantly address disparities in housing needs and in access to opportunity, replace segregated living patterns with truly integrated and balanced living patterns, transform racially and ethnically concentrated areas of poverty into areas of opportunity, foster and maintain compliance with civil rights, and affirmatively further fair housing. The goals and policy focus areas include:

- **Protect Oakland Residents from Displacement and Prevent Homelessness:** Protect Oakland tenants from displacement and create conditions that enable them to remain in their homes and communities.
- **Preserve and Improve Existing Housing Stock:** Conserve and improve the affordability of existing housing stock in Oakland and address substandard conditions.
- **Close the Gap Between Affordable and Market-Rate Housing Production by Expanding Affordable Housing Opportunities:** Facilitate the production of housing for extremely low, very low, low, and moderate-income households. In addition to increased production generally, provide a diversity of housing types, ownership opportunities, living arrangements, and features designed to accommodate persons with disabilities.

  Locate new housing to further access to opportunity (while simultaneously investing in and protecting tenants in disinvested communities) and remove constraints to affordable housing development.
- **Address Homelessness and Expand Resources for the Unhoused:** Recognize housing as a human right. Reduce homelessness through Housing First approaches and support coordination across the spectrum, from homelessness prevention to transitional housing/shelter and services to permanent housing with resources for long-term support.
- **Promote Neighborhood Stability and Health:** Promote resilient development in safe, healthy, and just communities. Increase resources in disinvested communities and create long-time stability through homeownership opportunities.

Table EJ-6: Top 10th Percentile Tracts by Indicator — Safe, Healthy, and Affordable Homes

TRACT NAME (WITH SCORE)						
HABITABILITY	**HOUSING BURDEN**	**EVICTION**	**HEATING[1]**	**OVERCROWDING**	**INCOMPLETE FACILITIES**	**LEAD**
Acorn Industrial* (1.00)	**Bancroft/ Havenscourt East (1.00)**	Port Lower* (1.00)	**Fremont District (1.00)**	**Fruitvale/ Hawthorne (1.00)**	**Uptown/ Downtown (1.00)**	**Bancroft/ Havenscourt East (1.00)**
Prescott/ Mandela Peralta (0.99)	**Eastmont (0.98)**	**Jack London Square (0.99)**	**Jingletown/ Kennedy (0.99)**	**Reservoir Hill/ Meadow Brook (0.98)**	Reservoir Hill/ Manzanita (0.99)	**Seminary (0.99)**
Port Upper (0.98)	**Melrose (0.98)**	Foothill Square/Toler Heights (0.98)	**Fitchburg (0.97)**	**Lower San Antonio East (0.98)**	Piedmont Ave North (0.98)	**Brookfield Village (0.98)**
Chinatown (0.97)	**Hoover/Foster (0.97)**	Las Palmas (0.97)	**Reservoir Hill/ Meadow Brook (0.97)**	**Fremont District (0.97)**	**Downtown/ Old Oakland (0.97)**	**Fremont District (0.97)**
Oakland Estuary (0.96)	**Lower San Antonio East (0.96)**	Downtown (0.96)	**Melrose (0.96)**	**Fruitvale (0.96)**	Lake Merritt (0.96)	**Lockwood/Coliseum/ Rudsdale (0.96)**
Clawson/ Dogtown (0.96)	**Brookfield Village (0.96)**	**Fitchburg (0.95)**	**McClymonds (0.94)**	**Elmhurst (0.96)**	Piedmont Ave Central (0.96)	**Lower San Antonio East (0.96)**
McClymonds (0.95)	**Peralta/Hacienda (0.95)**	Golf Links (0.95)	**Bunche/Oak Center (0.94)**	**Jingletown/ Kennedy (0.93)**	**Pill Hill (0.95)**	**New Highland (0.95)**
Foothill Square/ Toler Heights (0.94)	**Chinatown (0.94)**	**Bunche/MLK Jr (0.94)**	**Fruitvale/ Hawthorne (0.94)**	**Sobrante Park (0.93)**	**Lower San Antonio East (0.94)**	**Elmhurst (0.94)**
Prescott (0.93)	**New Highland (0.93)**	**Brookfield Village (0.93)**		**Brookfield Village/ Hegenberger (0.93)**	**Chinatown (0.93)**	**Reservoir Hill/ Meadow Brook (0.93)**
Bancroft/ Havenscourt East (0.92)	**Fitchburg (0.92)**	**Prescott/Mandela Peralta (0.92)**		**Bancroft/ Havenscourt East (0.90)**	**Harrington/ Fruitvale (0.92)**	**Bancroft/ Havenscourt West (0.92)**
Eastmont (0.91)	**Arroyo Viejo (0.91)**	**Prescott (0.91)**		**Peralta/ Hacienda (0.90)**	Lower Laurel/ Allendale (0.91)	**Brookfield Village/ Hegenberger (0.91)**
Jack London Square (0.90)	**Elmhurst (0.90)**	**McClymonds (0.90)**		**Brookfield Village (0.90)**	Golf Links (0.90)	**Arroyo Viejo (0.90)**

Note: Bolded and blue census tracts are EJ Communities.

** Indicates census tract with low population.*

1. Includes only 8 tracts in top decile due to ties. Next highest score is 0.88.

4.2 GOALS AND POLICIES

GOAL EJ-4 COORDINATE RESOURCES TO IMPROVE HOUSING QUALITY AND HABITABILITY.

EJ-4.1 **Resource Optimization.** Coordinate across City departments and with relevant partner agencies including the Oakland Housing Authority, EBMUD, BAAQMD, ABAG, ACPHD and others, to optimize the use of data, grant monies, incentives, financial resources, staffing, investments, and programs in addressing displacement and tenant protections; sanitary housing and maintenance issues; environmental hazards in homes and neighborhoods; and other concerns related to stable, safe, and sanitary housing.

EJ-4.2 **Supplemental Funding Sources for Building Rehabilitation.** Place a high priority on identifying supplemental funding sources/resources for retrofit, rehabilitation, and upgrade projects that address health and safety in housing occupied by low-income renters and homeowners, including air quality improvements. Supplemental funding sources could include loans and grants available from the California Strategic Growth Council, CalEPA, CARB, and other entities.

EJ-4.3 **Healthy Homes Inspections.** As part of the Joint Lead Hazard Abatement Program in partnership with ACPHD, improve ongoing ability to screen for and eliminate lead hazards through proactive approaches, including proactive inspections of rental property dwellings and lead-safe certification requirements for childcare facilities and schools. Prioritize abatement, testing, outreach, and education activities in high-risk areas and serving the populations most likely to live in high-risk dwellings in EJ Communities, as identified in **Figure EJ-18**.

EJ-4.4 **Healthy Homes Awareness.** Continue to work with Oakland HCD, ACPHD, and community organizations to promote safe and sanitary housing in EJ Communities in **Figure EJ-17** by providing owners and occupants with culturally appropriate and linguistically accessible information and resources about home health, including lead/Lead Safe Home Program grants, indoor air pollutants, asthma triggers, hazard zones, and other information. Efforts may include the development and dissemination of healthy home checklists, conducting trainings, workshops, or audits.

EJ-4.5 **Improve Indoor Air Quality in Existing Buildings.** For new projects and significant rehabilitations of existing buildings, improve indoor air quality and energy efficiency through weatherization and strategies to prevent buildup of mold and mildew.

EJ-4.6 **Environmental Quality.** In private and non-profit housing projects in EJ Communities, promote and seek ways to incentivize the inclusion of features and amenities that support and enhance the health of occupants and the environment, including:

- On-site health and human services;
- Energy-efficient and electric appliances;
- Green infrastructure, such as green roofs or appropriate tree planting;
- Car sharing;
- Community gardens or sponsored rides to farmers markets; and
- Transit and bus passes for lower income workers and persons with disabilities to reduce emissions.

5. Expanding Healthy Food Access

Access to affordable, healthy, nourishing food is one of the most basic human needs. Beyond this, Oakland's food system also plays a major role in shaping Oakland's culture, identity, and employment opportunities. However, there are parts of Oakland that lack food access, and many Oaklanders struggle with food insecurity. The U.S. Department of Agriculture (USDA) defines food insecurity as "lack of consistent access to enough food for every person in a household to live an active, healthy life."[1] Food-insecure households are not necessarily food insecure all the time. Food insecurity may reflect a household's need to make trade-offs between important basic needs such as housing or medical bills and purchasing nutritionally adequate foods. Challenges to accessing healthy food can lead to a higher risk of chronic diseases such as obesity, heart disease, and type 2 diabetes;[2] when people cannot get to grocery stores that sell healthy foods, they may shop at nearby corner stores, which often carry foods high in fat, sugar, and sodium and fewer healthy options like fresh produce. EJ Communities most burdened by food access issues are shown in **Table EJ-7**. This section describes Oakland's food network, including availability of food outlets, food availability, and food quality.

5.1 ISSUES AND DISPARITIES

In 2019, 11 percent of California Congressional District 13's population (encompassing the northwest branch of Alameda County) was food insecure. More than 40 percent of the food insecure population was not eligible for food assistance programs such as Supplemental Nutrition Assistance Program (SNAP, administered as CalFresh in California and formerly known as food stamps) and other nutrition programs because they make more than 200 percent of the federal poverty level.[3] Food insecurity rates differ by race and ethnicity: 20 percent of Black individuals and 15 percent of Hispanic people of any race were reported as food insecure, while the food insecurity rate among White, non-Hispanic individuals was seven percent. In Alameda County, 8 percent of residents receive CalFresh (SNAP) benefits, at an average of $219 per person, per month.[4] SNAP users may use their benefits to purchase food at accepting food markets and grocery stores. In addition, benefit cards can be used at participating farmers' markets, such as those in Temescal and Old Oakland.[5,6] SNAP is an important federal tool in reducing food insecurity; thus, places where there is a high rate of SNAP usage may indicate communities that could become food insecure if any federal changes affected SNAP availability or eligibility. In Oakland, tracts with the highest percentage of people receiving SNAP are located in West, East, and deep East Oakland. All tracts in the top tenth percentile for SNAP recipiency are EJ Communities.

The percentage of students receiving free or reduced-price lunch is often used as a proxy measure for the percentage of students living in poverty.[7] Beginning in the 2022–2023 school

1 Feeding America. 2021. https://www.feedingamerica.org/hunger-in-america/food-insecurity. Accessed Jan 30 2022

2 Centers for Disease Control and Prevention, "Healthy Food Environments: Improving Access to Healthier Food," last updated September 10, 2020, https://www.cdc.gov/nutrition/healthy-food-environments/improving-access-to-healthier-food.html, accessed February 23, 2023.

3 Feeding America. 2021. https://map.feedingamerica.org/district/2019/overall/california/district/13. Accessed Jan 10 2022.

4 California Department of Social Services. 2022. https://public.tableau.com/shared/6C68NTX9M. Accessed Dec 28 2022.

5 California Department of Social Services. https://www.cdss.ca.gov/calfreshoutreach/res/Toolkit/ConsumerFliers/ConsumerFlier_1_UsingCalFreshBenefitsisSimple_English.pdf. Accessed Dec 28, 2022.

6 United States Department of Agriculture. https://www.usdalocalfoodportal.com/fe/searchresults/?term=&location=Oakland,%20CA,%20USA&directory=farmersmarket&x=-122.2711639&y=37.8043514&c=0. Accessed Dec 28, 2022

7 National Center for Education Statistics. 2015. "Free or reduced price lunch: A proxy for poverty?" https://nces.ed.gov/blogs/nces/post/free-or-reduced-price-lunch-a-proxy-for-poverty Accessed Dec 28, 2022

year, all public and charter schools serving transitional kindergarten through 12th grade are required to provide two free meals to every student each school day, regardless of their eligibility for other meal programs. Served meals must comply with USDA nutrition guidelines, including milk and calorie requirements. The Universal Meals Program ensures that the nutritional needs of children who require affordable food options are met during the school day. In addition, the City's Summer Food Service Program provides free breakfast and lunch to Oakland kids and teens during summer break. Tracts with the greatest percentage of students receiving free or reduced-price lunch are located in Acorn/Jack London Gateway, central East Oakland, and deep East Oakland.

FOOD ACCESS

The grocery store is the primary source of healthy food for most Oaklanders, providing access to a wide variety of nutritious and relatively affordable produce and other foods compared to other types of food outlets like convenience stores. However, racial and socioeconomic inequities in access to healthy food have led to differential food access for communities of color. Current market forces driving the location of chain supermarkets continue to perpetuate food access inequity tied to policies that created residential segregation, poverty, and "supermarket flight" from certain neighborhoods. While incentives or other efforts may be needed to overcome these forces for traditional supermarkets, there are also mission-driven grocery store operators, such as food co-ops, that have emerged as an alternative that can provide healthy, culturally relevant food, while building community power and ownership. Food advocates have also urged more focus and support for smaller independent grocers that have served East and West Oakland for decades.

While development of full-service food retailers is an important strategy, existing convenience stores, dollar stores, corner stores, or gas station markets often provide the only retail food options in some areas of the city. Most corner stores sell a limited selection of non-perishable food items and less nutritious snack foods, though some also carry fresh produce and other nutritious fares. Initiatives to encourage stocking more fresh produce and healthier food options can include financial incentives, promotion and marketing, infrastructure investment (e.g., purchasing new refrigeration units or display stands), and produce supply chain development. The location of full-service food outlets and smaller convenience stores is shown in **Figure EJ-19**. While there are large grocery stores within a walkable distance for residents of Lake Merritt, Temescal, and Rockridge neighborhoods, considerable portions of East and West Oakland do not have one close by. East Oakland does have key smaller food markets which aim to fill the gap between larger stores.

Community gardens and farmers markets can help to improve fresh food accessibility in areas of lower food access. Community gardens are dedicated plots of land where residents can grow food or other plants; many are started by residents who recognize that their communities are underserved by traditional fresh food retailers. Community gardens can promote the concept of food autonomy, where people are empowered to control their food and food systems. The City can take additional steps to make City-owned land available for community gardens, prioritizing areas and community stewards that will have the greatest impact on food-deprived communities. Some research has shown that people who participate in community gardens eat more fruits and vegetables and worry less about running out of food before the end of the month. Oakland also has several farmers markets that accept SNAP, which benefits both the farmers and low-income shoppers. Moving farmers markets to more central locations, accessible by transit, can also promote food access.

FOOD DISTRIBUTION AND RECOVERY

Supporting a fine-grained network of food distribution points can also help to improve food access. For example, libraries, schools, parks, and even large parking lots can become sites where sales or distribution of fresh food can occur. Improving the effectiveness of existing food distribution programs, especially in underserved areas and those with higher prevalence of food insecurity, can be a cost-effective way to improve access to affordable healthier foods. For example, and the City could coordinate with community organizations to better connect eligible residents and families to federal, State, and local food programs, as well as emergency food assistance.

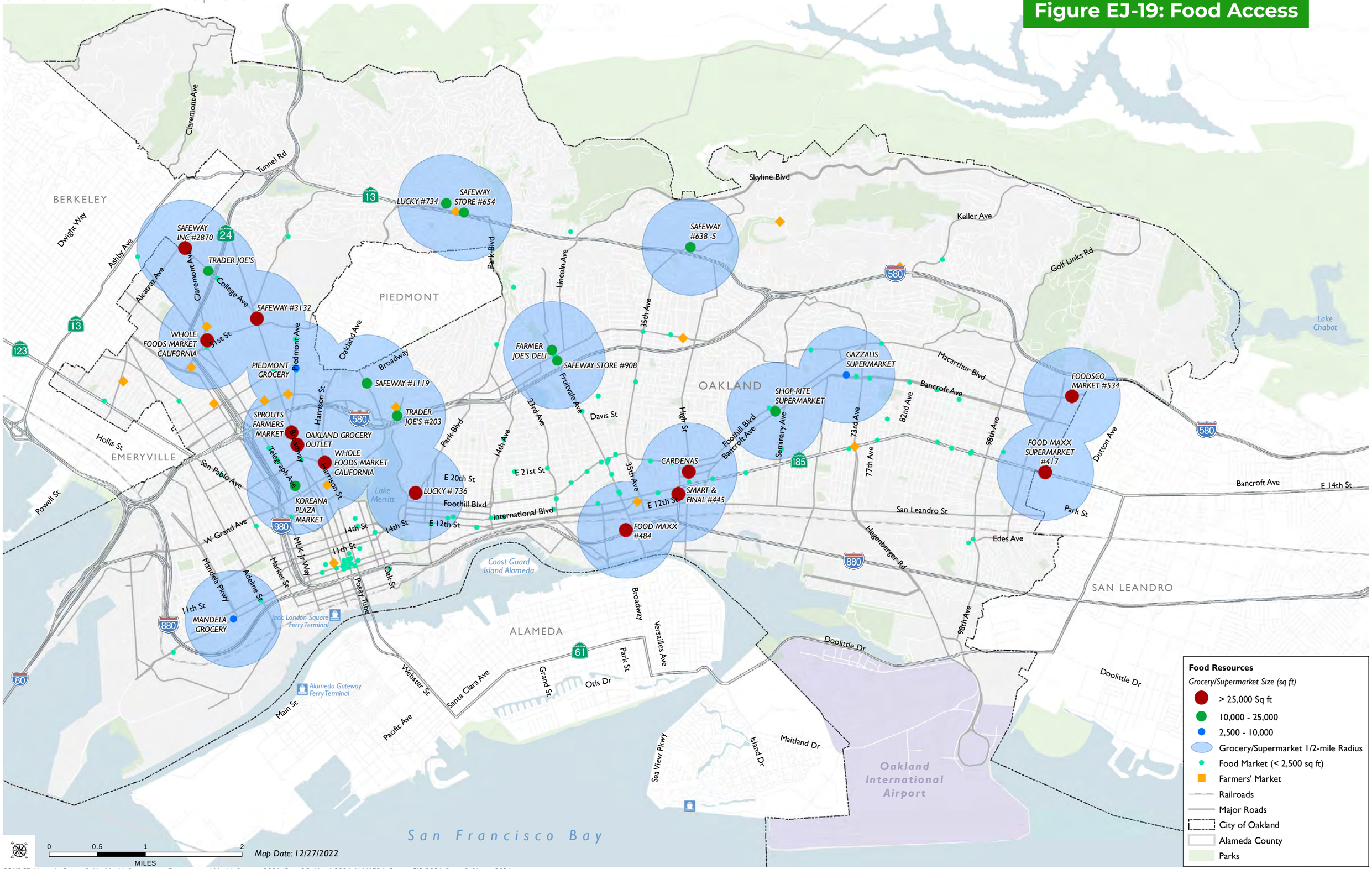
Edible food recovery programs divert food waste by redistributing unused food from food generators such as grocery stores, supermarkets, restaurants, corporate kitchens, and other wholesaler/distributors. Feeding hungry people through food recovery is the best use for surplus food and a vital way for Oakland to conserve resources and reduce waste thrown in landfills. The City can support food recovery by supporting existing capacity of food generators and develop new capacity to recover, divert, and redistribute consumable food to those in need.

FOOD ASSISTANCE AND EDUCATION

The price of food—in addition to taste, nutrition, convenience, and other factors—affects people's food choices, and is one of the greatest barriers to accessing healthy food. Participation in food assistance programs, such as the Supplemental Nutrition Assistance Program (also known as CalFresh) and Women, Infants, and Children nutrition program (WIC), can help to improve food security, offer benefits that enable families to purchase healthier diets, and free up resources for other necessities. The City will seek to understand barriers, promote access and community awareness, and expand acceptance of these benefit programs at retailers and farmers markets in partnership with community organizations.

Given the time limitations and financial and physical barriers people with disabilities and low-income families may face when preparing meals, it is important to increase education around convenient and easy-to-prepare healthy food options. The City will play a role in providing marketing and educational campaigns targeted at increasing food growing and healthy eating to support new healthy food retail in EJ Communities.

Figure EJ-19: Food Access



SOURCE: Alameda County Public Health Department Environmental Health Division, 2021; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

DYETT & BHATIA
Urban and Regional Planners

Building Resilience: Community-Led Food Security

Community organizations have led the charge in building local resilience and increasing food security. City Slicker Farms leads the urban farming and food justice movement in West Oakland, having transformed a vacant brownfield site into a thriving community park and farm. City Slicker has built more than 400 backyard and community gardens since 2001, and their West Oakland Farm Park is a vibrant community hub on land that was once heavily contaminated. City Slicker Farms also includes other programs that increase food access (the Backyard Gardens Program); support food sharing (participation in the Town Fridge collective); and build skills in farming and cooking (the Food and Farming Skill Sharing Program.)

In Deep East Oakland, Planting Justice (PJ) Nursery hires and trains formerly incarcerated people at their two-acre Rolling River tree nursery in the Sobrante Park neighborhood. In the last 10 years, the team has built over 450 edible gardens throughout the Bay Area. In partnership with Sogorea Te' Land Trust (STLT), an urban indigenous women-led community organization, PJ facilitated the transfer of the Rolling River Nursery's plot back into Chochenyo and Karkin Ohlone stewardship. This partnership recognizes Oakland's Ohlone history and grants STLT access to the land in perpetuity.

Mandela Grocery Co-op in West Oakland is a worker cooperative (co-op), which is a model that serves as an effective tool for creating long-term, dignified jobs, particularly in urban low-income communities. The Mandela Grocery Co-op is a grocery store that is operated, centrally governed, and democratically controlled by its worker-owners and sources from local entrepreneurs and farmers in California with a focus on Black and Brown farmers and food makers.

The Saba Grocers Initiative is a network of Arab immigrant and Black corner store owners working to build a food system where fresh fruits and vegetables are affordable for all. Initially funded by Oakland's 2017 "soda tax" after successful community organizing efforts, Saba Grocers helps its network of members secure fresh fruits and vegetables through bulk wholesale purchase and distribution to each member store. They also distribute Saba Food Cards, a closed loop Visa worth $250 each for residents in need of assistance, developed in partnership with 25 independent store owners in Oakland. The Initiative also coordinates a "Fresh 5x" nutrition incentive program funded by the USDA and distributes funds to local grocers that supplement CalFresh and CalSNAP benefits. Saba Grocers helps to sign people up for SNAP benefits, and for every dollar they spend on fresh produce, they get five additional dollars for additional produce, helping lower-income residents stretch their monthly grocery budgets by a significant amount.

Sources: City Slicker Farms website, Planting Justice Website, Mandela Grocery Co-op website, Oakland Equitable Climate Action Plan 2030, Saba Grocers Initiative website

City Slicker Farms

Photo Credit: David Jaber

Photo Credit: Saba Grocers

Table EJ-7: Top 10th Percentile Tracts by Indicator — Expanding Healthy Food Access

TRACT NAME (WITH SCORE)				
SNAP[1,2]	**FOOD ACCESS[2]**	**FARMERS' MARKETS**	**COMMUNITY GARDENS**	**FREE/REDUCED PRICE MEAL[2]**
Lockwood/Coliseum/	**Prescott/Mandela Peralta (0.91)**	**Brookfield Village (1.00)**	Montclair North (1.00)	Port Lower* (0.99)
Rudsdale (0.99)	**Acorn (0.91)**	Sequoyah (0.99)	Glen Highlands (0.99)	Acorn Industrial* (0.99)
DeFremery/Oak Center (0.99)	**Brookfield Village (0.91)**	Redwood Heights West (0.98)	Piedmont Pines (0.98)	**Melrose (0.98)**
Bancroft/Havenscourt East (0.98)	San Antonio/Highland Terrace (0.91)	**Brookfield Village/ Hegenberger (0.97)**	Montclair South (0.97)	**Acorn (0.97)**
Prescott/Mandela Peralta (0.97)	Golf Links (0.91)	Lincoln Highlands (0.96)	Caballo Hills (0.96)	**Jack London Gateway (0.96)**
Fruitvale/Hawthorne (0.93)	**Prescott (0.91)**	Lower Dimond School (0.96)	Panoramic Hill (0.96)	**Fremont District (0.96)**
Cox/Elmhurst (0.93)	Bushrod/Childrens Hospital (0.91)	**Cox/Elmhurst (0.95)**	Sequoyah (0.95)	**Elmhurst (0.95)**
Sobrante Park (0.93)	**Brookfield Village/ Hegenberger (0.91)**	**Stonehurst (0.94)**	Oakmore North (0.94)	**Bancroft/Havenscourt East (0.94)**
Acorn (0.93)	Mills College (0.91)	Laurel/Upper Peralta Creek (0.93)	Woodminster (0.93)	**New Highland (0.93)**
Brookfield Village (0.93)	Sequoyah (0.91)	**Prescott (0.92)**	Upper Piedmont Ave (0.92)	**Harrington/Fruitvale (0.92)**
Fremont District (0.91)	Port Lower* (0.91)	Woodminster (0.91)	**Seminary (0.91)**	**Webster (0.91)**
Bunche/MLK Jr (0.91)	**Sobrante Park (0.90)**	Foothill Square/Toler Heights (0.90)	**Sobrante Park (0.90)**	**Arroyo Viejo (0.90)**

Note: Bolded and blue census tracts are EJ Communities.

** Indicates census tract with low population.*

1. Only includes 11 tracts in top decile due to ties. Next highest score is 0.86.

2. Maximum score is not 1.00 due to ties.

5.2 GOALS AND POLICIES

GOAL EJ-5 SUPPORT A FOOD SYSTEM THAT PROVIDES NUTRITIOUS, AFFORDABLE, CULTURALLY RELEVANT, AND AFFORDABLE FOOD TO ALL OAKLANDERS

Improving Food Access

EJ-5.1 **New Healthy Food Grocers.** Leverage tax and fee deferral/reduction programs, California Food Financing Initiative funding, and other economic development grant monies to attract new healthy food grocers and co-ops and help them establish and/or make necessary improvements. As shown in **Figure EJ-19**, allow small grocery stores within residential areas. As a priority, efforts should be focused in areas underserved by healthy food retail with good access to the transportation network, where grocery stores and food co-ops are most economically viable.

EJ-5.2 **Community Gardens Program.** Partner with nonprofits, especially Indigenous groups, to expand the City's Community Gardens Program, with policies to address maintenance and permit Indigenous community harvesting/ foraging of parks. The program should include garden spaces, community-maintained edible landscapes, and amenities in public spaces.

EJ-5.3 **Community and Home Gardening.** Support community and home gardening efforts and – particularly in EJ Communities underserved by healthy food retail – by providing financial incentives such as land transfers or discounted water rates and technical assistance in the form of online and library resources and workshops on gardening basics and cooking easy, healthy meals with fresh produce. Work with community groups to increase the prevalence of accessible, local gardens. Other incentives may include:

- Explore the expansion of outright permitting of community gardens in areas where a Conditional Use Permit is currently required, particularly in the Broadway Valdez District (D-BV) and Central Estuary (D-CE) zones.
- Incentivize urban agriculture in urbanized areas by offering reduced property tax assessments or relief from Oakland vacancy tax in exchange for converting vacant or unimproved property to an agricultural use through a contract agreement for an initial period of five years.

EJ-5.4 **Urban Agriculture in New Development.** Promote rooftop gardens, edible gardens, and other sustainable agricultural landscaping alternatives within multi-unit, commercial, and industrial developments.

- Target creation of rooftop gardens highly visible from neighboring properties.
- Permit indoor "vertical food farms" in industrial areas.
- Reduce permit fees for large-scale farming of edible products.

EJ-5.5 **Entrepreneurship and Food Innovation.** Actively support food innovations such as street (sidewalk) vending, food cooperatives, pop-up markets and similar innovations that do not fit into the traditional brick-and-mortar storefront, farmers market, or community garden models. Promote indoor farming of fruits and vegetables in industrial zones.

Food Assistance and Nutrition Programs

EJ-5.6 **Food Assistance Programs.** Work to increase community awareness of and participation in existing federal food assistance programs, such as the Women, Infants, and Children (WIC) nutrition program and the Supplemental Nutrition Assistance Program (SNAP). Approaches can include:

- Providing information in City newsletters, on the City's website, and at community centers and other City facilities.
- Explaining to merchants the incentive to registering to accept WIC and SNAP payments (immediate expansion of market of potential customers).
- Supporting additional programs for local grocers to supplement CalFresh and CalSNAP benefits with cash match incentives.
- Partnering with community organizations that support low-income community members who are not eligible for food assistance through identification of funding or grants.

EJ-5.7 **Food Security Resources & Partnerships.** Coordinate with citywide community-serving organizations, the Oakland Unified School District, Alameda County, and other public agencies to ensure that eligible residents and families have access to federal, State, and local food programs, as well as emergency food assistance during public health and other crises. Partner with these service providers to distribute food at community centers and other central locations in areas with high

food insecurity and/or low access to food. During such emergencies, support the Alameda County Community Foodbank to expand hours and keep distribution centers operational.

EJ-5.8 **Education and Awareness.** In partnership with local agencies and community organizations, develop curriculum and marketing materials encouraging the growth and consumption of healthy food. Provide these to the Oakland Unified School District and community organizations focused on food justice and nutritional education. Support community organizations with financial incentives such as land transfers or discounted water rates and technical assistance in the form of online and library resources and workshops on gardening basics and cooking easy, healthy meals with fresh produce.

Food Recovery

EJ-5.9 **Food Recovery Program.** Support existing capacity of organizations within Oakland's food system, and develop new capacity, to recover edible food that is otherwise wasted, and distribute that food for human consumption. This includes:

- Exploring potential for agroforestry, where trees, shrubs, and agricultural crops are interspersed, in community gardens or parks, to create additional food sources.
- Engaging with stakeholders, including local food donation, recovery, and collection organizations, to build robust collection and food storage capacity, and reliable distribution systems to the neediest populations.
- Engaging with food generators such as supermarkets, wholesale distributors, large hotels, and institutions, to donate surplus edible food that food recovery partners want or will accept and ensuring food generators comply with the Edible Food Recovery requirements of SB 1383.
- Informing edible surplus food generators about strategies and best practices for preventing the waste of surplus food.

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6. Equitable Public Facilities

The adequate provision of public facilities is a critical component to the current and future prosperity of a community. Under State law (SB 1000), "public facilities" is an umbrella term that includes "public improvements, public services, and community amenities." This covers a wide spectrum of publicly provided uses and services including infrastructure, school facilities, parks, transportation, and emergency services. These amenities and services improve the health, safety, and well-being of a community by either enhancing the public sphere or providing services that are available to every resident.

Distribution and investment in a City's public facilities shapes residents' access to services and resources to fulfill their needs and wants. Because of past discriminatory land use policies, there are parts of Oakland that have been overlooked for public investments and development of new amenities. Delayed investments and programs can perpetuate current disparities in the built environment, access to opportunity and resources, and other social determinants of health – significantly prolonging these inequities and their corresponding outcomes in health and wellbeing. As part of SB 1000, environmental justice elements must ensure that EJ Communities receive priority for City investment and programs that are implemented in a timely fashion. Investments in public systems can include park improvements, transportation infrastructure improvements, upgrades to public facilities, and other systems.

More information on financing public facilities will be available in the new Infrastructure and Facilities Element in Phase 2 of the General Plan Update.

Building Resilience: Friends of the Hoover Durant Public Library

Founded in 2006, the Friends of the Hoover Durant Public Library (FOHDPL) is grassroots, volunteer-run nonprofit working to bring a public library branch back to West Oakland's Hoover, Durant, McClymonds and Clawson neighborhoods. The North Oakland and Telegrove libraries previously serving these areas were closed in 1950 and 1980 respectively, targeted for closure as a result of historic patterns of racially motivated, systemic disinvestment and institutional redlining. Their closures have since reduced accessibility to these vital public spaces, especially as the next closest library branches require crossing major roads and highways. FOHDPL seeks to close this gap and, in the meantime, act as an intermediary providing community events and services such as their Street Corner Library.

Thanks to the efforts of FOHDPL, the City issued a feasibility study for a new 12,000 square-foot library facility that will likely be completed by early 2024.

6.1 ISSUES AND DISPARITIES

COMMUNITY FACILITIES

Public Facilities

Community facilities in Oakland include a wide range of places that provide valuable amenities to the community. These include public libraries and community centers, which offer a variety of educational and recreational programs, community gathering spaces, access to information and technology, and opportunities to participate in a neighborhood's cultural, political, and social life.

Childcare and early education facilities keep children safe and healthy, help them develop skills they will need for succeeding in and out of school, and create better, more equitable long-term outcomes for children. Free or subsidized childcare programs provide much-needed support for working families. Head Start programs promote the school readiness of infants, toddlers, and preschool-aged children from low-income families. Head Start programs in Oakland are shown in **Figure EJ-20**. There are 17 Head Start locations across the city, mostly clustered in central and East Oakland. Five Head Start facilities are located near the Lower San Antonio and Fruitvale census tracts in central Oakland, while six Head Start facilities are located near the New Highland and Arroyo Viejo census tracts in East Oakland. There are no Head Start locations west of the I-580 or California State Route 24.

A healthy community also has convenient access to medical services. When health care facilities are accessible via public transit, medical care is more readily accessible to those who do not drive or own cars. As shown on **Figure EJ-21**, there are multiple medical facilities located within the city, ranging from large hospitals and medical complexes, such as Alta Bates Summit Medical Center, Kaiser Oakland Medical Center, and Highland Hospital. There are also 79 Federally Qualified Health Centers (FQHCs), or community-based health care providers and critical community development facilities that provide primary care services in underserved areas, in Oakland. Most healthcare locations are concentrated in certain census tracts such as Bushrod near the Children's Hospital, Pill Hill near Summit Campus of Alta Bates Summit Medical Center, and Fruitvale near a cluster of healthcare facilities. Distribution of healthcare facilities in Oakland is not uniform; most clusters are in North Oakland and Downtown, in contrast to the few in West and East Oakland.

As part of the Land Use and Transportation Element (LUTE) update, the City will explore strategies to incentivize additional childcare locations and healthcare facilities in areas of need, prioritizing EJ Communities.

