

# Deeply Rooted in Oakland Partnership



Credit: Favianna Rodriguez

August 18, 2023

To: Mayor Thao & Councilmembers Bas, Fife, Gallo, Jenkins, Kalb, Kaplan, Ramachandran, Reid

From: Deeply Rooted in Oakland Partnership

**Re: EJ, Safety and Zoning Code Recommendations for a Racially Just & Inclusive Oakland**

We write as the Deeply Rooted in Oakland Partnership, a collaboration of multiracial community institutions,<sup>1</sup> selected through a historic City RFP process to conduct community engagement on Oakland's General Plan. We are united in a collective vision of creating a racially equitable, sustainable, and culturally-thriving Oakland by ensuring that the priorities of Oakland's low income residents are uplifted in the City's planning efforts. To date, we have engaged with 9,620+ residents who have been part of 70+ community events and multimedia outreach on the Oakland General Plan.<sup>2</sup> In addition, Deeply Rooted's 11 Youth Fellows<sup>3</sup> have been deeply involved in the outreach process. We have also convened an Equity Working Group,<sup>4</sup> consisting of 17 Oakland residents representing flatland communities of color, to guide the City's planning process.

City Planning leaders, especially Director William Gilchrist and Project Lead Lakshmi Rajagopalan, have been model partners. However, there is more to be done to ensure the City's Environmental Justice (EJ) and Safety Elements and Zoning Code meet the needs and priorities of the community. This memo provides our elected officials with concrete community recommendations essential to the survival and thriving of Oakland's low income communities of color.

## **I. ENVIRONMENTAL JUSTICE & SAFETY COMMUNITY RECOMMENDATIONS**

As you know, Oakland has led the nation in climate justice. Former Oakland Mayor Ron Dellums, when in Congress, sponsored the first federal climate change legislation. The Dellums Administration

---

<sup>1</sup> Deeply Rooted Partners - EastSide Arts Alliance, Black Arts Movement Business District CDC, Black Cultural Zone, Communities United for Restorative Youth Justice (CURYJ), House/Full of Black Women, Just Cities, Lao Family Community Development, Inc, Malonga Arts Residents Association, Oakland Asian Cultural Center, The Unity Council, The Village, Urban Strategies Council, and West Oakland Environmental Indicators Project.

<sup>2</sup> Deeply Rooted Community Outreach effort - <https://www.deeplyrooted510.org/communityoutreach>

<sup>3</sup> Deeply Rooted Youth Fellowship: <https://www.deeplyrooted510.org/youthfellows>

<sup>4</sup> Equity Working Group Members - Arthur Shanks, Bethsaida Ruiz, Cathy Eberhardt, David Peters, Esther Goolsby, Gysell Perez, Iris Quach, Keta Price, Liana Molina, Liz Suk, Naru Kwina, Nayeli Bernal (until September 2022), Nora Smith, Priscilla Hoang, Reinaldi Gilder, Sandra Ue, and Shina Robinson.

## Deeply Rooted in Oakland Partnership

also worked with Ella Baker Center to create the Oakland Green Jobs Corp, one of the first programs in the nation to integrate fighting poverty with fighting climate change. However, Oakland's flatland communities are suffering disproportionately from current and future climate change threats, including wildfire and industrial pollution impacts to air quality, urban heat, sea level rise, flooding, and exposure to toxics from rising groundwater. The EJ and Safety Elements are about the life and death of Oakland's most vulnerable residents who have endured decades of racist planning and economic exclusion.

We are pleased to share that the City Planning Department has incorporated 39 EJ and Safety policy ideas and strategies from the Deeply Rooted community engagement process,<sup>5</sup> including:

- Conducting Participatory Action Research with those most vulnerable to climate crises and environmental injustices.
- As part of the LUTE update in Phase 2, the City will explore grocery store locations at walkable distances in all neighborhoods and ensure that food accessibility improvements are convenient for elders, youth, and differently-abled people and are culturally appropriate for Black and Brown communities.
- Pursuing resources to build more resilience hubs for frontline communities and create and distribute education materials regarding access to and utilization of resilience hubs.
- Committing to create emergency preparedness workshops to build resident preparedness.
- Implementation of policies and actions. The City has agreed to provide a biennial report on the progress on climate actions identified in the 2030 ECAP and actions identified in the Environmental Justice Element.

Staff responses to these feedback are available [here](#).

However, there are **36 impactful strategies suggested through community outreach that have not been included**, such as the following:

- 1. Racial Equity/Human Health/Socioeconomic Impacts Analysis of all market rate projects.** While the City has committed to studying these impacts for “larger market rate development projects in neighborhoods undergoing displacement or vulnerable to displacement” (Action 3.4.2), they should study the impact of all market rate housing projects on displacement, health, and homelessness by conducting a Racial Equity/Human Health/Socioeconomic Impacts Analysis before providing permits or zoning changes.
- 2. Engage residents as experts in their communities.** Residents are already engaged in the work around resilience, food security, and local data. As part of the City's plan to engage residents and community organizations to co-implement aspects of the Environmental Justice

---

<sup>5</sup> Comment letters can be found here:

<https://cao-94612.s3.amazonaws.com/documents/Combined-Comment-Letters-on-Safety-and-EJ-Elements-for-website.pdf>

The following links lead to redline versions of the Safety Element:

<https://www.google.com/url?q=https://cao-94612.s3.amazonaws.com/documents/Safety-Hearing-Draft-Redline-7.25.23.pdf&sa=D&source=docs&ust=1692399254371178&usg=AOvVaw1hNd5hc05oYwl2b6ZhMlbq>

and Environmental Justice Element:

<https://www.google.com/url?q=https://cao-94612.s3.amazonaws.com/documents/EJ-Hearing-Draft-Redline-7.31.23.pdf&sa=D&source=docs&ust=1692399254371243&usg=AOvVaw0hlQGrIub5jGQQfKvLzRY3>

## Deeply Rooted in Oakland Partnership

and Safety element, we strongly recommend that the City considers compensating residents working in a longer-term capacity for their involvement.

