

**APPENDIX B**  
**ANALYSIS OF SOURCES CITED FOR DISPLACEMENT**  
**AND PUBLIC HEALTH COMMENTS**

The comment letter of Dr. Rajiv Bhatia cited numerous studies, articles and sources. Several other commentors stated similar concerns and referred to Dr. Bhatia’s comments, or to the same sources as were referenced by Dr. Bhatia. Accordingly, addressing the sources referenced by Dr. Bhatia will address the evidence referenced by all commentors on the issue. In order to fully respond to the comment, Bay Area Economics evaluated the available data and information, and carefully reviewed each of the citations provided. The results of that detailed analysis were reviewed by the EIR preparers and are presented below. The first column (from left to right) contains the citation from the comment letter with the corresponding footnote number. (Some footnotes contained more than one source and are indicated by letter, e.g. 7a, 7b, etc.) The second column contains the quotation from the comment letter which cited to the corresponding source(s). The third column presents a response relating to the source and whether it supports the commentor’s assertions.

Footnote Number/ Source	Text from Comment Letter	Comments on Cited Source
1. Regional Development and Physical Activity: Issues and Strategies for Promoting Health Equity. PolicyLink, Nov. 2002.	“Reducing automobile use can also increase opportunities for walking and bicycling, leading to reduced stress, obesity, diabetes and heart disease.”	<p>The source supports the quoted text. However, the article is in general a critique of suburban sprawl, particularly its impacts on health in low-income communities impacted by loss of jobs, development and investment, which lead to “shifts in the tax base, political power, and public investments in infrastructure and services.” (PolicyLink at p. 7). The article does not indicate that mixed-use, pedestrian oriented infill development leads to increased automobile use. Rather it attributes high rates of automobile use to “the pattern of land use in which low density, auto-dependent development spreads farther and farther from urban core areas...” (<i>Id.</i>)</p> <p>The article is primarily concerned with the impact of regional development patterns on health and levels of physical activity, particularly in the urban core. The article identifies disinvestment in the urban core as a major contributor to lower levels of physical activity and high instances of certain diseases such as obesity in low-income communities (<i>Id.</i> at 9). As an example, the article discusses the difficulty of obtaining healthy foods in</p>

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		<p>low-income communities and identifies this as a major contributor to obesity. Continuing with this point, the article states that efforts to reduce obesity should consider “opportunities to purchase and eat healthy foods,” suggesting that developments which help to attract or otherwise bring neighborhood-serving retail to an area are beneficial to community health (<i>Id.</i>).</p> <p>The article identifies several major obstacles to higher levels of physical activity in low-income communities including lack of recreation facilities and parks, as well as fear of crime and unsafe pedestrian conditions related to inadequate infrastructure, such as road design and safety features. With its inclusion of public open space and substantial investment in off-site infrastructure, the proposed Wood Street Project directly benefits the pedestrian environment in a manner that the authors identify as important to community health. Moreover, the Wood Street Project would improve the area tax base and spur further investment in the area, helping to reverse a pattern of disinvestment the authors identify as harmful to community health.</p>
<p>2. Frumkin, Howard. “Urban Sprawl and Public Health,” <i>Public Health Reports</i>, 2002; 117: 201-217.</p>	<p>“Reducing automobile use can also increase opportunities for walking and bicycling, leading to reduced stress, obesity, diabetes and heart disease.”</p>	<p>The source supports the quoted text. However, the source is an article that critiques suburban sprawl and suggests mixed-use infill development as an attractive alternative from the perspective of public health. The article does not contain data specific to the City of Oakland.</p> <p>The article critiques development patterns that keep land uses (e.g., housing, retail, office, industry and recreational facilities) separate from one another because such land use patterns encourage more driving. The article also states that “sprawl is associated with high levels of driving, driving contributes to air pollution, and air pollution causes morbidity and mortality.” (Frumkin at 203) The article also correlates “lower density development and more automobile travel.” (<i>Id.</i> at 202). In contrast, the proposed Wood Street Project contemplates a mixture of residential, commercial and open space uses, within walking distance of a major mass transit facility.</p>

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		<p>The article criticizes “suburban development patterns [that] often feature significant economic stratification. Many housing developments are built to specific price ranges, so that buyers of \$250,000 homes are effectively segregated from buyers of \$500,000 homes (and those at the bottom of the economic ladders are excluded altogether). This pattern creates income homogeneity within neighborhoods...” (<i>Id.</i> at 209). In contrast, the Wood Street Project would include a mix of residential units, varying by housing type and size, providing rental and ownership opportunities to individuals and families with a range of household income levels. Moreover, the development will be situated in and physically integrated with a neighborhood that includes many low-income households. In this way the Project will contribute to economic integration and help to reverse a pattern of disinvestment and economic isolation which the authors identify as a contributor to poverty. (<i>Id.</i>).</p> <p>To combat the problems created by sprawl, the article suggests interventions such as “planting more trees or providing sidewalks” as well as more complex and expensive solutions such as “mass transit and mixed-use zoning.” (<i>Id.</i> at 211).</p>
3. California Air Resources Board, 2003.	“Transportation is responsible for 59% of California’s greenhouse gas emissions.”	The source supports the quoted text. However, the accuracy of the statistic cited does not affect the analysis contained in the EIR.
4. EPA, 2001.	“Total vehicle miles of travel (VMT) have doubled in the U.S. since 1970.”	The citation provided by the commentator is inadequate to allow for confirmation. However, the accuracy of the statistic cited does not affect the analysis contained in the EIR.