PUBLIC ART AND CULTURAL FACILITIES

Sustaining and celebrating Oakland's cultural and creative diversity can initiate opportunities for artistic engagement, which has the potential to have significant positive effects on health, including decreased anxiety, stress, and mood disturbances. Music engagement, visual arts therapy, movement-based creative expression, and expressive writing have demonstrated positive outcomes for promoting healing as shown in a study from the American Journal of Public Health.[61] The study underscores that this more holistic approach to public health could also help to alleviate the burden of chronic diseases like heart disease and diabetes which are associated with depression and chronic stress.

Public art is a major public value in Oakland. As noted in Oakland's 2018 Culture and Belonging Report[62], community input indicated that cultural organizations face issues related to shrinking investments in arts and culture, retaining cultural spaces in a highly competitive real estate market, lack of adequate performance venues, and a need for more equitable funding. The East Oakland Neighborhood Initiative Plan also emphasized a desire to explore arts hubs in local warehouses, creative activation of vacant lots, and the purchasing of foreclosed spaces for these purposes. The East Oakland creative community anchors the character of the neighborhoods, and there is a growing interest in elevating the creative community through development and funding for the arts. In West Oakland, the West Oakland Cultural Action Network is exploring ways to foster art and preserve cultural spaces that showcase community creativity and artistry, particularly through mural projects.

Policies in the EJ Element give direction to address equitable distribution and access to community and cultural facilities as part of the LUTE. Policies related to facility maintenance and improvement will be addressed as part of the Infrastructure and Facilities Element developed as part of Phase 2.

PUBLIC INFRASTRUCTURE

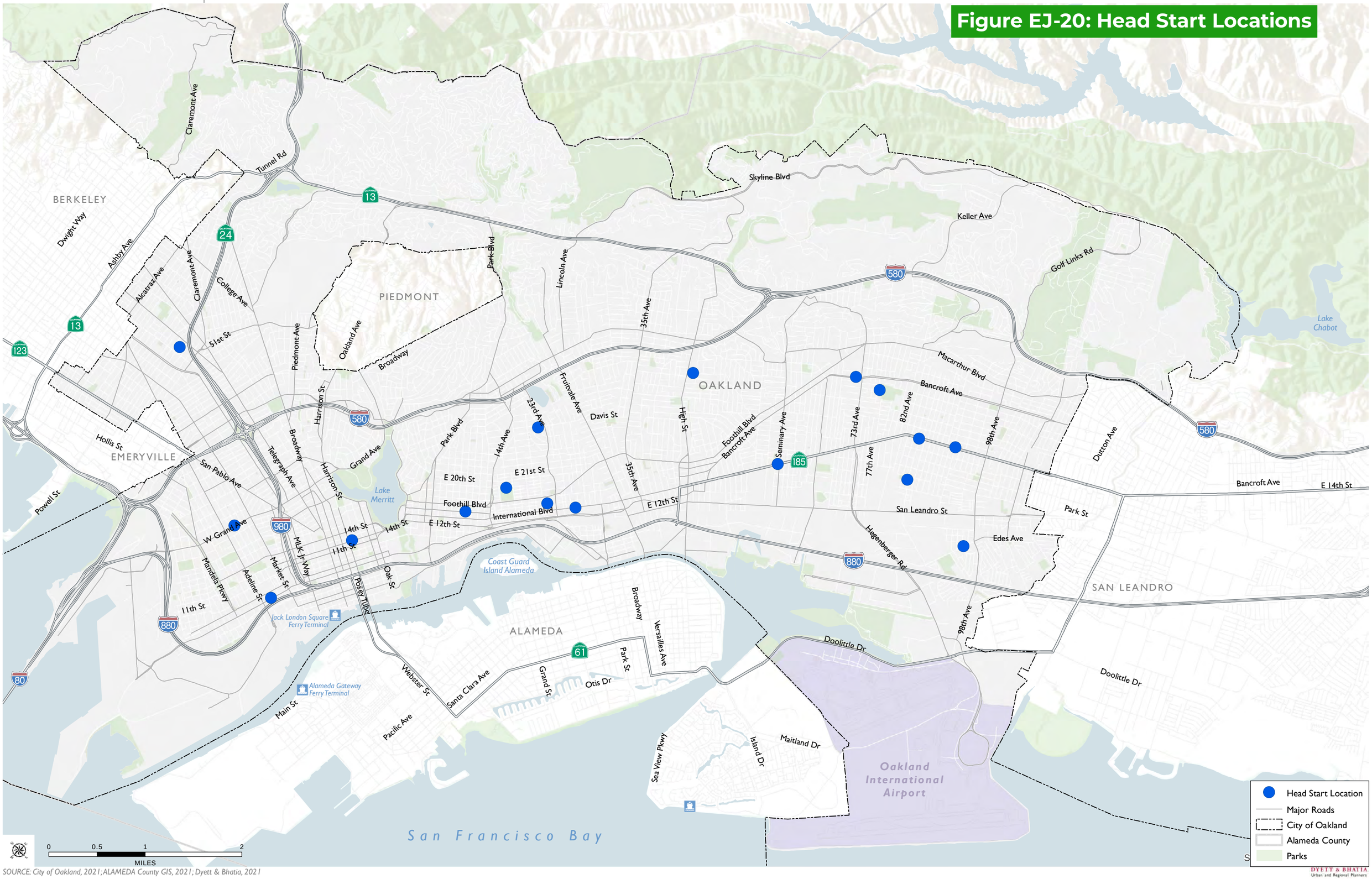
In 2019, the City introduced a new process to better reflect public input into the Capital Improvement Projects (CIP) budget, which is the City's plan for investments over the next three years. This methodology was further refined for the current (fiscal years 2021-2023) budget to capture more equitable representation of requests and projects in East Oakland. Generally, there is an equal geographic distribution of existing CIP and non-CIP projects throughout Oakland. Many new CIPs have also been recommended, including a number in Brookfield Village, Sobrante Park, and Stonehurst neighborhoods in East Oakland, Coliseum Industrial Complex area, and Ralph Bunche and Oak Center neighborhoods in West Oakland.

New CIPs will bring public improvements to street and road conditions, facilitated by the recently proposed 5-Year Paving Plan, which will direct more equitable investment in priority neighborhoods including those with higher concentrations of BIPOC and low-income residents. Policies in the General Plan seek to continue equity-focused Capital Improvement Projects, which will be carried forward in the new Infrastructure and Facilities Element of the General Plan.

61 Stuckey, H. and Nobel, J. The Connection Between Art, Healing, and Public Health: A Review of Current Literature. Am J Public Health. 2010 February; 100(2): 254–263. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2804629/ Accessed Dec 30, 2022.

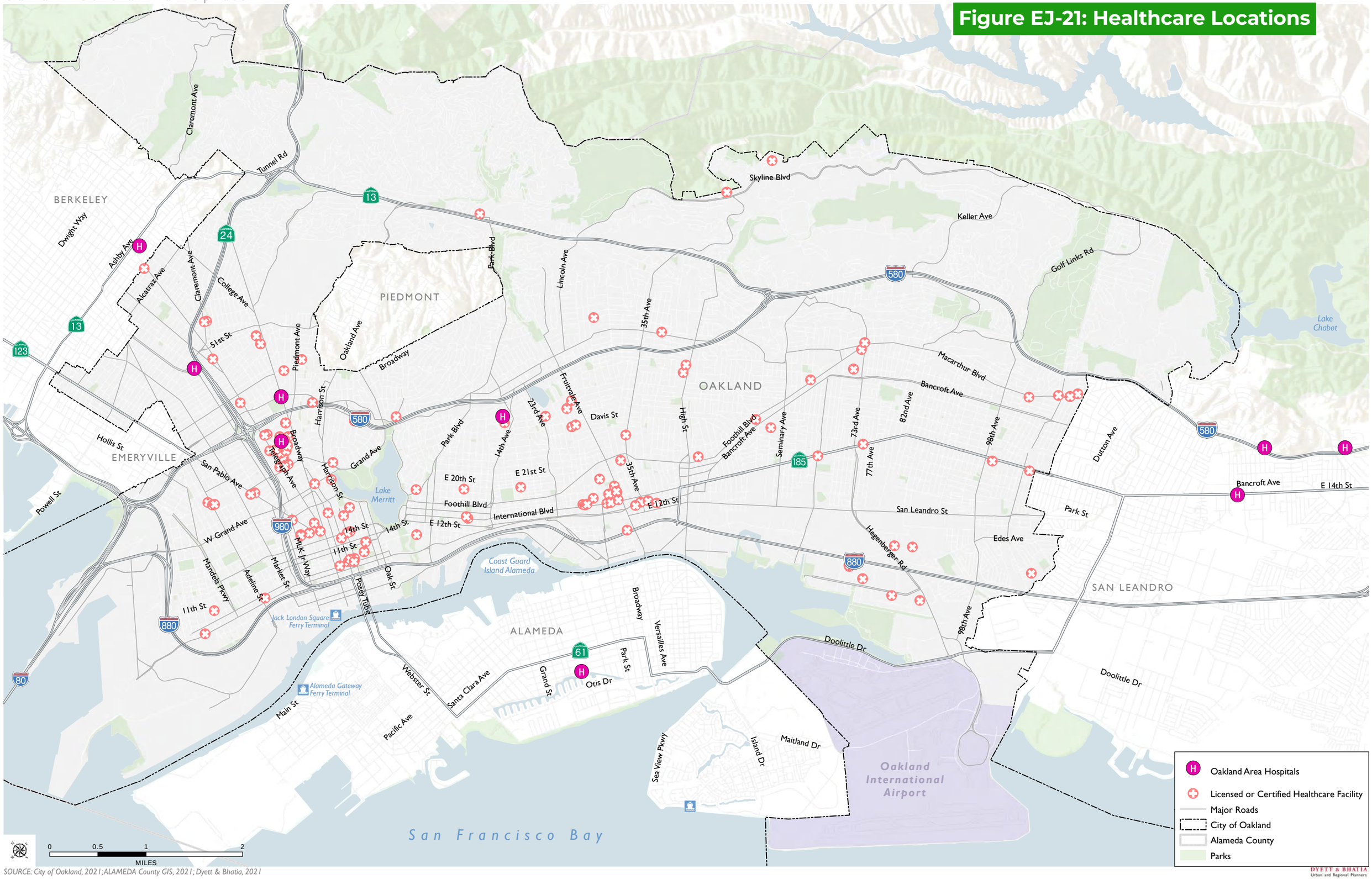
62 City of Oakland Cultural Affairs Division, Belonging in Oakland: A Cultural Development Plan, 2018, https://cao-94612.s3.amazonaws.com/documents/Cultural-Plan-9.24-online.pdf, accessed February 23, 2023.

Figure EJ-20: Head Start Locations



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Figure EJ-21: Healthcare Locations



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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Building Resilience: Oakland 2022 5-Year Paving Plan

The 2019 3-Year Paving Plan (3YP) guided citywide pavement prioritization between July 2019 and June 2022. On December 21, 2021, the City adopted the 2022 5-Year Paving Plan (5YP), which builds on the accomplishments of the 3YP to continue to invest in the care and maintenance of Oakland's streets. Both of these plans leverage repaving to make safety improvements and are center equity in service provision, with a new focus on neighborhood streets.

The 5YP prioritizes $225 million ($45 million a year) toward local streets, and 76 percent of this budget is programmed in consideration of equity factors to provide greater benefit to underserved populations—including people of color, low-income households, people with disabilities, households with severe rent burden, people with limited English proficiency, and youth and older adults (ages 65 and older)—and in geographic areas of greatest needs. Overall, the 5YP represents 350 miles of streets that will receive accessibility improvements including curb ramp improvements, sidewalk repairs, and crosswalk marking upgrades prioritized in local streets and underserved communities.

Source: City of Oakland, 5-Year Paving Plan, 2022

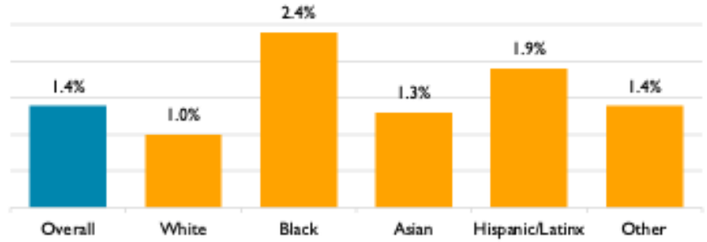
PUBLIC SERVICES AND UTILITIES

Public services in Oakland include water and sewage, electricity and gas, and solid waste services. Oakland's water supply, treatment facilities, and distribution systems are operated and managed by the East Bay Municipality Utility District (EBMUD). The City provides citywide sanitary sewer collection services while EBMUD provides sewage transport, treatment, and discharge services. Sewer discharge from buildings within Oakland flows through approximately 930 miles of the City's sewer network and ultimately deposits at the Municipal Wastewater Treatment Plant located in West Oakland. Solid waste services in Oakland are provided by Waste Management of Alameda County, which collects residential and business trash and compost. Residential recycling services are provided by California Waste Solutions.

Electricity and gas are provided by Pacific Gas & Electric (PG&E), and Comcast (also referred to as "Xfinity") and other companies provide internet service in Oakland. In 2018, Alameda County and 11 of its cities launched the East Bay Community Energy (EBCE) not-for-profit public power agency that governs Community Choice Energy service to help supply clean energy and create local green energy jobs, programs, and clean power projects. EBCE supplies electricity to residential, business, and municipal accounts that are delivered through PG&E.

A lack of essential services can have a significant impact on the daily lives of residents. Energy is one of these crucial services. High energy cost burdens can have several negative effects on households. Low-income households may have to make trade-offs between energy costs and the costs of other necessities such as food and medical care. Households that cut back on energy use due to high cost may experience negative health effects, including asthma and arthritis. High energy cost burden also creates a chronic source of stress, which negatively affects the mental health of household members. In addition, households of color experience greater energy cost burden compared to white households, as seen in **Chart EJ-4**. This is especially true for Black households in Oakland for which median energy cost burden is 2.34 times higher than for white households. Geographically, the census tracts that are most impacted by energy cost burden include Lockwood/Coliseum/Rudsdale, Lower San Antonio East, and Fitchburg, among others listed in **Table EJ-8**. Further analysis into public service infrastructure equity issues and financing options, including grants and assistance to lower income populations in EJ Communities, will be explored as part of the new Infrastructure and Facilities Element in Phase 2 of the General Plan Update.

Chart EJ-4: Median Percent of Household Income Spent on Energy Costs by Race, 2018



Source: Oakland Equity Indicators Report, City of Oakland, 2018.

Table EJ-8: Top 10th Percentile Tracts by Indicator — Equitable Public Facilities

ENERGY COST BURDEN	
Tract Name	**Score**
Lockwood/Coliseum/Rudsdale	**1.00**
Lower San Antonio East	**0.99**
Fitchburg	**0.98**
Castlemont	**0.97**
New Highland	**0.96**
Brookfield Village	**0.96**
Bancroft/Havenscourt East	**0.95**
Seminary	**0.94**
Stonehurst	**0.93**
Webster	**0.92**
Arroyo Viejo	**0.91**
Sobrante Park	**0.90**

Note: Bolded census tracts in blue are EJ Communities.

6.2 GOALS AND POLICIES

GOAL EJ-6 SUPPORT A NETWORK OF WELL-MAINTAINED COMMUNITY FACILITIES THAT ARE EASILY ACCESSIBLE, CULTURALLY SUPPORTIVE, AND RESPONSIVE TO COMMUNITY NEEDS.

Public Facilities

EJ-6.1 **Public Facilities Distribution.** Ensure the equitable distribution of beneficial public, civic, and cultural facilities, prioritizing new facilities and creative spaces in traditionally underserved areas.

EJ-6.2 **Childcare Facilities.** As part of planning efforts, ensure appropriate land use designations, zoning, and incentives to facilitate additional affordable and high-quality childcare facilities in areas without sufficient access, as shown in **Figure EJ-20**.

EJ-6.3 **Healthcare Facilities.** As part of long-range planning efforts, ensure appropriate land use designations and zoning to facilitate additional healthcare facilities in areas without sufficient access, as shown in **Figure EJ-21**.

EJ-6.4 **Facilities Maintenance.** Maintain and improve existing civic and public facilities to ensure safer, more attractive facilities that are responsive to community needs. Prioritize equitable capital improvements and maintenance projects and investments in public and community-driven social infrastructure in EJ Communities.

EJ-6.5 **Public Service Coordination.** Coordinate with the planning efforts of agencies providing public education, public health services, community centers, library services, justice services, flood protection, energy, and technology and communications services, as appropriate. Maintain interagency coordination agreements with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City/County to ensure effective and efficient service delivery.

EJ-6.6 **Public Restroom Facilities.** Access to safe, clean sanitation is globally recognized as essential for public health. Public toilets should be accessible to all Oaklanders, without social or physical barriers preventing usage. A public toilet facility's design and upkeep should offer privacy and safety, ensure cleanliness, provide required sanitation-related resources, and be gender equitable.

Credit: Black Cultural Zone

7. Promoting Physical Activity

Building complete neighborhoods with open spaces, parks, urban forest, and safe sidewalks and bikeways can support a greener, healthier City, with more opportunities for residents to get out and play, socialize, experience nature, and exercise. Physical inactivity is one of the key contributors to chronic disease in California. In fact, people who are physically active tend to have a higher life expectancy and lower risk for heart disease, stroke, type 2 diabetes, some cancers, and other health-related illnesses.[1] In Oakland, areas with the greatest prevalence of obesity include DeFremery/Oak Center and Acorn in West Oakland as well as Havenscourt/Coliseum, Bancroft/Havenscourt, and Seminary in East Oakland, whereas tracts in the Oakland Hills consistently have lower incidences of obesity.

The built environment plays an integral role in determining how communities can access opportunities for physical activity by providing places and encouraging land uses that support active transportation and other forms of exercise. The built environment of impacted communities can be negatively impacted by a history of inequitable investments and discriminatory land use practices. These practices have meant fewer opportunities for physical activity, such as fewer parks, recreation facilities, and safe pedestrian connectivity networks. This section describes some of the top barriers to physical activity and health and lays out a framework for addressing other considerations in the LUTE and Open Space, Conservation, and Recreation (OSCAR) Elements.

7.1 ISSUES AND DISPARITIES

MOBILITY AND SAFETY

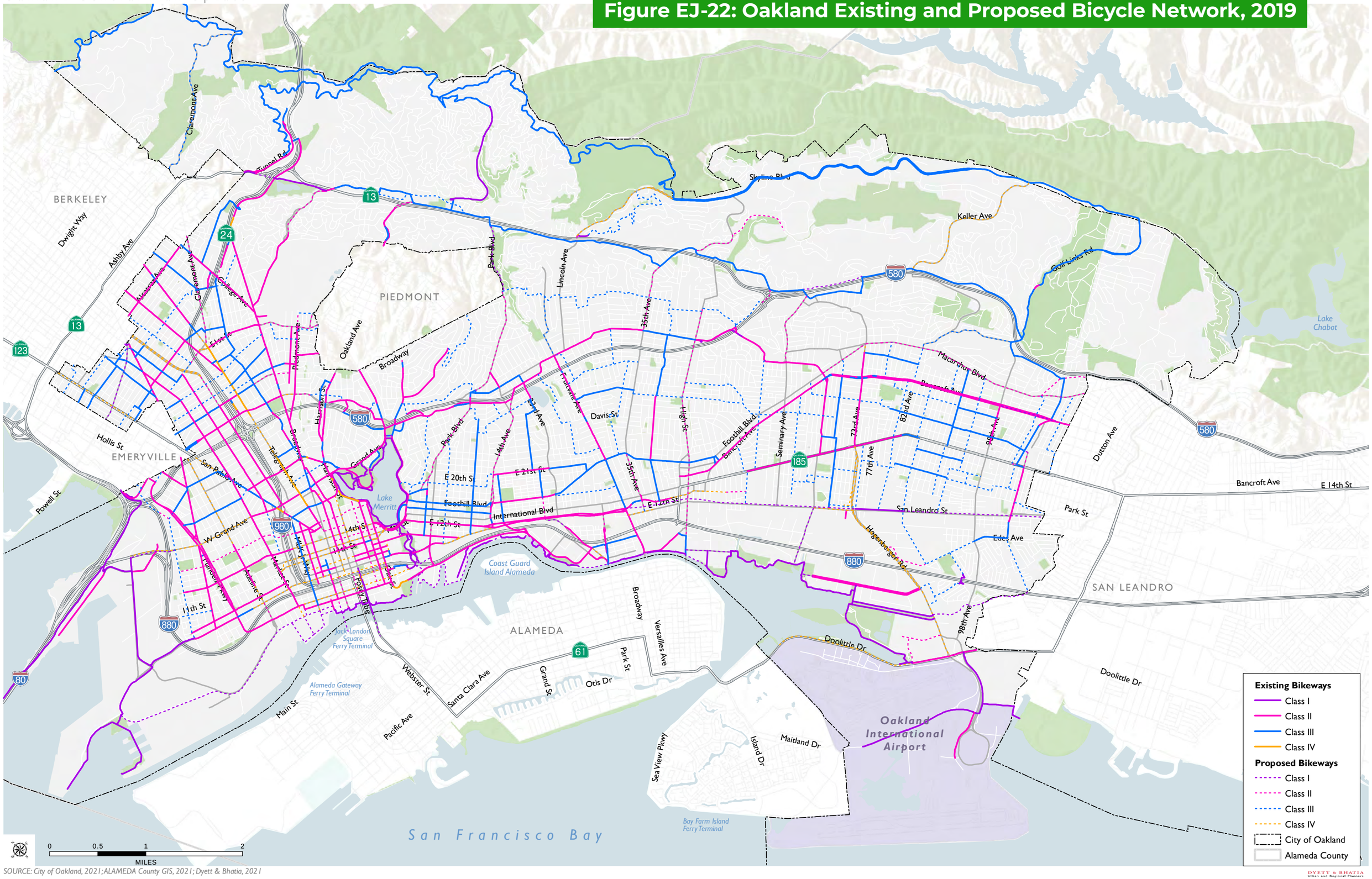
Accessible land use patterns with amenities in close distance, robust transportation options, and access to safe pedestrian and bicycle networks are important components of community livability. In addition to serving as spaces where people can recreate, pedestrian and bicycle facilities can help encourage residents to maintain an active and healthy lifestyle.

Bicycle Facilities

"Let's Bike Oakland" (2019), an addendum to the LUTE that forms the City's Bicycle Plan, takes an equity-focused approach to bicycle planning. The plan establishes a vision that Oakland will be a bicycle-friendly city where bicycling provides affordable, safe, and healthy mobility for all Oaklanders. The plan highlights new projects and programs that will work to enhance existing communities and their mobility needs. Existing and planned bicycle infrastructure from Let's Bike Oakland is shown in **Figure EJ-22**. The plan acknowledges the lack of bicycle infrastructure in East Oakland despite a strong desire among residents for more opportunities to bike and proposes significant investments in low-stress

1 Center for Disease Control and Prevention (CDC), Physical Inactivity, September 2022, https://www.cdc.gov/chronicdisease/resources/publications/factsheets/physical-activity.htm, accessed September 8, 2022.

Figure EJ-22: Oakland Existing and Proposed Bicycle Network, 2019



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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[2]bikeways, supportive infrastructure[3], and programming in East Oakland neighborhoods. However, the plan acknowledges the potential adverse effects of transportation investments on housing costs, particularly in historically disinvested neighborhoods, in a speculative land market. Let's Bike Oakland recognizes the connection between public investments in transportation infrastructure and new development, and the threat this relationship can pose to housing affordability and stability in Oakland's Black and Brown neighborhoods. The plan highlights the need for bicycle infrastructure investments to be paired with policies and programs that keep people in place, foster neighborhood economic development, and protect labor rights.

Transit Facilities

Oakland's 2018 Equity Indicators identified that bus frequency is relatively equitable compared to other citywide issues assessed in the report. Nevertheless, there are still some disparities in frequency between racial groups. Specifically, residents in majority Black census tracts experience less than half the average number of buses per hour than residents in majority White tracts. In addition, data from the 2019 American Community Surveys (ACS) demonstrates that provision of services does not align with needs, as almost all racial groups have similar percentages (approximately 25 percent) of working residents who commute by transit, except for Hispanic/Latinx, Native American/Alaskan, and Other races (18 percent and lower).[4] Oakland's existing transit infrastructure and bus route frequency as of 2017 is shown in **Figure EJ-23**.

AC Transit and OakDOT updated their Transit Action Strategy in 2020 which highlights actions to reduce transit costs for low-income transit users and identifies transit improvements that would benefit vulnerable populations, such as addressing gaps in bus frequency. These actions also address infrastructure upgrades, such as repaving transit streets, upgrading bus stops, and installing pedestrian lighting.

Pedestrian Network

In 2021, the United States Environmental Protection Agency (EPA) released an update to its Smart Location Database (version 3.0), which includes an analysis of transportation accessibility according to factors like location and quality of employment. Census block groups in Oakland generally fall within the higher (more walkable) range. Areas where there is less walkability include census block groups along the northern edge of the city, in addition to the industrial area of West Oakland (west of I-880) and Oakland International Airport. According to "Oakland Walks,", an addendum to the LUTE that forms the City's Pedestrian Plan, sidewalks in East and West Oakland are more likely to be damaged and to be missing critical amenities such as curb ramps, and these neighborhoods are disproportionately burdened by traffic collisions resulting in fatalities and severe injuries.[5] **Figure EJ-24** shows sidewalk gaps as identified in the Oakland Walks Plan. The neighborhoods along International Boulevard and parts of West Oakland north of Adeline Street are less likely to have sufficient tree coverage, exposing people walking to an uncomfortable environment characterized by extreme heat and pollution.[6]

The traditional approach to transportation planning and design has prioritized expeditious vehicular mobility over safety, resulting in an over-engineered transportation network that poses dangers to people walking and biking, along with segregating neighborhoods. The Oakland Equity Indicators Report also found that pedestrian safety is one of the 12 indicators that received the lowest possible score and is a therefore a top issue for equity.

As mapped in **Figure EJ-25**, there were 12,333 crashes that occurred between 2016 and 2020 in Oakland, including 1,552 pedestrian (13 percent), 848 bicycle (7.0 percent), 969 motorcycle (7.9 percent), 406 truck (3.0 percent), and 8,559 car (6.0 percent) crashes. About six percent of these accidents resulted in severe injury, and just over one percent resulted in death. The leading causes of these crashes are speeding (24 percent), improper turning (17 percent), violation of traffic signals/signs (16 percent), and violation of automobile right-of-way (14 percent).[7]

According to the Citywide Crash Analysis of crashes from 2012-2016, 60 percent of severe and fatal crashes in Oakland occur on just 6 percent of the total street network. Further, reported crash data reveal that certain demographic groups and geographic areas experience a disproportionate share of crashes in Oakland. For example, Black Oaklanders are twice as likely to be killed or

2 Low-stress bikeways involve little traffic interaction based on the roadway's vehicle speeds and volumes. Examples include trails, separated or buffered bike lanes on high-speed and high-volume roadways, and neighborhood bike routes.

3 Supportive infrastructure includes bicycle parking, wayfinding, and intersection treatments.

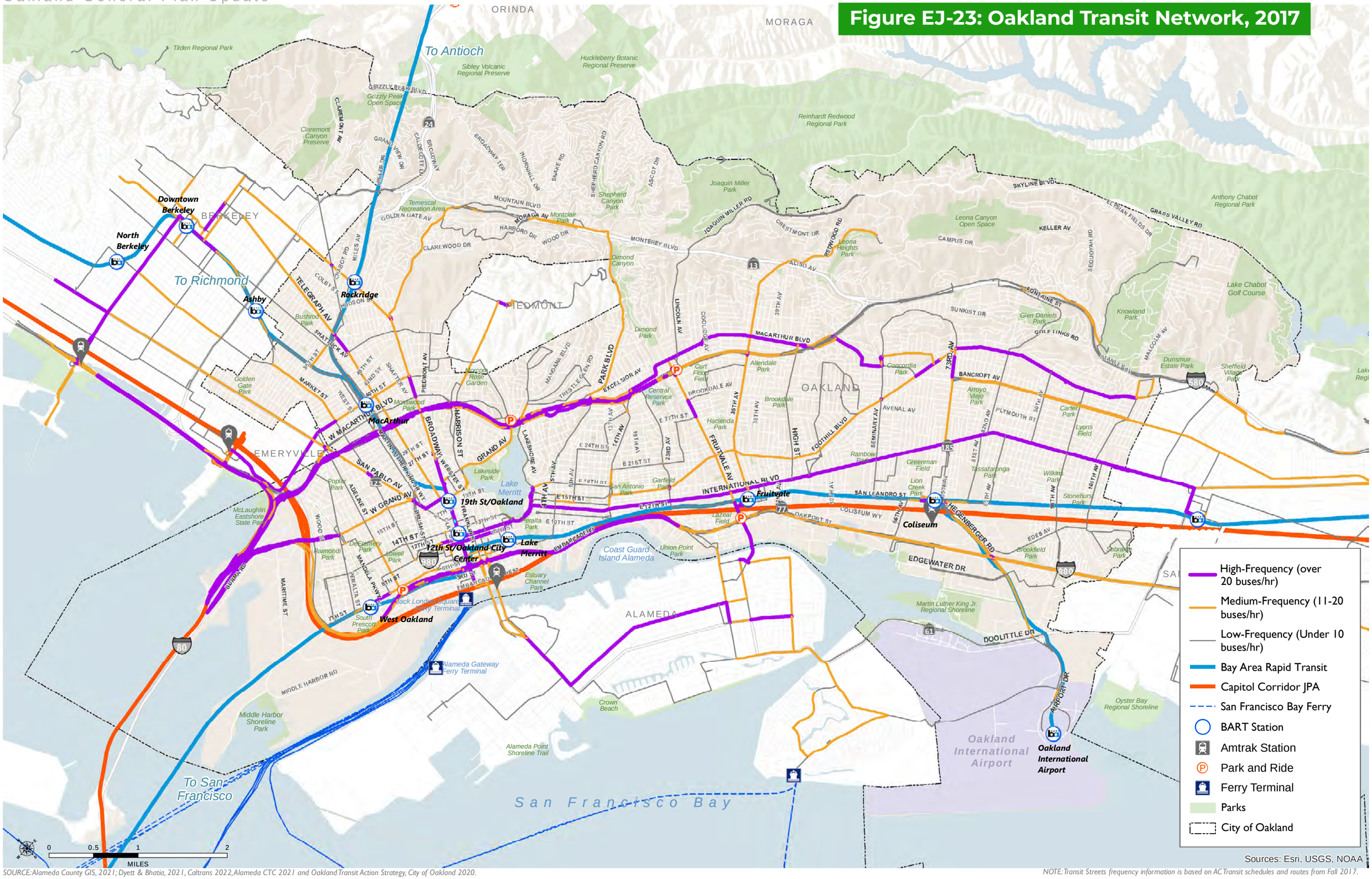
4 U.S. Census Bureau, 2019 American Community Surveys 5-Year Estimates Table S0802 [generated for Oakland city, California], https://data.census.gov/table?q=2019+oakland,ca+s0802&tid=ACSST5Y2019.S0802, accessed February 24, 2023.

5 City of Oakland Department of Transportation, Oakland Walks! 2017 Pedestrian Plan Update, https://cao-94612.s3.amazonaws.com/documents/Ped-Plan-2017-rev-sep2018-compressed.pdf.

6 Ibid.

7 University of California, Berkeley Safe Transportation Research and Education Center, Traffic Injury Mapping System, California Statewide Integrated Traffic Records System query for crashes in Oakland between January 1, 2016 and December 31, 2020, obtained March 3, 2022: https://tims.berkeley.edu/help/Query_and_Map.php

Figure EJ-23: Oakland Transit Network, 2017



SOURCE: Alameda County GIS, 2021; Dyett & Bhatia, 2021, Caltrans 2022, Alameda CTC 2021 and Oakland Transit Action Strategy, City of Oakland 2020.

NOTE: Transit Streets frequency information is based on AC Transit schedules and routes from Fall 2017.