Please see **Table 1** below for the full list of community recommendations on the EJ and Safety Elements and the status of their inclusion in the City's draft Elements.

## II. COMMUNITY RECOMMENDATIONS ON HOUSING SITES OVERLAY ZONE

**CITY PLANNING PROPOSAL:** To facilitate the production of housing on sites the City identified to meet its Regional Housing Needs Allocation (RHNA), the City Planning Department has proposed the Housing Sites Overlay (S-14) Zone. The S-14 Zone seeks to ensure that sites within the proposed S-14 Zone are developed with residential uses and that projects that contribute to meeting Oakland's needs for lower income housing receive By Right Approval (see [Proposed S-14 Housing Sites Combining Zone](#)).

To comply with state law requirements, the City will allow by-right development for projects with at least 20 percent of the units affordable to lower incomes on Prior Housing Element sites. The Housing Sites Overlay will go further by granting by right residential approval to a project if it is proposed on a parcel included in the Housing Sites Inventory and is not a Prior Housing Element Sites parcel; if it proposes at least as many lower- and moderate-income units as shown in the Housing Sites Inventory; if the project overall proposes at least as many total units as described as the Realistic Capacity for the parcel; and if it satisfies at least one of the following conditions:

- A. At least twenty percent (20%) of the total housing units are restricted to very low income households;
- B. At least twenty-five percent (25%) of the total housing units are restricted to any combination of very low- and lower-income household;
- C. At least forty percent (40%) of the total housing units are restricted to any combination of very low-, low-, and moderate-income households.

A project will not be eligible for by right residential approval under this proposal if the project proposes development in phases or proposes more than 100,000 square feet of floor area, unless 100% of the housing units other than manager's units are restricted to very low-, low- and moderate income residents.

**COMMUNITY CONCERNS:** Deeply Rooted members have expressed serious concerns about this proposal.

First, by exempting proposed projects from community notice or opportunity to be heard, this proposal would effectively silence all communities, particularly low income communities of color on critical issues such as market force displacement and environmental injustice. This outcome does not appear to align with the intentions of new state and federal law on ensuring meaningful community

## Deeply Rooted in Oakland Partnership

engagement of “underserved” or “disadvantaged” communities, including SB 1000 and President Biden’s new Executive Order 14096 on Environmental Justice, which states that:

*“[A]dvancing environmental justice will require investing in and supporting culturally vibrant, sustainable, and resilient communities in which every person has safe, clean, and affordable options for housing, energy, and transportation.... Pursuing these and other objectives integral to advancing environmental justice can successfully occur only through **meaningful engagement and collaboration with underserved and overburdened communities** to address the adverse conditions they experience and ensure they do not face additional disproportionate burdens or underinvestment.”* [[Executive Order 14096](#)].

At the state level, SB 1000 requires that general plans contain:

*“An environmental justice element ... that... identif[ies] objectives and policies to **promote civil engagement in the public decisionmaking process**; [and] identif[ies] objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities.”* [[California Government Code, Section 65302h](#)].

Eliminating community engagement of low-income communities of color in the public decision-making process would not advance these principles and opens the door to the perpetuation of harms created by racist historical practices such as redlining and “blight” clearance.

Second, allowing by right development in low-income communities of color also risks exacerbating current untenable racialized displacement. According to US Census Data, Oakland’s Black population has declined by 33% from 2000 to 2020, with a loss of over 46,000 people. Data from the 2020 Alameda Analysis of Impediments to Fair Housing Choice show that 28% of Hispanic and 25% of Black Alameda County survey respondents reported being displaced in the past five years, with 56% of those saying the primary reason for their displacement was rents becoming unaffordable. [[Alameda County Analysis of Impediments to Fair Housing Choice, V-39](#)]. It also reports displacement of Asian, Hispanic, or Black residents by white residents in nearly every part of Oakland, and attributes much of Oakland’s housing segregation to the location and availability of affordable housing. Every part of Oakland with the exception of the hills and the areas surrounding Piedmont were rated by UC Berkeley’s Urban Displacement Project as experiencing or vulnerable to some level of displacement or gentrification. [[Urban Displacement Project](#)]. If new housing developments do not meet the needs of existing residents in both the quantity and affordability of designated affordable housing units, rising neighborhood rents will lead to market force displacement and reinforce this trend.

