

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