Figure EJ-24: Sidewalk Gaps in Oakland (2004-2007)

Pending data from OakDOT

BERKELEY
PIEDMONT
EMERYVILLE
ALAMEDA
SAN LEANDRO
Oakland International Airport
San Francisco Bay
Lake Merritt
Lake Chabot
Coast Guard Island Alameda
Jack London Square Ferry Terminal
Alameda Gateway Ferry Terminal
Bay Farm Island Ferry Terminal

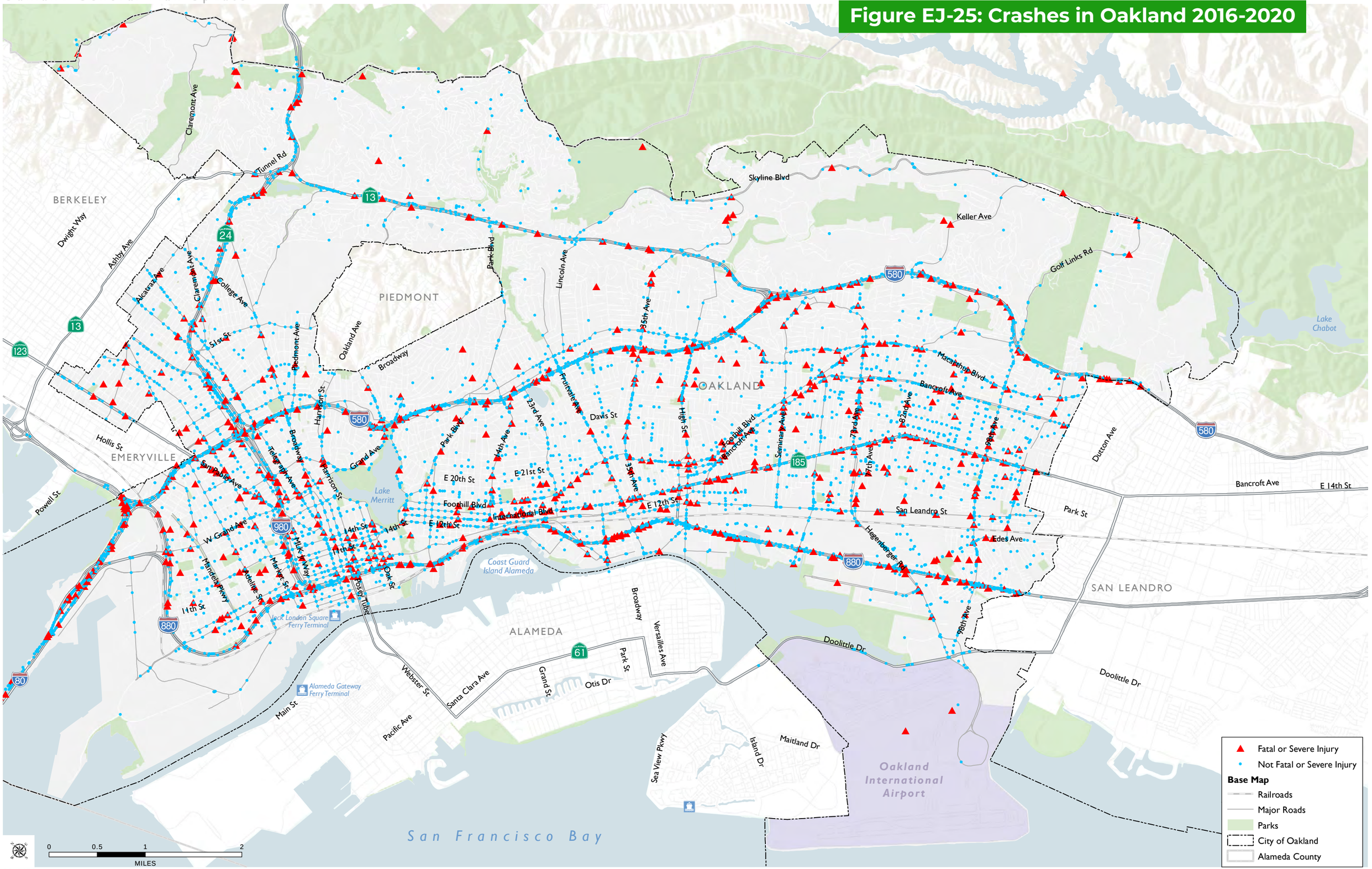
Claremont Ave
Tunnel Rd
Dwight Way
Ashby Ave
Alcatraz Ave
College Ave
51st St
Piedmont Ave
Oakland Ave
Broadway
Park Blvd
Lincoln Ave
35th Ave
Skyline Blvd
Keller Ave
Golf Links Rd
Macarthur Blvd
Bancroft Ave
Hollis St
San Pablo Ave
Telegraph Ave
Harrison St
Grand Ave
23rd Ave
Fruitvale Ave
Davis St
High St
Foothill Blvd
Seminary Ave
73rd Ave
77th Ave
82nd Ave
98th Ave
Dutton Ave
E 14th St
E 20th St
E 21st St
E 12th St
International Blvd
San Leandro St
Park St
Edes Ave
Hegenberger Rd
Powell St
W Grand Ave
MLK Jr Way
Market St
Adeline St
Mandela Pkwy
11th St
14th St
Oak St
Posey Tube
Webster St
Broadway
Versailles Ave
Park St
Grand St
Santa Clara Ave
Otis Dr
Main St
Pacific Ave
Doolittle Dr
Sea View Pkwy
Island Dr
Maitland Dr

0 0.5 1 2
MILES

Sidewalk Gaps
Data collected 2004-2007, as shown in 2017 Pedestrian Master Plan
City of Oakland
Alameda County

SOURCE: City of Oakland, 2017-2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

Figure EJ-25: Crashes in Oakland 2016-2020



SOURCE: Transportation Injury Mapping System (UC Berkeley), 2022; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

Includes crashes that occurred between January 1, 2016 and December 31, 2020.

severely injured in a crash compared to all other Oaklanders.[8] Based on data from the City's 2018 High Injury Network (HIN), which tracks the intersections and corridors with the greatest volume of crashes in the city, **Chart EJ-5** demonstrates how these crashes occur predominantly, and disproportionately, in majority Hispanic/Latinx tracts – more than double the proportion seen in tracts with other racial pluralities. In addition, both Black and Asian populations make up roughly 20 percent of the city's population and experience similar proportions of crashes (i.e., close to a one-to-one ratio), which is a significantly higher rate than for white populations.

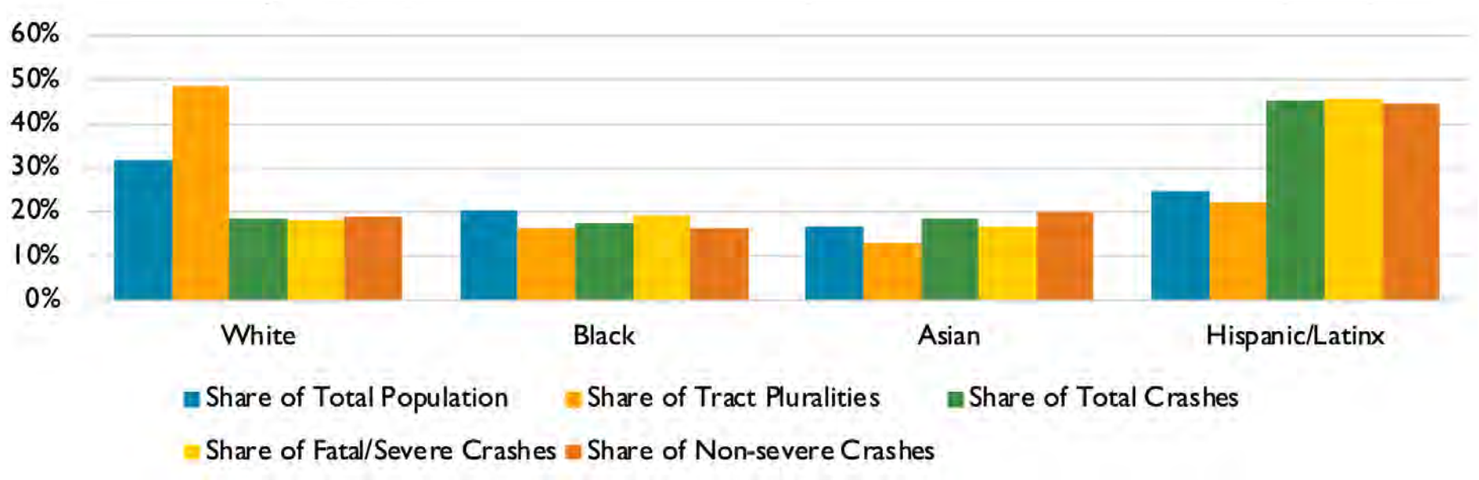
Poor lighting alongside secluded walking environments or minimal street activity can increase pedestrian vulnerability. In 2004, the Metropolitan Council awarded Oakland a $2.2 million grant to transform four crosswalks with pedestrian-scale lighting and retimed signals, which resulted in a more friendly and visible pedestrian environment. However, there is a continued need for investment in pedestrian safety and security. For example, the Oakland 2017 Pedestrian Plan encourages investigation into identifying targeted investments to bring all sidewalks up to minimum standards for pedestrian security using pedestrian-scale lighting or improved street lighting.

As part of the LUTE update, the City can work to ensure that new street design and redesign supports pedestrian safety by minimizing traffic volumes and/or speed, incorporating street trees, implementing leading pedestrian intervals (which give pedestrians the opportunity to enter the crosswalk 3-7 seconds before the vehicles are given the green signals), and adding pedestrian-scale lighting.

Issues and opportunities related to Oakland's roadway, bikeway, and pedestrian network will be further analyzed as part of the LUTE update. The City will focus on creating more accessible neighborhoods and identifying specific locations and strategies for improved street design and safety measures in EJ Communities and those most burdened by collisions.

8 City of Oakland, Citywide Crash Analysis, August 29, 2018, https://cao-94612.s3.amazonaws.com/documents/CityofOakland_CrashAnalysis_Infographic_08.29.18.pdf.

Chart EJ-5: High Injury Network Crashes by Census Tract Racial Majority, 2018



Note: Share of Total Population shows the percentage that each racial group represents of Oakland's total population (not by census tract). Share of Tract Pluralities shows the proportion of Oakland census tracts that each racial group has the greatest plurality in.

Building Resilience: Safe Oakland Streets

Safe Oakland Streets (SOS) is a citywide initiative launched in 2021 to prevent serious and fatal traffic crashes and eliminate crash inequities on Oakland's streets by prioritizing safety over speed with a focus on historically underserved communities. The SOS approach recognizes that all severe and fatal traffic crashes are preventable. One way the City is implementing this approach is through "Safe Systems," through which roadways are designed to anticipate human error and protect those who are most vulnerable rather than the traditional traffic safety approach that often relies on perfecting individual human behavior.

SOS is working across departments and building partnerships with the community to implement the most effective and equitable strategies. Previous planning efforts have laid the foundation for SOS, including OakDOT's 2016 Strategic Transportation Plan, Oakland Walks, and Let's Bike Oakland, which prioritize taking an integrated safety and equity-driven approach. For instance, OakDOT's Geographic Equity Toolbox—which identifies Priority neighborhoods to leverage attention and funding to neighborhoods that may have been historically and currently overlooked by City services and planning processes—and information from the HIN helps the department set data-informed priorities for improvements and reduce the incidence of crashes. Additionally, OakDOT maintains a contracted "community-based organization on-call" to continue to support the values of equity and engagement. This contracting mechanism allows OakDOT to pay non-profit organizations for the valuable work they do in support of transportation justice, ranging from grassroots engagement to policy input and meeting facilitation. These include organizations such as Bike East Bay, Safe Passages, Urban Strategies Council, Walk Oakland Bike Oakland, East Bay Asian Local Development Corporation, Transform, Cycles of Change, Eastside Arts Alliance, Building Opportunities for Self Sufficiency.

Source: City of Oakland, "Safe Oakland Streets"

Building Resilience: Interstate 980 Study - Vision 980

The Vision 980 study is a joint effort by Caltrans and the City of Oakland that will define transportation and land use strategies to reconnect Downtown Oakland and West Oakland communities along the I-980 corridor. The study will focus on community integration and environmental justice to establish a vision for I-980 that will guide the delivery of equitable outcomes for the City of Oakland, the Bay Area region, and the State of California. This currently ongoing effort will be accomplished by engaging study partners, stakeholders, and the public in developing and recommending a new collective vision for the corridor, such as:

- A broad range of multi-modal options, including bus and rail transit, active transportation, freight movement and emerging mobility and micro-mobility services.
- Land use options, including reallocating right-of-way to reconnect communities divided by the freeway.

The Vision 980 study will occur in two phases. The shared vision will be developed in the first phase, then the plan for accomplishing the shared vision will be developed in the second phase.

PARK ACCESS AND MAINTENANCE

Green spaces in parks and natural areas are valuable public assets that can greatly improve community livability, support healthy and active lifestyles, and provide ecological benefits. Overall, Oakland has excellent access to parks and open space, but there are also geographic disparities on the neighborhood level. As shown in **Figure EJ-26**, the Oakland Hills are almost entirely bordered by and include some regional parks (several of which are owned by the East Bay Park District rather than the City of Oakland). The hills also include large resource conservation areas and open spaces. The Oakland flatlands contain a much smaller total area of the City's parkland, with most parks being small neighborhood parks. Lake Merritt is the exception as it is surrounded by substantial community parkland; however, it is also surrounded by some of the densest neighborhoods in the city and a significant share of the population lives within close proximity, resulting in heavy use of these spaces.

Based on data from the Trust for Public Land, Oakland—which is the 45th most populous city—ranks 84th among the 100 most populous cities in the country. Residents in neighborhoods of color have access to 69 percent less park space per person compared to those in white neighborhoods. Specifically, white neighborhoods have access to 135 percent more park space per person relative to the city median, whereas Hispanic/Latinx neighborhoods have access to the least amount of park space, with 32 percent less than the city median.

In addition to provision of parkland, distribution of city investments can determine whether park quality is equitable. In 2020, the Oakland Parks and Recreation Foundation surveyed Oakland residents to better understand how to improve citywide park equity. This study found that park quality generally needs improvement, particularly for Black respondents; white respondents had the highest scoring perception of park quality.[9] Furthermore, the study highlighted that maintenance and safety are primary factors in park use, anecdotally showing that some residents feel they "have to drive to find a park that feels safe, has basic amenities, and functioning restroom and playground equipment," which was particularly true for residents of the East Oakland/South Hills area. In face of such issues, the City will need to balance park priorities between providing additional acreage and improving existing facilities to meet the needs of its residents.

As part of the OSCAR Element update and creation of a new Infrastructure and Facilities Element, the City can analyze major and minor CIP park projects and maintenance by funding and location as well as work orders connected to park facilities to better understand distribution of investments.

URBAN FOREST AND URBAN GREENING

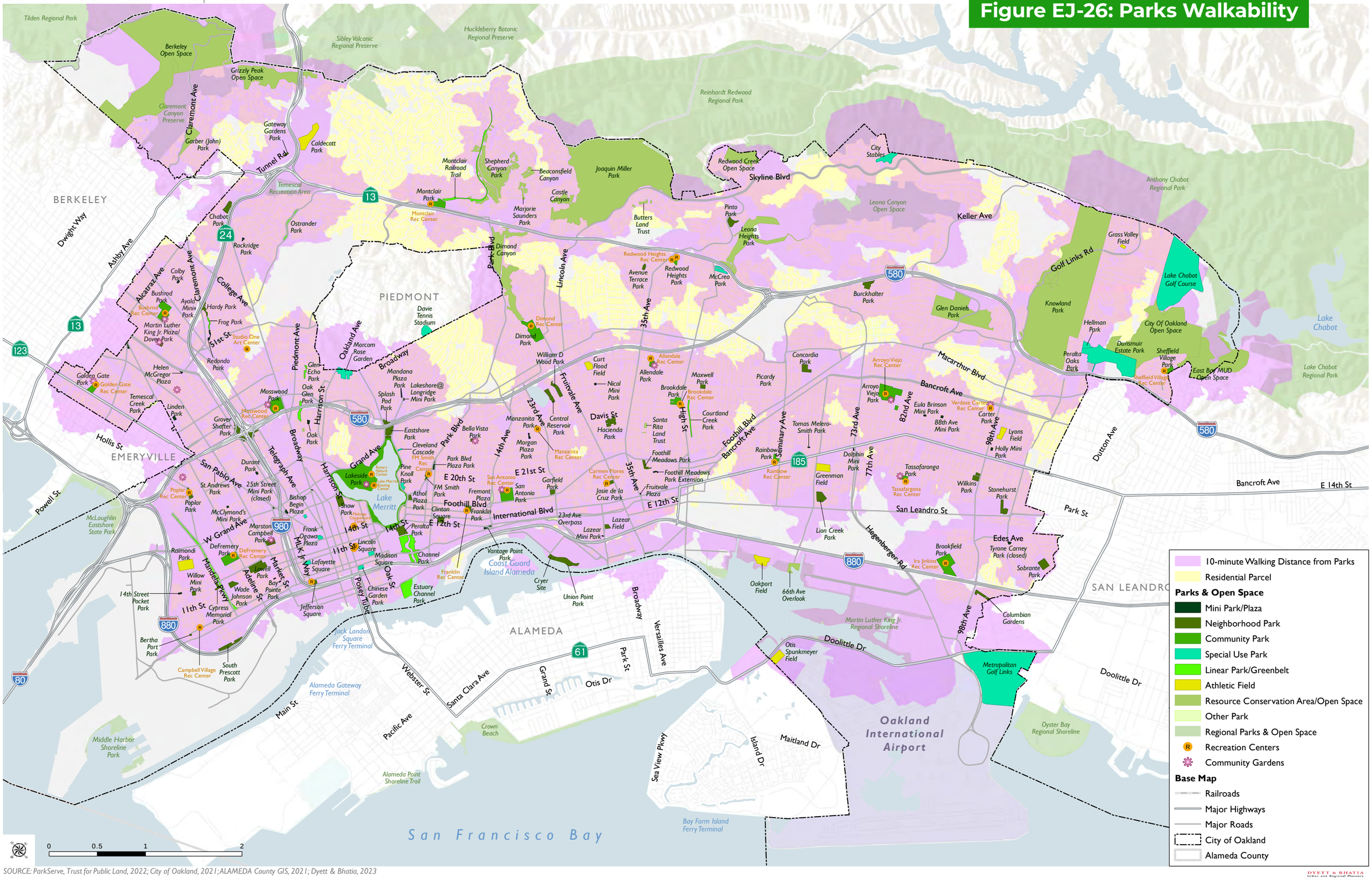
Urban Forest

Shaded trees and greenery play a major part in improving the urban environment. Urban trees balance the natural with the built environment and provide both shade and beauty. Trees play a key role in the climate as they absorb carbon dioxide and help manage stormwater runoff. They also help fight pollution by improving air quality, aid in cooling on hot days, and generally make it more pleasant to recreate outside.

In 2021, the City began the process of developing an Urban Forest Plan, an equity-focused guide on how the urban forest will be planned, managed, and protected over the next 50 years for the next generation of Oaklanders. Based on studies of community tree canopy, portions of West Oakland, North Oakland, East Oakland, and Deep East Oakland have the least amount of tree canopy coverage. The City's tree inventory, shown in **Figure EJ-27**, is also disproportionately distributed; while white residents make up only about a third of the City's population, they live in census tracts that contain more than half of the City's tree inventory. In comparison, Oakland's Asian population represents 17 percent of the total population, they live in census tracts where only nine percent of city trees are located. As part of development of the Urban Forest Plan, the City will include targeted planting efforts, tree maintenance, and investment strategies to increase and maintain tree canopy cover in these areas.

9 Oakland Parks and Recreation Foundation, Parks and Equity: The Promise of Oakland's Parks, December 2020, https://www.oaklandparks.org/wp-content/uploads/2021/01/OPRF-Parks-And-Equity-2021-01-12.pdf, accessed February 17, 2022.

Figure EJ-26: Parks Walkability



10-minute Walking Distance from Parks
Residential Parcel

Parks & Open Space

- Mini Park/Plaza
- Neighborhood Park
- Community Park
- Special Use Park
- Linear Park/Greenbelt
- Athletic Field
- Resource Conservation Area/Open Space
- Other Park
- Regional Parks & Open Space
- Recreation Centers
- Community Gardens

Base Map

- Railroads
- Major Highways
- Major Roads
- City of Oakland
- Alameda County

SOURCE: ParkServe, Trust for Public Land, 2022; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2023

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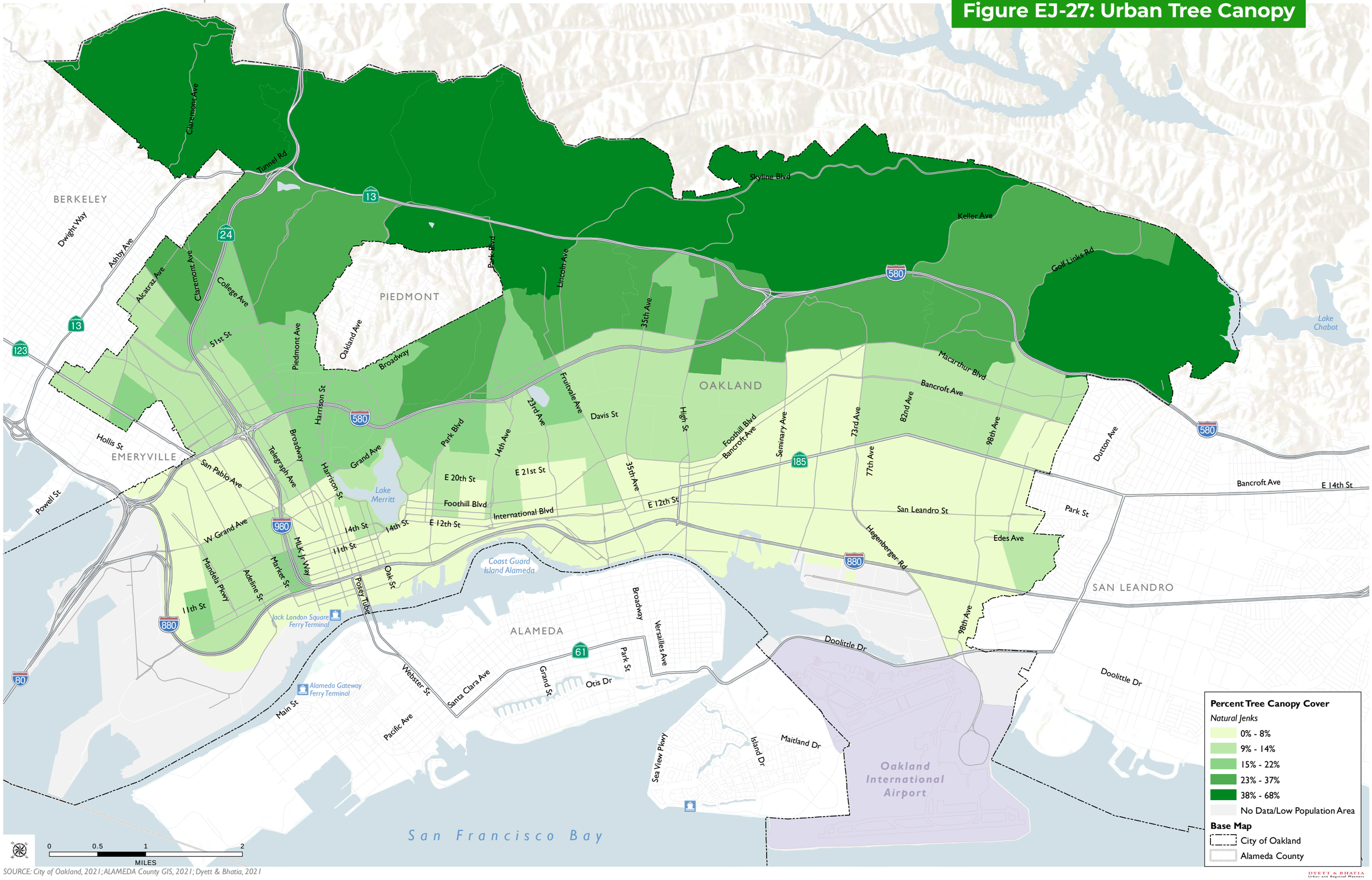
Figure EJ-27: Urban Tree Canopy



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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Urban Greening and Climate Resilience

Climate change is expected to cause more frequent and more severe extreme heat events, while sea level rise continues to accelerate. High energy demand can be expected from protecting households from extreme temperature fluctuations, which can create a cost burden for lower-income households. These climate-change related factors will impact some areas more than others and affect frontline communities more severely. Frontline communities are those who have been and will continue to be hit first and worst by the impacts of environmental injustice and the climate crisis. This disproportionate impact from climate change is a result of compounding vulnerabilities including racial discrimination, poverty, disability, housing insecurity, linguistic isolation, poor air quality, and other factors. These vulnerabilities often make these communities least able to adapt or recover from climate change impacts. For more information on climate resiliency, including sea level rise, emergency preparedness, and community resilience hubs, please see the Safety Element.

To identify areas that would be most affected by climate change-related factors, indicators that measure projected maximum temperatures during future heat health events, energy cost burdens, and flood hazards due to sea level rise were combined. As seen in **Figure EJ-28**, areas in southwest Oakland are the most cumulatively vulnerable to climate change effects, notably those closest to downtown and San Francisco Bay. Improving climate resiliency in these areas, such as by increasing urban forestry, can help lessen the burden on these frontline communities.

In many areas of Oakland, there are opportunities to create greener, more environmentally sustainable and livable communities by creating new parks, improving existing parks and green spaces, green walls, and planting trees. With the right design, these projects can filter stormwater, improve groundwater recharge, and improve water quality. Projects may also provide additional benefits such as reducing urban heat island effects, improving air quality, increasing walkability and increasing neighborhood safety. Urban greening's co-benefits have been included in the 2019 Green Stormwater Infrastructure Plan, and several community plans, including the West Oakland Community Action Plan and East Oakland Neighborhoods Initiative, have identified urban greening projects as one of the top community priorities. The City can also prioritize projects in Priority Conservation Areas (PCAs), which qualify for funding from the Metropolitan Transportation Commission (MTC).

Table EJ-9: Top 10th Percentile Tracts by Indicator — Promoting Physical Activity

TRACT NAME (WITH SCORE)		
TREE CANOPY	**PARK ACCESS**	**ROAD SAFETY[1]**
Port Lower* (1.00)	Glen Highlands (1.00)	**Chinatown (1.00)**
Melrose (0.98)	Lincoln Highlands (0.99)	**Fruitvale (0.99)**
Acorn Industrial* (0.98)	Montclair North (0.98)	Adams Point East (0.98)
Brookfield Village/Hegenberger (0.96)	Adams Point North (0.97)	**Downtown/Old Oakland (0.97)**
Port Upper (0.96)	Millsmont (0.96)	Downtown (0.96)
Jingletown/Kennedy (0.95)	**Oakland Estuary (0.96)**	**Jingletown/Kennedy (0.96)**
Oakland Estuary (0.95)	Trestle Glen (0.95)	**Acorn (0.95)**
McClymonds (0.91)	Redwood Heights Central (0.94)	**Fruitvale/Hawthorne (0.94)**
Chinatown (0.91)	Adams Point West (0.93)	**Chinatown/Laney (0.93)**
Downtown (0.91)	Crocker Highland (0.92)	**Fitchburg (0.92)**
Uptown/Downtown (0.91)	Redwood Heights East (0.91)	**Bunche/MLK Jr (0.91)**
	Durant Manor (0.90)	

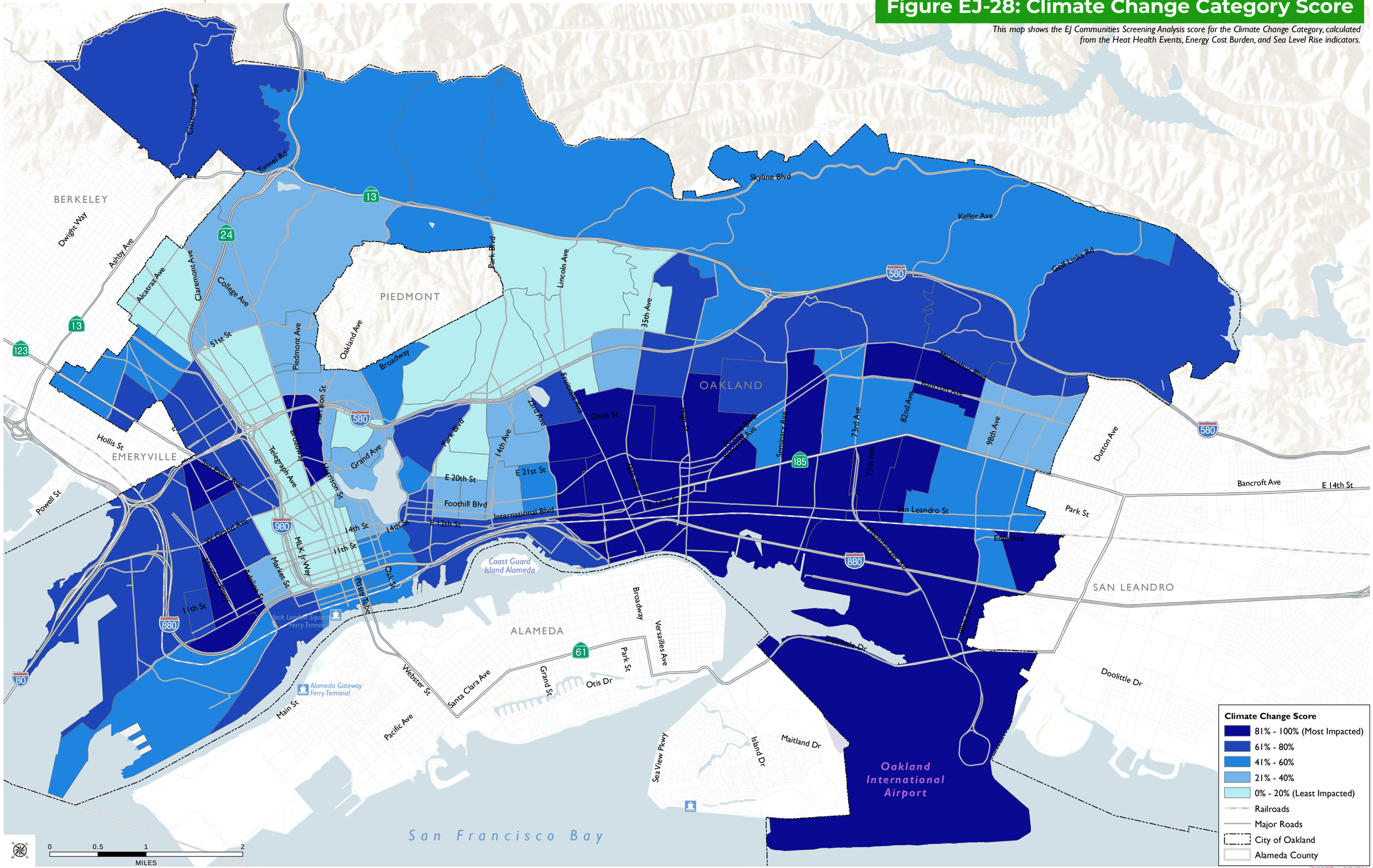
Note: Bolded and blue census tracts are EJ Communities.

** Indicates census tract with low population.*

1. Includes only 11 tracts in top decile due to ties. Next highest score for Tree Canopy is 0.87 and next highest for Road Safety is 0.89.

Figure EJ-28: Climate Change Category Score

This map shows the EJ Communities Screening Analysis score for the Climate Change Category, calculated from the Heat Health Events, Energy Cost Burden, and Sea Level Rise indicators.



SOURCE: City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2022

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7.2 GOALS AND POLICIES

GOAL EJ-7 **CREATE ENVIRONMENTS THAT SUPPORT PHYSICAL ACTIVITY, RECREATION, AND HEALTHY LIFESTYLES THROUGH SAFE, COMFORTABLE AND ADA-COMPLIANT WALKABLE, BIKEABLE NEIGHBORHOODS, WITH ACCESS TO TRANSIT, GREEN SPACE, TREES, PATHS, AND PARKS.**

Land Use Planning

Additional policies will primarily be developed as part of the Phase 2 LUTE update.

EJ-7.1 **Complete Neighborhoods.** Promote "complete neighborhoods"— where residents have safe and convenient access to goods and services on a daily or regular basis—that address unique neighborhood needs and support physical activity, including walking, bicycling, active transportation, recreation, and active play.

EJ-7.2 **Accessible Neighborhoods.** Encourage active modes of transportation and transit accessibility by supporting neighborhoods that provide access to a range of daily goods, services, and recreational resources within comfortable walking or biking distance. Encourage transit providers to prioritize, establish, and maintain routes to jobs, shopping, schools, parks and healthcare facilities that are convenient to EJ Communities.

Collisions

Additional policies will primarily be developed as part of the Phase 2 LUTE update.

EJ-7.3 **Street Design for Safe Speeds.** Work to maximize the safety of the transportation network by designing/redesigning streets for lower driving speeds and enforcing speed limits as well as promoting safe driving behavior. Strategies could include implementing leading pedestrian intervals for crosswalks in residential neighborhoods and providing pedestrian scale lighting. Prioritize speed reduction efforts in EJ Communities with the highest concentrations of pedestrian and bicyclist crashes. Study enforcement patterns annually to avoid racial profiling.

EJ-7.4 **Safe Oakland Streets.** Use a community engagement-rooted, data-driven and systematic approach to eliminate all traffic fatalities and severe injuries, while increasing safety, health, and equitable mobility for all.

EJ-7.5 **Bicyclist-and Pedestrian-Friendly Design.** Prioritize designs that protect people biking and walking, such as improvements that increase visibility of bicyclists and pedestrians, traffic calming, and safer intersection crossings and turns. Improvements should also prioritize universal design so that improvements are usable by all people, to the greatest extent possible, without the need for adaptation or specialization.

EJ-7.6 **Collaborative Safety Solutions.** Collaborate with educational institutions, senior living facilities, community organizations, and other stakeholders, particularly those who reside in EJ Communities, when developing and implementing programs and improvements that increase safety and encourage the use of active transportation modes. Identify and plan for improvements in collaboration with existing neighborhood residents and businesses to address concerns about gentrification and displacement.

EJ-7.7 **Equitable Paving.** Continue to plan and distribute paving program resources based on equity, road condition and safety metrics.

Parks, Programming, and Access

Additional policies will primarily be developed as part of the Phase 2 OSCAR update.

EJ-7.8 **Park Distribution.** As part of park planning efforts, prioritize development of new parks in EJ Communities that are underserved, as identified in **Figure EJ-26**.

EJ-7.9 **Enhancing Access to Parks.** Pursue strategies that increase community access to safe, high quality-open space, parks and recreational facilities, including increasing access to pedestrian and bicycle amenities around open space or recreational areas, expanding joint use agreements with schools and educational institutions; removing of physical barriers to access (ex: fences); and providing a choice of legible routes to and from park areas through the installation of new or improved multi-use shared paths, wayfinding, and signage.

EJ-7.10 **Parks Programming.** Create high-quality inclusive programming that encourages the use of the park facilities by a variety of users including older adults, youth, and people with disabilities throughout the day and evenings. Opportunities should be taken to incorporate local heritage and culture.

EJ-7.11 **Partnerships.** Coordinate partnerships with Caltrans and the Port to activate and increase access to parks and greenways with community programming and events.

EJ-7.12 **Park Safety.** Use Crime Prevention Through Environmental design (CPTED) and other best practices for landscaping, lighting, and other components when designing open space and recreational spaces.

EJ-7.13 **Park Maintenance.** When evaluating park projects and funds for maintenance—such as routine trash collection, cleaning of restroom facilities, provision of safety lighting, and other operational functions—include equity and presence in EJ Communities as a priority weighted factor.

EJ-7.14 **Community Input.** Provide ongoing opportunities for public engagement and input into the parks and recreation planning process, including priorities for amenities, facilities, programming, and improvements.

