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EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



November 9, 2021

Richard Corey, Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: 2021/2022 Air District Assembly Bill 617 Community Emissions
Reduction Plan Recommendation for CARB's Community Air Protection
Program

Dear Mr. Corey,

This letter serves as the Bay Area Air Quality Management District's (Air District) community recommendation for the state's Community Air Protection Program. The Community Air Protection Program was established by the state to implement Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017). AB 617 directs the state, in consultation with local air districts and others, to select communities that have a "high cumulative exposure burden" to air pollution. Once selected, these communities then become eligible to partner with local air districts on community emission reduction programs and/or community monitoring programs.

Background

In August 2018, the Air District submitted "high priority"¹ communities for the first five years of the state's Community Air Protection Program² drawn from the Bay Area's full list of candidate communities that experience large disparities in air pollution exposure and health effects. To select high priority communities from all Bay Area candidate communities, the Air District considered air quality and health-based data compiled through the Air District's Community Air Risk Evaluation (CARE) program, which was initiated in 2004. Also considered was community capacity, historical and on-going community monitoring efforts or exposure characterization work, concentration of stationary sources, socio-economic factors, and other public health data available via statewide screening tools. In September 2018, CARB approved the Air District's recommended high priority communities to move forward with a monitoring and/or emissions reduction

¹ Bay Area Air Quality Management District, *Final Submittal: Public Process for Determination of Recommended Communities*, August 1, 2018.

² AB-617 Nonvehicular air pollution: criteria air pollutants and toxic air contaminants, A.B. 617, Chapter 136, 2017.

https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617,
Accessed 31 Aug. 2021.

plan over the next five years. The communities include East Oakland, Eastern Contra Costa County (East County), Eastern San Francisco, Richmond, San Leandro, San Jose, the Tri-Valley, Vallejo, and West Oakland.

East Oakland Recommendation

The Air District recommends that CARB selects East Oakland for development of a community emissions reduction plan (CERP) in 2022, more specifically the area near High Street to the San Leandro border and to the west of the I-580 freeway. As described further below, our recommendation is primarily based on East Oakland's capacity to partner with the Air District in addition to the high disproportionate pollution and health burdens. Community leaders in East Oakland have been asking for action to improve local air quality in their community for decades. They have been working for years to build community capacity in air quality planning and have strongly advocated to be included in the Community Air Protection Program since the launch of AB 617. East Oakland has a long-standing history of strong community capacity and leadership. More recently, East Oakland organizations have been working together for over six years on their own collaborative community planning processes and have demonstrated successful coalition building across East Oakland neighborhoods. A number of East Oakland organizations have partnered with the Air District through grants and other partnerships to build community capacity and work with community and government agencies to strengthen partnerships necessary for improving environmental health, local air quality improvement, and understanding of air pollution. This recommendation acknowledges that the East Oakland community and the Air District have the capacity to co-develop a CERP.

East Oakland represents 38 percent of Oakland's population, approximately 162,600 people. East Oakland is a vibrant community with a largely Latin American and Black/African-American population. About half of the population is of Latin American descent and 30 percent is Black/African-American. East Oakland's population is relatively young with more than a third of residents under 25 and over half of residents being ages 25 to 59.

East Oakland is a low-income, community of color with a history of environmental injustices facilitated through generations of public policy and agency decisions, including those by the Air District. Historic redlining practices facilitated investments towards predominantly white portions of Oakland, while polluting industry has been consistently permitted in East Oakland. As a result, East Oakland residents have borne a high cumulative pollution burden, while also grappling with inadequate access to healthy foods, accessible health care, and educational opportunities. East Oakland is a major transportation and goods movement corridor. In East Oakland,

emission sources include, but are not limited to, the AB&I Foundry, a crematorium, concrete and asphalt manufacturing plants, food processing facilities, small to medium industrial sources, residential fuel combustion,³ commercial cooking, vapor intrusion from historical soil contamination, construction activities, off-road equipment, airport ground support equipment, diesel trucks, ships, major freeways, and busy roadways.

