February 2, 2012

Jared Blumenfeld, Regional Administrator
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Blumenfeld,

We are writing to seek your support for the inclusion of public health and environmental concerns into the development of the Sustainable Communities Strategies (SCS) across California, as part of SB 375 implementation. The Ditching Dirty Diesel Collaborative is led by community based organizations that seek to reduce diesel emissions and protect public health. We note your partnership with Caltrans to promote smart growth practices throughout California, including developing the California Regional Blueprint Planning Program and US EPA’s longstanding interest in smart growth and land use and transportation planning.

We urge you and your staff to more actively engage in the SCS process now underway for the San Francisco Bay region (in addition to the SCSs for other regions), with a specific focus on the health impacts this plan may have on already over-burdened communities in this region. We would like to meet with you to discuss two top tier health and environmental justice issues outlined below.

In particular, we are concerned about the potential health impacts both on current as well as new residents that live, and will be living, in close proximity to sources of toxic air contaminants from the freight transport industry. Diesel particulate matter, which contributes to asthma, chronic respiratory conditions, heart attacks, premature deaths, and other illnesses, comes from trucks, ships and trains in areas near freeways, ports, rail yards, airports, distribution centers near truck routes.1 This proximity issue is critical, because the health impacts of diesel particulate matter decrease significantly over just a short distance from the source. Disadvantaged and minority communities are often disproportionately more exposed to air pollution, particularly in the diesel freight related toxic hotspots.

The current SCS planning process has two major deficiencies in this regard. First, unlike the recently adopted San Diego and proposed Southern California plans, the Bay Area SCS does not include the development of a Freight Transport Strategy aimed at mitigating exposure of residents to the movement of existing and future freight transport throughout the Bay Area. Such a plan would not only help minimize the cancer risk and other health effects of breathing in toxic air contaminants to those living nearest freight transport routes, but it would help lessen the burden of other health impacts of living near freight transportation routes such as noise, vibration, and increased risk of accidents.

1 http://www.nrdc.org/health/effects/driving/contents.asp
http://www.arb.ca.gov/regact/2008/truckbus08/appd.pdf
Second, the SCS does not address the proximity to sources of toxic pollutants from the freight transport system in the placement of new residents nor does it take into consideration the impacts on existing residents within the Bay Area. The current SCS planning process is focused on placing new residents within Priority Development Areas (PDAs) identified by Bay Area cities. However, the metropolitan transportation agency is neither modeling the potential health benefits of locating new residents away from the sources of toxic pollutants nor developing incentives to encourage local jurisdictions to place residents in those portions of those PDAs where exposure to toxic pollution is lowest.

Based on these concerns, our recommendations are: 1) The Bay Area SCS should include a Freight Transport Strategy aimed at reducing exposure of residents to the movement of existing and future freight transport, and 2) The Bay Area SCS should model the potential health effects of placing new residents within Priority Development Areas and providing incentives for developments that mitigate negative health effects.

We are bringing these issues to your attention at this stage in the development of the Bay Area’s SCS in the hopes that your input into the process will result in better planning, a complete plan, and a process that addresses and mitigates the health impacts of the movement of freight on Bay Area residents, especially those that are already over-burdened. We are confident that a more thoughtful planning process can keep future residents out of harm’s way and minimize unintended impacts to current residents. We are also hoping that these concerns will be taken into account in the course of other activities at your agency pertaining to the Bay Area such as State Implementation Plan (SIP) planning, environmental reviews under the National Environmental Policy Act (NEPA), permitting, monitoring and other activities. Please find enclosed a report outlining the health risks discussed here and providing clarity on the location of those impacts.

We look forward to meeting with you and your staff to discuss a constructive and critical role for EPA Region 9 engagement in the SCS process. Thank you for your consideration of these concerns.

Sincerely,

The Ditching Dirty Diesel Collaborative:

West Oakland Environmental Indicators Project
Healthy and Safe Communities
Bay View Hunters Point Community Advocates
Communities for a Better Environment
RAMP
Natural Resources Defense Council
Pacific Institute
Center for Environmental Health
Healthy 880 Communities
San Leandro Residents
Alameda County Department of Public Health
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Working together to reduce the burden of asthma