Greening and the Urban Forest

EJ-7.15 **Urban Forest.** Implement the Urban Forest Plan, a comprehensive, area-wide urban canopy and vegetation plan that identifies locations where trees can be added and maintained, such as parks, streets, and rights-of-way. Develop a plan to maintain and protect existing trees that provide shade, reduce urban heat island impacts, and reduce exposure to air pollution emissions in communities most affected by air pollution. This includes partnering with local nonprofit groups, encouraging trees on private property, and working with the community on tree maintenance and (as needed) removal. Prioritize tree canopy in EJ Communities with the least amount of canopy, as shown in **Figure EJ-27**.

EJ-7.16 **Urban Greening.** Promote collaboration with community-based organizations in identifying, funding, developing, and maintaining specific green infrastructure projects in EJ Communities.

8. Engaged Communities

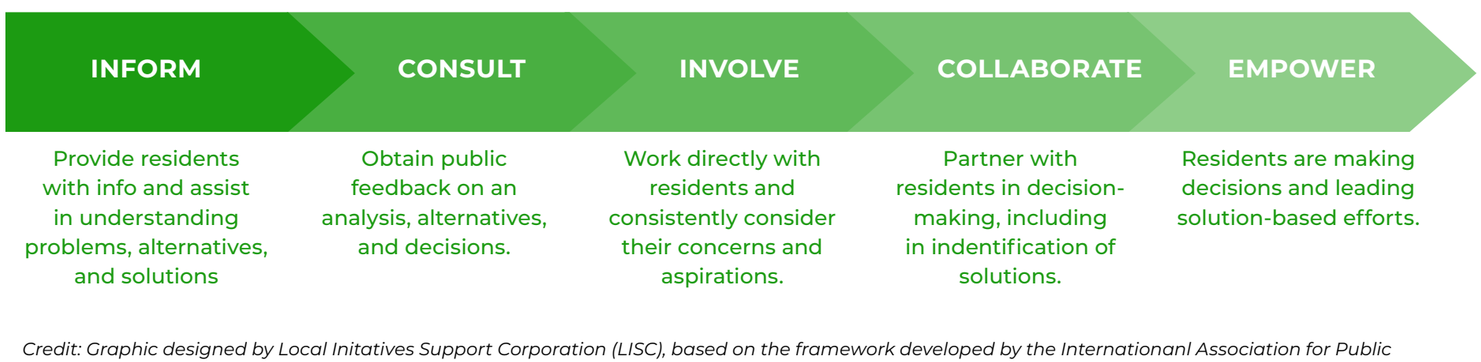
SB 1000 seeks to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color. Meaningful participation of all people in decisions that affect their lives and communities is a critical component of environmental justice and a prerequisite for a sustainable and equitable city. As discussed in Chapter 2, the most socioeconomically disadvantaged and environmentally impacted communities in Oakland have been institutionally barred out of decision-making processes, and the result has been a pattern of underinvestment and disinvestment in these communities. Redressing inequities will require a sustained effort to rebuild trust, engage and empower historically underrepresented communities, and focus investments and actions in areas that are cumulatively most affected by environmental, social, and economic burdens.

ENGAGEMENT BEST PRACTICES

Achieving inclusive, authentic community engagement and closing equity gaps requires direct participation by impacted communities in the development and implementation of solutions and policy decisions that directly affect them. As shown in the image below, community engagement can be conducted on a spectrum that ranges from informing to power sharing. This spectrum can also be thought of as series of steps essential for building capacity for community collaboration and governance, and the City will assess and orient community engagement efforts that advance the level of public impact toward greater community ownership. When the City conducts community engagement, it will start by identifying community assets and build sustained partnerships to support cultural brokers and community-based organizations who already have in-depth knowledge and established relationships in the community.

When designing community engagement efforts, it is crucial to identify potential barriers and address them as part of

Figure EJ-29: Community Engagement Spectrum



Credit: Graphic designed by Local Initatives Support Corporation (LISC), based on the framework developed by the Internationanl Association for Public Participation (IAP2).

implementation. The City will seek to remove technology, language, education, cultural, and other barriers that have limited participation of Black, Indigenous, and people of color (BIPOC); low-income; non-English speaking people; older adults; youth; people with disabilities; individuals across the sexual orientation/gender identity spectrum; unhoused people; formerly incarcerated persons; and other historically marginalized groups. Strategies to address barriers include provision of food and childcare at meetings; transportation vouchers; compensation for time and effort; translation services and materials available in people's desired language, including Braille or other languages accessible to people with disabilities or limited reading ability; venues and materials that are accommodating of work schedules and cultures; physically accessible venues; accessible marketing and informational materials with simple, relevant language; culturally relevant events and meeting formats; partnerships with trusted community organizations; expansion of internet access and coaching in digital skills; and establishment of pathways and resources for City staff follow-up.

8.1 ISSUES AND DISPARITIES

LINGUISTIC ISOLATION

One of Oakland's strengths is its diversity: residents come from many different cultures and backgrounds. Nearly 27 percent were born in another country, and common languages spoken at home (by at least one percent of the city's population, ages 5 and over) include Spanish, Vietnamese, Arabic, and Chinese (including Mandarin and Cantonese).[1]

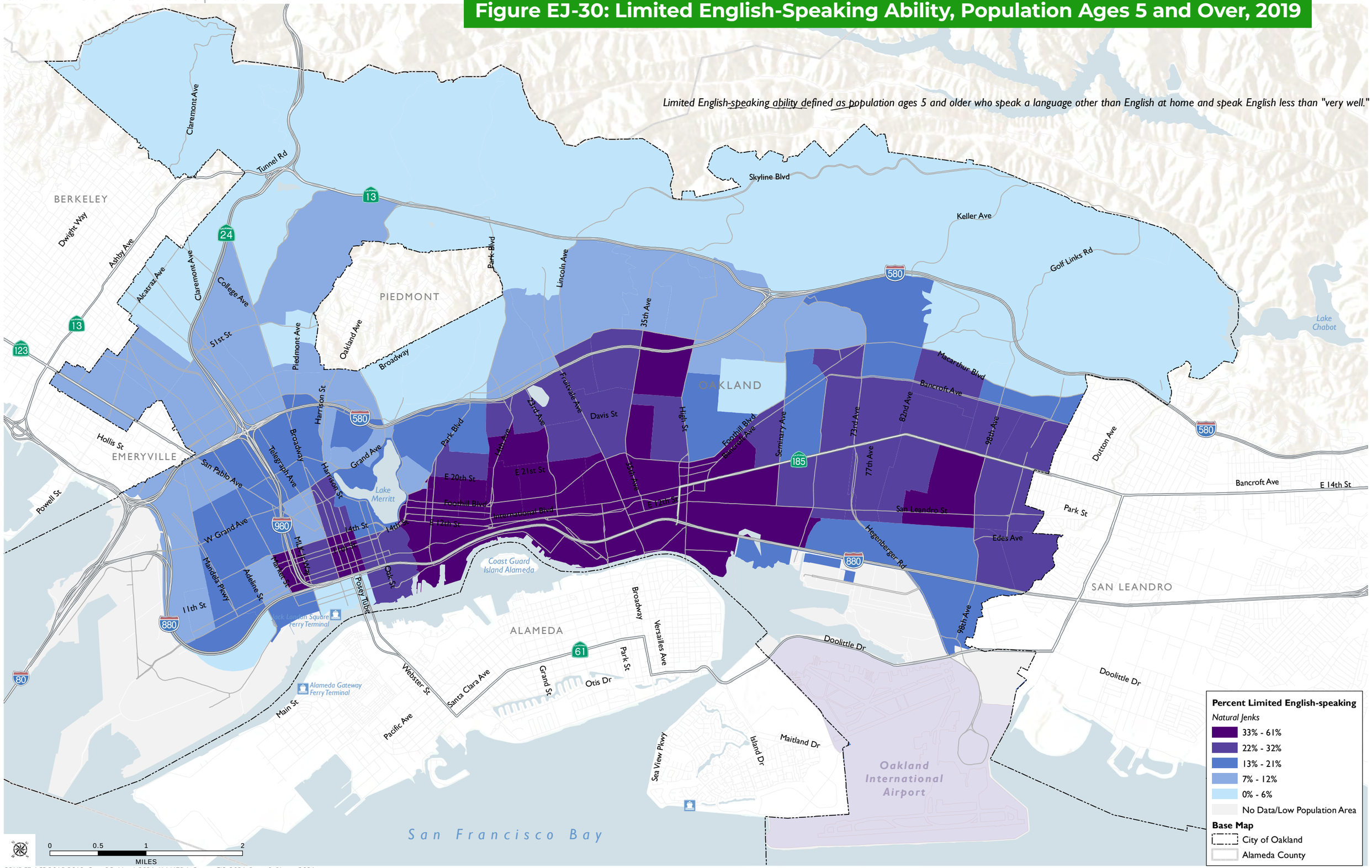
However, many of these residents do not speak or read English as a first language or at all and experience barriers to civic engagement, health and safety as a result. The people and institutions that provide social services and medical care often fail to provide translation or interpretation for adults who are not able to speak or read English well, which means they may not get the health care and information they need. Linguistically isolated households may not hear or understand important information when there is an emergency like a fire, earthquake, or extreme heat waves. A household's limited English proficiency can create even more barriers to social and civic inclusion. A household is considered linguistically isolated when all adults primarily speak a language other than English and have limited English proficiency. **Figure EJ-30** shows areas of linguistic isolation, which are greatest in the Jack London Gateway, Chinatown, Lower Laurel/Allendale, and Elmhurst Park tracts in addition to a large portion of south-central Oakland throughout Fruitvale and adjacent neighborhoods. The City will prioritize interpretation, translation, and connection to linguistically appropriate services in these communities. interpretation, translation, and connection to linguistically appropriate services in these communities. Policies in the Safety Element address linguistic barriers in community education, emergency preparedness, and emergency response.

1 U.S. Census Bureau, 2019American Community Surveys 1-Year Estimates Table B16002 [generated for Oakland city, California], https://data.census.gov/table?q=b16002+oakland,+ca&t=Language+Spoken+at+Home&tid=ACSDT1Y2019.B16002.

INTERNET ACCESS

Reliable access to the internet and telecommunications systems plays an increasingly important part in daily and civic life, helping people to work, learn, access services, participate in government, and stay connected to friends and family. Despite this importance, there are still households without access to the Internet or to computers at home. The impacts of digital isolation, especially for older adults, people with disabilities, and communities of color, include less access to resources and decreased ability to participate in civic political and non-political activities, which compounds other barriers to civic engagement and increases impacts of racial disparities in access to resources and opportunities. **Figure EJ-31** shows that tracts with the greatest proportion of households without Internet access are located in the Lockwood/Coliseum neighborhood in East Oakland and neighborhoods in Jack London Square. According to the 2018 Equity Indicators Report, Black individuals were the most likely to not have high speed internet access at home (40.8 percent), followed by Hispanic/Latinx individuals (33.5 percent). White individuals were least likely to lack high speed Internet access at home (14.6 percent). Among Asian individuals, 25.2 percent did not have access to high-speed internet at home, slightly lower than the citywide percent (26.8 percent). Black residents were 2.79 times more likely than white residents to not have high speed Internet access at home. Additional strategies to foster digital equity may include leveraging City infrastructure to provide access to households in underserved areas and partnering with telecommunications and cable providers to offer discounted wireless and broadband plans to low-income customers.

Figure EJ-30: Limited English-Speaking Ability, Population Ages 5 and Over, 2019



SOURCE: ACS 2015-2019; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

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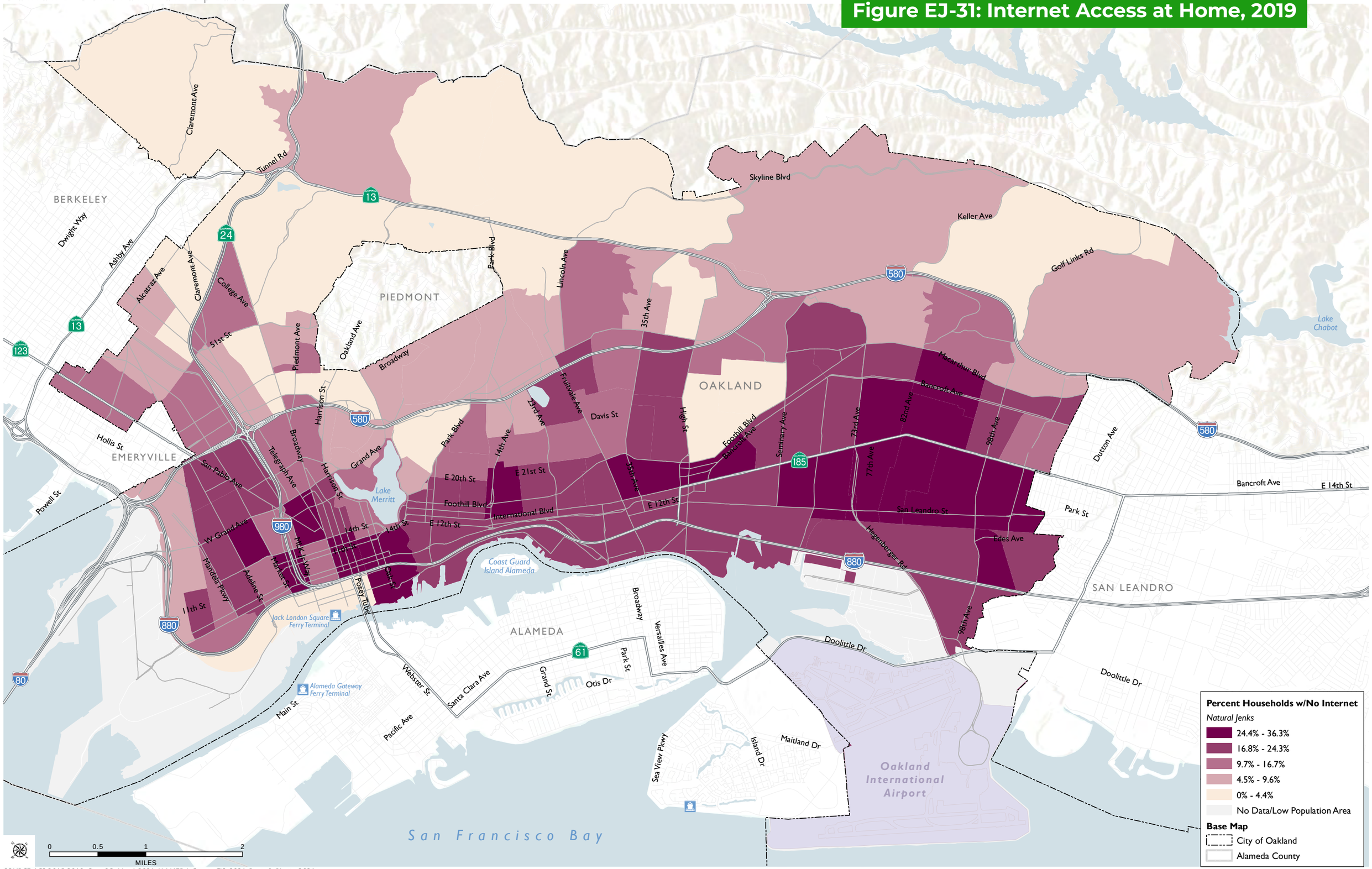
Figure EJ-31: Internet Access at Home, 2019



Percent Households w/No Internet

Natural Jenks

- 24.4% - 36.3%
- 16.8% - 24.3%
- 9.7% - 16.7%
- 4.5% - 9.6%
- 0% - 4.4%
- No Data/Low Population Area

Base Map

- City of Oakland
- Alameda County

SOURCE: ACS 2015-2019; City of Oakland, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Building Resilience: Bridging the Digital Divide

Even before the COVID-19 pandemic, essential activities like completing homework, finding a job, working from home, starting a business, making appointments, and accessing government services increasingly take place online. Yet, according to 2019 American Community Surveys (ACS) five-year estimates, over 15,000 Oakland residents do not have a computer and 27,600 do not have internet at home. Inability to access internet or broadband excludes the marginalized from educational and economic benefits available to those who are connected; this disparity between the have and have-nots is referred to as the "digital divide." The City has developed a program for "digital inclusion" with the objective of achieving digital equity. By targeting four intervention points—advocacy and awareness, internet access, devices, and digital literacy (skills)—the program can positively impact education, healthcare, employment, and economic development.

Funded through the federal CARES Act, the Oakland CARES Act: OAK WiFi Initiative provides free internet access for students, older adults, job seekers, small businesses, the underserved, and unconnected. Beginning in November 2020, the City has provided OAK WiFi live hotspots throughout the city, greatly expanding coverage from West Oakland through Downtown and along the International Boulevard corridor to the San Leandro border.

The #OaklandUndivided campaign is a partnership between the City Office of Education, Oakland Promise, Oakland Public Education Fund, Oakland Unified School District, and Tech Exchange that provides free school-loaned laptop computers, reliable internet connection, and ongoing tech support to public school students.

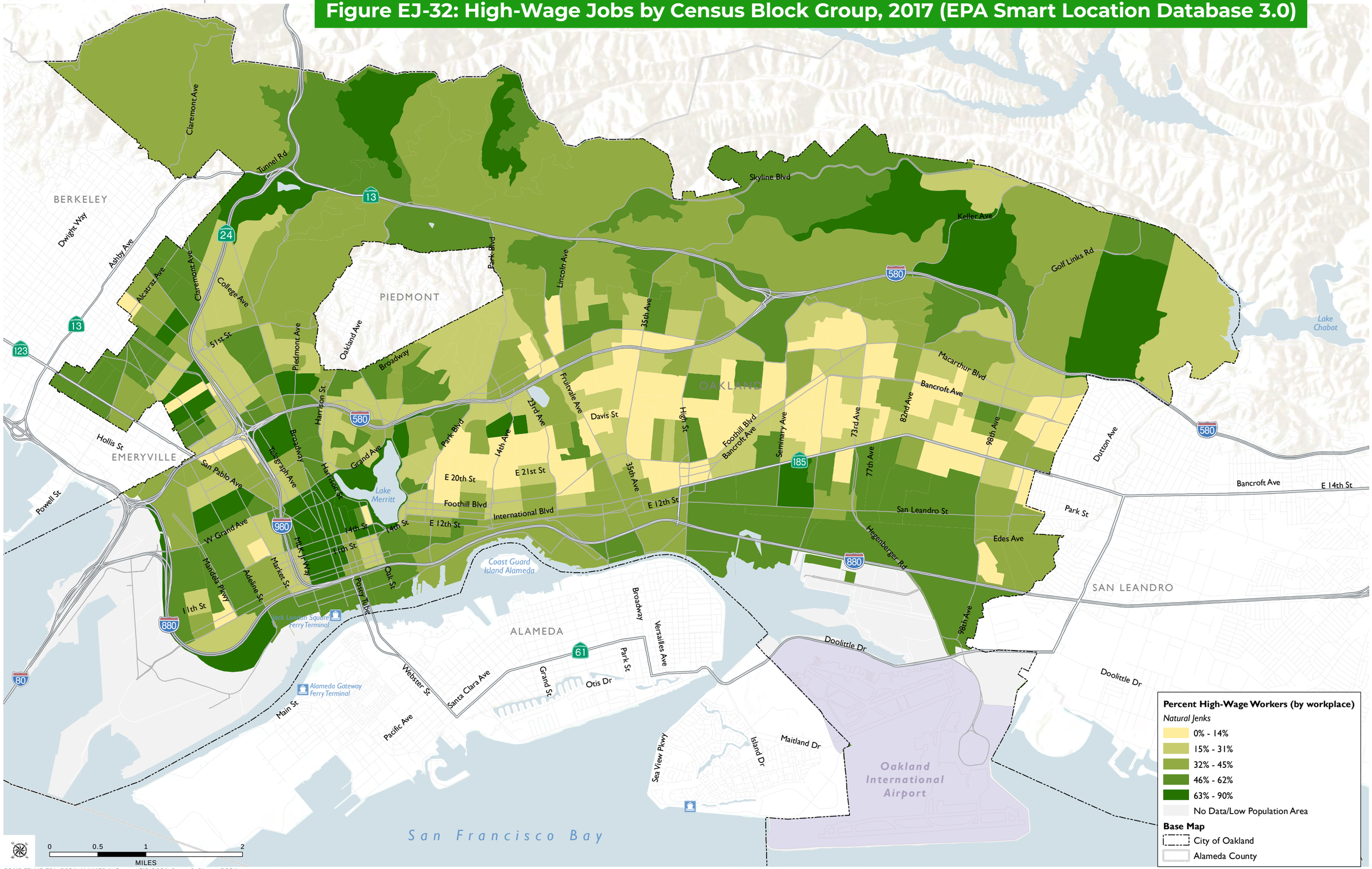
The City of Oakland also has also collaborated with the Greenlining Institute to address barriers to digital access through a year-long program called The Town Link, which builds digital inclusion and digital literacy through trainings and educational programs; builds awareness around free and affordable broadband plans; provides computers and tablets to residents that lack devices; and provides $100,000 in grants and technical assistance to 10 local organizations ($10,000 per organization) with the goal of increasing internet adoption and digital literacy in priority communities and neighborhoods. In October 2021, the Greenlining Institute announced the grant recipients, which included the following 10 grassroots Oakland organizations: Allen Temple Baptist Church, El Timpano, Homies Empowerment, Oakland Workers Fund, Vietnamese American Community Center of East Bay, Center for Empowering Refugees and Immigrants, Roots Community Health Center, The Unity Council, St. Mary's Center, and Building Opportunities for Self-Sufficiency.

Sources: ACS 5-Year Estimates, 2019; City of Oakland Digital Inclusion Report; City of Oakland "OAK WiFi – A Small Step to Closing the Digital Divide" website; #OaklandUndivided website; Greenlining website

ECONOMIC WELL-BEING

Economic well-being and employment represent a means by which people engage in community life. A state of economic well-being, where people can meet their basic needs, can also make it easier for people to participate in civic processes. Access to jobs and employment opportunities is an indicator of a place's economic health, and many of Oakland's smaller businesses represent the beating heart of Oakland's culture. As the city plans for employment of the future, the city is well-positioned to capture additional jobs in fast-growing Bay Area sectors related to software, social media, life sciences,- and the "green economy", given its burgeoning labor force already employed in these industries as well as its central, transit-accessible location and abundant real estate redevelopment opportunities. By providing enough jobs and the means to live near those jobs, cities can significantly help foster community and support residents. **Figure EJ-32** shows where high-wage jobs are located in Oakland by census block group, based on data from 2017 in the EPA Smart Location 3.0 database. Currently, areas between International Boulevard and I-580 throughout central and East Oakland have a lower percentage of high-wage employment. Downtown Oakland and the industrial area of West Oakland have high proportions of high-wage jobs, ranging between 73 and 90 percent of workers in the census block group.

Figure EJ-32: High-Wage Jobs by Census Block Group, 2017 (EPA Smart Location Database 3.0)



SOURCE: US EPA, 2021; ALAMEDA County GIS, 2021; Dyett & Bhatia, 2021

Preserving existing Oakland businesses is a key component in an equitable economic future. Many of these businesses represent the "beating heart" of Oakland's culture that strengthens and reflects the neighborhoods they are a part of. However, new economic growth can also mean displacement pressures, and the City must take action to protect these important community assets.

Entrepreneurship, specifically business ownership, is also an indicator of economic opportunity at both an individual and neighborhood level. Policies in the General Plan seek to overcome racial disparities in entrepreneurship opportunities. Additionally, through industry, government, and community partnerships, the City can help build a support system of education, training, and mentorship for industries of the future. These resources can support youth, women, people of color, and formerly incarcerated individuals with the skills and connections to new economic pathways.

The LUTE update will include additional strategies for employment related to business attraction, land use and infrastructure planning, revitalization of underperforming commercial corridors, and a more comprehensive equitable business development and support strategy. The EJ Element includes a focus on opportunities that promote equitable, inclusive, and sustainable growth and support for existing Oakland businesses, culture keepers, and entrepreneurs.

Table EJ-10: Top 10th Percentile Tracts by Indicator – Civic Engagement

TRACT NAME (WITH SCORE)		
LINGUISTIC ISOLATION	**UNEMPLOYMENT**	**INTERNET[1]**
Chinatown (1.00)	**DeFremery/Oak Center (1.00)**	**Webster (1.00)**
Lower San Antonio East (0.99)	**Acorn (0.99)**	**Lockwood/Coliseum/ Rudsdale (0.99)**
Fruitvale/Hawthorne (0.98)	**Oakland Estuary (0.98)**	**Chinatown (0.98)**
Eastlake (0.97)	**Fremont District (0.97)**	**Fremont District (0.96)**
Jack London Gateway (0.96)	**Seminary (0.96)**	**Arroyo Viejo (0.96)**
San Antonio/Sausal Creek (0.96)	Eastmont Hills (0.96)	**Uptown/Downtown (0.95)**
Chinatown/Laney (0.95)	**Cox/Elmhurst (0.95)**	**Fitchburg (0.95)**
Lower San Antonio West (0.94)	**Fruitvale (0.94)**	**Stonehurst (0.93)**
Downtown (0.93)	**Lower San Antonio West (0.93)**	**Castlemont (0.93)**
Oakland Estuary (0.92)	**Melrose (0.92)**	**New Highland (0.91)**
Harrington/Fruitvale (0.91)	**Jack London Gateway (0.90)**	**Elmhurst (0.91)**
Eastlake Clinton East (0.90)	Mills College (0.90)	

Note: Census tract names that appear in red are EJ Communities.

1. Includes only 11 tracts in the top decile due to ties. Next highest score for is 0.88.

8.2 GOALS AND POLICIES

GOAL EJ-8 FOSTER MEANINGFUL CIVIC ENGAGEMENT AND SUPPORT COMMUNITY POWER- AND CAPACITY-BUILDING.

EJ-8.1 **Meaningful, Relevant Engagement.** Design and implement public engagement processes and events that facilitate participation from low-income communities and communities of color; are driven by resident priorities, are easily accessible and understandable, and provide meaningful opportunities for participants to influence outcomes.

EJ-8.2 **Sustained Engagement.** Develop and maintain communication channels that allow for ongoing dialogue with neighborhood groups and individual residents; track issues and priorities at the neighborhood level; and foster transparency and accountability. Use this information to inform development of City programs, projects, and services, sharing information across departments to optimize the effectiveness of efforts, and share outcomes with groups.

EJ-8.3 **Innovative Methods.** Explore innovative strategies for increasing community involvement in civic processes and ownership of outcomes, tailoring strategies to best reach target audiences. Strategies to explore may include participatory budgeting, participatory action research, providing staff assistance to support community-driven planning and policy efforts, and other approaches that emphasize the active participation of community members most affected by the questions at issue.

EJ-8.4 **Community Partners.** Partner with community-based organizations that have relationships, trust, and cultural competency with target communities as to support engagement for local initiatives and issues. Seek opportunities to support community partners in these efforts such as by providing technical assistance, data, meeting spaces, funding and other support services as feasible.

EJ-8.5 **Community Capacity Building.** Empower historically marginalized community members to participate in local decision-making and engage meaningfully in planning efforts, including through increased representation in employment and civic life; providing educational/training workshops and programs about civic involvement and processes, such as through fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.

EJ-8.6 **Engagement Infrastructure.** Build City technology, staffing, funding and systems resources to conduct more inclusive, meaningful and community-empowered engagement, including seeking grant funding. Develop flexible but sustained infrastructure for two-way information sharing between City and partner agencies and community members.

EJ-8.7 **Interagency and Interdepartmental Collaboration.** Collaborate with and among public agencies and City departments to leverage resources, avoid duplication of effort and enhance the effectiveness of public participation.

EJ-8.8 **Youth-Centered Events.** Seek out opportunities for meaningfully and authentically involving young people—particularly from EJ Communities—in the planning and implementation of youth-centered events that develop confidence and leadership skills.

EJ-8.9 **Events for Older Adults.** Provide greater opportunity for older adults (ages 65 and over), particularly those from EJ Communities, to be integrated into community events and intergenerational exchanges. Involve older adults in the planning and implementation of events that are accessible to older adults.

EJ-8.10 **Linguistically Isolated Communities.** Continue to provide interpretation and translation services, assistance in accessing community services and programs, and direct engagement with specific demographic groups. Prioritize EJ Communities as identified in **Figure EJ-30**.

EJ-8.11 **Digital Access.** Ensure that all meetings, materials, and other engagement that uses technology is easily accessible by mobile devices. Invest in high-speed internet in underserved low-income communities to expand digital access and engagement opportunity. Prioritize expanded internet in public facilities and EJ Communities as identified in **Figure EJ-31**.

GOAL EJ-9 EXPAND ECONOMIC DEVELOPMENT, INCOME EQUALITY, AND OPPORTUNITY FOR ALL OAKLANDERS.

Economic Development and Opportunity

EJ-9.1 **Investments for Inclusive, Equitable Growth.** Make intentional investments to increase and diversify economic growth and living wage jobs in an inclusive and equitable manner that focuses on neighborhoods and their unique needs, particularly in EJ Communities.

EJ-9.2 **Small Business/Startup Support.** Support the development and retention of small business startups and new firms — particularly POC/women/veteran owned businesses - by providing assistance with business planning, expansion, and access to capital.

EJ-9.3 **Business Incubators.** Encourage occupancy of existing buildings with incubators for specific industry/trade groups and for artisans and craftspeople, where small startup businesses can share existing facilities and equipment.

EJ-9.4 **Public Procurement.** Continue to use the public procurement process to stimulate small business development, prioritize certified underrepresented business enterprises, including businesses owned by people of color, women, LGBTQIA+ community members, veterans, and individuals with disabilities, and locally-owned businesses in particular, and coordinate with anchor institutions such as universities, hospitals, public agencies, and school districts to help launch new products and services.

EJ-9.5 **Local Business Needs Assessment.** Continually assess business workforce needs and other requirements and use the findings to assist in developing a qualified workforce that meets the demands of established and emerging business and smaller, value-added businesses such as artisan foods, digital media, recording and sound technologies, smart engineered, cooling technologies, green industries (such as urban agriculture, urban forestry, riparian restoration, infrastructure resilience, and others and green building product development.

Workforce Development and Training

EJ-9.6 **Labor Force Skills Development.** The City shall partner with educational institutions, employers, and community-based organizations to develop a local labor force with skills to meet the needs of the area's businesses and industries. Continue and expand local-hire initiatives, training, apprenticeships, and partnerships with employers.

EJ-9.7 **Barriers to Workforce Participation.** The City shall collaborate with regional and local partners to identify and address barriers to workforce participation and access to training. Solutions to explore may include:

- Two-generation programs that link education, job training, and career-building for low-income parents with supports for their children;
- Bridge programs that prepare people with low academic skills for further education and training; and
- Transitional jobs programs that provide short-term subsidized employment or training for formerly incarcerated individuals.

EJ-9.8 **Entrepreneurship and Social Enterprise Training.** Support education and training in entrepreneurship and social enterprise as an alternative pathway to traditional jobs.

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9. Implementation Actions and Programs

9.1 PRIORITIZING IMPROVEMENTS AND PROGRAMS THAT MEET THE NEEDS OF EJ COMMUNITIES

SB 1000 requires that Cities prioritize programs and public and private investment in EJ Communities to meet identified community needs. Goals and policies related to monitoring and evaluation will also serve as a tool to track outcomes in EJ communities as they are implemented over time.

The following table includes **specific actions** that address the unique needs of EJ Communities as identified in the prior sections.

GOAL EJ-10 **PRIORITIZE IMPROVEMENTS AND PROGRAMS THAT MEET THE NEEDS OF ENVIRONMENTAL JUSTICE COMMUNITIES.**

EJ-10.1 **Prioritizing EJ Communities.** Implement topic-specific actions as shown in the Goals, Policies, and Actions table, prioritizing improvements, programs, investments, and partnerships in Environmental Justice Communities, as shown in Figure **EJ-7.** Spend or distribute resources to EJ communities in ways that meet the existing community's priority needs and improve resident's quality of life.

EJ-10.2 **Implementation Monitoring and Evaluation Plan.** To increase transparency and accountability, adopt an implementation monitoring and evaluation plan with achievable milestones, periodic evaluation, and a reporting mechanism, such as an online portal or newsletter to track outcomes and keep residents informed.