The community has come together to build a more resilient community by developing initiatives to provide healthy food, improve education outcomes, increase locally owned and community-based businesses, workforce development and prevent and mitigate environmental and public health hazards.⁴ The East Oakland Neighborhood Initiative (EONI) is one example of the community's successful collaboration between local governments and community-based organizations, including but not limited to Communities for a Better Environment, HOPE Collaborative, The East Oakland Collective, East Oakland Building Healthy Communities and City of Oakland, to learn from each other, establish trust, and deepen partnership to implement community's goals and priorities for improving public health, reducing greenhouse gases, building economic empowerment, preventing displacement and plan by and with the community.⁵ It serves as a model and foundation for collaborative partnership in building just, healthy, resilient, and prosperous neighborhoods. The preliminary boundary for East Oakland (see Figure 1 in Appendix A) reflects EONI area, aligns with the City of Oakland's EONI planning area, and Alameda County's Public Health regions. The specific geography for East Oakland will be determined by the Community Steering Committee, which will be established as part of the CERP process.

The combination of industrial sources and goods movement routes surrounding low-income, Black and Brown neighborhoods, places East Oakland among the most impacted census tracts in the state, as identified by CalEnviroScreen 4.0 (see Figure 2 in Appendix A). The preliminary East Oakland area includes 35 census tracts that are in the top 30 percent of pollution burden statewide. People living in East Oakland experience higher rates of cancer, heart disease, stroke, chronic lower respiratory disease mortality, unemployment, and disabilities, while experiencing lower life expectancy, than other areas in Alameda County. Even within East Oakland, health outcomes are racialized, with Black/African-American residents experiencing the highest rates of mortality for most diseases and the lowest life expectancy compared to other race/ethnicities.

³ Residential fuel combustion includes the burning of natural gas, wood, and other fuels for space heating, water heating, and cooking.

⁴ Communities for Better Environment, *East Oakland*, <https://www.cbecal.org/organizing/northern-california/oakland/> Accessed 31 Aug. 2021.

⁵ East Oakland Neighborhoods Initiative, *Better Neighborhood, Same Neighbors! EONI Community Plan*, February 16, 2021.

Community Support for a Community Emission Reduction Program

On November 3, 2021, the Air District Board of Directors unanimously approved the recommendation to CARB to nominate East Oakland for a CERP. Speakers from Communities for a Better Environment and The East Oakland Collective highlighted the need for emissions and exposure reductions and the capacity of East Oakland community-based organizations to engage affected community members in a planning process. A number of speakers from the public also spoke in support, including community-based organizations from East and West Oakland, youth organizations, environmental educators, and climate advocates, and local residents. For more information, see the board package ([agenda](#) and [presentations](#)). On August 12, 2021, the Air District held a workshop where community members learned about the AB 617 program and the Air District's plan to recommend East Oakland for a CERP, which they strongly supported. A panel of community advocates from various AB 617 communities, including speakers from Communities for a Better Environment and New Voices are Rising, also shared their experiences, support, and hopes for a community-led CERP process to reduce emissions and exposure of toxic air contaminants and criteria pollutants in East Oakland in the coming year.

Thank you for the opportunity to participate in the state's Community Air Protection Program. The Air District's recommendation for East Oakland supports the community's and Air District's efforts to reduce air pollution from sources that impact one of the Bay Area's most overburdened communities. We look forward to working with the State and the community in addressing these issues through the successful implementation of a CERP.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO

cc: Deldi Reyes, Office of Community Air Protection Director, California
Air Resources Board