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<p>5. San Francisco Bay Crossings Study. Metropolitan Transportation Commission, July, 2002.</p>	<p>“The MTC expects VMT to grow by 50% in the Bay Area Region from 1998 to 2005 despite significant transportation investments.”</p>	<p>An electronic search of the cited document does not locate a reference to vehicle miles of travel (VMT). This reference is contained in other MTC documents and these data sources indicate that a 50 percent increase in VMT is not expected until approximately 2028. According to an article published by MTC in 1998, a “decline in vehicular emissions is predicted to continue despite a population growth of 30 percent and a 50 percent increase in daily vehicle miles of travel over the next 30 years.” (Goode, Reka. “Clean Air 101: Bay Area Goes Back to School On Clearing Region's Skies”, <i>Transactions Online</i>. MTC. December 1998/January 1999. <a href="http://198.94.156.110/publications/transactions/ta1298-0199-htm/covstory.htm">http://198.94.156.110/publications/transactions/ta1298-0199-htm/covstory.htm</a>).</p> <p>Other data posted at the MTC website also indicates that, according to the regional indicators data, Bay Area regional VMT is expected to increase only 10 percent between 1998 and 2006 from 135,778,300 to 149,926,500 miles. (MTC. <i>San Francisco Bay Area Vehicle Miles of Travel (VMT) Population and Employment, 1990-2025</i>. <a href="http://www.mtc.ca.gov/datamart/stats/vmt.htm">http://www.mtc.ca.gov/datamart/stats/vmt.htm</a>).</p>
<p>6. BAAQMD CEQA Guidelines, Dec., 1999.</p>	<p>“Local, regional, and state policies, including the Bay Area Regional Air Quality plan, and the California General Plan Guidelines, aim for improving the jobs-housing balance in order to mitigate adverse environmental effects.”</p>	<p>The source supports the quoted text in that the cited plans do aim to improve the jobs-housing balance in order to improve regional air quality. However, the Guidelines are also supportive of developments like the proposed Wood Street Project.</p> <p>According to the document cited: “Land use decisions are critical to air quality planning because land use patterns greatly influence transportation needs, and motor vehicles are the largest source of air pollution. The location, intensity and design of land use development projects significantly influences how people travel. For example, land use strategies such as locating moderate or high density development near transit stations increases opportunities for residents/employees to use transit rather than drive their cars. Similarly, design considerations such as orienting a building entrance</p>

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		<p>towards a sidewalk and/or transit stop increases the attractiveness of walking and transit as an alternative to driving.</p> <p>Some important land use and design issues to consider include the following:</p> <ul style="list-style-type: none"> <li>• Encourage the development of higher density housing and employment centers near transit stations.</li> <li>• Encourage compact development featuring a mix of uses that locates residences near jobs and services.</li> <li>• Provide neighborhood retail within or adjacent to large residential developments.</li> <li>• Provide services, such as restaurants, banks, copy shops, post office, etc., within office parks and other large employment centers.</li> <li>• Encourage infill development.</li> <li>• Ensure that the design of streets, sidewalks and bike paths/routes within a development encourages walking and biking.</li> <li>• Orient building entrances towards sidewalks and transit stops.</li> <li>• Provide landscaping to reduce energy demand for cooling.”</li> </ul> <p>Elsewhere the document states: “There are myriad ways in which land use influences travel behavior. Examples of such considerations include the following:</p> <ul style="list-style-type: none"> <li>• Are residential and commercial developments of sufficient density to support transit service?</li> <li>• Are neighborhoods sufficiently "compact" to encourage walking and biking for errands, socializing, etc.?</li> <li>• Are houses, jobs and services located close enough together to allow walking and biking for at least some trips?</li> </ul>

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		<ul style="list-style-type: none"> <li>• Does the circulation network and the design of individual streets provide a safe and attractive environment for bicyclists and pedestrians?</li> <li>• Do the designs of individual development projects provide direct, safe and attractive pedestrian access to transit stops and nearby development?</li> <li>• Does the community have a rough balance between the number of jobs and the number of employed residents?”</li> </ul> <p>In qualitative terms, the proposed Wood Street Project clearly meets the criteria for evaluation laid out by the BAAQMD. In quantitative terms it also meets the criteria regarding jobs housing balance. See Master Response 5.</p>
7a. Governor’s Environmental Goals and Policy Report; Office of Planning and Research, Nov. 10, 2003.	“Local, regional, and state policies, including the Bay Area Regional Air Quality plan, and the California General Plan Guidelines, aim for improving the jobs-housing balance in order to mitigate adverse environmental effects.”	<p>The source supports the quoted text in that the Governor’s Environmental Goals and Policy Report advocates more housing development near jobs to improve air quality and mitigate associated health problems. Nonetheless, similar to the BAAQMD CEQA Guidelines, the Report is generally supportive of mixed use, infill developments such as the proposed Wood Street Project.</p> <p>The Report notes that the “a spatial mismatch between jobs, transportation, housing and services” contributes to increased VMT and that increased VMT is linked to air pollution and poor health (Report at 58). The Report cites several examples of how to reduce VMT and related emissions, shown below:</p> <p>“SCAG has estimated that a modest redistribution of jobs and housing would result in an 8.5% reduction in VMT and a reduction in ROG of 45.5 tons.</p> <p>A study of Kings County, Washington showed that mixed-use neighborhoods had substantial increases in non-motorized work trips, from 3.9% to 12.2%. The share of walking compared to total weekday trips was as</p>

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		<p>high as 18.1% in some compact mixed-use neighborhoods.</p> <p>A study of travel and emissions in San Diego showed that per capita VMT for infill development was 52% of greenfield VMT, while NOx and particulate matter emissions were 58% of Greenfield emissions.</p> <p>Transit use rises significantly at a threshold development density of about 7 households per acre.” (<i>Id.</i>).</p> <p>It is important to note that as a higher-density, infill, mixed-use housing and retail development located amid a significant employment cluster and near BART, the Wood Street Project conforms to the Governor’s suggested strategies for reducing VMT and reducing emissions.</p>
<p>7b. State of California, General Plan Guidelines, Office of Planning and Research, 2003.</p>	<p>“Local, regional, and state policies, including the Bay Area Regional Air Quality plan, and the California General Plan Guidelines, aim for improving the jobs-housing balance in order to mitigate adverse environmental effects.”</p>	<p>The source supports the quoted text. The State General Plan Guidelines explicitly advocate a jobs/housing balance as instrumental to sustainable development. Like the previous two documents cited, the Guidelines support mixed-use, infill development and should be considered as generally supportive of developments such as the proposed Wood Street Project as a means of addressing a regional jobs-housing imbalance.</p> <p>As stated in the Guidelines, “strategies for improving the jobs/housing balance include locating higher-density housing near employment centers, promoting infill development, promoting transit oriented development, actively recruiting businesses that will utilize the local workforce, developing a robust telecommunications infrastructure, developing workforce skills consistent with evolving local economies, and providing affordable housing opportunities within the community.” (Guidelines at 21). As described above, the proposed Wood Street Project is clearly consistent with the first few strategies outlined by the Guidelines for improving the jobs/housing balance. The Wood Street Project is susceptible to criticism in connection with the Guidelines because it does not include income-restricted affordable housing units, the inclusion of which is identified as a strategy for</p>