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY	ACTION
GOAL EJ-1: REDUCE POLLUTION, MITIGATE THE IMPACTS OF POLLUTION ON EXISTING SENSITIVE LAND USES, AND ELIMINATE ASSOCIATED PUBLIC HEALTH DISPARITIES.	
EJ-1.1 **Toxic Air Contaminants.** Reduce the public's exposure to toxic air contaminants through appropriate land use and transportation strategies, particularly in Environmental Justice Communities and other areas most burdened by air pollution, as identified in **Figure EJ-12**	**EJ-A.1** Amend the City's Zoning code to include the following changes: • Allow greater residential density in less-polluted areas, including existing single-family residential neighborhoods. • Condition the permitting of heavy industrial businesses within five hundred (500) feet of a zone that permits residential activities. • Establish special permit criteria for truck-intensive industrial activities located within five hundred (500) feet of any zone that permits residential activities. • Establish special performance standards and standard conditions of approval for Truck-Intensive Industrial Activities located within five hundred (500) feet of any zone that permits residential activities. • Amend the permit procedures for nonconforming Truck-Intensive Industrial Activities • Condition the permitting of commercial kitchen operations designed for online ordering and food delivery. • Modify the S-19 Health and Safety Protection Combining Zone to prohibit use of diesel generators as the primary source of power within five hundred (500) feet from any Residential, Open Space, or Institutional Zone boundary. **Responsibility:** Planning & Building Timeframe: Short-term
EJ-1.2 **Truck Emissions and Pollution Exposure.** Minimize air pollution and exposure of sensitive uses to truck pollution, particularly in EJ Communities and other areas most burdened by air pollution, while recognizing the Port of Oakland's role as the highest-volume shipping port in Northern California.	
EJ-1.3 **Industrial Uses Near Sensitive Land Uses.** Ensure that heavy industrial uses are adequately buffered from residential areas, schools, and other sensitive land uses. In new developments, require adequate mitigation of air contaminant exposure and vegetative barriers near large stationary and mobile sources of air pollution.	**EJ-A.2** Adopt more stringent air quality construction and operations requirements for development near or within industrially zoned land as part of standard conditions of approval. **Responsibility:** Planning & Building Timeframe: Medium
EJ-1.4 **Performance Standards.** Develop zoning standards applicable to new industrial and commercial developments in order to minimize or avoid the potential for adverse effects related to air quality, noise, or safety on adjacent existing residential uses and Environmental Justice Communities. This could include expansion of the S-19 Health and Safety Protection Combining Zone to include air quality effects.	**EJ-A.3** Work with BAAQMD and other partners in the region to explore creation of a grant program for installation and maintenance of air filtration devices/systems in existing buildings. Develop a list of priority buildings near heavy industrial uses, including schools, nursing homes, and other sensitive uses within EJ Communities and areas most affected by air quality issues, shown in **Figure EJ-12**. **Responsibility:** Planning & Building, Office of Sustainability and Resilience Division, City Administrator's Office Timeframe: Medium
EJ-1.5 **Regulate Polluting Uses.** Develop more stringent permitting standards and limit the number of variances approved for new, high-intensity, industrial or commercial land uses near sensitive uses in Environmental Justice Communities. See also Policy SAF-5.1.	
EJ-1.6 **Enhanced Enforcement.** Prioritize code enforcement to address illegal land uses and activities that cause pollution and are hazardous to health in EJ Communities.	
EJ-1.7 **Truck-Related Impacts.** For new warehouses and truck-related businesses, reduce impacts from truck loading and delivery including noise/vibration, odors, air pollution, and greenhouse gas emissions.	
EJ-1.8 **Air Filtration.** Consistent with the State's Building Energy Efficiency Standards for air filtration in effect as of January 1, 2023, require newly constructed buildings of four or more habitable floors to include air filtration systems equal to or greater than Minimum Efficiency Reporting Value (MERV) 13 (ASHRAE Standard 52.2), or a particle size efficiency rating equal to or greater than 50 percent in the 0.3-1.0 µm micrometer range and equal to or greater than 85 percent in the 1.0-3.0 µm micrometer range (AHRI Standard 680).	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
EJ-1.9	**EV Charging.** Require industrial and warehouse facilities to provide electrical connections for electric trucks and transport refrigeration units in support of CARB regulations.	**EJ-A.4**	In partnership with representative groups from EJ Communities, develop a Carbon Sequestration Incubator in Oakland to incubate and develop green jobs in urban agriculture, urban forestry, aquatic and riparian restoration, and/or other forms of carbon removal. Assess market opportunities, policy drivers, potential locations, and existing businesses and nonprofits that may benefit from collaborating in such a space. **Responsibility:** Public Works, Parks Recreation, and Youth Services Department, Office of Sustainability and Resilience Division, City Administrator's Office, Economic & Workforce Development Department Timeframe: Medium
EJ-1.10	**Reduce Emissions from Port Operation.** Support Port of Oakland's efforts reduce emissions as part of operation and compliance with CARB regulations. This could include: • Support of zero-emission drayage truck operations through appropriate local ordinance amendments, including allowable weight limits for single-axle, zero-emission trucks on local streets, and developing an investment plan for needed upgrades. • Provision of data or staff time to study of the effects on truck flow and congestion due to increasing visits from larger container ships, the feasibility of an off-terminal container yard that utilizes zero-emission trucks to move containers to and from the marine terminals, and the potential efficiency gains from increasing the number of trucks hauling loaded containers on each leg of a roundtrip to the Port.	**EJ-A.5**	Study the feasibility of an amortization ordinance, which allows the City to identify and prioritize nonconforming land uses (which could include existing polluting industries) to phase out over time. The study should recommend an implementation plan that includes criteria to determine which industries to amortize. Criteria could include total cost of land and improvements; cost of moving and reestablishing the use elsewhere in the city; whether the use is significantly non-conforming; compatibility with existing land use patterns and densities; and possible threat to public health, safety, or welfare. **Responsibility:** Planning & Building (in coordination with BAAQMD) Timeframe: Medium
EJ-1.11	**Building Electrification.** Continue to enforce compliance with Oakland's Building Electrification Ordinance, which requires new and newly renovated buildings to be natural gas-free and support the transition of existing buildings to natural gas alternatives in order to improve safety and air quality and reduce health risks. This could include: • Ensuring that all new developments reduce on-site natural gas combustion through electrification of heating and cooking technologies.	**EJ-A.6**	Prioritize and implement vegetative buffer projects, including those between industrial land and sensitive land uses, as identified in specific plans and community plans, including EONI and WOCAP. **Responsibility:** Planning & Building Timeframe: Short
EJ-1.12	**Construction Site Impacts.** Through standard conditions of project approval, code enforcement, and other regulatory mechanisms, require new development to minimize disturbances of natural water bodies and natural drainage systems caused during construction and to implement measures to protect areas from road dust, erosion, and sediment loss.	**EJ-A.7**	As part of the LUTE update in Phase 2, evaluate residential/industrial conflicts, especially in areas such as West and East Oakland, and evaluate measures, including limiting additional residential development in high pollution areas and ensuring adequate buffering between industrial and residential land uses through land use designations. **Responsibility:** Planning & Building Timeframe: Short
EJ-1.13	**Emissions from Construction Activities.** Require projects to implement construction air pollution and greenhouse gas emissions controls and applicable mitigation strategies for all construction sites to the maximum extent feasible. Refer to Best Construction Practices and Best Available Retrofit Control Technology (BARCT) recommended by BAAQMD.		
EJ-1.14	**Reduced Exposure to Air Pollution for Project Occupants.** Incorporate measures to improve indoor air quality and reduce exposure to air pollution in new development projects.		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
EJ-1.15	**Sensitive Uses.** Coordinate with BAAQMD and community partners in evaluating human exposure to toxic air contaminants, particularly in Environmental Justice Communities, and impose conditions as appropriate on projects to protect public health and safety beyond those in the City's 2020 standard conditions of approval.	EJ-A.8	As part of the LUTE update in Phase 2, explore modifications to truck routes and truck management in partnership with the Port of Oakland and WOIEP. **Responsibility:** OakDOT, Planning & Building Timeframe: Short
EJ-1.16	**Community Air Protection.** On an ongoing basis, support BAAQMD, community members, businesses, and other stakeholders in developing and implementing Community Air Monitoring Plans, Community Emissions Reduction Plans, and other air pollution control initiatives pursuant to AB 617. Supportive City actions may include: • Participation on steering committees and technical advisory committees. • Co-investments that leverage additional funding for actions in EJ Communities. • Utilization of community-collected air quality data in policy development and evaluation. • Contracts with community partners and other air pollution monitoring organizations to obtain more granular pollution data.	EJ-A.9	Designate an adequate system of roads connecting port terminals, warehouses, freeways and regional arterials, and other important truck destinations that minimizes impacts to sensitive uses. This system should rely upon arterial streets away from residential neighborhoods. **Responsibility:** OakDOT, Planning & Building Timeframe: Short
EJ-1.17	**Data-Informed Efforts.** Collaborate with BAAQMD, community organizations, and other stakeholders, to use air quality monitoring data to inform area-specific improvement actions outside of AB 617-related efforts. Such actions may include: • Prioritizing areas for capital investments with co-benefits for air quality, such as the planting of trees and installation of EV charging infrastructure. • Integrating air quality improvement actions into planning efforts, such as new specific plans, master plans, or area plans that will guide development in impacted areas. • Limiting the establishment of new sources of air pollutants in areas with elevated levels of pollutant concentrations unless appropriate mitigation is implemented. • Obtaining and using hyperlocal data along with community ground-truthing to more accurately inform development of air quality improvement strategies that are most effective and responsive to the needs of EJ Communities. • Seeking opportunities to enhance existing air monitoring efforts, such as by working with BAAQMD and helping to expand the current monitoring network, especially where sensitive uses are within close proximity (within 500 feet) of pollution sources. • Partnering with industrial and warehouse facility owners, community-based environmental and energy justice organizations to install rooftop solar PV systems to power EV charging stations.	EJ-A.10	Adopt requirements that new commercial and employment uses that generate truck traffic are located along existing truck routes to the extent feasible and work with project proponents to develop preferred truck routing that avoids sensitive land uses, such as schools, hospitals, elder and childcare facilities, and residences wherever feasible **Responsibility:** OakDOT, Planning & Building Timeframe: Short
		EJ-A.11	Coordinate with public agencies in the Bay Area region to catalyze the development and deployment of zero emission medium- and heavy-duty fleets and support development of shared charging hubs and resources. Support advocacy efforts for significant additional funding for retrofitting or replacing diesel trucks with zero-emission EV trucks, prioritizing a just transition approach by including economic support for independent truckers to compensate for lost wages while waiting for retrofitted or new EV trucks. **Responsibility:** Office of Sustainability and Resilience Division, OakDOT, City Administrator's Office, Planning & Building Timeframe: Ongoing
		EJ-A.12	Work with the Port of Oakland to establish permanent locations for parking and staging of Port-related trucks and cargo equipment, i.e. tractors, chassis, and containers. Such facilities will provide long-term leases to parking operators and truck owner-operators at competitive rates. Such facilities will be at the City or Port logistics center or otherwise not adjacent to Oakland residents who are disproportionately impacted by poor air quality. **Responsibility:** City Administrator's Office, Planning & Building, OakDOT Timeframe: Medium

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
EJ-1.18	**Impact Assessment and Mitigation.** Continue to use BAAQMD modeling tools and guidance documents as appropriate to identify and mitigate air quality impacts from proposed development projects.		
EJ-1.19	**Regional Coordination.** Support air quality planning efforts led by other local, regional, and State agencies while simultaneously leveraging City authority and resources to focus on reducing air pollution burden in EJ Communities.		
GOAL EJ-2: PROTECT OAKLAND WATER SUPPLIES FROM CONTAMINATION.			
EJ-2.1	**Clean Water Programs.** In partnership with Oakland community organizations, promote environmental stewardship and pollution prevention activities with outreach, assistance and incentives for residents and businesses, particularly in EJ Communities and areas with impaired surface and groundwater, as identified in **Figure EJ-13**.	**EJ-A.13**	Continue to participate in the Alameda Countywide Clean Water Program to protect creeks, wetlands, and the San Francisco Bay. Prioritize creek restoration projects in Environmental Justice Communities with the lowest Tree Canopy and Park Access scores. **Responsibility:** Public Works, Sustainability and Resilience Division, City Administrator's Office Timeframe: Ongoing
EJ-2.2	**Water Quality Hazard Prevention.** Remediate and clean up sites with known or potential contamination, as mapped in **Figure EJ-14** or identified on GeoTracker, that impact or potentially impact water quality. Continue to support the San Francisco Regional Water Quality Control Board and California Department of Toxic Substances Control to assess cleanup sites, leaking underground storage tanks, and gasoline stations in EJ Communities with high water contamination threat.	**EJ-A.14**	Fund and implement a green infrastructure program for the installation and maintenance of projects and existing civic resources such as the parks system and public spaces, to improve stormwater management, support biodiversity, reduce air pollution exposure, improve water quality, and increase access to natural spaces, including trees. Prioritize investment in frontline communities, and particularly in residential neighborhoods dominated by concrete and asphalt with limited green space and elevated air pollution, in Priority Conservation Areas, and in areas where green infrastructure, including trees and other types of vegetated buffers, can effectively address stormwater management issues and reduce air pollution exposure among sensitive populations. • Consider and give priority to specific projects identified in the West Oakland Specific Plan, EONI and other community and specific plans. Continue to work with community groups throughout the implementation process. • Utilize the Priority Conservation Areas "Equity Checklist" **Responsibility:** Public Works, Sustainability and Resilience Division, City Administrator's Office Timeframe: Medium
EJ-2.3	**Protect and Restore Creeks and Wetlands.** Protect, enhance, and restore riparian corridors and wetlands, increasing biodiversity as well as increasing access for residents to existing creeks and wetlands. Collaborate with environmental justice organizations and EJ community residents to co-develop environmental stewardship and pollution prevention programs with outreach, assistance, and incentives for residents and businesses.		
EJ-2.4	**Stormwater Management.** Reduce stormwater runoff by implementing the Green Stormwater Infrastructure Plan to help conserve water, protect water bodies, and mitigate localized flood risk from large storm events.		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION
GOAL EJ-3: PREVENT, REDUCE AND CLEAN UP ILLEGAL DUMPING.		
EJ-3.1	**Design for Graffiti Reduction.** Establish guidelines based on Crime Prevention Through Environmental Design (CPTED) standards and other best practices that decrease opportunity for graffiti.	**EJ-A.15** In partnership with school districts, community college networks, local vocational programs, labor unions in the recycling and waste diversion sector, and unhoused residents who depend on recycling for their survival, co-create a community reuse and repair program to increase waste diversion, reduce material consumption, and create green jobs. Target this program for residents of neighborhoods with the highest unemployment rates. **Responsibility:** Public Works Timeframe: Medium
EJ-3.2	**Blight Control and Prevention.** Control and mitigate impacts of blight-producing industrial and commercial activities with a high tendency of attracting trash and litter, such as recyclers, fast food restaurants, warehouses and industrial sites, vacant lots, and other businesses that may attract blight.	
EJ-3.3	**Proactive Illegal Dumping Cleanup.** Support the expansion of proactive cleanup crews that target illegal dumping "hot spot" areas first in EJ Communities, as identified in **Figure EJ-15**.	
EJ-3.4	**Illegal Dumping Enforcement.** Continue to enforce dumping as an illegal activity, including surveillance of hot spots, ticketing, and expansion of Environmental Enforcement Officers. Periodically assess enforcement efforts to ensure discriminatory patterns do not emerge.	
EJ-3.5	**Community Education on Illegal Dumping.** Expand community campaigns in EJ Communities to prevent dumping, inform neighbors about affordable services, and support youth leadership. *Examples include education about Bulky Block parties and engagement of the Oaktown PROUD Student Ambassadors.*	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY	ACTION
GOAL EJ-4: COORDINATE RESOURCES TO IMPROVE HOUSING QUALITY AND HABITABILITY.	
EJ-4.1 **Resource Optimization.** Coordinate across City departments and with relevant partner agencies including Oakland Housing Authority, EBMUD, BAAQMD, ABAG and others, to optimize the use of grant monies, incentives, financial resources, staffing, investments, and programs in addressing displacement and tenant protections; sanitary housing and maintenance issues; environmental hazards in homes and neighborhoods; and other concerns related to stable, safe, and sanitary housing.	**EJ-A.16** As part of the LUTE update in Phase 2, explore incentives and strategies to promote health-promoting features in housing projects that are built in EJ Communities. **Responsibility:** Planning & Building, Oakland Housing and Community Development Timeframe: Short
EJ-4.2 **Supplemental Funding Sources for Building Rehabilitation.** Place a high priority on identifying supplemental funding sources/resources for retrofit, rehabilitation, and upgrade projects that address health and safety in housing occupied by low-income renters and homeowners, including air quality improvements. Supplemental funding sources could include loans and grants available from the California Strategic Growth Council, CalEPA, CARB, and other entities.	**EJ-A.17** Compile a database of all lead hazards identified within the City of Oakland and maintain comprehensive and up-to-date public records on lead hazards and rehabilitation and remediation efforts. Enter every dwelling or other facility where habitability issues are found into an Equitable Lead Hazard Abatement Program database. **Responsibility:** Oakland Department of Housing and Community Development, Residential Lending Division; Sustainability and Resilience Division, City Administrator's Office Timeframe: Medium
EJ-4.3 **Healthy Homes Inspections.** As part of the Joint Lead Hazard Abatement Program in partnership with ACPHD, improve ongoing ability to screen for and eliminate lead hazards through proactive approaches, including proactive inspections of rental property dwellings and lead-safe certification requirements for childcare facilities and schools. Prioritize abatement, testing, outreach, and education activities in high-risk areas and serving the populations most likely to live in high-risk dwellings in EJ Communities, as identified in **Figure EJ-18**.	**EJ-A.18** Increase Renovation, Repair, and Painting training and certification opportunities for existing small local businesses through targeted outreach to businesses registered to do business in Oakland, particularly those owned by people of color. **Responsibility:** Economic and Workforce Development Department Timeframe: Ongoing
EJ-4.4 **Healthy Homes Awareness.** Continue to work with Oakland HCD, Alameda Department of Public Health, and community organizations to promote safe and sanitary housing in EJ Communities in **Figure EJ-17** by providing owners and occupants with culturally appropriate and linguistically accessible information and resources about home health, including lead/Lead Safe Home Program grants, indoor air pollutants, asthma triggers, hazard zones, and other information. Efforts may include the development and dissemination of healthy home checklists, conducting trainings, workshops, or audits.	
EJ-4.5 **Improve Indoor Air Quality in Existing Buildings.** For new projects and significant rehabilitations of existing buildings, improve indoor air quality and energy efficiency through weatherization and strategies to prevent buildup of mold and mildew.	
EJ-4.6 **Environmental Quality.** In private and non-profit housing projects in EJ Communities, promote and seek ways to incentivize the inclusion of features and amenities that support and enhance the health of occupants and the environment, including: • On-site health and human services; • Energy-efficient and electric appliances; • Green infrastructure, such as green roofs or appropriate tree planting; • Car sharing; • Community gardens or sponsored rides to farmers markets; and • Transit and bus passes for lower income workers to reduce emissions.	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
GOAL EJ-5: SUPPORT A FOOD SYSTEM THAT PROVIDES NUTRITIOUS, AFFORDABLE, CULTURALLY RELEVANT, AND AFFORDABLE FOOD TO ALL OAKLANDERS.			
EJ-5.1	**New Healthy Food Grocers.** Leverage tax and fee deferral/reduction, California Food Financing Initiative funding, and other economic development grant monies to attract new healthy food grocers and co-ops and help them establish and/or make necessary improvements. As shown in **Figure EJ-19**, allow small grocery stores within residential areas. As a priority, efforts should be focused in areas underserved by healthy food retail with good access to the transportation network, where grocery stores and food co-ops are most economically viable.	**EJ-A.19**	Promote availability of permits – such as for Cottage Food Operations or Microenterprise Home Kitchen Operation (MEHKO) – that allow for preparation, cooking and serving food to consumers on the same day from a private residence, either through delivery, take-out, or dine-in the home. Focus outreach and promotional efforts in EJ Communities where home-based operations or other innovations can serve as both a source of healthy food and an opportunity for entrepreneurship. Reduce permit fee for income-qualified individuals. **Responsibility:** Planning & Building Timeframe: Medium
EJ-5.2	**Community Gardens Program.** Partner with nonprofits, especially indigenous groups, to expand the City's Community Gardens Program in areas with low food access, with policies to address maintenance and permit Indigenous community harvesting/ foraging of parks. The program should include garden spaces, community-maintained edible landscapes, and amenities in public spaces.	**EJ-A.20**	In underserved areas shown on **Figure EJ-19** where convenience stores and other retail outlets exist, develop and implement a program to incentivize and assist business owners to stock fresh and healthy food at affordable prices. Prioritize local neighborhood resident-owned businesses. Program elements could include: • Funding for refrigeration equipment; • Business counseling and technical assistance; • Nutritional education; and • Store design support. **Responsibility:** Economic and Workforce Development, Planning & Building Timeframe: Medium
EJ-5.3	**Community and Home Gardening.** Support community and home gardening efforts and – particularly in EJ Communities underserved by healthy food retail – by providing financial incentives such as land transfers and technical assistance in the form of online and library resources and workshops on gardening basics and cooking easy, healthy meals with fresh produce. Work with community groups to increase the prevalence of accessible, local gardens. Other incentives may include: • Explore the expansion of outright permitting of community gardens in areas where a Conditional Use Permit is currently required, particularly in the Broadway Valdez District (D-BV) and Central Estuary (D-CE) zones. • Incentivize urban agriculture in urbanized areas by offering reduced property tax assessments or Oakland vacancy tax in exchange for converting vacant or unimproved property to an agricultural use through a contract agreement for an initial period of five years.	**EJ-A.21**	As part of the LUTE update in Phase 2, explore potential locations and other strategies, such as incentives, zoning overlays, land use changes, density or intensity bonuses, or others, for prioritization of new full-service grocery stores over a certain square footage. Prioritize grocery store development in EJ Communities with the lowest food access, and incentivize community-led, neighborhood resident-owned and cooperatively-owned full-service grocery stores. **Responsibility:** Planning & Building Timeframe: Short
EJ-5.4	**Urban Agriculture in New Development.** Promote rooftop gardens, edible gardens, and other sustainable agricultural landscaping alternatives within multi-unit, commercial, and industrial developments. • Target creation of rooftop gardens highly visible from neighboring properties. • Permit indoor "vertical food farms" in industrial areas. • Reduce permit fees for large-scale farming of edible products.	**EJ-A.22**	Community Gardens Initiative. Consider community gardens an integral part of the city's park, recreation, and open space system. Acquire land for public community gardens, leveraging the City's park impact fee, along with the Parks & Recreation Fund and grant money from sources such as Proposition 84 (which funded the City Slickers Community Garden). Collaborate with EJ Community groups, schools, food justice and urban farming organizations to collaboratively steward and develop standards for community gardens as part of the OSCAR Element update in Phase 2. **Responsibility:** Planning & Building, Public Works Timeframe: Short
EJ-5.5	**Entrepreneurship and Food Innovation.** Actively support food innovations such as street (sidewalk) vending, food cooperatives, pop-up markets and similar innovations that do not fit into the traditional brick-and-mortar storefront, farmers market, or community garden models. Promote indoor farming of fruits and vegetables in industrial zones.		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
EJ-5.6	**Food Assistance Programs.** Work to increase community awareness of and participation in existing federal food assistance programs, such as the Women, Infants, and Children (WIC) nutrition program and the Supplemental Nutrition Assistance Program (SNAP). Approaches can include: • Providing information in City newsletters, on the City's website, and at community centers and other City facilities. • Explaining to merchants the incentive to registering to accept WIC and SNAP payments (immediate expansion of market of potential customers). • Supporting additional programs for local grocers to supplement CalFresh and SNAP benefits with cash match incentives. • Partnering with community organizations that support low-income community members who are not eligible for food assistance through identification of funding or grants.	**EJ-A.23**	Healthy Community Markets Program—utilize grants, funding, etc. to promote the creation of local businesses that sell produce in areas where healthy food access is limited including food innovations such as street (sidewalk) vending, food cooperatives, pop-up markets and similar innovations that do not fit into the traditional brick-and-mortar storefront, or community garden models. Increase the size, frequency, and number of farmers markets. **Responsibility:** Economic and Workforce Development Timeframe: Long
EJ-5.7	**Food Security Resources & Partnerships.** Coordinate with Citywide community-serving organizations, the Oakland Unified School District, Alameda County, and other public agencies to ensure that residents and families have access to federal, state, and local food programs, as well as emergency food assistance during public health and other crises. For undocumented food insecure residents, that do not qualify for public food assistance, work with partner agencies and organizations to provide food and benefits to all residents, regardless of legal status. During emergencies, support the Alameda County Community Foodbank to expand hours and keep distribution centers operational.		
EJ-5.8	**Education and Awareness.** In partnership with local agencies and community organizations, develop curriculum and marketing materials encouraging the growth and consumption of healthy food. Provide these to the Oakland Unified School District and community organizations focused on food justice and nutritional education. Support community organizations with financial incentives such as land transfers or discounted water rates and technical assistance in the form of online and library resources and workshops on gardening basics and cooking easy, healthy meals with fresh produce.		
EJ-5.9	**Food Recovery Program.** Support existing capacity of organizations within Oakland's food system, and develop new capacity, to recover edible food that is otherwise wasted, and distribute that food for human consumption. This includes: • Exploring potential for agroforestry, where trees, shrubs, and agricultural crops are interspersed, in community gardens or parks, to create and recover other food sources • Engaging with stakeholders including local food donation, recovery, and collection organizations to build robust collection and food storage capacity, and reliable distribution systems to the neediest populations. • Engaging with food generators such as supermarkets, wholesale distributors, large hotels, and institutions, to donate surplus edible food that food recovery partners want or will accept, and ensuring food generators comply with the Edible Food Recovery requirements of SB 1383. • Informing edible surplus food generators about strategies, existing programs, and best practices for preventing the waste of surplus food.		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
GOAL EJ-6: SUPPORT A NETWORK OF WELL-MAINTAINED COMMUNITY FACILITIES THAT ARE EASILY ACCESSIBLE, CULTURALLY SUPPORTIVE, AND RESPONSIVE TO COMMUNITY NEEDS.			
EJ-6.1	**Public Facilities Distribution.** Ensure the equitable distribution of beneficial public, civic, and cultural facilities and places for public gatherings, prioritizing new facilities and creative spaces in traditionally underserved areas.	**EJ-A.24**	As part of the update of the LUTE and OSCAR Elements, and the creation of a new Infrastructure and Facilities Element, include policies that address equitable distribution and maintenance of public facilities in EJ Communities. **Responsibility:** Planning & Building, Public Works Timeframe: Short
EJ-6.2	**Childcare Facilities.** As part of long-range planning efforts, ensure appropriate land use designations, zoning, and incentives to facilitate additional affordable and high-quality childcare facilities in areas without sufficient access, as shown in **Figure EJ-20**.	**EJ-A.25**	As part of the LUTE update in Phase 2, explore land use changes that are supportive of cultural organization operation in partnership with community groups, small business associations, and the Cultural Affairs office. **Responsibility:** Planning & Building, Economic and Workforce Development Timeframe: Short
EJ-6.3	**Healthcare Facilities.** As part of long-range planning efforts, ensure appropriate land use designations and zoning to facilitate additional healthcare facilities in areas without sufficient access, as shown in **Figure EJ-21**.		
EJ-6.4	**Facilities Maintenance.** Maintain and improve existing civic and public facilities to ensure safer, more attractive facilities that are responsive to community needs. Prioritize equitable capital improvements and maintenance projects, and investments in public and community-driven social infrastructure in EJ Communities.		
EJ-6.5	**Public Service Coordination.** Coordinate with the planning efforts of agencies providing public education, public health services, community centers, library services, justice services, flood protection, energy, and technology and communications services, as appropriate. Maintain interagency coordination agreements with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City/County to ensure effective and efficient service delivery.		
EJ-6.6	**Public Restroom Facilities.** Access to safe, clean sanitation is globally recognized as essential for public health. Public toilets should be accessible to all Oaklanders, without social or physical barriers preventing usage. A public toilet facility's design and upkeep should offer privacy and safety, ensure cleanliness, provide required sanitation-related resources, and be gender equitable		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
GOAL EJ-7: CREATE ENVIRONMENTS THAT SUPPORT PHYSICAL ACTIVITY, RECREATION, AND HEALTHY LIFESTYLES THROUGH SAFE AND COMFORTABLE WALKABLE, BIKEABLE NEIGHBORHOODS, WITH ACCESS TO GREEN SPACE, TREES, PATHS, AND PARKS.			
EJ-7.1	**Complete Neighborhoods.** Promote "complete neighborhoods"— where residents have safe and convenient access to goods and services on a daily or regular basis—that address unique neighborhood needs, and support physical activity, including walking, bicycling, active transportation, recreation, and active play.	**EJ-A.26**	As part of the LUTE update in Phase 2, include policies that promote a fine-grained neighborhood land use pattern that encourages walking, biking, and getting around without a car. **Responsibility:** Planning & Building Timeframe: Short
EJ-7.2	**Accessible Neighborhoods.** Encourage active modes of transportation and transit accessibility by supporting neighborhoods that provide access to a range of daily goods, services, and recreational resources within comfortable walking or biking distance. Encourage transit providers to prioritize, establish and maintain routes to jobs, shopping, schools, parks and healthcare facilities that are convenient to EJ Communities.	**EJ-A.27**	As part of the LUTE update in Phase 2, include policies that prioritize bicyclist, pedestrian, and roadway improvements that prioritize safety and comfort of non-auto users. Target these improvements in EJ Communities and areas identified in Figure EJ-22. **Responsibility:** Planning & Building, OakDOT Timeframe: Short
EJ-7.3	**Street Design for Safe Speeds.** Work to maximize the safety of the transportation network by designing/redesigning streets for lower driving speeds and enforcing speed limits as well as promoting safe driving behavior, while protecting against discriminatory policing, racial profiling, or racial bias in enforcement. Strategies could include implementing leading pedestrian intervals for crosswalks in residential neighborhoods and providing pedestrian scale lighting. Prioritize speed reduction efforts in EJ Communities with the highest concentrations of pedestrian and bicyclist crashes. Study enforcement patterns annually to avoid racial profiling.	**EJ-A.28**	As part of LUTE update in Phase 2, study shuttles and other local transit programs that are supportive of AC Transit's core service to foster local mobility and connections between neighborhoods and rail transit. **Responsibility:** Planning & Building, OakDOT Timeframe: Short
EJ-7.4	**Safe Oakland Streets.** Utilize a community-engagement-rooted, data-driven, and systematic approach to eliminate all traffic fatalities and severe injuries, while increasing safety, health, and equitable mobility for all.	**EJ-A.29**	Prioritize urban greening projects identified in community plans, such as EONI, WOCAP, and others. Implement projects in partnership with community groups in EJ Communities. **Responsibility:** OakDOT, CAO Sustainability & Resilience Division, Planning & Building Timeframe: Medium
EJ-7.5	**Bicycle- and Pedestrian-Friendly Design.** Prioritize designs that protect people that are biking and walking, such as improvements that increase visibility of bicyclists and pedestrians, traffic calming, and safer intersection crossings and turns. Improvements should also prioritize universal design so that improvements are usable by all people, to the greatest extent possible, without the need for adaptation or specialization.		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION
EJ-7.6	**Collaborative Safety Solutions.** Collaborate with educational institutions, senior living facilities, community organizations, and other stakeholders, particularly those who reside in EJ Communities, when developing and implementing programs and improvements that increase safety and encourage the use of active transportation modes. Identify and plan for improvements in collaboration with existing neighborhood residents and businesses to address concerns about gentrification and displacement.	
EJ-7.7	**Equitable Paving.** Continue to plan and distribute paving program resources based on equity, road condition and safety metrics.	
EJ-7.8	**Park Distribution.** As part of park planning efforts, prioritize development of new parks in EJ Communities that are underserved, as identified in **Figure EJ-26**.	
EJ-7.9	**Enhancing Access to Parks.** Pursue strategies that increase community access to parks and recreational facilities, including expanding joint use agreements with schools and educational institutions; removing of physical barriers to access (ex: fences); and providing a choice of legible routes to and from park areas through the installation of new or improved multi-use shared paths, wayfinding, and signage.	
EJ-7.10	**Parks Programming.** Create high-quality inclusive programming that encourages the use of the park facilities by a variety of users including older adults, youth, and people with disabilities throughout the day and evenings. Opportunities should be taken to incorporate local heritage and culture.	
EJ-7.11	**Partnerships.** Coordinate partnerships with Caltrans and the Port to activate and increase access to parks and greenways with community programming and events.	
EJ-7.12	**Park Safety.** Use Crime Prevention Through Environmental Design (CPTED) and other best practices for landscaping, lighting, and other components when designing open space and recreational spaces.	
EJ-7.13	**Park Maintenance.** When evaluating park projects and funds for maintenance, include equity and presence in EJ Communities as a priority weighted factor.	
EJ-7.14	**Community Input.** Provide ongoing opportunities for public engagement and input into the parks and recreation planning process, including priorities for amenities, facilities, programming, and improvements. Focus engagement in EJ Communities.	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION
EJ-7.15	**Urban Forest.** Implement the Urban Forest Plan, a comprehensive, area-wide urban canopy and vegetation plan that identifies locations that trees can be added and maintained, such as parks, streets, Caltrans' rights-of-way and develop a plan to protect existing trees that provide shade, reduce urban heat island impacts, and reduce exposure to air pollution emissions in communities most affected by air pollution. This includes partnering with local nonprofit groups, encouraging trees on private property, and working with the community on tree maintenance and (as needed) removal. Prioritize tree canopy in EJ Communities with the least amount of canopy, as shown in **Figure EJ-27**.	
EJ-7.16	**Urban Greening.** Develop equitable partner agreements with community-based organizations and collaboratively work to identify, fund, develop, and maintain specific green infrastructure projects in EJ Communities.	
GOAL EJ-8: FOSTER MEANINGFUL CIVIC ENGAGEMENT AND SUPPORT COMMUNITY POWER- AND CAPACITY-BUILDING.		
EJ-8.1	**Meaningful, Relevant Engagement.** Design and implement public engagement processes and events that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible and understandable and that provide meaningful opportunities for participants to influence outcomes.	**EJ-A.30** Study the feasibility of establishing a fund that City departments draw on for community outreach, including funding for community group partnerships. The fund would provide a source of funds to supplement departmental budgets and grant funding in order to ensure that City objectives for community outreach can be achieved, and that community groups are fairly compensated for their engagement. **Responsibility:** City Administrator's Office, Department of Finance Timeframe: Long
EJ-8.2	**Sustained Engagement.** Maintain communication channels that allow for ongoing dialogue with neighborhood groups and individual residents; track issues and priorities at the neighborhood level; and foster transparency and accountability. Use this information to inform development of City programs, projects, and services, sharing information across departments to optimize the effectiveness of efforts, and share outcomes with groups.	**EJ-A.31** Develop a participatory budgeting process for EJ Community investments and explore expansion into other departments. **Responsibility:** City Administrator's Office, Department of Finance Timeframe: Long
EJ-8.3	**Innovative Methods.** Explore innovative strategies for increasing community involvement in civic processes and ownership of outcomes, tailoring strategies to best reach target audiences. Strategies to explore may include participatory budgeting, participatory action research, or other approaches that emphasize the active participation of community members most affected by the questions at issue.	**EJ-A.32** Host an annual City-wide conference of Neighborhood Empowerment Councils, where councils plan proactively for healthy communities and provide feedback on General Plan implementation. **Responsibility:** City Administrator's Office Timeframe: Long
EJ-8.4	**Community Partners.** Partner with community-based organizations that have relationships, trust, and cultural competency with target communities as to support engagement for local initiatives and issues. Seek opportunities to support community partners in these efforts such as by providing technical assistance, data, meeting spaces, funding and other support services as feasible.	
EJ-8.5	**Community Capacity Building.** Empower historically marginalized community members to participate in local decision-making and engage meaningfully in planning efforts, including through increased representation in employment and civic life; providing educational/training workshops and programs about civic involvement and processes, such as through fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION
EJ-8.6	**Engagement Infrastructure.** Build City technology, staffing, funding and systems resources to conduct more inclusive, meaningful and community-empowered engagement, including seeking grant funding. Develop flexible but sustained infrastructure for two-way information sharing between City and partner agencies and community members.	
EJ-8.7	**Interagency and Interdepartmental Collaboration.** Collaborate with and among public agencies and City departments to leverage resources, avoid duplication of effort and enhance the effectiveness of public participation.	
EJ-8.8	**Youth-Centered Events.** Seek out opportunities for meaningfully and authentically involving young people – particularly from EJ Communities - in the planning and implementation of youth-centered events that develop confidence and leadership skills.	
EJ-8.9	**Events for Older Adults.** Provide greater opportunity for older adults (ages 65 and over), particularly those from EJ Communities, to be integrated into community events and inter-generational exchanges. Involve older adults in the planning and implementation of events that are accessible to older adults.	
EJ-8.10	**Linguistically Isolated Communities.** Continue to provide interpretation and translation services, assistance in accessing community services and programs, and direct engagement with specific demographic groups. Prioritize EJ Communities as identified in **Figure EJ-30**.	
EJ-8.11	**Digital Access.** Ensure that all meetings, materials, and other engagement that uses technology is easily accessible by mobile devices. Invest in high-speed internet in underserved low-income communities to expand digital access and engagement opportunity. Prioritize expanded internet in public facilities and EJ Communities as identified in **Figure EJ-31**.	