Finally, Deeply Rooted members worry that without community review, City processes meant to protect them from displacement are vague, inadequate, and unaccountable. The Equitable Climate Action Plan Consistency Checklist simply asks the developer if the project would “reduce or prevent the direct displacement of residents and essential businesses”; it does not require developers to

## Deeply Rooted in Oakland Partnership

prevent displacement, describe their methods for researching or mitigating displacement, or conduct community engagement and does not address market-force displacement at all. Furthermore, the Conditions of Approval frequently require specific mitigation measures only “if feasible.” Without community engagement, the only perspective presented to city staff in deciding what is feasible will be that of developers, not the community members who will be impacted. **By right development can also lead to worse overall projects due to the lack of community input, alienate the communities they’re ostensibly meant to serve, and perpetuate historical distrust of government.**

**COMMUNITY RECOMMENDATIONS:** Deeply Rooted partners propose the following four changes to the Housing Sites Zoning Overlay to ensure that low-income communities of color do not suffer market force displacement due to by-right development that doesn’t meet the affordability needs of the neighborhood.

1. **Comply with the City’s Racial Equity Impact Assessment (REIA) recommendations** on the proposed Housing Sites Overlay Zone proposal, which are similar to the Deeply Rooted recommendations. The below language is from the City’s REIA of the Housing Sites Overlay Zone proposal.<sup>6</sup> We understand that City staff considered the below recommendations, conducted outreach with affordable housing developers, consulted with other jurisdictions, and deemed the below REIA recommendations as not feasible.

*Consider adopting by-right development in accordance with objective and human design standards for housing developments on 6th cycle sites that: (a) include at least 30 percent deeply affordable housing in high resource areas and (2) include at least 50 percent affordable housing in low resource areas.*

The City’s is proposing by-right residential approval for projects proposed on sites not included in the previous housing element sites if the project proposes as many lower- and moderate-income units as shown in the Housing Sites Inventory, the project overall proposes at least as many total units as described as the Realistic Capacity for the parcel, and the project satisfies at least one of the following conditions:

- A. At least twenty percent (20%) of the total housing units are restricted to very low income households;
- B. At least twenty-five percent (25%) of the total housing units are restricted to any combination of very low- and lower-income household;
- C. At least forty percent (40%) of the total housing units are restricted to any combination of very low-, low-, and moderate-income households.

---

<sup>6</sup> Implementing Actions to Advance REIA in Phase 1 of the Oakland 2045 General Plan Update 2023-2031 Housing Element Housing Action Plan, 3.4.10, page 5;  
<https://cao-94612.s3.amazonaws.com/documents/Analysis-of-Actions-to-Advance-REIA.pdf>

2. **Integrate the City’s commitment in the Housing Element to study the potential displacement of market rate housing projects in Oakland’s low income communities of color, which should include the best practice process for conducting a REIA as established by the Government Alliance of Race & Equity and Race Forward, such as the following steps.**

- **Engaging Stakeholders:** Have stakeholders from different racial/ethnic groups—especially those most adversely affected—been informed, meaningfully involved and authentically represented in the development of this proposal?
- **Identifying & Documenting Racial Inequities:** Which racial/ethnic groups are currently most advantaged and most disadvantaged by the issues this proposal seeks to address? How are they affected differently? What quantitative and qualitative evidence of inequality exists? What evidence is missing or needed?
- **Considering Adverse Impacts:** What adverse impacts or unintended consequences could result from this policy? Which racial/ethnic groups could be negatively affected? What blocks and neighborhoods are most impacted? How could adverse impacts be prevented or minimized?
- **Examining Alternatives or Improvements:** Are there better ways to reduce racial disparities and advance racial equity? What provisions in this policy could be changed or added to ensure positive impacts on racial equity and inclusion?

Indeed, the City Planning Director in 2005, in response to community concerns about market force displacement impacts, commissioned an impact analysis of the West Oakland Wood Street Project, which found that the Project would result in winners (current homeowners whose property values would increase) and losers (low income tenants whose rents would likely increase due to the scale of the new market rate housing). Armed with this information, the City Council required affordable housing to be included in the project. A copy of the Wood Street report can be found at: <https://www.deeplyrooted510.org/>

3. **Exempt flatland low-income communities of color undergoing displacement, including West Oakland, North Oakland, East Oakland, and Chinatown from “by right” development.**

According to a preliminary Just Cities analysis, the proposed exemption for low-income communities of color confronting racialized displacement and harm would affect 24 sites included in the sixth cycle housing element sites inventory (See Tables 2 & 3, pages 18-19). These sites combined could yield over 2,000 new housing units in low income communities undergoing severe displacement conditions. However, under the City’s proposal, 80% of these new housing units would be market rate units, unaffordable to current lower income residents in desperate need of affordable housing, exacerbating current market force displacement conditions.

## Deeply Rooted in Oakland Partnership

In addition, these over 2,000 new housing units contribute about 12% of the total units in the full Housing Sites Inventory and about 49% of sites that would be subject to the Overlay Zone.<sup>7</sup> Subject to community review, development could still occur in these sites and Oakland could still meet its RHNA goals by building mixed-income housing in higher-resource neighborhoods without the risk of displacing vulnerable residents. To address Oakland’s housing shortage and segregation, the City should allow by-right development as proposed *in high-resource areas* and implement Deeply Rooted recommendations to ensure that new construction in displacement-prone areas does not displace current residents.

4. Use the policy tool of **Inclusionary Zoning** requirements to meet the City’s important goal of mixed-income housing, rather than “by right development.” Other cities including San Francisco and Berkeley have inclusionary zoning policies that require private market rate developers to include lower income units in their housing project. Oakland’s current policy is structured as a “housing impact fee,” rather than an inclusionary zoning requirement. This would require the City Council to adopt new Inclusionary Zoning legislation.
  