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		improving jobs/housing balance in certain circumstances. Nonetheless, the Guidelines do not proscribe a one size fits all solution to the jobs/housing imbalance, that should be carried out in all jurisdictions under all circumstances. The Guidelines note that “improving the jobs/housing balance requires carefully planning for the location, intensity, and nature of jobs and housing in order to encourage a reduction in vehicle trips and miles.” The Guidelines are clear that careful planning for adequate affordable housing is to be carried out through the local General Plan and its Housing Element. These regulations are the appropriate vehicle through which to plan for the location, intensity and nature of housing to be located at various sites throughout the city.
8. California Planning Roundtable, 1998	“To improve jobs-housing balance, new housing must be sufficient in quantity, adequate in size, affordable to area employees, and have accessibility to schools, libraries, parks and other public infrastructure.”	The citation provided by the commentor is not specific and the document could not be located for review. However, the accuracy of the statement does not affect the analysis contained in the EIR.
9. California Planning Roundtable, 1998	“Currently, less than one-quarter of home in the region are affordable to median income families.”	See No. 8 above.
10. State of California, General Plan Guidelines, 2003.	“Mixed income housing and local hiring are two recognized strategies towards jobs/housing balance.”	The source supports the quoted text. See discussion of this source contained above at 7b.
11. San Francisco Planning Department. Update of the	“In the San Francisco Bay Area Region, few households	The citation provided by the commentor could not be located as the web link is no longer active. The San Francisco Housing Element does indicate that

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Housing Element of the General Plan. Accessed at: <a href="http://www.ci.sf.ca.us/planning/citywide/c1_housing_element.htm">http://www.ci.sf.ca.us/planning/citywide/c1_housing_element.htm</a>	currently earn enough to afford median sale price of housing.”	in San Francisco only 6% of houses sold were affordable to households earning the median income. Looking at the data another way, 11% of San Francisco households can afford the median home sale price.  The San Francisco Housing Element does not state how many households in the Bay Area or Oakland currently earn enough to afford the median sale price of housing. The San Francisco Housing Element also does not contain data about the community surrounding the Wood Street Project.
12. Out of Reach 2003: America’s Housing Wage Climbs,” National Low Income Housing Coalition.	“In addition, high rents leave many paying more than 50% of their incomes for housing costs.”	According to the data presented in this study, Oakland is the fourth most expensive rental market in the country behind San Francisco, San Jose, and Stamford-Norwalk, CT. The commentator’s statement that many pay more than 50% of their income for housing costs could not be located in the cited study, but the accuracy of the statement does not affect the analysis contained in the EIR.
13. Governor’s Environmental Goals and Policy Report. Office of Planning and Research, Nov. 10, 2003.	“Even individuals earning modest wages, such as, public service employees and those in the construction trades simply cannot afford to live where they work.”	Authority for this statement could not be located in the cited document. Nonetheless, the statement is reasonable and true of certain locations around the Bay Area. However, the accuracy of the statement does not affect the analysis contained in the EIR.
14. California Government Code Section 21000	“CEQA regulations require public agencies to analyze reasonably foreseeable direct or indirect adverse effects on human beings.”	The commentator appears to be referencing Public Resources Code section 21000. This section of the Code does not support the statement, however CEQA does require analysis of a project’s physical impact on the environment.

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15. CEQA Guidelines Section 15065	“More specifically, CEQA considers that adverse human impacts directly or indirectly related to environmental change are mandatory finds of significance.”	The cited CEQA Guideline states: “Mandatory Findings of Significance: (4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.”
16. Bass, Herson & Bodgan,. CEQA Deskbook, A step-by-step guide on how to comply with the California Environmental Quality Act. Solano Press Books. 2001.	“Under CEQA an EIR must analyze environmental impacts resulting from social or economic effects.”	The cited source states: “Effects analyzed under CEQA must be related to a physical change in the environment. Guideline sec. 15358(b). Economic and social effects are not considered environmental effects under CEQA. These effects need to be considered in EIRs only if they would lead to an environmental effect. ... The evaluation of economic or social effects is generally treated as optional; agencies may, but are not required to, evaluate them and sometimes do include an analysis of economic or social effects of the proposed project. Guidelines sec. 15131.” CEQA Deskbook at p. 102-03. (2d ed. 1999, Supp. 2001).
17. Citizen’s Association for Sensible Development v. County of Inyo, 172 Cal. App. 3d 151 (1985).	Under CEQA, an EIR must analyze environmental impacts resulting from social or economic effects. For example in Citizen’s Association for Sensible Development of Bishop Area v. County of Inyo, plaintiffs successfully argued that retail development on the town’s fringe would result in disinvestment and blight in the town’s central business district. The court held that these effects needed analysis	The facts in the cited case are considerably different from the circumstances of the proposed Wood Street Project. The cited case involved a retail development on the fringe of a town whose lead agency issued a negative declaration rather than prepare an EIR. The court held that an EIR was necessary and quoted CEQA Guidelines sections 15064 (d) and (f) [now contained in section 15064(e)]. Section 15064(f) states:  “Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a

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	within the EIR.”	<p>significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.” See 172 Cal. App. 3d at 169-70.</p> <p>Contrary to the cited case, the Wood Street Project proposes to reduce blight by developing a mixed-use, in-fill project on vacant and/or underdeveloped parcels. See Master Response 5.</p>
18. California Government Code Section 65040.12	“California Law defines Environmental Justice as “... the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”	The cited Code section states that for purposes of that section, environmental justice is defined as the commentor notes.
19. President’s Council of Economic Quality, 1997.	“Federal guidance states that adverse environmental effects from physical change can be economic, social cultural, and ecological impacts directly or indirectly related to physical environmental changes or impacts.”	The citation is general and a specific document could not be located for review. However, the accuracy of the statement does not affect the analysis contained in the EIR.