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY		ACTION	
GOAL EJ-9: EXPAND ECONOMIC DEVELOPMENT, INCOME EQUALITY, AND OPPORTUNITY FOR ALL OAKLANDERS.			
EJ-9.1	**Investments for Inclusive, Equitable Growth.** Make intentional investments to increase and diversify economic growth and living wage jobs in an inclusive and equitable manner that focuses on neighborhoods and their unique needs, particularly in EJ Communities.	EJ-A.33	As part of land use planning efforts, explore the following strategies in partnership with community organizations based in EJ Communities: • Corridor revitalization • Zoning opportunities to facilitate smaller, "microretail" spaces that are more affordable to new or smaller businesses. • Cultural Districts that showcase, support, and preserve existing cultural identity of retail and commercial services. For example, programs that support restoration of historical Black business districts in West Oakland. • Neighborhood retail and local business conservation strategies to prevent conversion of existing neighborhood-retail uses in neighborhoods that would otherwise lose easy access to nearby shops and neighborhood services, including through anti-displacement strategies. • Anti-displacement strategies for artists and creative businesses **Responsibility:** Planning & Building Timeframe: Short
EJ-9.2	**Small Business/Startup Support.** Support the development and retention of small business startups and new firms — particularly POC/women/veteran owned businesses - by providing assistance with business planning, expansion, and access to capital.		
EJ-9.3	**Business Incubators.** Encourage occupancy of existing buildings with incubators for specific industry/trade groups and for artisans and craftspeople, where small startup businesses can share existing facilities and equipment.		
EJ-9.4	**Public Procurement.** Continue to use the public procurement process to stimulate small business development, prioritize certified underrepresented business enterprises, including businesses owned by people of color, women, LGBTQIA+ community members, veterans, and individuals with disabilities, and locally-owned businesses in particular, and coordinate with anchor institutions such as universities, hospitals, public agencies, and school districts to help launch new products and services.		
EJ-9.5	**Local Business Needs Assessment.** Continually assess business workforce needs and other requirements, using the findings to assist in developing a qualified workforce that meets the demands of established and emerging business and smaller, value-added businesses such as artisan foods, digital media, recording and sound technologies, smart engineered, cooling technologies, green industries (such as urban agriculture, urban forestry, riparian restoration, infrastructure resilience, and others) and green building product development.		
EJ-9.6	**Labor Force Skills Development.** Partner with educational institutions, employers, and community-based organizations to develop a local labor force with skills to meet the needs of the area's businesses and industries. Continue and expand local-hire initiatives, training, apprenticeships, and partnerships with employers.		
EJ-9.7	**Barriers to Workforce Participation.** Collaborate with regional and local partners to identify and address barriers to workforce participation and access to training. Solutions to explore may include: • Two-generation programs that link education, job training, and career-building for low-income parents with supports for their children; • Bridge programs that prepare people with low academic skills for further education and training; and • Transitional jobs programs that provide short-term subsidized employment or training for formerly incarcerated individuals		

Table EJ-11: Implementation — Goals, Policies, and Actions

POLICY	ACTION
EJ-9.8 **Entrepreneurship and Social Enterprise Training.** Support education and training in entrepreneurship and social enterprise as an alternative pathway to traditional jobs.	
GOAL EJ-10: PRIORITIZE IMPROVEMENTS AND PROGRAMS THAT MEET THE NEEDS OF ENVIRONMENTAL JUSTICE COMMUNITIES.	
EJ-10.1 **Prioritizing EJ Communities.** Implement topic-specific actions as shown in the Goals, Policies, and Actions table, prioritizing improvements, programs, investments, and partnerships in Environmental Justice Communities, as shown in **Figure EJ-7.** Spend or distribute resources to EJ communities in ways that meet the existing community's priority needs and improve resident's quality of life.	**EJ-A.34** In partnership with community groups, develop an implementation monitoring and evaluation plan framework and reporting mechanism. **Responsibility:** Planning & Building Timeline: Short
EJ-10.2 **Implementation Monitoring and Evaluation Plan.** To increase transparency and accountability, adopt an implementation monitoring and evaluation plan with achievable milestones, periodic evaluation, and a reporting mechanism, such as an online portal or newsletter to track outcomes and keep residents informed.	

OAKLAND 2045
GENERAL PLAN

#001

Posted by **Michael Belman** on **06/15/2023** at **1:28pm** [Comment ID: 287] - Link

Type: Suggestion

Agree: 1, Disagree: 0

we need clean parks and public restrooms

#002

Posted by **Sharifa E. Taylor** on **05/31/2023** at **10:29pm** [Comment ID: 257] - Link

Type: Question

Agree: 0, Disagree: 0

As a community serving organization, we have had three member facing meetings about the EJ element and there have been community members who cannot access the documents since they are not available in languages aside from English. Is there a plan/timeline for when these documents will be uploaded in the top 5 languages spoken in Oakland? Specifically, Spanish, Chinese (Cantonese), and Arabic. Additionally, will there also be a 90 day comment period for the folks using the translated documents since they weren't released in March along with the English documents.

#003

Posted by **Shelley Mitchell** on **06/09/2023** at **12:32am** [Comment ID: 268] - Link
Type: Suggestion
Agree: 0, Disagree: 0
These are very general ideas for safety. I would like to see a focus on Mental Health Awareness and getting young people into programs that will help them address their mental health aiding to the future safety of Oaklanders.

#004

Posted by **Frontline Catalysts Youth Leaders** on **06/07/2023** at **3:12pm** [Comment ID: 263] - Link
Type: Suggestion
Agree: 0, Disagree: 0
To be more specific, the proposed policies are too vague. We want Specific, measurable, achievable, Realistic, and Timely goals. There is only one goal/policy mentioned here with a deadline.

#005

Posted by **Ryder Diaz** on **05/16/2023** at **5:16pm** [Comment ID: 245] - Link
Type: Suggestion
Agree: 0, Disagree: 0
What about the air quality of homes near high-traffic corridors, freeways, factories, crematories, etc? Reducing the sources of air pollution from cars and trucks. California's landscape is adapted to fire and low-intensity prescribed burns are necessary to avoid catastrophic high-intensity fires. Therefore, a baseline level of fire and smoke is necessary to prevent massive fires. However, we can remove other sources of air pollution (cars, trucks, factories, etc) that are not critical to managing the health of the landscape.

#006

Posted by **Gustavo Gutierrez** on **04/21/2023** at **6:30pm** [Comment ID: 244] - Link
Type: Suggestion
Agree: 4, Disagree: 0
"Addressing homelessness"

To me, this language is too neutral. What does it mean to address homelessness? Does it mean further policing homelessness and sweeping encampments? This is not something I would support.

What about, "Addressing the root causes of homelessness and the systemic discrimination that homeless people face."

#007

Posted by **Ryder Diaz** on **05/18/2023** at **4:33pm** [Comment ID: 249] - Link
Type: Question
Agree: 0, Disagree: 0
How do we request tree maintenance? I have put in a request via 311 in the past, but nothing happened. A overgrown tree in my neighborhood blocks much of the sidewalk and hinders use for people using wheelchairs.

#008

Posted by **Ryder Diaz** on **05/18/2023** at **4:31pm** [Comment ID: 248] - Link
Type: Question
Agree: 0, Disagree: 0
Will new parks be created in neighborhoods that currently lack them?

#009

Posted by **Ryder Diaz** on **05/18/2023** at **4:30pm** [Comment ID: 247] - Link
Type: Suggestion
Agree: 0, Disagree: 0
More protected bike lanes. Near my home, cyclists aren't able to use the bike lane because cars are consistently parked in the bike lane. This causes cyclists to enter fast-moving car traffic. Having more protected bike lanes will prevent cars from parking in them and will allow help prevent cyclists from getting doored by parked cars, making cycling safer.

#010

Posted by **Ryder Diaz** on **05/16/2023** at **5:31pm** [Comment ID: 246] - Link
Type: Suggestion
Agree: 0, Disagree: 0
It might also be worth doing more marketing around how people can report illegal dumping, and those marketing materials should be in a variety of languages (not just limited to English, Spanish, and traditional Chinese). Trash may remain in some communities because residents may be unaware as to how they can take action. Also the 311 reporting website is only in English-- it also needs to be accessible in multiple languages.

#011

Posted by **Michael Belman** on **06/15/2023** at **1:34pm** [Comment ID: 288] - Link
Type: Suggestion
Agree: 0, Disagree: 0
hurry up and make the comment

#012

Posted by **Ryder Diaz** on **05/18/2023** at **4:53pm** [Comment ID: 250] - Link
Type: Suggestion
Agree: 0, Disagree: 0
The Ohlone people still are land stewards. Please use the present tense here.

#013

Posted by **Michael Belman** on **06/08/2023** at **2:03pm** [Comment ID: 267] - Link

Type: Suggestion

Agree: 0, Disagree: 0

All the parks within walking distance to my house do not have volleyball, basketball, or any sport courts nor do they have public bathrooms. All parks should have bathrooms and water fountains at the very least and city in more play infrastructure.

#014

Posted by **Michael Belman** on **06/08/2023** at **1:58pm** [Comment ID: 266] - Link

Type: Suggestion

Agree: 0, Disagree: 0

I'm new to Oakland and I learned abut lead poisoning in school. However, I have no clue how or who to call if there is lead paint in my house. I have a 9, 7 and 6 year old siblings and they play outside the house all the time. They are exposed but we don't know nor have we been asked by anyone in our schools if they have lead poison or how to check our home. This information should have been given to us when we moved in. A certificate not only information that the home is clear of lead.

#015

Posted by **Yuli Martin** on **06/08/2023** at **1:53pm** [Comment ID: 264] - Link

Type: Suggestion

Agree: 0, Disagree: 0

This form needs to be in other languages in order for other people who do not speak the English language. If we want civic engagement from other non-English speaking folks, the report should be in other languages or the workshops should be in Other languages, otherwise people will not understand or participate and give feedback.

#016

Posted by **Frontline Catalysts Youth Leaders** on **06/08/2023** at **1:54pm** [Comment ID: 265] - Link

Type: Question

Agree: 0, Disagree: 0

When you say that you want resources to be invested in impacted communities, will that money go toward the communities themselves or to outside analysts/organizations?

#017

Posted by **Ryder Diaz** on **05/18/2023** at **6:16pm** [Comment ID: 251] - Link

Type: Question

Agree: 0, Disagree: 0

Does this also take into account the size and ammennities of the park? For example, Dimond Park is very different than Josie de la Cruz Park, with the former having ample open space, multiple children's play areas, a swimming pool, tennis courts, various natural habitats, and natural hiking trails. While the latter really only has a soccer field and a very sad children's play area. Does this also take into account the density of residents that live around the park? That is, are high-density neighborhoods served by tiny parks? What is the ratio of the density of the residents to the area of the closest park?

#018

Posted by **Ryder Diaz** on **05/18/2023** at **6:19pm** [Comment ID: 252] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Need to also address lead in schools, including soils and water.

#019

Posted by **Ryder Diaz** on **05/22/2023** at **4:11pm** [Comment ID: 253] - Link
Type: Question
Agree: 0, Disagree: 0
Does this apply to trucks on the freeways, or only heavy duty trucks that reside on Port property?

#020

Posted by **Ryder** on **06/14/2023** at **6:01pm** [Comment ID: 286] - Link

Type: Question

Agree: 0, Disagree: 0

Is there information available on the total number of requests, not just requests per 1,000 people? I'm not really sure what it means to show rates of dumping per 1000 people. Does it mean that you are dividing requests by the number of people, which would be undercounting requests in more densely populated neighborhoods? Or is it something else?

#021

Posted by **Sharifa E. Taylor** on **06/01/2023** at **5:50pm** [Comment ID: 258] - Link
Type: Question
Agree: 0, Disagree: 0
If/when AB 1000 (2023-24), a safety buffer zone bill mandating 1000 feet buffers between sensitive receptors, is passed, will all of the 500 feet safety buffers mentioned in the General Plan be updated to reflect this new safety standard before the final Plan is ratified by City Council?

#022

Posted by **Sharifa E. Taylor** on **05/31/2023** at **9:57pm** [Comment ID: 255] - Link
Type: Question
Agree: 0, Disagree: 0
How is the City defining "short-term", "medium", and "Ongoing" in units of time in this document? For example, is 0 months to 1 year considered "short-term" while "ongoing" means something is continuously maintained? How is an ongoing program monitored for enforcement?

> Reply by **Sharifa E. Taylor** on **05/31/2023** at **10:23pm** [Comment ID: 256] - Link
> *Type: Question*
> *Agree: 0, Disagree: 0*
> Additionally, when does "ongoing" or "continuous" start in term of a timeline? Are there any monitoring/enforcement avenues community can use to monitor ongoing programs?

#023

Posted by **Sharifa Taylor** on **06/14/2023** at **4:41pm** [Comment ID: 285] - Link
Type: Question
Agree: 0, Disagree: 0
How is the City defining "adequately buffered from residential areas, schools, and other sensitive land uses" when the existing 500 foot buffer boundary does not take into account fugitive emissions remaining from polluting industries concentrated in East Oakland?

#024

Posted by **Sharifa Taylor** on **06/14/2023** at **4:37pm** [Comment ID: 284] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Define how the City defines "appropriate land-use and transportation strategies". Consider more health protective strategies when defining "appropriate land-use and transportation strategies". It is possible to have an Oakland that is healthy, safe, and thriving commercially.

#025

Posted by **Sharifa E. Taylor** on **06/01/2023** at **6:13pm** [Comment ID: 260] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Please share more specific details about the proposed Carbon Sequestration Incubator since engineered carbon sequestration technologies encourage the extension of harmful industries at the expense of public health and community well-being rather than directly cutting GHG emissions.

#026

Posted by **Sharifa E. Taylor** on **06/01/2023** at **6:27pm** [Comment ID: 262] - Link
Type: Question
Agree: 0, Disagree: 0
How is the City defining "adequate" here in terms of safety buffers? Will AB 1000 (2023-24) apply here for a boundary of 1000 feet, if passed?

#027

Posted by **Sharifa E. Taylor** on **06/01/2023** at **6:10pm** [Comment ID: 259] - Link
Type: Question
Agree: 0, Disagree: 0
Which agency holds the leading responsibility for this program/policy?
Additionally, what measurement or evaluation tools are being used to determine successful or failed policy, program, or goal implementation for this goal and others listed within the chapter?

#028

Posted by **Sharifa E. Taylor** on **06/01/2023** at **6:15pm** [Comment ID: 261] - Link
Type: Question
Agree: 0, Disagree: 0
Is the statement "reestablishing the use elsewhere" referring to toxic and/or industrial site relocation within or outside of Oakland? For example, AB&I via McWane left Oakland but it's moving to Texas where there are less strict environmental protections. How much should this study will be concerned with things outside of Oakland's jurisdictional authority?

#029

Posted by **Sharifa Taylor** on **06/14/2023** at **2:03pm** [Comment ID: 269] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Link modelling tools and guiding documents in the final document so that Oaklanders can easily access the BAAQMD tools.

Also, define "appropriate" in this policy.

#030

Posted by **Sharifa Taylor** on **06/14/2023** at **2:15pm** [Comment ID: 270] - Link
Type: Suggestion
Agree: 0, Disagree: 0
In final document, identify who is the lead agency responsible for this policy.

#031

Posted by **Sharifa Taylor** on **06/14/2023** at **2:19pm** [Comment ID: 271] - Link
Type: Question
Agree: 0, Disagree: 0
Who enforces CPTED? Could an uninformed/unarmed officer enforce this policy since there is such a contentious history with police in BIPOC communities and graffiti is a non-violent "crime"?

#032

Posted by **Sharifa Taylor** on **06/14/2023** at **2:22pm** [Comment ID: 273] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Clarify the role and duties of Environmental Enforcement Officers for this policy and EJ-3.1.

> Reply by **Sharifa Taylor** on **06/14/2023** at **2:23pm** [Comment ID: 274] - Link
> *Type: Suggestion*
> *Agree: 0, Disagree: 0*
> Define "periodically" in units of time and who will be monitoring the enforcement/oversight of Environmental Enforcement Officers.

#033

Posted by **Sharifa Taylor** on **06/14/2023** at **2:21pm** [Comment ID: 272] - Link
Type: Question
Agree: 0, Disagree: 0
How frequent does proactive cleanup happen? Which department or agency is responsible for the oversight of this policy?

#034

Posted by **Sharifa Taylor** on **06/14/2023** at **3:32pm** [Comment ID: 276] - Link
Type: Question
Agree: 0, Disagree: 0
Which agency is the lead responsible agency for this action? This should be clearly defined in the final document.

#035

Posted by **Sharifa Taylor** on **06/14/2023** at **3:30pm** [Comment ID: 275] - Link
Type: Suggestion
Agree: 0, Disagree: 0
For data hubs, can a link be provided in the final document for ease of non-City employee readers?

#036

Posted by **Sharifa Taylor** on **06/14/2023** at **3:35pm** [Comment ID: 278] - Link
Type: Question
Agree: 0, Disagree: 0
How will this policy be measured for success? What metric will be used to explain the success of this policy to members of the public?

#037

Posted by **Sharifa Taylor** on **06/14/2023** at **3:36pm** [Comment ID: 279] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Provide link in the final document for the resource list mentioned in EJ-4.4.

#038

Posted by **Sharifa Taylor** on **06/14/2023** at **3:33pm** [Comment ID: 277] - Link
Type: Suggestion
Agree: 0, Disagree: 0
Provide a data clearinghouse link to the supplemental resources mentioned in this goal in the final document.

#039

Posted by **Sharifa Taylor** on **06/14/2023** at **3:43pm** [Comment ID: 280] - Link

Type: Question

Agree: 0, Disagree: 0

What mitigation protocols have been identified to make smaller grocery stores more accessible to EJ communities while protecting community health?

#040

Posted by **Sharifa Taylor** on **06/14/2023** at **3:45pm** [Comment ID: 281] - Link

Type: Question

Agree: 0, Disagree: 0

What health protections are in place to make "vertical food farms" in industrial areas a successful food production practice? It is concerning that food could be produced in an environment where air, water, and soil pollution without proper remediation could make food from these farms too toxic to eat.

#041

Posted by **Sharifa Taylor** on **06/14/2023** at **3:53pm** [Comment ID: 282] - Link
Type: Question
Agree: 0, Disagree: 0
Will Oakland's compost program be expanded (or better marketed) as part of EJ-5.9?

#042

Posted by **Sharifa Taylor** on **06/14/2023** at **3:59pm** [Comment ID: 283] - Link

Type: Question

Agree: 0, Disagree: 0

Will public restroom facilities remain accessible to Oakland's unhoused population at night? It is understood, that the restrooms are not meant for sleeping, however they are still necessary for use after business or park hours. Additionally, accessible public restroom facilities provide shelter to the unhoused population in the event of an extreme weather event.

#043

Posted by **Beth Teper** on **05/31/2023** at **3:31pm** [Comment ID: 254] - Link

Type: Suggestion

Agree: 0, Disagree: 0

Include Columbia Gardens as a named neighborhood here. This is important as it's named in other City and Community plans and projects, e.g. EONI and San Leandro Creek.

May 17, 2023

City of Oakland Planning Department
250 Frank H. Ogawa Plaza
Oakland, CA 94612

Subject: Integrating Equitable Climate Resilience Policies into Oakland's Environmental Justice and Safety Elements

Dear Lakshmi Rajagopalan and the Oakland General Plan Update team,

Thank you for the opportunity to provide comments on the Oakland Environmental Justice and Safety Element drafts. We were pleased to see the Elements' expansive vision for equitable resilience planning in Oakland. In subsequent drafts of the EJ and Safety Elements, we encourage you to further incorporate nature-based climate resilience measures into the recommended policies and actions. We also encourage you to outline plans for obtaining adequate funding to implement these Elements, and to include a stronger focus on accountability to impacted communities during implementation. We have provided specific policy recommendations in an attachment that will help ensure strong outcomes for equitable climate resilience.

Our resilience goals are aligned with several General Plan Guiding Principles referenced in the EJ Element. Below, we've outlined areas of alignment, as well as opportunities for the EJ and Safety Elements to better meet our resilience goals. Specific policy suggestions to more comprehensively incorporate nature-based resilience into the EJ and Safety Elements are included in the attachment.

- *Ensure that every home, neighborhood, school, and park has clean air, water, and land.*
    - We support the draft language around nature-based climate resilience solutions such as green stormwater infrastructure (GSI) in the EJ and Safety Elements. As Oakland deals with more severe storms due to climate change, green infrastructure can improve local water quality by absorbing and filtering stormwater. Research also shows that GSI can improve air quality by reducing the impacts of vehicle emissions, particulate pollution, and ground-level ozone.[1] The draft EJ and Safety Elements should incorporate nature-based resilience into

[1] Environmental Protection Agency. (n.d.). *Exploring the Link Between Green Infrastructure and Air Quality*. EPA. Retrieved April 27, 2023, from https://www.epa.gov/green-infrastructure/exploring-link-between-green-infrastructure-and-air-quality

all relevant policies, including those regarding workforce development, stormwater management, and environmental quality.

- *Design streets that are safe for walking, biking, rolling, and playing.*
    - The EJ and Safety Elements should incorporate GSI and other nature-based resilience measures into complete streets planning. Green stormwater infrastructure should be integrated into bicycle and pedestrian infrastructure to make Oakland's streets safer for walking, biking, and other forms of active transportation. GSI should also be incorporated into curb bulb-outs and other traffic calming features, and can be used to separate bike lanes and footpaths from traffic. In addition to acting as a physical barrier, GSI can also make streets more comfortable for walking and rolling by mitigating the urban heat island effect.
- *Co-develop solutions with community groups, community members, and the Ohlone people, such that all people of Oakland feel ownership of the city.*
    - As the City of Oakland proceeds with adoption and implementation of the EJ Element, they should partner with and support the existing work of Oakland-based, BIPOC-led community organizations such as the West Oakland Environmental Indicators Project, Communities for a Better Environment, Mycelium Youth Network, and the 40x40 Council. The 40x40 Council is made up of Roots Community Health Center, the Brotherhood of Elders Network, the Black Cultural Zone Community Development Corporation, and the East Oakland Youth Development Center. The 40x40 is an area that extends from Seminary Avenue to the San Leandro border and from MacArthur Blvd to the Bay, and fits the draft EJ Element's definition of an EJ community. The 40x40 Council is embedded in this part of East Oakland and is highly engaged in interventions to improve the lives of Black legacy residents both in and from this area, wherever they may currently reside.
    - We also encourage the City to develop a timeline for meaningful engagement with EJ communities and work closely with EJ Communities through developed and existing community advisory councils of BIPOC-led EJ organizations that are focused on ground-truthing the proposed interventions. These communities and organizations should be compensated for this work; the City should utilize specific budget line items to build out robust infrastructure for community engagement and compensation. This engagement should begin in a timely manner after the EJ Element is adopted.
    - The City must also strive to use accessible language as part of outreach by reducing jargon and prioritizing language that resonates with resident needs and priorities.
    - We would additionally like to see legacy Black, brown, and indigenous residents of EJ communities prioritized for suggested benefits, including energy-saving tax benefits, green jobs, and benefits for small businesses and pop-up food purveyors.
- *Cultivate lush active parks, recreation areas, and quiet green spaces that are accessible, safe, clean, drought-resistant, and well-maintained.*

- As shown in the Environmental Justice Element, EJ communities in East and West Oakland lack tree canopy compared to their wealthier counterparts (Fig. EJ-27). The Element also states that “people of color are more likely to live in areas with higher rates of contaminated water, stormwater and wastewater overflows, and increased risks of flooding.” To help mitigate these inequities, the EJ and Safety Elements should prioritize the funding and implementation of nature-based climate resilience measures, such as green stormwater infrastructure and restored tidal wetlands, in and near impacted communities.

In order to realize these priorities, we encourage you to incorporate the specific actions and model policies included in the attachment into the Environmental Justice and Safety Elements.

Climate hazards have become the new norm, and residents of EJ communities in Oakland are disproportionately suffering the impacts. Planning for equitable climate resilience in the EJ and Safety Elements is crucial to protect vulnerable communities. We appreciate the EJ and Safety Elements’ focus on equitable resilience, and we urge you to incorporate our recommendations to create a safer, more just future for Oakland.

Sincerely,

David Lewis, Executive Director
Save The Bay

Brian Beveridge, Co-Director
West Oakland Environmental Indicators Project

Nicole Wires, Project Director
Oakland Climate Action Coalition (OCAC)

Rev. Dr. George C.L. Cummings, Regional Executive Director
Faith In Action East Bay

Noha Aboelata, CEO
Roots Community Health Center

Carolyn Johnson, CEO
Black Cultural Zone CDC

Gregory Hodge, CEO
Brotherhood of Elders Network

Selena Wilson, CEO
East Oakland Youth Development Center

Attached: Specific Actions and Policy Priorities for the Environmental Justice and Safety Elements

Below, we've provided specific policy recommendations that will further the Environmental Justice and Safety Elements' climate resilience goals. We've identified key actions and priorities from Save The Bay's Position Paper on San Francisco Bay Sea Level Rise & Flood Strategy and the Greenbelt Alliance's Resilience Playbook and position paper on The Critical Role of Greenbelts in Wildfire Resilience. We'd also like to uplift policy priorities from the City of Oakland's own Equitable Climate Action Plan (ECAP), the West Oakland Community Action Plan (WOCAP), and the East Oakland Neighborhoods Initiative Community Plan (EONI). Our feedback is organized by the EJ and Safety Elements' relevant goals and policies.

Specific Actions and Policy Priorities for the Environmental Justice Element

- **GOAL EJ-1:** Reduce pollution, mitigate the impacts of pollution on existing sensitive land uses, and eliminate associated public health disparities.
    - *Feedback:* We support Goal EJ-1 and its associated policies and actions. We appreciate the grassroots organizing and advocacy done by the West Oakland Environmental Indicators Project in particular, and are grateful to see the goals and policies from the West Oakland Community Action Plan incorporated into the Environmental Justice Element.
    - Policy: EJ-1.3 Industrial Uses Near Sensitive Land Uses.
        - *Feedback:* We support the use of "vegetative barriers near large stationary and mobile sources of air pollution." Wherever possible, these barriers should be integrated with green stormwater infrastructure to maximize pollution prevention and flood resilience benefits. The EJ Element should align air pollution and water pollution planning in order to ensure investments are multi-benefit.
        - *Feedback:* We support Action EJ-A.1's amendment of the Zoning code to "allow greater residential density in less-polluted areas, including existing single-family residential neighborhoods." Dense, affordable, infill development can connect historically under-invested communities to resources and infrastructure, while protecting them from pollution sources.
        - *Feedback:* We support Action EJ-A.4 to "develop a Carbon Sequestration Incubator in Oakland to incubate and develop green jobs." In addition to the functions listed, this incubator should conduct workforce development for the implementation and maintenance of green stormwater infrastructure. This can help connect residents of EJ communities with green jobs while ensuring adequate GSI is built in Oakland.
    - Policy: EJ-1.17 Data-Informed Efforts.
        - *Feedback:* We support policy EJ-1.17's focus on "prioritizing areas for capital investments with co-benefits for air quality, such as planting of

trees." To maximize their climate resilience benefits, these co-benefits should include multiple climate and environmental hazards, including flooding.

- **GOAL EJ-2:** Protect Oakland water supplies from contamination.
    - Policy: EJ-2.1 Clean Water Programs., EJ-2.3 Protect and Restore Creeks and Wetlands
        - *Feedback:* We strongly support the draft language in policy EJ-2.3 of "co-develop[ing] environmental stewardship and pollution prevention programs" in collaboration with environmental justice organizations and EJ Community residents.
    - Policy: EJ-2.4 Stormwater Management.
        - *Feedback:* We support Policy EJ-2.4 and Action EJ-A.14 to "fund and implement a green infrastructure program" and prioritize investment in frontline communities." This program should include the green stormwater projects already identified in previous planning documents, including the East Oakland Neighborhoods Initiative Community Plan (EONI). Some of these include green streets, vegetative buffers, and stormwater tree wells.
        - *Feedback:* One of the major barriers to implementing this policy is a lack of funding, which is identified in Oakland's GSI Plan. The next draft of the EJ Element should include clear plans for identifying and pursuing funding in order to adequately meet the threat posed by intensifying storms due to climate change. If new taxes are considered, they should raise funds in the most progressive manner possible. Besides taxes, options for funding GSI include the state Office of Planning and Research's Integrated Climate Adaptation and Resilience Program (ICARP) and Extreme Heat and Community Resilience Program.
        - *Feedback:* In order to identify where to prioritize investments, the City of Oakland should map tree canopy gaps and prioritize urban canopy expansion in communities vulnerable to urban heat effects, utilizing tools such as the Tree Equity Score. (Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs: A Guidebook) This mapping may be done as part of the Oakland Urban Forest Plan, and can build on the maps in American Forests Community ReLeaf's Oakland Urban Tree Canopy Assessment.
- **GOAL EJ-3:** Prevent, reduce and clean up illegal dumping.
    - *Feedback:* In partnership with Faith in Action East Bay and Block by Block Organizing Network, we recommend that the EJ element include the following policies to help mitigate illegal dumping in Oakland. These priorities were presented at the 2023 Illegal Dumping Conference in this presentation.
        - Increase the budget of the Oakland Public Works department such that they're better able to manage illegal dumping. Prioritize hiring more workers to clean Oakland streets, as well as a team of environmental inspectors to monitor progress on cleanup projects. (Faith in Action East Bay)

        - Invest in equipment to better monitor and clean up illegal dumping, including repairing existing equipment and installing cameras in areas identified as illegal dumping hot spots. (Faith in Action East Bay)
        - Ask the Department of Race and Equity to make the flatlands of Oakland a priority for illegal dumping cleanup. (Faith in Action East Bay)
    - Policy: EJ-3.4 Illegal Dumping Enforcement.
        - *Feedback:* To prevent discriminatory enforcement patterns, ensure training of Environmental Enforcement Officers has a strong focus on racial equity.
    - Policy: EJ-3.5 Community Education on Illegal Dumping.
        - *Feedback:* Ensure community campaigns in EJ communities are developed in partnership with impacted community members and center community goals by engaging local residents.
- **GOAL EJ-4:** Coordinate resources to improve housing quality and habitability.
    - Policy: EJ-4.6 Environmental Quality.
        - *Feedback:* We strongly support the draft language about green infrastructure in Policy EJ-4.6. We recommend that this green infrastructure be integrated into the city's stormwater system to protect residents and community members from flooding.
- **GOAL EJ-5:** Support a food system that provides nutritious, affordable, culturally relevant and affordable food to all Oaklanders.
    - Policy: EJ-5.3 Community and Home Gardening.
        - *Feedback:* Prioritize legacy Black, brown, and indigenous residents for these land transfers, discounted water rates, and reduced property tax assessments.
    - Policy: EJ-5.5 Entrepreneurship and Food Innovation.
        - *Feedback:* Prioritize legacy Black, brown, and indigenous small businesses in EJ communities for these food innovations. Healthy, culturally responsive foods will be better received and supported by the community, ensuring greater success of this policy while providing economic stability for residents.
- **GOAL EJ-6:** Support a network of well-maintained community facilities that are easily accessible, culturally supportive, and responsive to community needs.
    - *Feedback:* To maximize their climate resilience benefits, the "new CIPs [for] public improvements to street and road conditions" should incorporate green stormwater infrastructure wherever possible. Given that they will focus on neighborhoods with high concentrations of BIPOC and low-income residents, adding GSI to these projects will help protect the aforementioned communities from climate impacts.
    - *Feedback:* The city should prioritize community engagement, feedback, and data, which will be critical to this goal. The community who uses these facilities are the most informed to guide the process of their development and refurbishment in line with their needs.
    - Policy: EJ-6.5 Public Service Coordination.