5. Increase the affordable unit proportion required for by right development to 50%, and define affordability by neighborhood AMI instead of regional AMI to ensure “affordable” units are actually affordable to existing residents. A similar recommendation was made based on the City’s racial equity impact analysis of the Housing Element: “Consider adopting by-right development in accordance with objective and human design standards for housing developments on 6th cycle sites that: (a) include at least 30 percent deeply affordable housing in high- resource areas and (2) include at least 50 percent affordable housing in low-resource area.”

### III. SUMMARY OF DATA SOURCES

**Table 1: Community Engagement Feedback on EJ & Safety Elements**

<b>Community Priorities for EJ &amp; Safety</b>	<b>Inclusion Status in City EJ &amp; Safety Elements</b>
<b>Minimize air pollution</b>	
Implementation of policies and actions. The City has agreed to provide a biennial report on the progress on climate actions identified in the 2030 ECAP and actions identified in the Environmental Justice Element.	<b>Yes EJ-A.40</b>

<sup>7</sup> Being “subject to” the proposed Housing Sites Overlay Zone uses the following criteria: private ownership; not used in prior housing elements; 10+ unit site capacity; and not projected to contain 100% affordable units, which would make the developments eligible for by-right development in the separate Affordable Housing Overlay Zone.

## Deeply Rooted in Oakland Partnership

<p><b>Add Policy/Action items under Goal 1 to:</b>          Create <b>fresh air/breathing centers for unhoused people</b> and low-income communities          Provide residents who live close to freeways and in other polluted conditions with free and/or reduced fee <b>comprehensive health care services</b>          Encourage hydrogen-powered buses          Encourage use of solar energy and create more non-smoking areas.</p>	<p><b>No</b>   <b>Non-smoking areas - OMC Title 8, Chapter 8.30</b>  <b>Solar energy - ECAP</b></p>
<p>Consider strategies to <b>reduce truck traffic on Interstate 980 and other highways</b> surrounding EJ Communities (removing Interstate 980, allowing trucks on other highways) add language under <b>EJ-1.2 Truck Emissions and Pollution Exposure</b></p>	<p><b>Yes</b>  <b>EJ-7.11</b></p>
<p><b>Add language to EJ-1.17 Data informed efforts:</b>          Ensure the City of Oakland <b>provides access to (hyperlocal) neighborhood data</b> so that residents can evaluate the City of Oakland 's policies.</p>	<p><b>Partially Yes</b></p>
<p><b>Add language to EJ-1.17 Data informed efforts:</b>          Create a <b>Participatory Action Research project</b> with those who are most vulnerable to climate crises and environmental injustices. Examples can include local air monitoring by providing air monitoring tools to test quickly.</p>	<p><b>Yes</b>  <b>EJ 8.3</b></p>
<p><b>Add language under Actions EJ A.4:</b>          Specify the nature of the jobs and add a requirement to hire local Oaklanders.</p>	<p><b>No</b></p>
<p>Co-develop an ordinance with EJ CBO's and low-income EJ community residents to <b>prioritize identification and closure of existing polluting industries</b> located in or near residential areas. (REIA) <b>Add language under EJ A.5</b></p>	<p><b>No</b></p>
<p><b>Engage with WOCAP, BCZ and CDC</b> to provide feedback on prioritization and implementation of vegetative buffer projects, including those between industrial land and sensitive land uses, as identified in specific plans and community plans. <b>EJ-A.6 Reducing Pollution Exposure and Improving Air Quality</b></p>	<p><b>No</b></p>
<p><b>Minimize water pollution</b></p>	
<p><b>Add Policy/Action under Goal 2 to provide clean water to unhoused people:</b>          Pay for equipment to make it possible to <b>get water from fire hydrants</b>. The City of Oakland should take this on instead of small nonprofits.          Human Services needs to provide bottled water. The Mobile Assistance Community Responders of Oakland (MACRO) Program provides water to unhoused folks but cannot meet current demands.</p>	<p><b>No</b>  <b>Out of scope of General plan</b></p>
<p><b>Add language under Goal 2 to:</b>  <b>Involve Alameda County Health Department and County Supervisors Office</b> in the development and implementation of Policies/Actions. The City of Oakland of Oakland does not have a Public Health department and needs to hear the latest on public health oriented policies.</p>	<p><b>Partially Yes</b>  <b>EJ 6.5</b></p>
<p><b>Add language under Goal 2 to:</b>          Add more information on <b>Port of Oakland's plans</b> around wastewater and concerning clean water and how the City of Oakland of Oakland can further support these efforts.</p>	<p><b>Yes</b>  <b>Port of Oakland's plans Information has been added in Page</b></p>