Appendix A, Figures of East Oakland

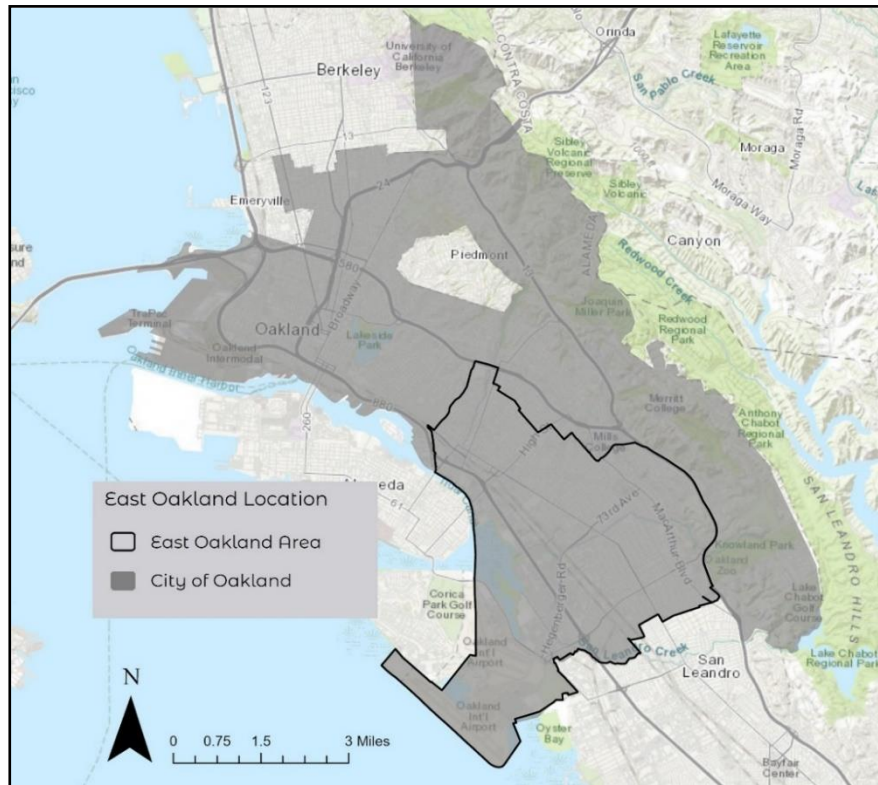


Figure 1. Preliminary boundary of the East Oakland area

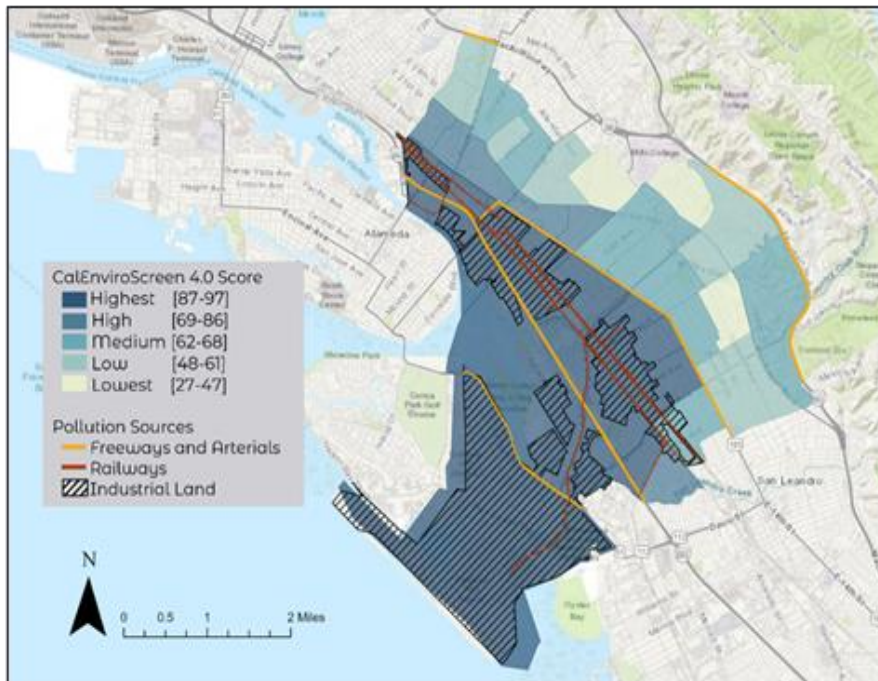


Figure 2. East Oakland area with industrial land, large roadways, and CalEnviroScreen 4.0

Appendix B, References

AB-617 Nonvehicular air pollution: criteria air pollutants and toxic air contaminants, A.B. 617, Chapter 136, 2017.

https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617, Accessed 31 Aug. 2021.

Bay Area Air Quality Management District, *Final Submittal: Public Process for Determination of Recommended Communities*, August 1, 2018.

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