        - *Feedback:* Incorporate language about ensuring strong coordination between agencies during climate emergencies, with an emphasis on in-language outreach targeted to the most vulnerable communities.
- **GOAL EJ-7:** Create environments that support physical activity, recreation, and healthy lifestyles through safe and comfortable walkable, bikeable neighborhoods, with access to green space, trees, paths, and parks.
    - Policy: EJ-7.7 Equitable Paving.
        - *Feedback:* When repaving roads, the City of Oakland should implement a broad array of bicycle and pedestrian improvements identified in the West Oakland Specific Plan, the 2019 Oakland Bike Plan, and the 2017 Oakland Walks Pedestrian Plan. (Strategy 57, WOCAP)
        - *Feedback:* The EJ Element should align complete streets and green stormwater infrastructure planning to ensure GSI is incorporated into new complete streets projects wherever possible.
    - Policy: EJ-7.12 Park Safety.
        - *Feedback:* The City should take into consideration violence indicators when improving park safety and make those safety improvements with adequate knowledge of the violence that may occur in these parks. This information may be obtained from the City's Department of Violence Prevention, where locations of shootings can be cross-referenced with parks and public safety measures can be implemented to protect residents.
    - Policy: EJ-7.15 Urban Forest.
        - *Feedback:* The City should incorporate green stormwater infrastructure into Oakland's urban forest whenever possible. Especially in areas prone to flooding, trees added to the urban forest should be planted in specialized stormwater tree wells. Incorporating GSI will also ensure tree replacements are aligned with the San Francisco Bay Regional Water Quality Control Board's Municipal Regional Stormwater Permit (MRP), of which the City of Oakland is a Permittee.
        - *Feedback:* Where possible, the city should prioritize the planting of multi-purpose trees, such as fruit trees, in addition to strictly shade trees.
        - *Feedback:* Trees planted in stormwater tree wells should be low on the allergenic scale. This will best serve EJ communities, who are most impacted by public health concerns related to allergens, pollutants, and lack of access to health care. A list of allergy-friendly evergreen trees can be found on the American Conifer Society's website here.
    - Policy: EJ-7.16 Urban Greening.
        - We appreciate the extensive inclusion of nature-based climate resilience in the EJ Element, and we're supportive of the opportunities the City has identified to incorporate GSI into housing, stormwater management, and tree canopy policy. While the EJ Element is a promising first step towards equitable GSI implementation, there are additional opportunities to

incorporate nature-based resilience into environmental justice planning. We've included some of these specific recommendations in this section.
        - *Feedback:* The City of Oakland should focus green stormwater improvements for areas at risk of flooding (along creeks, in low-lying areas, and along the coast) with an emphasis on vulnerable communities. (Resilience Playbook–Harnessing the Power of Nature)
        - *Feedback:* We recommend that the City establish requirements for major development and redevelopment projects to construct and maintain urban greening projects in the adjacent public right of way. (Resilience Playbook–Harnessing the Power of Nature)
        - *Feedback:* The City of Oakland should utilize overlay zones, ordinances, or resolutions to create new urban greening zoning requirements in areas regarding flooding, habitat, or other priorities. (CR-2 - CR-4, ECAP)
        - *Feedback:* We recommend that the City establish temporary and permanent car-free areas, to be used for active transportation, parks, parklets, green infrastructure, pop-up community and commercial activity, and other uses that address community needs. (TLU-6, ECAP)
        - *Feedback:* By 2023, the City should establish a program for both voluntary and compliance GHG mitigation fees to be invested locally. Projects in frontline communities should be prioritized, such as tree planting and urban greening, including in parks; building electrification; creek restoration; and neighborhood EV car share. (CR-1, ECAP) This investment could directly fund the Carbon Sequestration Incubator highlighted in Action EJ-A.4.
        - *Feedback:* Articulate (in the Environmental Justice, OSCAR, and LUTE Elements) a citywide greening network that involves "greenways" along specific city creeks, connections to existing and proposed green streets and green corridors, and other amenities such as parks, urban gardens, and schools. Such a network should ensure that residents in the flatland sections of Oakland are within ¼-mile to ½-mile to such a greening network. This network should prioritize establishing connections between Oakland's neighborhoods, parks on the Bay shoreline, and regional parks (such as the MLK Jr. Shoreline Park and Middle Harbor Shoreline Park) as well as identify zones in need of green infrastructure investments. The EJ Element should reflect the City's report on Priority Conservation and Development Areas, which provides further details about this greenway network.
- **GOAL EJ-8:** Foster meaningful civic engagement and support community power- and capacity-building.
    - Policy: EJ-8.1 Meaningful, Relevant Engagement.
        - *Feedback:* Community involvement, capacity building, and decision making are foundational to the implementation of the EJ Element. We strongly encourage the City to move from informing/consulting with communities to collaborating with them and advancing community

ownership by engaging organizations embedded in EJ communities (as illustrated in the Movement Strategy Center's Spectrum of Community Engagement to Ownership). These processes should be one of the first priorities for EJ Element implementation, and should be started immediately after the Element is adopted.
        - *Feedback:* The timeline of community involvement should be more clearly defined under Goal EJ-8. Short, medium, and long term goals should be articulated in the EJ Element, coupled with tangible next steps the city will take to ensure accountability to Oakland communities.
        - *Feedback:* When engaging residents, an effort should be made on the part of the city to engage both long-term legacy residents of EJ communities and former residents who have since been displaced from these communities. Many of these people continue to use schools, clinics, and other services in their former neighborhoods and can provide a great deal of useful feedback on the reasons for their displacement, therefore helping to keep long-term residents in place. Without a specific focus on engaging historical and displaced residents, the City risks engaging only new residents with standard community engagement efforts. These new residents may not understand the culture of EJ communities, and their presence may discourage legacy or displaced residents from engaging with the City's EJ processes.
    - Policy: EJ 8.11 Digital Access
        - *Feedback:* This is a very important strategy to improve EJ communities' ability to access information and resources. In addition to improving digital access to city meetings and ensuring adequate access in public institutions, the City should ensure that there is a communications plan in place to inform residents of the new resources available to them. Additionally, this communications plan should be a key part of the strategy to inform and engage community members in EJ and Safety planning, development and implementation.
- **GOAL EJ-9:** Expand economic development, income equality and opportunity for all Oaklanders.
    - *Feedback:* This goal and all its sections are key to the safety and security of EJ Communities and a thriving, economically stable Oakland. We applaud the efforts listed in this goal and would like to encourage the city to leverage existing programs in workforce development, green jobs, and support and training for small businesses. Additionally, we encourage the city to outline the funding streams available for these important opportunities and evaluation measures for their success, both of which are not currently included in this section.
- **GOAL EJ-10:** Prioritize improvements and programs that meet the needs of environmental justice communities.
    - Policy: Action EJ-A.34 In partnership with community groups, develop an implementation monitoring and evaluation plan framework and reporting mechanism.

- *Feedback:* Establish the Oakland Climate Action Network to Support Inclusive Community Engagement on ECAP Implementation. (CL-5, ECAP) This network could also be used to support engagement on the EJ Element implementation.
- *Feedback:* The implementation monitoring and evaluation plan in Action EJ-A.34 should specifically focus on equity and environmental justice. Relevant metrics should be developed in partnership with compensated frontline groups.

Specific Actions and Policy Priorities for the Safety Element

- **GOAL SAF-2:** Proactively prevent urban fires and exposure to wildfire and protect community members and property from fire danger.
    - We support the Safety Element's policies around minimizing the risk of wildfire to new and existing developments. We encourage your team to incorporate additional wildfire resilience solutions, including high-density infill development and greenbelts, into the next draft of the Safety Element.
    - *Feedback:* The Safety Element should accelerate greenbelts as nature-based solutions to wildfire resilience and risk reduction, and prioritize increasing greenbelts as strategic locations for wildfire defense through policy and planning. (Resilience Playbook–Co-existing With Wildfire) This includes identifying existing greenbelts and the best locations for new greenbelts, and incorporating these locations into comprehensive wildfire planning. (The Critical Role of Greenbelts in Wildfire Resilience)
    - *Feedback:* The City of Oakland should adopt (or renew) local policies that maintain space between cities, including urban growth boundaries (UGBs), urban limit lines (ULLs), and community separators—preferably voter approved—to contain growth, prevent sprawl, and reduce wildfire risk. (Resilience Playbook–Co-existing With Wildfire)
    - *Feedback:* We recommend that the City preference vegetation that has relatively high water content in vegetated areas serving as greenbelts or wildfire buffers to avoid ignition. (Building to Coexist with Fire: Community Risk Reduction Measures for New Development in California)
    - *Feedback:* To build wildfire resilience in Oakland, the City should explore feasibility of a new Community Wildfire Resilience Zone around communities in high fire risk areas. This includes assessing feasibility of creating a Community Wildfire Resilience Zone in the one-quarter-mile area around communities in high and very high fire hazard severity zones to promote responsible land uses, guide land stewardship activities, and provide permanent and consistent risk reduction. (Resilience Playbook–Co-existing With Wildfire)
    - *Feedback:* The Safety Element should include incentives, such as certification programs, for homeowners who go beyond minimum building codes and standards that can help reduce insurance costs. (Resilience Playbook–Co-existing With Wildfire)
    - *Feedback:* The Safety Element should address exposure to wildfire smoke, especially for BIPOC and EJ communities who are already disproportionately exposed to industrial and mobile pollution. The City should fund access to personal and indoor air filters for residents of EJ communities.
    - Policy: SAF-2.2 Vegetation and Urban Forest Management.
        - *Feedback:* We support SAF-2.2's goal of "contract[ing] with Indigenous groups with expertise in using cultural burning and other traditional ecological management and fire suppression techniques." In addition to cultural burning, the Vegetation Management Plan referenced in SAF-2.2

can also incorporate selective harvest, non-commercial thinning, and other indigenous forest treatments. (Resilience Playbook–Co-existing With Wildfire)

- **GOAL SAF-3:** Protect people and property from flooding.
    - *Feedback:* We appreciate SAF-A.12's focus on ecologically sensitive solutions to flooding. We look forward to partnering with the City of Oakland and community-based organizations to further equitable, nature-based resilience measures to flooding and sea level rise. To that end, we encourage the City of Oakland to continue pursuing the 2017 Preliminary Sea Level Rise Road Map's goal of "leveraging Measure AA funding for wetland restoration" as a way to build resilience to sea level rise. This strategy leverages the potential of Oakland's wetlands to act as natural 'sponges' to absorb sea level rise while providing numerous added benefits, including wildlife habitat and shoreline access for adjacent communities.
    - *Feedback:* We recommend that the City focus new development and redevelopment in less vulnerable areas near transit and jobs to increase climate resilience and reduce climate emissions. In developed areas where sea level rise and extreme storms will bring intermittent flooding, resilient building standards should be applied consistently to minimize social and economic disruption from flooding. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
    - Policy: SAF-3.5: Green Stormwater Infrastructure.
        - *Feedback:* We strongly support this policy, and we appreciate the incorporation of our feedback around green stormwater infrastructure into the EJ and Safety Elements. In addition to building resilience to flooding, GSI provides a number of benefits to surrounding communities, as listed in SAF-3.5. The next draft of the Safety Element should include or reference plans for funding and implementation of GSI for flood resilience, including long-term maintenance.
- **GOAL SAF-4:** Proactively plan for impacts of sea level rise on people, property, and essential infrastructure.
    - *Feedback:* We support the Oakland Safety Element's comprehensive approach to sea level rise, including its emphasis on community partnerships (SAF-4.1), "use of best available science about projected sea level rise" (SAF-4.2), and focus on regional coordination (SAF-4.6).
    - Policy: SAF-4.3 New Development and Sea Level Rise.
        - *Feedback:* Identify and require appropriate setbacks from creeks and shoreline areas to allow for intermittent flood surges and incorporate those into resilience plans. This will also allow for additional restoration opportunities and enhance habitat and recreational access. Ensure these setbacks align with the City's Priority Conservation and Development Areas when possible. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)

        - *Feedback:* Prioritize nature-based design elements wherever possible to promote the multiple benefits of flood protection, habitat restoration, and equitable recreational access. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
        - *Feedback:* Require a minimum of 4 feet of freeboard above the current Base Flood Elevation, to align with state guidance that recommends planning for 3.5 ft of SLR by 2050.[2] (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
        - *Feedback:* Identify and adopt new standards to mitigate the risk of building damage due to increased liquefaction risk in areas susceptible to groundwater intrusion. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
        - *Feedback:* Require the use of flood resistant materials and building practices for new construction in areas of shoreline and inland flood risk from projected sea level rise and increased storm intensity. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
- **GOAL SAF-5:** Minimize health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.
    - *Feedback:* Toxic materials removed as part of cleanup efforts should be disposed of in the least harmful manner so that the impact is not shifted from one vulnerable community to another. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
    - *Feedback:* Identify and plan for the risk of groundwater rise and the associated pollution and public health risk due to the inundation of improperly cleaned up toxic sites. New housing should not be approved or built on or near hazardous sites in flood-prone areas before cleanup has been completed. (Save The Bay Position Paper, San Francisco Bay Sea Level Rise & Flood Strategy)
        - Ensure the map of Hazardous Materials and Sites (Figure SAF-8) aligns with UC Berkeley's Toxic Tides mapping project.

[2] https://www.opc.ca.gov/webmaster/_media_library/2022/08/SLR-Action-Plan-2022-508.pdf

Credit: Favianna Rodriguez

June 12, 2023

To: City of Oakland of Oakland
From: Deeply Rooted in Oakland Partnership

Re: Ideas and Recommendations on Environmental Justice and Safety Element Public Drafts from Deeply Rooted Engagement from November 2021- May 2023. Part-1

Just Cities as part of Deeply Rooted Collaborative is sharing our recommendations on the Environmental Justice and Safety Element Public Draft. This is Part -1 of the feedback. The Memo includes recommendations from the following engagement efforts.

1. Equity Working Group
2. Deeply Rooted Partners
3. Community Engagement (Conducted between November 2021 and October 2022)
4. Community Engagement (February 2023 to May 2023)

Please refer to Deeply Rooted Recommendations listed in the table below.

Table 1- DR Recommendations on the Environmental Justice and Safety Element

Topic	DR Feedback (Section and page number)
Overall	• [DR] Describe the implementation plan (timeline, objectives) for accountability and tracking of EJ and Safety actions and policies. • [DR] Under actions list community based organizations who can be partnered with to implement the actions. (WOEIP) • [DR] Add a spreadsheet as an appendix, listing all the neighborhoods with details on issues, cost for cleanup, preventions and infrastructure needed. (WOEIP)
Minimize Water Pollution Goal- 2 Protect oakland water supplies from contamination	**Protect Oakland water supplies from contamination** • [DR] Add programs to support unhoused people to access clean water. ○ Pay for equipment to make it possible to get water from fire hydrants. The City of Oakland should take this on instead of small nonprofits.

Topic	DR Feedback (Section and page number)
Environmental Justice Element Please refer to EWG #16 slides for policy/action categories.	○ Human Services needs to provide bottled water. The Mobile Assistance Community Responders of Oakland (MACRO) Program Since the provides water to unhoused folks but cannot meet current demands. ● [DR] Involve Alameda County Health Department and County Supervisors Office in the development and implementation of these policies. The City of Oakland of Oakland does not have a Public Health department and needs to hear the latest on public health oriented policies. ● [DR] Add more information on Port of Oakland's plans around wastewater and concerning clean water and how the City of Oakland of Oakland can further support these efforts. ● [EWG] Add more information on dedicated funding to implement these proposals. ● [DR engagement] Add programs to test water quality in EJ communities with support from EJ organization. ● [DR engagement & EWG] Add an action or policy to alleviate concerns of lead contamination in tap water. Also add a funding program to replace lead pipes for most impacted communities. ● [EWG] Create programs to financially assist residents in replacing water pipes that have been contaminated with lead and other toxins. **Policies related to restoration of water sources** ● [DR] Add more information on the green jobs program as part of stewardship. The programs should offer an opportunity to hire local people and help with skills training. And as REIA mentioned, should have more collaboration with EJ CBOs and low-income EJ community residents and businesses. ● [DR] Add more on Green infrastructure - ○ More specific data on types of plants and trees surrounding neighborhoods, freeways and construction sites. ○ Add programs to capture water and act as an emissions filter.

Topic	DR Feedback (Section and page number)
	● [EWG] Prioritize the MLK shoreline and adjacent green space for restoration. Create more access and encouragement for East Oakland residents to use this park.
Minimize land pollution Goal- 3 Prevent, reduce and clean up illegal dumping Environmental Justice Element Please refer to EWG #17 slides for policy/action categories.	**Policies related to reduce blight, trash, and dumping** ● [EWG] Add language to policy EJ.A.15 to raise awareness and increase frequency of City of Oakland 's Bulk Pickup and Oaktown PROUD students program in EJ Communities. ● [EWG] Add language to policy A.15 to prioritize local hiring of residents from the neighborhood on clean-up teams. ● [EWG] Regarding EJ 3.4 Illegal dumping enforcement, do not involve Oakland Police Department during Public Works duties. ● [EWG] Add a Policy/Action item to build more public bathrooms for unhoused people and distribute them equitably across Oakland. ● [DR] Add language to EJ 3.4 to increase patrolling beyond 9-5pm to identify illegal dumping. Dedicate more resources to increase enforcement officers and staff hours for dumping from industrial zones. (WOEIP and WOCAP) ● [DR] Add Policy/Action item to ensure safe dumping with the following language; ○ Add language on putting dumpsters in neighborhoods especially near unhoused communities.Add a program to place dumpsters with separate sections for hazardous material. These should be placed on unused open lots to ensure safe dumping. The program should announce pickups ahead of time. ○ Add more context under the Goal 3 on illegal dumping not done by Oakland residents, but by businesses and is focused in under-resourced communities surrounded by industrial businesses, freeways, rail, port and recycling. ○ Add a policy/action item to evaluate all soil areas that are contaminated including groundwater and related cleanup plans.(WOEIP) ● Vacant lots ○ [EWG] Add language to EJ 3.2, to require all owners of vacant properties to be responsible for maintaining

Topic	DR Feedback (Section and page number)
	and keeping the property clean.
Minimize air pollution Goal - 1 - Reduce pollution, mitigate the impacts of pollution on existing sensitive land uses, and eliminate associated public health disparities, Environmental Justice Element Please refer to EWG #17 slides for policy/action categories.	**Policies related to vehicle pollution** ● [DR] Add Policy/Action item to research how to provide residents who live close to freeways and other polluted conditions with free and/or reduced fee comprehensive health care services. Funding can come from taxing polluting industries (industrial businesses and shipping companies that emit pollutants). ● [DR] Add Policy/Action item to research how industrial companies can compensate residents who are negatively impacted by the company's operation near a residential area. **Policies related to emission from construction activity** ● [DR] Add Policy/Action item to encourage use of solar energy. ● [DR] Add Policy/Action item to create more non-smoking areas. **Policies related to data collection** ● [EWG] Add language to EJ 1.17, to ensure City of Oakland 's Air pollution study focuses on all pollutants emitted by industrial facilities in Oakland. ● [DR] Add language under EJ A.5 to co-develop an ordinance with EJ CBO's and low-income EJ community residents to prioritize identification and closure of existing polluting industries located in or near residential areas. (REIA) ● [DR] Add language to policy EJ 1.17 to ensure the City of Oakland provides access to (hyperlocal) neighborhood data so that residents can evaluate the City of Oakland 's policies. ● [DR] Add language under EJ 1.17 data informed efforts to create a Participatory Action Research with those who are most vulnerable to climate crises and environmental injustices. Examples can include local air monitoring by providing air

Topic	DR Feedback (Section and page number)
	monitoring tools to test quickly. ● [DR] Add Policy/Action to introduce programs which enable the community/CBO's to access and monitor implementation of policies/actions. ● [DR] Add language under Actions EJ A.4 on specification of green jobs. Specify the nature of the jobs and add a requirement to hire local Oaklanders. **Policies related to Zoning Requirement** ● [EWG] Add language under EJ-A.1 to Increase staffing for Planning Code Enforcement and Department of Transportation also prioritize local hiring. ● [DR] Add language under EJ-A.1 to encourage the removal of industrial businesses near residential areas. ● [DR] Update language under EJ-A.1 to ensure a 600 foot buffer instead of 500 feet to align with Air District Research. (CBE) ● [DR] Add Policy/Action to create fresh air/breathing centers for unhoused people and low-income communities. ● [DR] Clarify if no use of diesel generators (add policy/action) is also intended for residents. Residents use diesel generators at parks or other places for short periods of time to access power.
Protect people from polluted areas, such as industrial zones, freeways, landfills, and toxic cleanup sites Goal - 5 Human-made Hazards: Minimize health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.	**Policies related to Storage and Manufacturing** ● [EWG] Add Policy/Action to create community education that explains the enforcement process, agencies and/or departments responsible, and their contact information.[DR] Add language under all policies/actions on enforcement (responsible departments/agencies). ● [DR] Add language under SAF-5.1 to enforce regulation on refineries and concrete companies in the City of Oakland. . **Policies related to Transportation** ● [EWG] Add Policy/Action item to create pollution mitigation programs that address the airport and seaport. This includes

Topic	DR Feedback (Section and page number)
Safety Element Please refer to EWG #18 slides for policy/action categories.	supporting the port's efforts to reduce emissions. ● [DR] Add language to policy SAF-5.4 to allow commercial vehicles and large trucks on Highway 580 in order to decrease pollution on the 880 and on flatlands roads. ● [DR] Add language to policy SAF-5.4 to follow Caltrans research and engagement on removing Interstate 980 for the City to determine feasibility and outcomes. **Policies related to Existing Programs and Funding** ● [DR] Add language to SAF5.5 to use mycelium as part of Bioremediation technique to remove contamination from water resources. (REIA)
Mitigate the impact of fires Goal -2 Fire: Proactively prevent urban fires and exposure to wildfire and protect community members and property from fire danger. Safety Element Please refer to EWG #19 slides for policy/action categories.	**Policies related to vegetation and Urban Forest Management.** ● [EWG] Add language under policy SAF-2.6 to require PG&E, to update their infrastructure, and ensure that customers are not cost burdened. ● [DR] Add Policy/Action item to discourage accumulations of waste that are susceptible to fires at home. Residents and especially people who have experienced incarceration should be involved to educate people on strategies to reduce fires. **Policies related to agency coordination and financial assistance** ● Add Policy/Action items to ensure that people are not displaced due to code enforcement. Align it with the proactive rental inspection, but ensure it goes beyond rental properties.

Credit: Favianna Rodriguez

July 7th, 2023
To: City of Oakland
From: Deeply Rooted in Oakland Partnership

Re: Ideas and Recommendations on Environmental Justice and Safety Element Public Drafts from Deeply Rooted Engagement from June 2023, Part-2 Just Cities, as part of Deeply Rooted Collaborative, is sharing our recommendations on the Environmental Justice and Safety Element Public Draft. This Memo is Part-2 of our feedback on the Environmental Justice and Safety element. The Memo includes recommendations from the following engagement efforts.

1. Equity Working Group Meetings
2. Deeply Rooted Partners Meetings

We will follow up with part-3 of the feedback on 07/10/2023. Part-3 will include input from Deeply Rooted Engagement (conducted from June 2023), Equity Working Group, Deeply Rooted Partners, and West Oakland Environmental Indicators Project (WOEIP). Please refer to Deeply Rooted Recommendations listed in the table below.

Table 1- DR Recommendations on the Environmental Justice and Safety Element

Topic	DR Feedback (Section and page number)
Mitigate Earthquake Hazards Goal- 2 Geologic and Seismic Hazards: Minimize the risk to life and property caused by seismic and geologic hazards. Safety element	**Policies related to new and existing buildings:** ● [EWG] Add language in **SAF-1.2 Structural Hazards** on specifics of the programs under this policy. ● [EWG] Add language under action **SAF-A.6,** regarding assistance to retrofit old residential buildings that are grandfathered in. Also, include minority contractors in the list for retrofitting contractors. City should provide subsidies if residents hire minority contractors. **Policies related to new buildings and development**

Topic	DR Feedback (Section and page number)
	• [EWG] Add a policy/action item requiring new developments to use electricity rather than gas to mitigate gas-related hazards. **Policies related to coordination and data** • [EWG] Add a policy/action to create a list of potential sites/areas affected by Earthquake in EJ communities and low income communities of color and a program to reach out to them with assistance. • [EWG] Cross reference and add language under policy **SAF-8.9 Community Training and Awareness** to expand training programs and community education materials in order to build capacity to create interdependence among residents in case of an emergency.
Provide access to healthy food Goal 5 Support a food system that provides nutritious, affordable, culturally relevant, and affordable food to all Oaklanders. Environmental Justice Element	• [EWG] Add a policy/action item to conduct a study to understand the closures of grocery stores, and assess how grocery stores can survive for longer time periods. • [EWG & DR] Add language to **EJ A-21** to provide grocery stores at walkable distances in all neighborhoods. Ensure that food accessibility improvements are also convenient for elders, youth, differently abled people and are culturally appropriate for Black and Brown communities. • [EWG] Add language to **EJ 5.9 Food Recovery Program** to ensure free food providers/deliverers have a standard for the quality of food being provided. Food should not be bruised or near expiration. Incentivize local groceries and restaurants to donate items, in order to prevent food waste. Also, include small grocers in the food recovery program. • [EWG] Add language to **EJ 5.8 Education and Awareness** to incentivize local fresh produce sellers to

Topic	DR Feedback (Section and page number)
	highlight foods used in cultural dishes, such as showcasing an item used in a recipe. • [EWG] Add language to **EJ - 5.5 Entrepreneurship and Food Innovation** to support individual residents in small-scale agriculture and distribution, through education and financial assistance. • [DR] Add language under **Goal 5** to call out community gardens and healthy grocery stores as indicators of gentrification historically. • [DR] Add language under **Goal 5** to call out the recent shutdown of several East and West Oakland food banks. • [DR] Add language to **EJ- 5.5 Entrepreneurship and Food Innovation.** Do not use police force or criminalization to enforce street vending regulations. Reallocate this enforcement funding as grants to support small businesses. • [DR] Add language to **EJ-5.8 Education and Awareness** to provide nutritional education, plant medicine and cooking classes, with an emphasis on cultural and ancestral recipes. Additionally, create programs to train youth as chefs and food business entrepreneurs. • [DR] Add language to **EJ A-20** to include/call out liquor stores and corner stores to stock healthy foods.
Increase access to cultural centers, libraries, child care centers, health care facilities, and other basic amenities such as PG&E & EBMUD Goal 6 Support a network of well-maintained community facilities that are easily accessible,	• [EWG] Add the Figure 2.9 Cultural Asset Map from Environmental Justice and Racial Equity Baseline under Goal 6. Engage with the community to update cultural asset maps.

Topic	DR Feedback (Section and page number)
culturally supportive, and responsive to community needs.Environmental Justice Element	
Engage people in city planning efforts, including those who have been incarcerated in the past, those who are unhoused, LGBTQ+, youth, and elders. (EJ) Goal 9 - Foster meaningful civic engagement and support community power and capacity-building. Environmental Justice Element	• [DR] Add a policy/action item under **Goal 9** to fund capacity building under community engagement. Capacity building should include expert educational training so that residents know the best practices related to any policy or actions and can make informed decisions. • [DR] Add a policy/action item under **Goal 9** to fund a trust-building program with the various and distinct communities. The program should include report-back and contact information flyers, a portal to track the progress of community requests, and educational material to ensure transparency on the City process and responsibility. • [DR] Add a policy/action item under **Goal 9** to fund a deep listening session program before planning any new projects or interventions. • [DR] Add a policy/action under **Goal 9** to build more time for community engagement in City led projects and programs. • [EWG] Add policy/action item under **Goal 9** to provide avenues for formerly incarcerated people to participate as "ambassadors" similar to Oakland Chinatown, to have a job & paycheck, a goal of positively interacting with the community, and most importantly, working together on a common goal which is developing a plan to open a transition center. • [EWG] Add policy/action under **Goal 9** on the responsible agency and departments to conduct engagement and maintain partnerships with CBOs and community. • [EWG] Add language to policy **EJ-8.2** sustained engagement to develop outreach and engagement

Topic	DR Feedback (Section and page number)
	strategies for particular populations as Racial equity impact analysis (REIA) recommends.

Deeply Rooted in Oakland Partnership

Credit: Favianna Rodriguez

July 10th, 2023
To: City of Oakland
From: Deeply Rooted in Oakland Partnership

Re: Ideas and Recommendations on Environmental Justice and Safety Element Public Drafts from Deeply Rooted Engagement between May - June 2023, Part-3

Just Cities, as part of Deeply Rooted Collaborative, is sharing our recommendations on the Environmental Justice and Safety Element Public Draft. This Memo is Part-3 of our feedback. The Memo includes recommendations from the following engagement efforts.

1. Equity Working Group Meetings
2. Deeply Rooted Partners Meetings
3. Deeply Rooted Engagement (June 2023)

Please refer to Deeply Rooted Recommendations listed in the table below.

Table 1- DR Recommendations on the Environmental Justice and Safety Element

Topic	DR Feedback (Section and page number)
Overall	● In discussing the Environmental Justice and Safety Element Plan Public Draft, the community was still concerned about affordable housing, wellbeing, job stability, access to affordable healthy food, social connections, neighborhood resilience, and access to physical activity. ● One of the biggest concerns is the implementation of policies and actions in the Environmental Justice and Safety Element Plan Public Draft.
Build infrastructure for emergency response and recovery Goal 8 Emergency Preparedness and Response: Maintain an	● **Policies related to Resilience Hubs** ○ [DR & EWG] Add language to **SAF-A.36** to create at least 8 resilience hubs within East Oakland. ○ [DR] Add language to **SAF-A.36** to ensure that designated resilience hubs are seismically

Topic	DR Feedback (Section and page number)
emergency preparedness and response network that keeps all Oaklanders informed, connected, and safe before, during and after an emergency. Safety element	retrofitted. ○ [EWG] Equip public schools to serve as resilience hubs in the case of disasters. ○ [DR] Add language to **SAF-8.10 Public Facilities for Resilience & Relief** to create and distribute education materials regarding access and utilization of resilience hubs. ○ [EWG] Add language to **SAF-A.36** to support and equip decentralized facilities, along with public facilities, to serve as resilience hubs in the case of disasters. ● [DR] Add policy/action to **Goal 7** to create a strategy that utilizes and maps vacant lands/parks as relief sites in certain disasters, where displaced residents can access charging stations, counseling, and other basic needs. Explore this policy recommendation in the OSCAR/LUTE element. ● [DR & EWG] Add language under action **SAF-A.41** to partner and additionally financially compensate CBOs already doing emergency preparedness work, to expand their outreach and recruitment capacity. ● [DR] Add language to **SAF-8.10 Community Training and Awareness** to host a series of emergency preparedness workshops that include the voices of residents who have survived past disasters. Additionally, utilize the expertise of unhoused people who have extensive experience living outside of physical housing which will be a reality in case of a disaster. Implement a plan to translate all the emergency related material for non-english speakers. ● [DR] All the policies and actions under **Goal 8** to create specific emergency response strategies for communities undergoing different adversities (such as unhoused and undocumented communities). ● [DR & DR POP UPs] Add a language to **SAF-8.9**

Topic	DR Feedback (Section and page number)
	Community Training and Awareness not only continue but create a series of training that equip residents with survival skills for different disasters. Additionally, conduct regular emergency preparedness drills in the community and provide families with natural disaster plans and free emergency kits. Introduce neighborhood/block kits similar to City of Berkeley's program. • [DR] Add language to **SAF-8.16 Priority Route Coordination** to create evacuation strategies for all particularly low-income people, the unhoused, and people living in houseboats. • [DR] Add language to **SAF-8.9 Community Training and Awareness to create a program** to learn from unhoused people on how to live without the conveniences of houses in emergency situations. Include unhoused people and pay them during emergency training.
Protection from Sea level rise Goal 4 Proactively plan for impacts of Sea Level Rise on people, property, and essential Infrastructure. Enforce and update local ordinances, and comply with regional orders, that would reduce the risk of storm-induced flooding. Safety element	• [DR] Add language to **SAF- 4.1 Current Development and Sea Level Rise** on mapping Sump pumps in all neighborhoods. Additionally, add language to **SAF- 4.3 Sea Level Rise and Community Engagement** to create transparent and accessible informational materials on where sump-pumps are located in all neighborhoods. • [DR] Add a policy/action under **Goal 4** to add studies related to contaminated soil and Sea level rise. • [DR] Additionally add language under **Goal 4** to explore Hemp to clean up contaminated soil. • [DR] Add language to **SAF- 4.3 New Development and Sea Level Rise** to emphasize urgency of Sea Level Rise and the need of Sea Level Rise Guidelines. • [DR] Add language **SAF 4.1 Sea Level Rise and Community Engagement** or action under **Goal 4** to Organize Sea Level Rise preparedness workshops

Topic	DR Feedback (Section and page number)
	around at accessible facilities, like public libraries. Partner with CBOs that have established work around Sea Level Rise, such as WOEIP, to conduct these workshops. • [DR] Add language to **SAF- 4.3 New Development and Sea Level Rise** to develop construction guidelines that decrease the usage of concrete in public spaces, and alternatively use green infrastructure to mitigate effects of Sea Level Rise. • [EWG] Add a policy/action under **Goal 4** to proactively establish a fund to respond to immediate needs of frontline communities. This fund should be used to provide immediate relief, as well as long term reconstruction finance. Additionally, create a system for donations to be distributed directly and immediately to people impacted by disasters. • [EWG] Add a policy/action to under **Goal 4** to remove bans on rainwater catchment. Create a program for outreach and education of safe practices of rainwater catchment.
Protection from Flooding Goal 3 Hydrology and Flooding: Protect People and Property from Flooding. Safety element	• [DR] Add language to all actions under **Goal 3** prioritize flood mitigation strategies in West Oakland. • [DR] Add language to **SAF-A.12** to account for the technology barrier when informing unhoused people about incoming floods. • [EWG] Add action under **Goal 3** to create a process to maintain storm drains during heavy rains, to avoid clogging by trash. • [EWG] Add a policy/action to **Goal 3** add training and education on sinkhole awareness to existing training programs. • [EWG] Add an action to **Goal 3** to create a support network that enables community members to

Topic	DR Feedback (Section and page number)
	temporarily shelter neighbors displaced by disaster.
Protection from Airport hazards Goal 6 Other Public Safety and Hazard Issues: Protect Oaklanders from Airport Land Use Hazards. Safety element	• [EWG] Add policy/action to **Goal 6** guarantee jobs created by the expansion of the Oakland airport to prioritize local residents for hiring. • [DR] Add action/policy to **Goal 6** create education material and outreach programs on hazards caused by airport operation. • [DR] Add action/policy to **Goal 6** to mitigate noise impact from proximity to the airport.
Develop areas for exercise, such as parks Goal 7 Create environments that support physical activity, recreation, and healthy lifestyles through safe and comfortable walkable, bikeable neighborhoods, with access to green space, trees, paths, and parks. Environmental Justice Element	• [EWG] Add details on the speed assumptions used for mapping park walkability in **Figure EJ -26.** • [EWG] Add language to **EJ 7.5 Bicycle and Pedestrian Friendly Design** to create bike lane infrastructure for workers and not only caters to recreational cyclists. • [EWG] Add language to **EJ 7.2 Accessible Neighborhoods** on creating neighborhoods which are accessible by biking/walking in 15 min. • [EWG] Add language to cross reference **EJ 5.2 Community Gardens Program** from Goal 5. • [EWG] Add language to **EJ 7.15 Urban Forest** to support local plant growth that supports a healthy insect population. • [EWG] Add policy/action items to **Goal 7** to study sidewalk lighting and create a plan to ensure sidewalks are lit all the time. • [EWG] Add language to **EJ 7.5 Bicycle and Pedestrian Friendly Design** to create a program to reduce crime on sidewalks. • [EWG] Add language to **EJ-A.26** to change land use to add more eyes on the street to make the streets safer.