## Deeply Rooted in Oakland Partnership

	<b>3-10</b>
<p><b>Add language under Goal 2 to:</b>  <b>Create a green jobs program</b> 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.</p>	<b>No</b>
<p><b>Add language under Goal 2 to:</b>  More <b>specific data on types of plants and trees surrounding</b> neighborhoods, freeways and construction sites.</p>	<b>Yes EJ 7.15</b>
<p><b>Add language under Goal 2 to:</b>  Create a program to <b>capture water and act as an emissions filter</b>.  Dedicate <b>funding to implementation</b>.  Create a program to <b>test water quality</b> in EJ communities with support from EJ organization.</p>	<b>Comments forwarded to EBMUD</b>
<p><b>Add an action or policy under Goal 2 to:</b>  Alleviate concerns of <b>lead contamination in tap water</b>.  Add a <b>funding program to replace lead pipes</b> for most impacted communities.</p>	<b>Comments forwarded to EBMUD. Please see <a href="#">EMBUD Lead testing program</a></b>
<p><b>Provide clean water to residents in encampments</b> who don't have access to running water and water purifiers. Add language to EJ 2.1 Clean Water Programs</p>	<b>No</b>
<b>Trash/Waste Management/illegal dumping</b>	
<p><b>Add more context under the Goal 3</b> on illegal dumping is not done by Oakland residents, but by businesses and is focused in under-resourced communities surrounded by industrial businesses, freeways, rail, port and recycling.</p>	<b>Yes Subsection Illegal Dumping under section 3.1 Issues and Disparities has been updated with additional context</b>
<p><b>Add Policy/Action under EJ Goal 3</b> to increase well-paying jobs for neighborhood clean up</p>	<b>Yes EJ A.15</b>
<p><b>Add Policy/Action under EJ Goal 3</b> Build more public bathrooms for unhoused people and distribute them equitably across Oakland.</p>	<b>Yes EJ 6.6</b>
<p><b>Add Policy/Action under EJ Goal 3:</b>  Introduce programs for Cultural infrastructure and street beautification (community art and murals, and green spaces)  Ensure safe dumping with the following 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.  Relocate landfills/junk yards away from residential areas and housing</p>	<b>No</b>

## Deeply Rooted in Oakland Partnership

Evaluate <b>contaminated soil including groundwater</b> and related cleanup plans.(WOEIP)	<b>Yes SAF 4.4</b>
<b>Add language to EJ 3.2</b> to require all owners of vacant properties to be responsible for maintaining and keeping the property clean.	<b>Yes EJ 3.2</b>
<b>Add language to EJ 3.4</b> Illegal dumping enforcement: Do not involve Oakland Police Department during Public Works duties. 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)	<b>Yes EJ 3.4</b>
Raise awareness and increase frequency of City of Oakland 's Bulk Pickup and Oaktown PROUD students program in EJ Communities and prioritize local hiring of residents from the neighborhood on clean-up teams <b>add language to policy EJ.A.15</b>	<b>Partially Yes EJ 3.5</b>
<b>Ensure Safe &amp; Secure Housing</b>	
<b>Add policy/action under Goal 4:</b> Provide <b>affordable housing for all residents.</b>	<b>Yes Housing Element and Goal 4 in EJ element</b>
<b>Add policy/action under Goal 4:</b> Supply residents with <b>emergency equipment, water, and food for their home.</b> Support residents through <b>funding and assistance to acquire solar panels.</b>	<b>No</b>
<b>Healthy Food Access</b>	
<b>Add policy/action item Goal 5:</b> <b>Zoning restrictions</b> against food services (with exceptions of large retail locations) in most neighborhoods.	<b>Yes Addressed in Phase 1 code amendments</b>
<b>Add policy/action item Goal 5:</b> Conduct a <b>study on the closures of grocery stores</b> , and assess how grocery stores can survive for longer time periods Engage with <b>HOPE Collaborative</b> and <b>Oakland Food Policy Council</b> to provide feedback on healthy food access policies.  <b>Add language under Goal 5 to call out:</b> Community gardens and healthy grocery stores as <b>indicators of gentrification historically</b> and recent shutdown of several <b>East and West Oakland food banks.</b> Create a program to ensure grocery stores sell <b>products at affordable prices.</b>	<b>No</b>
<b>Add language to EJ - 5.5 Entrepreneurship and Food Innovation:</b> Support individual residents in <b>small-scale agriculture and distribution</b> , through education and financial assistance. Create programs to <b>train youth as chefs and food business entrepreneurs.</b> <b>Implement the-regulations for street vending</b> , 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.	<b>Partially Yes EJ 5.5</b>

## Deeply Rooted in Oakland Partnership

Ensure all food providers accept food stamps. Add language to <b>EJ-5.6 Food Assistance Programs</b>	<b>Partially Yes</b>
<b>Add language EJ 5.8 Education and Awareness to:</b> Create programs to teach <b>plant medicine and facilitate wellness</b> activities. Additionally, <b>provide access to nutritional education</b> and cooking classes, with an emphasis on cultural and ancestral recipes. Create and distribute more education around healthy foods, especially directed at youth.	<b>Partially Yes</b>
Provide more <b>free community fridges</b> . Add language to <b>EJ 5.9 Food Recovery Program</b>	<b>Yes</b>
Ensure free food providers/deliverers have a <b>standard for the quality of food being</b> provided. Food should not be bruised or near expiration. <b>Incentivize local groceries and restaurants to donate items</b> , in order to prevent food waste. Also, include small grocers in the food recovery program. Add language to <b>EJ 5.9 Food Recovery Program</b>	<b>Partially Yes</b>
Include/call out liquor stores and corner stores to <b>stock healthy foods</b> . Add language to <b>EJ A-20</b>	<b>Yes</b>
Provide <b>grocery stores at walkable distances</b> 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. Add language to <b>EJ A-21</b>	<b>Yes</b>
<b>Support more cultural food providers</b> . Add language to <b>EJ A-23</b>	<b>Yes</b>
<b>Meaningful Engagement</b>	
<b>Add a policy/action recommendation under Goal 9</b> <b>Fund capacity building under community engagement. Capacity building should include expert educational training</b> so that residents know the best practices related to any policy or actions and can make informed decisions. <b>Fund a trust-building program</b> 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. <b>Fund a deep listening session program</b> before planning any new projects or interventions. <b>Build more time for community</b> engagement in City led projects and programs. <b>Provide avenues for formerly incarcerated people to participate as "ambassadors"</b> 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. <b>Mention responsible agencies and departments</b> to conduct engagement and maintain partnerships with CBOs and communities.	<b>No</b>
Develop outreach and engagement <b>strategies for particular populations</b> as Racial equity impact analysis (REIA) recommends. Add language to policy <b>EJ-8.2 Sustained engagement</b>	<b>Yes</b>
<b>Creating Spaces to stay physically active (parks, bike paths, sidewalks)</b>	
<b>Add language to Goal 7:</b>	<b>No</b>