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20. California Administrative Code, Title 14, Section 15064(e)	“Economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment.”	The citation appears to refer to the CEQA Guidelines (contained at the California Code of Regulations) and accurately reflects the cited Guideline, the exact text of which is:  “Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment.”
21. <i>Christward Ministry v. Superior Court</i> , 184 Cal. App. 3d 180 (1986).	“CEQA guidelines and law include several examples of the social effects of physical change, including crowding of public facilities, the displacement of people, and the loss of social cohesion and the disturbance of cultural practices.”	The <i>Christward Ministry</i> case contains the following statement: "Christward also raised the potentially adverse effect on its religious retreat. The CEQA guidelines state a city in amending a general plan should address the secondary effects on the amendment. (Cal. Admin. Code, tit. 14, § 15146, subd. (b).) The guidelines also state "[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by the project." (Cal. Admin. Code, tit. 14, § 15131, subd. (b).) The following example is given: "[I]f the construction of a road and the resulting increase in noise in an area disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment. The religious practices would need to be analyzed only to the extent to show that the increase in traffic and noise would conflict with the religious practices." (Ibid) Christward presented evidence that the presence of solid waste facilities would disturb its religious practices, worship in the natural environment of the Cresthaven Retreat." See 184 Cal. App. 3d 180, 197. See Master Response 5.
22. California Government Code Section 21082	“CEQA authorizes local governments to adopt by “...ordinance, resolution, rule, or regulation” locally specific “objectives, criteria, and procedures for the evaluation of projects.”	The comment accurately quotes the cited statutory section.

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<p>23. Office of Planning and Research, 1994 (<a href="http://tinyurl.com/4f3dr">http://tinyurl.com/4f3dr</a>).</p>	<p>“Thresholds of significance can be based on health based standards, service capacity standards, ecological tolerance standards, policies and goals within the city’s general plan, or any other standard based on environmental quality.”</p>	<p>The comment accurately quotes the web page. The title of the web page is “Thresholds of Significance: Criteria for Defining Environmental Significance.”</p>
<p>24a. Dunn, James R., <i>A Population Health Approach to Housing: A Framework for Research</i>, National Housing Research Committee and Canada Mortgage and Housing Corporation, January, 2002.</p>	<p>“By not meeting affordable housing needs, the project contributes to numerous adverse human health impacts.”</p>	<p>The cited article indicates various health-related impacts of poor housing. In particular the study argues that research should focus not only on the direct impacts of poor housing on human health (e.g., exposure to physical, chemical, or biological hazards that harm health) but also on the indirect effects caused by ongoing stress related to housing (e.g., stress related to meeting high rental costs, stress related to living in a poor neighborhood). The article explores the existing literature on these topics and suggests areas for further study.</p> <p>The article does not make the claim that housing developments without income restricted affordable housing contribute to adverse human health impacts, nor does the article suggest a causal link between building additional housing units and an increase in adverse human health impacts. The article does not contain data specific to the City of Oakland.</p>
<p>24b. Unaffordable Housing: the Costs to Public Health, City and County of San Francisco Department of Public Health, Occupational and Environmental Health, Program on Health, Equity and Sustainability, June, 2004.</p>	<p>“By not meeting affordable housing needs, the project contributes to numerous adverse human health impacts.”</p>	<p>This Report is a compilation of secondary sources. The commentator is the director of the Department which authored the Report. The Report calls for the development of tools for “housing impacts assessment for environmental impact review under CEQA.” It notes that the state suffers from a longstanding affordable housing crisis and that “unaffordable housing has indirect environmental and economic consequences.” (Report at 2). The Report indicates that high cost housing in regional job centers is one factor</p>

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		<p>that drives development of lower cost housing on the urban fringe, contributing to traffic congestion, air pollution, and loss of regional farm land.</p> <p>The Report links lack of affordable housing and inadequate nutrition in children, higher levels of stress, and overcrowding. It also notes that poorly maintained housing leads to adverse health impacts (e.g., exposure to lead and mold). The Report does not contain data specific to the City of Oakland.</p> <p>The Report notes that increased housing costs may precipitate gentrification, leading to loss of social cohesion which can in turn spur a “broken window” effect and lead to increased crime but does not explain the causal links in this process. The report does not state that building new housing on vacant or underutilized land leads to gentrification or to an increase in the price of existing homes.</p> <p>Also, development of the Wood Street Project addresses some of the concerns of the Report. Redevelopment law relevant to private development provides for 15% affordable units on site, and that, to satisfy that requirement, the Redevelopment Agency may cause to be available two units outside the redevelopment plan area for each unit that otherwise would have been required to be available inside the redevelopment plan area. The affordable housing is to be funded by the Redevelopment Agency through a requirement that 20 percent of the tax increment funds generated as a result of the rising property values within a redevelopment area be set aside to provide affordable housing. The Wood Street Project, by developing underutilized property, is consistent with the Redevelopment Plan and state redevelopment laws in that it will lead to the generation of these tax increment funds that must be used to provide for affordable housing. However, the Project will not cause any physical impacts to the environment related to the City’s ability to promote goals related to affordable housing. Also, the City’s Planning Director has indicated that City staff will be preparing a report to study if the Project will require economic contributions</p>

