July 11, 2012

Steve Hemminger
Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Dear Mr. Hemminger:

Thank you for the opportunity to comment on the scoping for the Plan Bay Area draft Environmental Impact Report. The Ditching Dirty Diesel Collaborative (DDDC) is a regional collaborative dedicated to reducing the impacts of diesel pollution on the health of Bay Area residents, especially low-income and minority communities that often live closest to the sources of diesel pollution. As such, DDDC has consistently advocated for one simple concept throughout the development of the Bay Area Sustainable Communities Strategy (SCS) – don’t repeat the mistakes of the past by allowing new sensitive receptors like homes, day care centers, hospitals, schools and senior centers to be built in the highest risk areas nearest sources of diesel pollution such as highways, freight distribution centers, ports and railyards. Many scientific studies over the last 15 years have shown that health risks such as increased asthma attacks, cardiovascular disease and cancer are greater for people living nearer to these sources of diesel pollution than for those living further away.

The Jobs-Housing Connection Scenario approved earlier this year for the Bay Area Sustainable Communities Strategy predicts the Bay Area will add 660,000 housing units over the next 28 years. For reasons such as proximity to transit and affordability of land, many of these new housing units will likely be proposed to be built in the highest risk areas closest to sources of diesel pollution. DDDC strongly believes that the Sustainable Communities Strategy has an obligation to address these potential Environmental Justice health impacts by reducing or eliminating the number of these predicted new homes and other sensitive receptors that could potentially be built too close to these sources of pollution, and ensuring that adequate mitigations are put in place for those homes and sensitive receptors that end up being placed too close to these sources.

Therefore, Ditching Dirty Diesel Collaborative requests that the Plan Bay Area draft Environmental Impact Report include for each Alternative Scenario:
1) An analysis of the number of new residential units and other sensitive receptors likely to be built in the areas at highest risk from the impacts of diesel pollution.

2) A Health Impact Assessment for the people occupying those new housing units or other sensitive receptors in those high risk areas, including increased risk of cancer, lung disease, and cardiovascular disease; increased prevalence of asthma and asthma attacks; loss of sleep; and the health impacts from noise and vibration, including mental health impacts.

3) A comparison of the demographics of the people likely to occupy new housing units or utilize sensitive receptors located in those high risk areas in terms of race, age, income level and educational attainment to those people likely to occupy the rest of the new proposed housing units and sensitive receptors built in the Bay Area as part of the SCS.

4) Proposed mitigations measures that would keep housing units and other sensitive receptors from being built in the highest risk areas, or would provide protection from the impacts of diesel pollution for the people living in or using sensitive receptors in the highest risk areas.

5) An analysis of the health impacts from the increased usage of public transportation, biking and walking resulting from implementation of the SCS due to their proximity to the freight transportation and distribution infrastructure.

We recommend you use the CEQA guidelines adopted by the Bay Area Air Quality Management District in June, 2010 to determine thresholds of significance in your EIR for these issues.

Please contact Azibuike Akaba, (510) 302-3346 if you have any questions regarding these comments.

Thank you for your attention to issues, and we look forward to the analysis of them in the draft Environmental Impact Report.

Sincerely,

Azibuike Akaba, on behalf of the Ditching Dirty Diesel Collaborative

cc. Kenneth Kirkey, David Ory, Dave Vautin, Ashley Nguyen