## Deeply Rooted in Oakland Partnership

Plant more native flowers, trees and plants to <b>enhance the environment for pollinators</b> and optimize irrigation systems for them.	
<b>Add policy/action items to Goal 7:</b> Study sidewalk lighting and create a plan to ensure sidewalks are lit all the time. Enhance access to waterfronts as recreational areas. Provide public transportation safe and free for all. Create more public spaces where it's legal to sit and lay down. Build more recreational spaces like skating facilities Build accessible open spaces near the shoreline under	<b>No</b>
Support local plant growth which creates a healthy environment for insects. Add language to <b>EJ 7.14 Urban Forest</b>	<b>No</b>
<b>Add action/ policy under EJ-7.16 Urban Greening:</b> Promote compost programs to revitalize the soil Support Indigenous and BIPOC led stewardship programs create jobs by planting trees in neighborhoods.	<b>No</b>
<b>Prioritize EJ communities in Community Input.</b> Add language to <b>EJ-7.15 Community Input</b>	<b>Yes</b>
Creating neighborhoods which are accessible by biking/walking in 15 min. Add language to <b>EJ 7.2 Accessible Neighborhoods</b>	<b>No</b>
Change land use to add more eyes on the street to make the streets safer. <b>Add language to EJ-A.26</b>	<b>No</b>
<b>Create open gyms, playgrounds for youth, areas designated areas</b> for - skateboarding, recreation areas for pets, and rugby fields in parks. Add language to <b>EJ-7.10 Parks Programming</b>	<b>Partially Yes</b>
<b>Repair sidewalks</b> especially repair streets with potholes and streets in East Oakland. Add language to <b>EJ 7.7 Equitable Paving policy</b>	<b>No</b>
<b>Add language to EJ 7.5 Bicycle and Pedestrian Friendly Design:</b> Create <b>bike lane infrastructure for workers</b> and not only caters to recreational cyclists. Create a program to <b>reduce crime on sidewalks.</b> Program to provide unhoused residents with <b>free access to bikes.</b>	<b>No</b>
Create a data driven and systematic approach to eliminate all traffic fatalities and severe injuries. This approach needs to <b>integrate engagement.</b> <b>EJ-7.4 Safe Oakland Streets</b>	<b>Yes</b>
<b>Increase access to cultural centers, libraries, child care centers, health care facilities, and other basic amenities such as PG&amp;E &amp; EBMUD</b>	
<b>Add policy/action under Goal 6 to:</b> <b>Create spaces for people with disabilities, spaces for more intergenerational conversations between youth and elders.</b> <b>Integrate strategies from the Oakland Cultural Plan - <a href="#">Belonging in Oakland: A Cultural Development Plan</a></b> Engage with the community to <b>update cultural asset maps.</b> Add the Figure 2.9 Cultural	<b>No</b>

## Deeply Rooted in Oakland Partnership

Asset Map from Environmental Justice and Racial Equity Baseline under Goal 6.	
Create more <b>spaces and activities for creative learning.</b>	<b>Yes</b>
Provide counseling programs and rehab & recovery programs to unhoused people. Increase <b>mental health facilities and emergency response</b> in areas that are not surveilled by the police.	<b>Partially Yes</b> <b>New Policies EJ-8.12 and SAF-7.3 and new Action EJ-A.39 have been added (see EJ Element pages 9-15 and 9-16 and Safety Element page 5-8)</b>
Create a program to assist residents on accessing basic amenities and pay bills. Add language to <b>EJ 6.5 Public Service Coordination</b>	<b>No</b>
<b>Add language to EJ 6.1 Public Facilities Distribution:</b> Create a <b>Cultural Center dedicated to specific cultures</b> , 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. Engage with ESAA to provide feedback on beneficial civic and cultural facilities and prioritizing new facilities and creative spaces in traditionally underserved areas.	<b>No</b>
<b>Mitigate earthquake</b>	
<b>Add a policy/action item under Goal 1:</b> Requiring new developments to <b>use electricity rather than gas</b> to mitigate gas-related hazards. Create a <b>list of potential sites/areas affected by Earthquake in EJ communities</b> and low income communities of color and a program to reach out to them with assistance. Clarify <b>earthquake safe development requirements</b> such as setbacks, freeway entrances, buffer zones as part of LUTE. Specify high risk zones such as West Oakland. Create a <b>program to engage architects/planners/engineers to educate residents</b> on Earthquake safe construction. (WOEIP) 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) Conduct a feasibility study on tearing down the 980 freeway Provide material resources such as encampment improvements and creating more housing for unhoused people.	<b>No</b>
<b>Specify the programs</b> to minimize seismically related structural hazards. Add language in <b>SAF-1.2 Structural Hazards</b>	<b>No</b>
Create a <b>pre-project assessment and approval process for buildings</b> in hazardous zones. Additionally create a program to educate residents on science behind skyscrapers, and the status of constructing soft-story structures. Add language to SAF-1.2 Structural Hazards	<b>No</b>
Provide <b>assistance to retrofit old residential buildings</b> that are grandfathered in. Also, include minority contractors in the list for retrofitting contractors. City should provide subsidies if residents hire minority contractors. Add language under action SAF-A.6	<b>No</b>