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		<p>from the City or instead bring economic benefits to the City. That report is expected to shed light on these market and economic forces affecting West Oakland, but that report is outside the scope of this EIR.</p>
<p>24c. Health Impact Assessment of Housing Improvements, A Guide, Public Health Institute of Scotland.</p>	<p>“By not meeting affordable housing needs, the project contributes to numerous adverse human health impacts.”</p>	<p>The Study compiles various research to broadly examine the question of how housing improvements impact human health. With regard to the topics of area/neighborhood improvement (called “regeneration” in the study) and gentrification, the Study notes that “regeneration has unclear overall impact on health or illness”. (Study at 15). The Study was produced by the Public Health Institute of Scotland and does not contain data specific to the City of Oakland.</p> <p>The Study notes that in one regeneration process 58% of residents complained about the process linking uncertainty and negative health impacts. It also notes that some housing regeneration projects can lead to displacement and references another study. It is not clear whether the projects referred to caused displacement directly (through demolition of existing housing units). The Study notes that a review of “regeneration and health highlighted the possibility of increasing exclusion and area division through regeneration” (Study at 12). Health effects of such division when it occurs are “not known.” (<i>Id.</i>).</p> <p>The Study notes that in looking at gentrification, which sometimes accompanies regeneration, “a range of complex and conflicting findings were reported ... impacting on housing demand and prices, social diversity, social mix, crime, occupancy rate, private and local investment, population loss from other areas.” (<i>Id.</i>). According to the report, few studies have looked at the impacts on original residents and fewer still on the health impacts. Further, the report notes that local contexts vary widely and may influence the direction of impacts.</p>
<p>24d. Cooper, Merrill. “Housing Affordability: A Children’s</p>	<p>“By not meeting affordable housing needs, the project</p>	<p>The Study points to various adverse health impacts association with poor quality housing and high costs of housing. It does not indicate that</p>

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Issue.” <i>Canadian Policy Research News</i> .	contributes to numerous adverse human health impacts.”	development of new housing on vacant or underutilized parcels leads to adverse health impacts, nor that such development increases area housing prices. The Study does not contain data specific to the City of Oakland.
24e. San Francisco Families in SROs Workgroup. Report on Families with Children Living in Single Room Occupancy Hotels in San Francisco. City and County of San Francisco, 2001.	“By not meeting affordable housing needs, the project contributes to numerous adverse human health impacts.”	The Report is not available for review. However, the source appears to reference single-room occupancy hotels in San Francisco and not housing in the City of Oakland. The Wood Street Project proposes a mixed-use, in-fill development on vacant or underdeveloped land. For a discussion of how the Project furthers the provision of affordable housing, see the response to No. 24b, above.
25. Krieger J., Housing and Health: Time Again for Public Health Action, <i>American Journal of Public Health</i> , 2002.	“The mechanisms through which housing impacts physical and mental health are complex, as described in the numerous research studies linking housing adequacy and affordability to health”	The source supports the comment’s text. The article points to various health effects of living in substandard housing. It also points to an earlier cited study indicating that low-income persons receiving housing subsidies are healthier than their peers who are on waiting lists to receive these subsidies. The article does not contain data specific to the City of Oakland. The Project will not remove any current housing nor will it create any substandard housing. For a discussion of how the Project furthers the provision of affordable housing and the City’s efforts to examine benefits of the Project, see the response to No. 24b, above.
26. Institute of Medicine, <i>Clearing the Air: Asthma and Indoor Air Exposures</i> , National Academy Press, Washington D.C., 2000.	“A number of environmental conditions in older and poorly maintained housing affect health. Irritants and allergens, including house dust, mites, cockroach antigens, cat dander, mold spores, and pollens, present in one’s home environments contribute to asthma.”	The citation refers generally to a 425-page book. However, based on a general review of the source, the source appears to support the comment’s text. The Report does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR.. The question of whether development of the Project will force members of the community to relocate into housing that is of a lower standard from their current residence is speculation. See Master Response No. 5.

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<p>27. Meyers, Frank, Roos, &amp; Peterson, “Housing Subsidies and Pediatric Undernutrition,” <i>Archives of Pediatric and Adolescence</i> (1995) at 148:1079-1084.</p>	<p>“Spending more of household income on rent often means doing without necessities such as food, clothing, transportation, or health care. In one study, children from low-income families receiving housing subsidies had increased growth compared with children whose families were on a subsidy waiting list.”</p>	<p>The source supports the comment’s text. The study found that 21.6 percent of children in families on a waiting list for housing assistance had low weight or height for age compared with 3.3 percent of children in families receiving housing assistance. The article is based on research conducted in Boston and refers to families on waiting lists for housing assistance in that city. It is not clear from the article whether the term “housing assistance” in the study refers exclusively to public housing and private rent subsidies through “Section 8” or if it also includes programs targeted to higher income levels. The main policy implication of the study appears to be that funding for public housing assistance such as Section 8 vouchers should be increased to protect children’s health. The study does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR..</p>
<p>28. Cohen, Sheldon et al. “Types of Stressors That Increase Susceptibility to the Common Cold in Healthy Adults.” <i>Health Psychology</i>, 1998: 17(3): 214-223.</p>	<p>“Residential displacement can increase psychological stress, which impacts the human immune and endocrine systems. For example, a randomized study of healthy human volunteers demonstrated that chronic stress doubled the rate at which inoculation with a common cold virus led to a clinical infection.”</p>	<p>According to the cited article, chronic stress increased the rate of infection for healthy human volunteers exposed to a common cold virus. However, chronic stress does not appear to “double” the rate at which infection occurs. While the article is highly technical, it appears that the actual rate of increase is approximately 42 percent. Approximately 35 percent of those with no chronic stress became infected while approximately 50 percent of those with chronic stress became infected. Of more importance in the context of the EIR, the study cited states that the relationship between increased risk of developing a cold and stress was “primarily attributable to under- or unemployment and to enduring interpersonal difficulties with family or friends.”</p> <p>The study is quite clear in identifying which stresses are likely to lead to increased risk of infection. Housing displacement is not called out. Indeed, the study seems to suggest that living in an area that suffers from a lack of reinvestment, where jobs are scarce, is harmful to one’s health. Moreover, the study indicates that “severe acute stressful life events (less than 1 month long) were not associated with developing colds.” It is not clear from the</p>