Topic	DR Feedback (Section and page number)
	• [EWG] Add language to **EJ 7.7 Equitable Paving policy** to repair sidewalks especially repair streets with potholes and streets in East Oakland. • [DR Pop-Up] Add language to **EJ-7.10 Parks Programming** to create open gyms, playgrounds for youth, areas designated for skateboarding, recreation areas for pets,and rugby fields in parks. • Add language to **EJ 7.5 Bicycle and Pedestrian-Friendly Design** to create a program to provide unhoused residents with free access to bikes. • [DR Pop-Up] Add language to **EJ 7.16** Urban Greening to create jobs by planting trees in neighborhoods. • [DR Pop-Up] Add policy/action items to **Goal 7** to enhance access to waterfronts as recreational areas. • [DR Pop-Up] Add policy/action items to **Goal 7** public transportation safe and free for all. • [DR Pop-Up] Add policy/action items to **Goal 7 to** create more public spaces where it's legal to sit and lay down.
Safe and Secure Housing Goal 4 Coordinate resources to improve housing quality and habitability. Environmental Justice Element	• [DR Pop-Up] Add language to **EJ-A.17** Ensure tap water sources are not contaminated with fluoride or toxins. • [DR Pop-Up] Add policy/action under **Goal 4** to supply residents with emergency equipment, water, and food for their home. • [DR Pop-Up] Add language to **Goal 4** to provide affordable housing for all residents. • [DR Pop-Up] Support residents through funding and assistance in acquiring solar panels.
Increase access to cultural centers, libraries, child care centers, health care facilities, and other basic amenities such as PG&E & EBMUD	• [DR] Add policy/action to **Goal 6** to increase mental health facilities and emergency response in areas that are not surveilled by the police. • [DR Pop-Up]Add language to **EJ 6.5 Public Service**

Topic	DR Feedback (Section and page number)
Goal 6 Support a network of well-maintained community facilities that are easily accessible, culturally supportive, and responsive to community needs.Environmental Justice Element	**Coordination** to create a program under **Goal 6** to assist residents on accessing basic amenities and pay bills. • [DR Pop-Up] Add language to **EJ-6.3 Healthcare Facilities** to create centers where residents can access mental health therapy services, substance use treatment, and programs to increase access to health insurance, and create local clinics in all neighborhoods. • Add language to **EJ 6.1 Public Facilities Distribution** Create a Cultural Center dedicated to specific cultures, including for Indigenous Guatemalan residents. Additionally, creates a program to fund for services that fulfill social needs and create opportunities for residents to learn about their histories. • Add policy/action to **Goal 6** Create spaces for people with disabilities, spaces for more intergenerational conversations between youth and elders. Create more spaces and activities for creative learning. Additionally create spaces for music and dancing. • [DR Pop-Up] Add policy/action to **Goal 6** to provide counseling programs and rehab & recovery programs to unhoused people. Other comments • To increase more family care resources, fund more youth programming. • To ensure equitable education and resources in all K-12 schools. • Invest in social and emotional education at schools.
Public Safety Goal 7 Foster Feelings of Safety in All Oakland Neighborhoods. Safety element Goal 3 Prevent, reduce, and clean up illegal dumping. Environmental Justice Element	• [DR] Add language under **Goal 7** on Context and Policies must include stronger language on need for equity, using public health data, inclusion of vulnerable populations in these decisions and outcomes. • [DR] Add policy/action under **Goal 7** to further develop reimagining public safety task force recommendations. Add community processes to further develop and

Topic	DR Feedback (Section and page number)
Note - We heard contradictory points from you regarding policing. Generally, community supported implemented reimagining	implement public safety policies in this plan. • [DR] Add policy/action under **Goal 7 to** legally protect formerly incarcerated residents from discrimination. The community members referred to Atlanta, Georgia program to protect formerly incarcerated people as Protected Class • [DR] Add policy/action under **Goal 7** to redirect funding towards supporting alternatives to policing and affordable housing, jobs, healthy food, etc. • Add language under **Goal 7** to include the Office of Attorney General from the California Department of Justice and Oakland Police Department. • [DR] Add policy/action under **Goal 7** to repair and maintain infrastructure such as overhead electrical wiring, rain gutters, and diesel generator usage for emergencies and maintain emergency exit routes free of potholes. Regulations should be through permitting, business licenses, and regular checks. • [DR] Add policy/ action under **Goal 7** to increase more green spaces, health clinics, healthy grocery stores, and other community spaces, ensuring that job hiring emphasizes re-entry employment for formerly incarcerated applicants. Additionally, All public jobs should require consideration/employment of formerly incarcerated people. • [DR] Add language to **SAF-7.1 Reimagining Public Safety** to cross reference policies from the Housing element to ensure affordable housing projects are serving low-income residents. • [DR] Add language under **Goal 7** to have an alternative to police since many residents don't feel safe even in police presence. Alternatively, create neighborhood-based watch patrols in all neighborhoods.

Topic	DR Feedback (Section and page number)
	○ [EWG] Add language to **SAF-7.1 Reimagining Public Safety** to increase funding and support for community-based violence prevention programs. Additionally, protect these crime prevention programs and CBO from budget cuts. Rather, reallocate funding increases that OPD is receiving to community partners and resources. Ensure that collaboration with the community is ongoing. **Other comments** ● [EWG] The city should provide free and accessible "Know Your Rights" workshops in all neighborhoods. ● [DR] Add policy/action to create programs for youth and adult transitional adult programs to increase incarceration diversion efforts. ● [DR Pop-Up] Create a program to organize free self defense classes. ● [DR Pop-Up] Increase opportunities for the city to directly listen to residents' concerns over public safety. ● [DR Pop-Up] Guarantee housing for all people undergoing mental health issues. ● [DR Pop-Up] Increase animal protection policies. ● [DR Pop-Up] Regulate against tinted windows in cars. ● [DR Pop-Up] Create policies to reduce guns in neighborhoods. ● [DR Pop-Up] Facilitate more town halls between the police department and the community. ● [DR Pop-Up] Mandate bans on guns, or gun prevention laws.
Mitigate Earthquake Hazards	● [DR] Add language to **SAF-1.2 Structural Hazards** to create a pre-project assessment and approval process for

Topic	DR Feedback (Section and page number)
Goal- 2 Geologic and Seismic Hazards: Minimize the risk to life and property caused by seismic and geologic hazards. Safety element	buildings in hazardous zones. Additionally create a program to educate residents on science behind skyscrapers, and the status of constructing soft-story structures. • [DR] Add action under **Goal 1** to clarify Earthquake safe development requirements such as setbacks, freeway entrances, buffer zones as part of LUTE. Specify high risk zones such as West Oakland. • Add a policy/action under **Goal 1** to create a program to engage architects/planners/engineers to educate residents on Earthquake safe construction. • Add language under **Goal 1** creating a tour of the different neighborhoods in Oakland/The Hills/ Most affluent neighborhoods. What is the difference between equity here? Density is used as a solution in the Flatlands. (WOEIP) • [DR] Add a policy/action to **Goal 1** to conduct a feasibility study on tearing down the 580. (WOEIP) • [DR] Add a policy/action to **Goal 1** which caters to specific needs of the unhoused people. Provide material resources such as encampment improvements and creating more housing for unhoused people.
Provide access to healthy food Goal 5 Support a food system that provides nutritious, affordable, culturally relevant, and affordable food to all Oaklanders. Environmental Justice Element	• [DR Pop-Up] Add a policy/action to **Goal 5** to create a program to ensure grocery stores sell products at affordable prices. • [DR Pop-Up] Add language to **EJ A-23** to support more cultural food providers. • [DR Pop-Up]Add language to **EJ 5.8 Education and Awareness** to create and distribute more education around healthy foods, especially directed at youth • [DR Pop-Up] Add language to **EJ-5.6 Food Assistance Programs** to ensure all food providers accept food stamps. • [DR Pop-Up] Add language to **EJ-5.9 Food Recovery Program** to provide more free community fridges.

Topic	DR Feedback (Section and page number)
	• [DR] Add language to **EJ 5.5 Entrepreneurship and Food Innovation** to implement the-regulations for street vending, to make the industry more equitable and accessible to all. Do not use police force or criminalization to enforce street vending regulations. Reallocate this enforcement funding as grants to support small businesses. • [DR] Add language to **EJ 5.5 Entrepreneurship and Food Innovation to** create programs to train youth as chefs and food business entrepreneurs. • [DR] Add language to Goal 5 to call out the zoning restrictions against food services (with exceptions of large retail locations) in most neighborhoods. • [DR] Add language **EJ 5.8 Education and Awareness** to create programs to teach plant medicine and facilitate wellness activities. Additionally, provide access to nutritional education and cooking classes, with an emphasis on cultural and ancestral recipes. • [DR] Add a policy/action to **Goal 5** encouraging liquor stores and corner stores to stock healthy foods. • [DR Pop-Up] Add language to **EJ 5.7 Food Security Resources & Partnerships** to increase the quality of food in schools and provide more culturally relevant meals for students.
Minimize Water Pollution Goal- 2 Protect oakland water supplies from contamination Environmental Justice Element	• [DR Pop-Up] Add language to **EJ 2.1 Clean Water Programs** to provide clean water to residents in encampments who don't have access to running water. • [DR Pop-Up] Add language to **EJ 2.1 Clean Water Programs** to provide filter for purifiers

PORT OF OAKLAND

June 22, 2023

Mr. Edward Manasse, Deputy Director Planning Bureau
City of Oakland Planning & Building
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612
Transmitted via email: generalplan@oaklandca.gov

Subject: Oakland 2045 General Plan Update – Draft Environmental Justice and Safety Elements

Dear Mr. Manasse,

The Port of Oakland (Port) appreciates this opportunity to comment on the draft Environmental Justice and Safety Elements (Draft Elements) of the Oakland 2045 General Plan Update. The Port is an independent Department of the City of Oakland (City), acting by and through its Board of Port Commissioners. The Port manages four lines of business: Maritime/Seaport, Aviation/Oakland International Airport (Airport), Commercial Real Estate, and Utilities. Please see the following comments from the Port.

1. **Environmental Justice (EJ) Element**
   Section 9 - Implementation Actions and Programs
   Reduce Pollution, Mitigate the Impacts of Pollution on Existing Sensitive Land Uses, And Eliminate Associated Public Health Disparities *(GOAL EJ-1*)
   The proposed EJ implementation action to amend the City's Zoning code, includes the following:

   - *Allow greater residential density in less-polluted areas, including existing single-family residential neighborhoods.*
   - *Condition the permitting of heavy industrial businesses within five hundred (500) feet of a zone that permits residential activities.*
   - *Establish special permit criteria for truck-intensive industrial activities located within five hundred (500) feet of any zone that permits residential activities.*
   - *Establish special performance standards and standard conditions of approval for Truck-Intensive Industrial Activities located within five hundred (500) feet of any zone that permits residential activities.*
   - *Amend the permit procedures for nonconforming Truck-Intensive Industrial Activities.*

   The Port encourages all growth of heavy industrial business and truck-intensive industrial activities to be sustainable and environmentally responsible. It is the Port's understanding

that the purpose of the City's *Industrial Lands Policy* is to strengthen industrial protections, embrace sustainability and support economic growth that prioritizes employment for Oakland residents. However, the proposed special permit criteria *(including special performance standards and standard conditions of approval)* for heavy industrial businesses and truck-intensive industrial activities located within five hundred (500) feet of residential activities is overly restrictive. The proposed special conditions do not adequately balance the City's *Industrial Land Policy* in support of jobs & economic growth. The proposed special conditions also do not address the use of decarbonized (zero emissions) industrial operations and truck-intensive activities. The Port recommends the City include conditions in the special permit criteria that do not conflict with the City's *Industrial Land Policy* and consider exceptions for zero-emission industrial operations and truck-intensive activities.

It is also recommended that as part of the Land Use and Transportation Element (LUTE) update in Phase 2, the *Industrial Lands Policy* and associated Industrial Land Use Planning Codes are updated to include special permit conditions for new proposed residential activities located within 500 feet of heavy industrial businesses and truck-intensive industrial growth. A residential activities special permit will serve to:

- Minimize land use conflicts;
- Create clearly defined boundaries between industrial and residential land uses;
- Preserve industrial lands & uses; and
- Prevent residential encroachment and support future economic growth.

It is also recommended that updates to the *Industrial Lands Policy* included in the LUTE is cross-referenced with EJ implementation actions (EJ-A.1 and A.7).

West Oakland Truck Management Plan

The West Oakland Truck Management Plan (WOTMP) is an action-based plan, jointly developed by the City, West Oakland community, and the Port. Initially developed as part of the Oakland Army Base Redevelopment project Standard Condition of Approval, the WOTMP serves as a framework that establishes a collaborative process for updating the network of truck routes and truck prohibited streets (to be reflected in the City's Municipal Code).

As part of the LUTE update in Phase 2, it is recommended that the WOTMP is referenced as the framework to be used to explore modifications to truck routes and truck management. It is further recommended that EJ-A.8 be updated to reflect the existing process and exploration of a provision of staff time and resources to maintain, update, and implement WOTMP strategies.

2. <u>Safety Element</u>

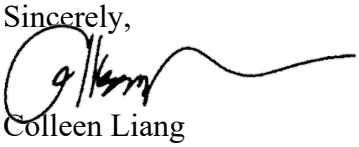
Section 3.2- Other Public Safety and Hazard Issues

On May 9, 2023, the Port submitted comments on the Proposed Phase I Oakland 2045 General Plan Update Draft Environmental Impact Report (Draft EIR). The Port's Draft EIR comments apply to the Safety Element section, therefore the Port is re-submitting the

Draft EIR comments to this letter as part of the Port's comments on the Safety Element section. Please see Attachment 1.

The Port appreciates the opportunity to comment on the Draft Elements and looks forward to working with the City of Oakland to address the Port's comments. Please contact me with any follow-up questions and responses at cliang@portoakland.com or 510-627-1198.

Sincerely,



Colleen Liang
Acting Director of Environmental Programs and Planning

Encl: Attachment 1 – Phase I Oakland 2045 General Plan Update Draft Environmental Impact Report Comments

CC:
Danny Wan, Executive Director
Kristi McKenney, Chief Operating Officer
Jason Garben, Project Management Services Manager
Joan Zatopek, Aviation Planning and Development Manager
Radiah Victor, Senior Port Strategic Planner
Sharon Grewal, Aviation Project Manager

Attachment 1

PORT OF OAKLAND

May 9, 2023

Mr. Edward Manasse, Deputy Director Planning Bureau
City of Oakland Planning & Building
250 Frank H. Ogawa Plaza, Suite 2114
Oakland, CA 94612
Transmitted via email: generalplan@oaklandca.gov

Subject: Phase I Oakland 2045 General Plan Update Draft Environmental Impact Report (Draft EIR) Comments

Dear Mr. Manasse,

The Port of Oakland (Port) appreciates this opportunity to comment on the Proposed Phase I Oakland 2045 General Plan Update Draft Environmental Impact Report (Draft EIR). The Port of Oakland is an independent Department of the City of Oakland (City), acting by and through its Board of Port Commissioners. The Port manages four lines of business: Maritime/Seaport, Aviation/Oakland International Airport (Airport), Commercial Real Estate, and Utilities. Please see the following comments from the Port.

Airport Land Use Compatibility Plan

The Airport Land Use Compatibility Plan (ALUCP) is the primary document used by the Alameda County Airport Land Use Committee (ALUC) to promote compatibility between Oakland International Airport (OAK) and its environs. The intent of the ALUCP is to encourage compatibility between airports and the various land uses that surround them. There are four primary criteria for evaluating the compatibility of proposed land use in the Airport Influence Area (AIA): Airspace Protection Zones, Overflight Zones, Noise, and Safety.

The Port recommends working with the Alameda County Community Development Agency (in its role as the County's Airport Land Use Commission) and with the Port of Oakland to ensure consistency with the ALUCP and the City's various planning documents, zoning ordinance, and land-use development proposals near the Airport. Other cities within the County meet regularly and coordinate closely with the Port on upcoming development proposals and planning efforts. The Port requests the City to coordinate closely on upcoming development proposals and planning efforts.

Airspace Protection Zones

The Port conducted a preliminary airspace impact analysis of the increase in allowable heights from 160 feet to 175 feet as proposed in the Draft EIR. The Port's analysis indicates that the height increases proposed along Hegenberger Rd., south of I-880 have an adverse impact on Airport operations. Specifically, these impacts include a decrease in low-visibility capabilities on North Field runways which can negatively impact the ability of OAK to effectively operate. These impacts will not only exist during construction of potential new development when cranes will be operating but will also persist once buildings are completed.

It should be noted that the existing height of 160 feet on the southernmost end of Hegenberger Rd. is problematic for the Airport's operation. A sampling of height restriction points in the area near Hegenberger Rd. and Doolittle Dr. indicates that the building height limitations should be a maximum 103 feet. The Port is requesting that the City decrease the maximum building height to avoid impacting the Airport operations. The Port will continue to analyze the impacts of development on airport operations and continue to discuss the issue with the City.

The Hegenberger corridor is located within the Avigation Easement Zone as depicted in the ALUCP. An avigation easement dedicated to the Port as a condition for any discretionary local approval of any residential or non-residential development within the Avigation Easement Zone should be recorded with the Alameda County Clerk-Recorder.

Land uses that may cause visual, electronic, navigational, or bird strike hazards to aircraft in flight shall be allowed within the AIA only if the uses are consistent with FAA rules and regulations.

Overflight Zones

Noise from the overhead flight of aircraft can be annoying and intrusive in locations beyond the limits of the noise contours. While sensitivity to aircraft overflights will vary from person to person, the basic intent of overflight policies is to warn people near an airport of the presence of aircraft so that they have the ability to make informed decisions regarding the acquisition or lease of property within the influence area of an airport.

The ALUCP requires that Overflight Notifications be included as a condition for local agency approval of new residential development within the Overflight Notification Zone. Further, California state statutes (Business and Professional Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353) mandate that sellers or leasers of real property must disclose information regarding whether their property is situated within an AIA.

However, Overflight Notifications and real estate disclosures are not required for properties for which an avigation easement is required. The avigation easements required for the projects located within the AIA serve the purpose of the Overflight Notifications and real estate disclosures. We recommend that a buyer notification plan be implemented so buyers are well informed of the overflights and associated noise prior to purchase.

A deed notice on any parcel map, tentative map, or final map should be recorded with the Alameda County Clerk-Recorder stating that areas with the AIA are subject to overflights by aircraft using the Airport.

Noise

The Port does not advise building homes near the airport as aircraft noise can become a real issue for the City of Oakland residents. Zoning regulations near the airport allow for commercial, industrial, and retail activities while restricting residential buildings, schools, childcare centers, and the like. When a residential neighborhood does fall within an airport's flight path, noise can certainly be a problem. The residential buyer notification program would ensure that buyers understand that the area is subject to frequent overflights from the airport and that single event noise will audible and a possible concern, particularly with windows open. The Port requests the building design to contain upgraded windows and doors with sound proofing and sound dampening to reduce outdoor aircraft noise levels.

Safety

Land use safety compatibility criteria are developed to minimize the risks to people and property on the ground, as well as those people in an aircraft in the event of an accident or emergency landing occurring outside the airport boundary. The seven safety zones identified in the ALUCP are based on those depicted in the California Airport Land Use Compatibility Handbook (Handbook). The ALUCP lists compatible land uses within each safety zone. The safety zone criteria developed for a particular zone is largely a function of risk acceptability. Land uses (e.g., schools and hospitals) which, for a given proximity to the airport, are judged to represent unacceptable risks must be prohibited. Where the risks of a particular land use are considered significant but tolerable, establishment of restrictions may reduce the risk to an acceptable level. In certain situations, such as venues accommodating the assemblage of large numbers of people with restricted mobility (i.e., sports stadiums, amphitheaters, etc.), the perceived risk of an aircraft accident occurring maybe an intolerable risk no matter where it is located within the AIA.

FAA Advisory Circular 1550/5200/33B, Hazardous Wildlife Attractants on or Near Airports provides a comprehensive discussion of the land use practices that potential attract hazardous wildlife and wildlife hazard management procedures. This Advisory Circular recommends that

the FAA be notified as early as possible in the planning process of any land use changes that may attract wildlife within 5 statute miles of an airport. This will allow the FAA to perform a brief examination to determine if further investigation is warranted.

Regulate land uses within designated airport safety zones, height referral areas, and noise compatibility zones to minimize the possibility of future noise conflicts and accident hazards.

Outside the seaport and airport, land should be developed with a variety of uses that benefit from the close proximity to the seaport and airport and that enhance the unique characteristics of the seaport and airport. These lands should be developed with uses which can buffer adjacent neighborhoods from impacts related to such activities.

Closing

Development of sites proximate to airport flight paths should be in conformance with Federal and State standards, as articulated in Federal Aviation Regulation, Part 77 and Part 150, ALUC planning guidelines, and any other applicable regulations and amendments. Again, the Port appreciates the opportunity to comment on the Draft EIR and looks forward to working with the City of Oakland to address the Port's comments. Please contact Sharon Grewal, AICP, Aviation Project Manager at sgrewal@portoakland.com or Anjana Mepani, AICP, Acting Port Environmental Supervisor at amepani@portoakland.com with any follow-up questions and responses.

Sincerely,

Colleen Liang

Colleen Liang
Acting Director of Environmental Programs and Planning

CC:
Danny Wan, Executive Director
Kristi McKenney, Chief Operating Officer
Mary Richardson, Port Attorney
Craig Simon, Acting Aviation Director
Matthew Davis, Director of Governmental Affairs
Joan Zatopek, Aviation Planning and Development Manager
Matt Davis, Airport Operations Manager, Airside
Sharon Grewal, Aviation Project Manager
Anjana Mepani, Acting Port Environmental Supervisor
Lakshmi Rajagopalan, Planner IV, City of Oakland Bureau of Planning

Fw: Save The Bay SB 272 & General Plan Follow up

Kalb, Dan
Tue 6/27/2023 2:01 PM
To:Rajagopalan, Lakshmi <LRajagopalan@oaklandca.gov>;Kaminski, Laura <LKaminski@oaklandca.gov>
Cc:Manasse, Edward <EManasse@oaklandca.gov>

1 attachments (100 KB)
Oakland EJ and Safety Element Line Edit recommendations.pdf;

Can U review these suggested edits. Sorry for sending these at the last minute.

-Dan

--- ---
-**DAN KALB**
Oakland City Councilmember, District #1
One Frank Ogawa Plaza, 2nd floor
Oakland, CA 94612

Sign up here to receive Dan's newsletter in your inbox; past issues at this link
COVID-19 resources/info can be found at this link
510-238-7001

From: Erin Pang <epang@savesfbay.org>
Sent: Monday, June 26, 2023 5:11 PM
To: Malsin, Matthew <MMalsin@oaklandca.gov>; Kalb, Dan <DKalb@oaklandca.gov>
Cc: Hayley Currier <hcurrier@savesfbay.org>
Subject: RE: Save The Bay SB 272 & General Plan Follow up

Thanks Matthew! Attached are our suggested line edits for the EJ and Safety element drafts.

All the best,
Erin

Erin Pang
POLICY ASSOCIATE
epang@savesfbay.org | 510-463-6809 | www.saveSFbay.org

Pronouns: she, her

Protect and Restore San Francisco Bay
For People and Wildlife

Attachment A:

Specific Line Edit Recommendations for the Environmental Justice Element

- **GOAL EJ-1:** Reduce pollution, mitigate the impacts of pollution on existing sensitive land uses, and eliminate associated public health disparities.
    - Policy: EJ-1.3 Industrial Uses Near Sensitive Land Uses.
        - *(Add to EJ-1.3)* Prioritize nature-based mitigation solutions such as vegetative barriers wherever feasible, and align with other greening opportunities such as canopy need, green stormwater infrastructure, and high heat areas to plan for multiple benefits.
    - Policy: EJ-1.17 Data-Informed Efforts.
        - *(Add bolded to first bullet under EJ-1.17) "*Prioritizing areas for capital investments with co-benefits for air quality, such as the planting of trees, **green stormwater infrastructure for flood management,** and installation of EV charging infrastructure."
- **GOAL EJ-2:** Protect Oakland water supplies from contamination.
    - Policy: EJ-2.4 Stormwater Management.
        - *(Add as bullet points under EJ-2.4 on pg. 3-21)*
            - Review all infrastructure projects for feasibility of inclusion of green stormwater infrastructure elements, including bike/ped and traffic calming infrastructure, street realignment, public plaza redevelopment, or utility upgrades.
            - Integrate GSI into tree planting efforts in order to prioritize multi-benefit solutions.
            - Require major development and redevelopment projects to construct and maintain urban greening projects in the adjacent public right of way.
            - Identify priority GSI investments in areas that are park poor, low-income, high urban heat index, and at risk of flooding to maximize co-benefits for implementation and align with other infrastructure projects happening in those areas to ensure no opportunities for flood resilience are missed.
- **ACTIONS**
    - Action: EJ-A.4
        - *(Add bolded text on pg. 9-3)* In partnership with representative groups from EJ Communities, develop a Carbon Sequestration Incubator in Oakland to incubate and develop green jobs in urban agriculture, urban forestry, **green stormwater infrastructure maintenance and management,** aquatic and riparian restoration, and/or other forms of carbon removal. **Establish a program for both voluntary and**

compliance GHG mitigation fees to be invested locally and fund the Incubator.

- Action: EJ-A.13
  - *(Add language on pg. 9-5)* Protect and restore natural floodplains along riparian areas to reduce flood risk, keeping new development out of 100-year flood zones.
- Action: EJ-A.14
  - *(Add language on pg. 9-5)* Require major development and redevelopment projects to construct and maintain urban greening projects in the adjacent public right of way to ensure GSI provides the most benefits to communities. Use existing data from the GSI Plan, Bicycle Plan, Oakland Urban Tree Canopy Assessment, high heat zones, high air pollution zones, low tree canopy, and high flood risk areas to identify priority GSI projects that will have the highest impact for low income, park-poor communities. Create a plan for identifying and pursuing funding to implement projects.

- **GOAL EJ-3:** Prevent, reduce and clean up illegal dumping.
  - Policy: EJ-3.4 Illegal Dumping Enforcement.
    - *(Add to EJ-3.4)* To prevent discriminatory enforcement patterns, ensure training of Environmental Enforcement Officers has a strong focus on racial equity.
  - Policy: EJ-3.5 Community Education on Illegal Dumping.
    - *(Add to EJ-3.5)* Develop campaigns in EJ communities are developed in partnership with impacted community members and center community goals by engaging local residents.
- **ACTIONS**
  - Action: EJ-A.15
    - *(Add language to EJ-A.15)* Increase the budget of the Oakland Public Works department such that they're better able to manage illegal dumping. Prioritize hiring more workers to clean Oakland streets, as well as a team of environmental inspectors to monitor progress on cleanup projects.[1]
    - Invest in equipment to better monitor and clean up illegal dumping, including repairing existing equipment and installing cameras in areas identified as illegal dumping hot spots.
    - Ask the Department of Race and Equity to make the flatlands of Oakland a priority for illegal dumping cleanup.
- **GOAL EJ-6:** Support a network of well-maintained community facilities that are easily accessible, culturally supportive, and responsive to community needs.
  - Policy: EJ-6.5 Public Service Coordination.

[1] Faith in Action East Bay and Block by Block Organizing Network, 2023. https://drive.google.com/file/d/1UQXtH6BqxoxX-M9eHf-5l43m55pN0NOV/view

        - *(Add to EJ-6.5)* Ensure strong coordination between agencies during climate emergencies, with in-language and culturally appropriate outreach targeted to the most vulnerable communities.
- **GOAL EJ-7:** Create environments that support physical activity, recreation, and healthy lifestyles through safe and comfortable walkable, bikeable neighborhoods, with access to green space, trees, paths, and parks.
    - Policy: EJ-7.7 Equitable Paving.
        - *(Add to EJ-7.7)* Align paving programs with other city infrastructure priorities including the West Oakland Specific Plan, the 2019 Oakland Bike Plan, the 2017 Oakland Walks Pedestrian Plan[2]. In addition, align the paving program with the GSI Plan to ensure flood resilience and pollution prevention is incorporated, and no opportunities are missed, per Section C.3 of the Municipal Regional Stormwater Permit.
    - Policy: EJ-7.12 Park Safety.
        - *(Add to EJ-7.12)* Take into consideration violence indicators when improving park safety and make those safety improvements with adequate knowledge of the violence that may occur in these parks. This information may be obtained from the City's Department of Violence Prevention, where locations of shootings can be cross-referenced with parks and public safety measures can be implemented to protect residents.
    - Policy: EJ-7.15 Urban Forest.
        - *(Add bolded to EJ-7.15) "*Implement the Urban Forest Plan, a comprehensive, area-wide urban canopy and vegetation plan that identifies locations that trees can be added and maintained, such as parks, streets, Caltrans' rights-of-way and develop a plan to protect existing trees that provide shade, reduce urban heat island impacts, **reduces flooding, reduces pollution,** and reduce exposure to air pollution emissions in communities most affected by air pollution. **Align tree canopy with climate resilience planning, including green stormwater infrastructure**. **Trees should be low on the allergenic scale, to serve EJ communities most impacted by air pollution and asthma**.[3]"
    - Policy: EJ-7.16 Urban Greening.
        - *(Add to EJ-7.16)* Align urban greening efforts with flood and pollution prevention, prioritizing green stormwater infrastructure, especially in areas at risk of flooding.
    - Action: EJ-A.30 *Add additional action*
        - *(Add action to pg. 9-11)* In alignment with the City's report on Priority Conservation and Development Areas, articulate (in the Environmental

[2] WOCAP, Strategy 57. https://www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan

[3] A list of allergy-friendly evergreen trees can be found on the American Conifer Society's website here.

Justice, OSCAR, and LUTE Elements) a citywide greening network that involves “greenways” along specific city creeks, connections to existing and proposed green streets and green corridors, and other amenities such as parks, urban gardens, and schools. Such a network should ensure that residents in the flatland sections of Oakland are within ¼-mile to ½-mile to such a greening network. This network should prioritize establishing connections between Oakland’s neighborhoods, parks on the Bay shoreline, and regional parks (such as the MLK Jr. Shoreline Park and Middle Harbor Shoreline Park) as well as identify zones in need of green infrastructure investments.

Specific Actions and Policy Priorities for the Safety Element

- **GOAL SAF-2:** Proactively prevent urban fires and exposure to wildfire and protect community members and property from fire danger.
    - Policy: SAF-2.7
        - *(Add text to SAF-2.7)* Provide access to personal and indoor air filters for residents of EJ communities to protect against impacts of wildfire smoke, as these communities are already disproportionately exposed to industrial and mobile pollution.
    - Action: (*Include additional SAF on pg. 5-2)* Develop an incentive program, such as a certification, for homeowners who go beyond minimum building codes and standards that can help reduce insurance costs.
- **GOAL SAF-3:** Protect people and property from flooding.
    - Action: SAF-A.16: Green Stormwater Infrastructure.
        - *(Add new action on pg. 5-4)* Develop a funding, prioritization, and implementation plan for GSI for flood resilience, including long-term maintenance.
- **GOAL SAF-4:** Proactively plan for impacts of sea level rise on people, property, and essential infrastructure.
    - Policy: SAF-4.1
        - (Add to SAF-4.1) Identify and plan for the risk of groundwater rise and the associated pollution and public health risk due to the inundation of improperly cleaned up toxic sites. New housing should not be approved or built on or near hazardous sites in flood-prone areas before cleanup has been completed. Ensure the map of Hazardous Materials and Sites (Figure SAF-8) aligns with UC Berkeley's Toxic Tides mapping project.
    - Policy: SAF-4.3 New Development and Sea Level Rise.
        - *(Add to SAF-4.3)* Identify and require appropriate setbacks from creeks and shoreline areas to allow for intermittent flood surges and incorporate those into resilience plans. This will also allow for additional restoration opportunities and enhance habitat and recreational access. Ensure these setbacks align with the City's Priority Conservation and Development Areas when possible. Require a minimum of 4 feet of freeboard above the current Base Flood Elevation, to align with state guidance that recommends planning for 3.5 ft of SLR by 2050.[4]
    - Policy: SAF-4.4
        - *(Add to SAF-4.4)* Require mitigation to prioritize nature-based adaptation and design elements wherever possible to promote the multiple benefits of flood protection, habitat restoration, and equitable recreational access.
- **GOAL SAF-5:** Minimize health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.
    - Policy: SAF-5.2

[4] https://www.opc.ca.gov/webmaster/_media_library/2022/08/SLR-Action-Plan-2022-508.pdf

        - *(Add to SAF-5.2)* Toxic materials removed as part of cleanup efforts should be disposed of in the least harmful manner so that the impact is not shifted from one vulnerable community to another.
    -