## Deeply Rooted in Oakland Partnership

<b>Protection from Flooding/Sea level rise</b>	
<p><b>Add policy/action under Goal 3 to:</b>            Create a process to <b>maintain storm drains during heavy rains</b> to avoid clogging by trash.  <b>Add training and education on sinkhole awareness</b> to existing training programs.            Create a support network that enables community members to <b>temporarily shelter neighbors displaced by disaster</b>.            Prioritize flood mitigation strategies in West Oakland.</p>	<b>No</b>
<p>Account for the <b>technology barrier when informing unhoused people</b> about incoming floods. Add language to SAF-A.12</p>	<b>No</b>
<p><b>Add a policy/action under Goal 4 to:</b>            Proactively establish a <b>fund to respond to immediate needs of frontline communities</b>. 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.  <b>Remove bans on rainwater catchment</b>. Create a program for outreach and education of safe practices of rainwater catchment.</p>	<b>No</b>
<p><b>Integrate studies related to contaminated soil and Sea level rise</b>. Additionally, explore Hemp to clean up contaminated soil. <b>Add a policy/action under Goal 4</b></p>	<b>Yes</b>
<p><b>Organize Sea Level Rise preparedness workshops</b> 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. <b>Add language SAF 4.1 Sea Level Rise and Community Engagement</b></p>	<b>No</b>
<p><b>Develop construction guidelines</b> that decrease the usage of concrete in public spaces, and alternatively use green infrastructure to mitigate effects of Sea Level Rise. Add language to <b>SAF- 4.3 New Development and Sea Level Rise</b></p>	<b>No</b>
<p>Emphasize urgency of Sea Level Rise and the need of <b>Sea Level Rise Guidelines</b>. Add language to <b>SAF- 4.3 New Development and Sea Level Rise</b></p>	<b>No</b>
<p><b>Map Sump pumps in all neighborhoods</b>. Add language to SAF- 4.2 Current Development and Sea Level Rise.            Additionally, add language to <b>SAF- 4.1 Sea Level Rise and Community Engagement</b> to create transparent and accessible informational materials on where sump-pumps are located in all neighborhoods.</p>	<b>Yes</b>
<b>Public safety from airport hazards</b>	
<p><b>Add policy/action to Goal 6 to:</b>            Guarantee jobs created by the expansion of the Oakland airport to <b>prioritize local residents for hiring</b>.</p>	<b>Not controlled by the City</b>
<p><b>Create education material and outreach programs</b> on hazards caused by airport operation.</p>	<b>Explore in Noise element</b>

## Deeply Rooted in Oakland Partnership

<p><b>Mitigate noise</b> impact from proximity to the airport.</p>	
<p><b>Public safety</b></p>	
<p><b>Adopt a compassion-centered approach in all City operations and projects</b> by not involving the police force in all enforcement efforts, and practicing restorative justice</p>	<p><b>No</b></p>
<p><b>Add language under Goal 7 to:</b>          Include stronger language on <b>need for equity, using public health data</b>, inclusion of vulnerable populations in these decisions and outcomes.          Further develop reimagining public safety task force recommendations. Add <b>community processes to further develop and implement</b> public safety policies in this plan.          Legally <b>protect formerly incarcerated residents from discrimination</b>. The community members referred to Atlanta, Georgia program to protect formerly incarcerated people as Protected Class          Redirect funding towards supporting <b>alternatives to policing</b> and affordable housing, jobs, healthy food, etc.          Include the Office of Attorney General from the California Department of Justice and Oakland Police Department.          Increase green spaces, health clinics, healthy grocery stores, and other community spaces, ensuring that job hiring emphasizes <b>re-entry employment for formerly incarcerated applicants</b>. Additionally, All public jobs should require consideration/employment of formerly incarcerated people.  <b>Create neighborhood-based watch patrols</b> in all neighborhoods.</p>	<p><b>No</b></p>
<p><b>Repair and maintain infrastructure</b> 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.</p>	<p><b>Yes</b>  <b>This is included as part of SAF-8.1, SAF-8.5, and EJ-7.7</b></p>
<p>Increase <b>funding and support for community-based violence prevention programs</b>. 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. Add language to <b>SAF-7.1 Reimagining Public Safety</b></p>	<p><b>Yes</b></p>
<p><b>Emergency Preparedness, Response &amp; Recovery</b></p>	
<p><b>Add a policy/action under Goal 8</b>          Create <b>specific emergency response strategies for communities undergoing different adversities</b> (such as unhoused and undocumented communities).          Create a strategy that <b>utilizes vacant lands/parks</b> 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.</p>	<p><b>No</b></p>
<p>Expand training programs and community education materials in order to <b>build capacity</b> to create interdependence among residents in case of an emergency. Cross reference and add language under policy <b>SAF-8.9 Community Training and Awareness</b></p>	<p><b>Yes</b></p>
<p><b>Add language to SAF-8.9 Community Training and Awareness:</b>          Create a series of training that <b>equip residents with survival skills</b> for different disasters.</p>	<p><b>Partially Yes</b></p>