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		<p>article whether relocation would be an acute or a chronic stress. This citation is used as part of an argument that suggests that redevelopment leads to displacement and that displacement leads to higher levels of disease. Leaving aside whether redevelopment in general leads to displacement and whether the proposed Wood Street Project would in particular lead to displacement, the cited article is silent as to whether residential displacement is the type of stress that increases one’s susceptibility to disease. Based on the article, it is as plausible that living in a neighborhood that lacks reinvestment, and experiences the concomitant problems of high unemployment, high crime and low levels of public services, is as likely to create chronic stress leading to infection as is relocation related to redevelopment in a distressed area. The Report does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR.</p>
<p>29. Cooper, Merrill. “Housing Affordability: A Children’s Issue.” <i>Canadian Policy Research News</i>.</p>	<p>“For children, family relocation leads to children’s grade repetitions, school suspensions, and emotional and behavioral problems.”</p>	<p>The source supports the comment’s text. The Report does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR. For a discussion on whether the Project will lead to displacement of current residents near the Project Area, see Master Response No. 5.</p>
<p>30. Cohen, Underwood, &amp; Gottlieb, <i>Social Support Measurement and Intervention</i>, Oxford University Press, New York, 2000.</p>	<p>“Displacement can also lead to the loss of supportive family and community relationship if displaced residents are forced to relocate outside of their neighborhood. Strong social relationships and community cohesion are protective of health in multiple ways. Neighbors, friends, and family provide material as</p>	<p>The citation is to a book that appears to be a text for researchers in the field of examining social support networks. Based on a review of the relevant chapters of this source, it appears likely that the authors support the position that social support, perceived or provided, buffers stressful situations and contributes to self-esteem. The book’s main objective appears to be reviewing the theoretical framework for research in this field and describing how to properly measure social support and establish social support interventions.</p> <p>In the chapters reviewed, the book does not discuss the role of residential displacement in disrupting social support networks nor does it comment on any associated health impacts of residential displacement.</p>

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	<p>well as emotional support. Support perceived or provided can buffer stressful situations prevents damaging feelings of isolation, and contributes to a sense of self-esteem and value.”</p>	<p>The chapters reviewed do not discuss causes of residential displacement nor suggest that new housing developments on vacant or underutilized land would lead to such displacement or disrupt social support networks.</p> <p>The book does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR. For a discussion on whether the Project will lead to displacement of current residents near the Project Area, see Master Response No. 5.</p>
<p>31. Berkman &amp; Syme, “Social Networks, Host Resistance, and Mortality: A Nine-Year Follow-up Study of Alameda County Residents,” <i>American Journal of Epidemiology</i> (1979), at 109(2): 186-204.</p>	<p>“In the Alameda County Study, those with fewer social contacts . . . had twice the risk of early death, even accounting for income, race, smoking, obesity, and exercise.</p>	<p>The article cited does indicate a significantly higher mortality rate among people with fewer social connections. The article, written in 1979, does not discuss whether moving or residential displacement is a major cause of lost social connections. The article notes that the most important type of social connection toward health is marriage, followed by contact with friends and/or relatives. The article is silent as to whether moving harms these social connections. The information presented does not affect the analysis of the EIR.</p>
<p>32. Eschbach et al. “Neighborhood context and mortality among older Mexican-Americans: is there a Barrio advantage?” <i>American Journal of Public Health</i>, 2004; 94:1807-1812.</p>	<p>“Displacement can also lead to the loss of supportive family and community relationships if displaced residents are forced to relocate outside of their neighborhood. Strong social relationship and community cohesion are protective of health in multiple ways. . . . In a more recent study, living in high-density Mexican American Neighborhoods, reduced the risk of stroke,</p>	<p>The source supports the comment’s text. The article pertains to the health benefits to older Mexican-Americans of living in Mexican American neighborhoods. Nonetheless, the authors are very deliberate to note that their research is focused exclusively on older Mexican-Americans living in areas with high concentrations of Mexican Americans and they note that mortality rates are quite different in African-American neighborhoods. The article describes the phenomena that it explains as the “Hispanic paradox” or the “barrio effect.” This article is not particularly applicable to West Oakland, given the neighborhood’s high concentration of African-Americans and relatively low concentration of Latinos relative to the overall Bay Area population. According to data compiled by Urban Strategies as of 2000, the West Oakland Redevelopment Project Area was 66 percent African-American, 16 percent Hispanic and 11 percent Caucasian. See <a href="http://www.urbanstrategies.org/programs/econopp/REAP/westoakland">http://www.urbanstrategies.org/programs/econopp/REAP/westoakland</a>.</p>

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	cancer, and hip fracture by two-thirds for older Mexican immigrants.”	<a href="#">html</a> . In comparison, the nine county Bay Area was 7.5 percent African American, 19.4 percent Hispanic, and 58.1 percent Caucasian. See <a href="http://census.abag.ca.gov/bayarea.htm">http://census.abag.ca.gov/bayarea.htm</a> . The West Oakland area remains predominantly African American and has a low concentration of Hispanic and Caucasian residents in comparison with their respective percentages at a Bay Area wide level. For a discussion on whether the Project will lead to displacement of current residents near the Project Area, see Master Response No. 5.
33. Hahn 1987.	“The Alameda County Study found that the effects of low-income neighborhoods on mortality were independent of effects of personal household income.”	The commenter’s citation is unclear. However, the sentence appears to reference the study referenced in footnote 31. The quoted statement could not be located in the study cited in footnote 31, however, the accuracy of the statement does not affect the analysis contained in the EIR.
34. Wilson and Kelling, “Broken Windows,” <i>Atlantic Monthly</i> , 1982.	“Increased housing costs are also contributing to the concentration of poor families in low-income neighborhoods. . . . The “broken window effect” illustrates the relationship between concentrated disadvantage, physical blight, and violence.”	The cited article discusses a program in New Jersey that placed police foot patrols on the ground in various urban areas throughout the state. In evaluating the program, the authors discuss the importance of maintaining order in communities toward creating a sense of safety. According to the authors, “untended behavior” (e.g., public drunkenness, vandalism, or rowdiness by teens) leads to a breakdown of “community controls”, signaling that, “no one cares” about the neighborhood. (Wilson & Kelling at p. 33). According to the article, areas with such an environment are more likely to experience serious crime than other neighborhoods.  Central to the article’s “broken widow” theory is the concept of equilibrium. According to the authors, “the ratio of respectable to disreputable people is ordinarily so high as to make informal social control [of neighborhoods] effective.” ( <i>Id.</i> at 36). The article describes the force that disturbs this equilibrium, thereby threatening “community controls,” as “urban decay” ( <i>Id.</i> at 33) prompting people who are able to move away from inner cities. The article does not contain data specific to the City of Oakland, nor does the information presented affect the analysis of the EIR.

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		<p>Based on this article, the proposed Wood Street Project would appear to be part of the solution to the “urban decay” which threatens inner city neighborhoods. If completed, the development will represent a major reinvestment, infrastructure improvements, and bring new residents to the area. As noted above in item 24b, it will also promote the provision of affordable housing. See also Master Response No. 5.</p>
<p>35. Acevedo-Garcia et al, “Future Direction in Residential Segregation and Health Research: A Multilevel Approach,” <i>American Journal of Public Health</i> (2003), Vol. 93: 215-221.</p>	<p>“Increased housing costs are also contributing to the concentration of poor families in low-income neighborhoods. . . . Disinvestment from segregated neighborhoods also results in neighborhoods with few assets such as banks and grocery stores.”</p>	<p>This citation appears at the end of a sentence about the effects of neighborhood disinvestment on neighborhood assets (banks and stores). The article does not discuss disinvestment as leading to lack of neighborhood assets. An electronic search of the article did not locate the words “disinvestment” “assets”, “banks”, or “grocery stores.” The citation may be more applicable to the comment’s next sentence: “Residents of segregated neighborhoods experience, high rates of teenage childbearing, tuberculosis, cardiovascular disease, homicide, and pre-mature mortality.” The article cited is a literature review of health impacts associated with living in segregated neighborhoods. The article references other studies, which found higher infant mortality rates, adult mortality rates and crime rates in residentially segregated African American neighborhoods. The article does not contain data specific to the City of Oakland. The main topic of the paragraph where this citation occurs appears to be that increased housing costs contribute to segregation. However, the citation does not support that assertion. The article notes that socio-economic status accounts for only a portion of racial segregation and that discrimination in the housing market continues to exist, preventing “upwardly mobile members of minority groups from becoming more spatially integrated with Whites.” (Acevedo-Garcia at 215).</p> <p>Based on this article and on the commentor’s statement that disinvestment results in neighborhoods with few assets, the proposed Wood Street Project would not appear to be harmful either to neighborhood health in the vicinity of the development or to the stock of neighborhood assets. The Project</p>

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		proposes a mixed-use development on vacant and underutilized sites that may include neighborhood serving retail, public open space and a publicly accessible plaza. The commentor does not provide any evidence to indicate that the Wood Street Project would lead to increased segregation. Rather, the development would be more likely to reduce segregation, benefiting families in vicinity of the development. See also Master Response No. 5.
36. U.S. Dept. of Housing and Urban Development, Moving to Opportunity for Fair Housing Demonstration Program: Interim Impacts Evaluation, 2003.	“Strong causal evidence for the health impacts of segregated environments comes from the HUD Moving to Opportunity program.”	The source supports the comment’s text. However, the cited study which links poverty concentration to health problems. The Project’s development could lessen such concentration of poverty in the area by providing substantial investment with a mixed-use development on vacant and underutilized sites. As noted in the response to item 24b above, the City’s Planning Director has indicated that City staff will be preparing a report to study if the Project will require economic contributions from the City or instead bring economic benefits to the City. That report is expected to shed light on these market and economic forces affecting West Oakland, but that report is outside the scope of this EIR. See also Master Response No. 5.
37. US Conference of Mayors	“Lack of housing contributes to respiratory infection and the activation of tuberculosis. Housing used by the homeless population often lacks safe drinking water and hot water for washing and has ineffective waste disposal, intrusion by disease vectors (e.g., insects and rats), and inadequate food storage, all of which can contribute to the spread of infectious diseases.”	The citation to the source provided by the commentor is general and could not be located. However, regardless of the accuracy of the statement, it does not affect the analysis in the EIR. A discussion of how the Project advances the provision of affordable housing is contained in the response to item 24b, above. See also Master Response No. 5.

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<p>38. Zima, Wells &amp; Freeman, “Emotional and Behavioral Problems and Severe Academic Delays Among Sheltered Homeless Children in Los Angeles County,” <i>American Journal of Public Health</i>, February, 1994, Vol. 84: 260-264.</p>	<p>“A 1994 study of children living in homeless shelters in the Los Angeles area found that the vast majority (78%) of homeless children interviewed suffered from depression, a behavioral problem, or severe academic delay.”</p>	<p>The source supports the comment’s text. The referenced study does not, however, contain data specific to the City of Oakland nor information that affects the analysis contained in the EIR. A discussion of how the Project advances the provision of affordable housing and the steps being taken by the City to evaluate the benefits of the Project to the City of Oakland is contained in the response to item 24b, above. See also Master Response No. 5.</p>
<p>39. Barrow et al, “Mortality Among Homeless Shelter Residents in New York City,” <i>American Journal of Public Health</i>, 1999; 89: 529-534.</p>	<p>“Among sheltered homeless men and women, age adjusted death rates are several fold higher than in the general population.”</p>	<p>The source supports the comment’s text. The referenced study does not, however, contain data specific to the City of Oakland nor information that affects the analysis contained in the EIR. A discussion of how the Project advances the provision of affordable housing and the steps being taken by the City to evaluate the benefits of the Project to the City of Oakland is contained in the response to item 24b, above. See also Master Response No. 5.</p>
<p>40. Land &amp; Danielsen, “Gated Communities in America: Walling Out the World,” <i>Housing Policy Debate</i>, 1997; 4: 867-899.</p>	<p>“Research on “gated communities” in the United States suggests that these structures may diminish social contact across ethnic and class lines, and members can form powerful voting blocks against public sector interests.”</p>	<p>The citation is to an article on gated communities. By the terms of the article, gated communities meet one of three typologies as identified by Edward Blakely and Mary Gail Snyder. While the typologies are not spelled out in detail in this article, Blakely and Snyder spell them out elsewhere in related writings. The first typology is the lifestyle community, “where the gates provide security and separation for the leisure activities within. . . .Second are the Prestige communities, which lack the amenities of the Lifestyle communities, but where the gates still are valued as markers of distinction and status. The Lifestyle and Prestige communities are developer-built, and primarily suburban. . . . The third category is the Security Zone, where trouble with crime or traffic and fear of outsiders are the most common motivations. In these cases residents, not developers, install gates and fences to their previously open neighborhoods. While the image of the neighborhood that retrofits itself with gates or barricades is of the embattled</p>