## Deeply Rooted in Oakland Partnership

<p>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.</p> <p>Host a series of emergency preparedness workshops that include the voices of residents who have survived past disasters. Additionally, <b>utilize the expertise of unhoused people</b> 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.</p>	
<p>Create <b>evacuation strategies</b> for all particularly low-income people, the unhoused, and people living in houseboats. Add language to <b>SAF-8.16 Priority Route Coordination</b></p>	<p><b>Yes</b></p>
<p><b>Add language to SAF-A.36</b>          Create at least 8 resilience hubs within East Oakland.          Ensure that designated resilience hubs are seismically retrofitted. (no)          Equip public schools to serve as resilience hubs in the case of disasters.</p>	<p><b>Partially Yes</b></p>
<p>Create and distribute education materials regarding access and utilization of resilience hubs. Add language to <b>SAF-8.10 Public Facilities for Resilience &amp; Relief</b></p>	<p><b>Yes</b></p>
<p>Support and equip decentralized facilities, along with public facilities, to serve as resilience hubs in the case of disasters. Add language to <b>SAF-A.36</b></p>	<p><b>Yes</b></p>
<p>Partner and additionally <b>financially compensate CBOs</b> already doing emergency preparedness work, to expand their outreach and recruitment capacity. <b>Add language under action SAF-A.41</b></p>	<p><b>No</b></p>



**Table 2: Housing Sites Overlay Zone Policy Parcels**

<b>Parcels Information</b>	<b>Parcels</b>	<b>Potential Low-income Units</b>	<b>Potential Moderate Income Units</b>	<b>Potential Above-Moderate Income Units</b>	<b>Total Units</b>
All Parcels From Housing Sites Inventory (HSI)	498	7189	4167	7553	18,909
All HSI Parcels Not Used In Previous Housing Elements	348	6492	1215	5413	13,120
All Privately Owned HSI Parcels Not In Previous Housing Elements	308	3014	885	4451	8,350
All Privately Owned HSI Parcels Not In Previous Housing Elements With 10+ Unit Capacity	90	2947	843	4177	7,967
All Privately Owned HSI Parcels Not In Previous Housing Elements With 10+ Unit Capacity, Projected <90% Affordable Units	46	316	258	4172	4,746

Table 2 shows the filters applied to the parcels contained in the Housing Sites Inventory (Table C-26 in the Housing Element) to contain only parcels relevant to the discussion of the Housing Sites Overlay Zone proposal. First, we eliminated all parcels used in previous housing elements to weed out sites ineligible for the proposed zone. Next we eliminated all publicly-owned land, since the proposal is intended as an incentive for private developers. We then eliminated parcels with fewer than 10 units as too small for the proposal to provide sufficient incentive for the inclusion of affordable units. We finished by eliminating all parcels which were projected to contain 90% or more affordable units, as these would already qualify for by-right development if they were able to achieve 100% affordability.

**Table 3: Potential Units Subject to By-Right Development in the Housing Sites Overlay Zone Policy by Neighborhood**

Area	Parcels	Potential Low-income Units	Potential Moderate Income Units	Potential Above-Mode rate Income Units	Total Units
Chinatown Parcels*	1	0	16	16	32
Downtown/Lake Merritt/Waterfront Parcels	11	24	126	1076	1226
East Oakland Parcels*	5	168	14	553	735
East Lake/San Antonio/Fruitvale Parcels*	2	0	0	234	234
Hills/Mills Parcels	10	44	6	595	645
North Oakland Parcels*	8	54	7	469	530
Piedmont/Claremont/Rockridge Parcels	1	0	51	459	510
West Oakland Parcels*	8	26	38	755	819
<b>*Total In Deeply Rooted Proposed Exemption</b>	<b>24</b>	<b>248</b>	<b>75</b>	<b>2027</b>	<b>2350</b>
<b>Total In Other Neighborhoods</b>	<b>22</b>	<b>68</b>	<b>183</b>	<b>2145</b>	<b>2396</b>
<b>All Parcels Subjected to Housing Sites Overlay Zone Policy</b>	<b>46</b>	<b>316</b>	<b>258</b>	<b>4172</b>	<b>4746</b>
<b>Proposed Exemption as Percentage of Units Subject to Housing Sites Overlay Zoning</b>	<b>52.2%</b>	<b>78.5%</b>	<b>29.1%</b>	<b>48.6%</b>	<b>49.5%</b>
<b>Proposed Exemption as Percentage of All Units in Housing Sites Inventory</b>	<b>4.8%</b>	<b>3.4%</b>	<b>1.8%</b>	<b>26.8%</b>	<b>12.4%</b>

Table 3 shows the number of units projected to be produced in each region of Oakland. We defined the geographical regions as follow: East Oakland is composed of the neighborhoods south and west of Macarthur Boulevard and High Street, excluding Maxwell Park; East Lake/San Antonio/Fruitvale is composed of the neighborhoods south of Park Blvd, north of High Street, and east of the 580; North Oakland is composed of the neighborhoods east of the 24 and Telegraph Avenue and north of the 580, plus Mosswood; and West Oakland is composed of the neighborhoods bounded by the 880, 980, and 580 freeways. These are the areas we propose exempting from the Housing Sites Overlay Zone proposal. We also show the total number of parcels and projected units we propose exempting from the proposal as a percentage of the total number that would be subjected to the Housing Sites Overlay Zone proposal and as a total of all parcels included in the Housing Sites Inventory.