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		<p>moderate-income city community, such closures occur in the inner city and in the suburbs, in neighborhoods of great wealth and in areas of great poverty. Gating is easily done in open private-street subdivisions. In neighborhoods with public streets, it is usually very controversial, as the streets must be taken over from the city before they can be gated off.” (Blakely E. and Snyder MG, “Putting Up Gates” <i>Shelterforce Online</i>. May/June 1997, <a href="http://www.nhi.org/online/issues/93/gates.html">http://www.nhi.org/online/issues/93/gates.html</a>)</p> <p>With multiple points of entry, publicly dedicated streets and open space, the proposed Wood Street Project would clearly not be a gated community whether in the commonplace sense of being surrounding by gates and walls or according to the typologies identified in the cited article. Whether the residents of the proposed Wood Street development would vote as a block and if so how they would vote, cannot in anyway be discerned from the cited article. Moreover, speculating as to the voting patterns of new residents is beyond the scope of the EIR process.</p>
<p>41a. Newman &amp; Ashton, “Neoliberal Urban Policy and New Paths of Neighborhood Change in the American Inner City,” <i>Environment and Planning A</i>, 2004; 36: 1151-1172.</p>	<p>“Additional research on urban dynamics suggests the migration of population with relatively higher socio-economic class into low-income or distressed urban neighborhoods results in the demolition of low-income housing and reduction in support for public health and social services.”</p>	<p>The commentor overstates the findings of the cited article. This article is based on a case study of a single neighborhood in Newark, New Jersey. It does not contain data pertaining to the City of Oakland. According to the authors, the City of Newark, as part of a revitalization strategy, has demolished high-rise public housing. This demolition resulted in a net loss of approximately 20 percent of the City’s public housing units. In the instance of the proposed Wood Street Project, there will be no demolition of residential units. While the article’s authors were generally critical of urban policy in Newark, looking specifically at their case study neighborhood, they noted the following: “The new housing construction is increasing access to homeownership for many who otherwise could not afford it. And the new residents are not the typical gentry; they are neither white nor upper class. Instead, they are mostly working-class and middle-class families of color. . . . Even skeptics of this process [of revitalization] have a difficult time pointing to directly averse consequences of reinvestment in West Side Park. Much of the newly developed land had been vacant or unproductive, and</p>

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		<p>new population increases the viability of commercial activity.” (Newman &amp; Ashton at 1166). With regard to public health and social services, the authors note revitalization that focuses on drawing higher income residents to an area targets benefits away from very low income residents and that in such a climate “neighborhood service providers continue to struggle to keep up with demand for health and social services.” (<i>Id.</i> at 1170). The authors do not state that the neighborhood changes they observed resulted in “reduction in support for public health and social services.” For a further discussion of socioeconomic issues the Project, see Master Response No. 5.</p>
<p>41b. Curran, W. “Gentrification and the nature of work: exploring the links in Williamsburg, Brooklyn,” <i>Environment and Planning A</i>, 2004; 36: 1243-1258.</p>	<p>“Additional research on urban dynamics suggests the migration of population with relatively higher socio-economic class into low-income or distressed urban neighborhoods results in the demolition of low-income housing and reduction in support for public health and social services.”</p>	<p>This citation refers to an article about the effects of gentrification on industrial land uses. It does not relate to the sentence in the comment for which it was provided as support. For a further discussion of socioeconomic issues the Project, see Master Response No. 5.</p>
<p>42. Forbes, Elaine, “Eroding Neighborhood Integration: The Impact of California’s Expiring Section 8 Rent Subsidy Contracts,” <i>The Ralph and Goldy Lewis Center for Regional Policy Studies</i>, UCLA, 2000.</p>	<p>“A recent study that examined expiring HUD Section 8 agreements with private owners in California, found that, on average, families relocated to relatively more racially-segregated communities.”</p>	<p>The cited source generally supports the comment’s text. The cited study found that young families living in integrated neighborhoods were the most likely to have their section 8 contracted homes converted to market rate housing. And “the small sample of Sacramento movers suggest that households may move to less racially and economically integrated neighborhoods.” However, the applicability of this study to the proposed Wood Street Project is not clear. This development would not be a Section 8 project. Moreover, as it would be located in an area with a very high concentration of African-American residents, there is very little risk of the development contributing to people moving out of the area into a more segregated location. The referenced study discusses the impacts of people</p>

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		being forced to move from integrated neighborhoods with good schools and job opportunities, into less racially and economically integrated neighborhoods such as West Oakland. The study is not concerned with and does not discuss any problems of having new housing develop in less racially and economically integrated neighborhoods. A discussion of how the Project advances the provision of affordable housing and the steps being taken by the City to evaluate the benefits of the Project to the City of Oakland is contained in the response to item 24b, above. See also Master Response No. 5 for a discussion of potential displacement as a result of the Project.
43. Wilson & Kelling, “Broken Windows,” <i>The Atlantic Monthly</i> , 1982.	“Low-income housing (discussed above) is often concentrated in low-income neighborhoods. The “broken window effect” illustrates the relationship between concentrate disadvantage, physical blight, and violence.”	The cited article is discussed in the response to item No. 34.
44. Acevedo-Garcia et al, “Future Direction in Residential Segregation and Health Research: A Multilevel Approach,” <i>American Journal of Public Health</i> , 2003: 93: 215-221.	“Disinvestment from segregated neighborhoods also results in neighborhoods with few assets such as banks and grocery stores.”	The cited article is discussed above at item No. 35.
45. Aragon T., Mortality in San Francisco. Dept. of Public Health, 2000.	“In San Francisco, residents in Bayview Hunter’s Point, a low-income neighborhood, live on average over five fewer years than male	The cited study was not available for review. Based on the comment’s text, it does not present data on the City of Oakland. Assuming the accuracy of the comment’s statement, it does not affect the analysis in this EIR.

Footnote Number/ Source	Text from Comment Letter	Comments on Cited Source
	residents in the rest of San Francisco.”	
46. U.S. Dept. of Housing and Urban Development, Moving to Opportunity for Fair Housing Demonstration Program: Interim Impacts Evaluation, 2003.	“Particularly strong causal evidence for the health impacts of segregated environments come from the HUD Moving to Opportunity Program.”	The cited source is discussed in response to Item No. 36, above.