

Why isn't CEHD blowing the whistle on GHA?

The Center to Eliminate Health Disparities (CEHD) at UTMB has been analyzing many of the “environmental hazards” on the Island that have a negative impact on health. This is very valuable information! The GOP has been doing similar work. When we review reports published by CEHD, we see many of the same “environmental hazards” that we have identified, which will impact the proposed mixed-income sites, and, in some cases, even the scattered sites. **Some “environmental hazards” make a very strong case for not building any more subsidized housing on the Island at all** (e.g. wind and flood risks), and others are more site specific (e.g. traffic, contamination, industrial).

The first quotation from their work (shown below) raises the issue of **whether ANY residential development should be allowed on the three footprints north of Broadway where the GHA intends to build mixed-income due its proximity to industry, but it doesn't even include the issue of contamination!**

The second quotation does raise the **contamination** issue, including **brownfields** which are clustered north of Broadway, and the **vulnerability to flooding**; more reasons NOT to build on these sites! (**Falstaff is very near the Cedar Terrace site**)

This only scratches the surface of the environmental issues involved with building subsidized housing on the Island!

*“Historically, part of the reason that North of Broadway has been lower in value is due to its **proximity to industry, which often brings noise and light pollution and can affect sleeping patterns, memory, etc.**”*

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*While this Element focused heavily on water, beaches, and related areas, the Element gave little attention to the **critical***

issue of soil contamination in Galveston. For instance, testing of Galveston Bay sediment that washed onto the island after Hurricane Ike revealed arsenic, chromium, lead, and some dioxin at levels that could have human health effects, especially for children (see appendix 9).

NR-8.1 To add: Additionally, there are several areas on the island designated as brownfields that are recognized as contaminated, such as the Falstaff Brewery, and others that may be contaminated (see appendix 10). Given Galveston's legacy of naturally occurring heavy metals, industrial processes, lead in the house paint of our older stock of housing, proximity to the Galveston and Houston Ship Channels, and vulnerability to exposure following hurricanes and flooding, monitoring the soil for contaminants (as well as exposure among children) should remain a priority, especially prior to any major developments, in relation to sensitive land use and activities, and for populations living near industry or historically exposed neighborhoods.

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Contamination and Brownfields maps. (Note: other maps show more sites)

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http://www.utmb.edu/cehd/Projects/Resources/CEHD_HIA_of_Galv_Draft_Comp_Plan.pdf

Also from CEHD:

Housing and Neighborhoods Element

- Assess likely health impacts of proximity to industry, traffic, noise/light pollution, contaminated soil, and the effects of gentrification on low-income residents in neighborhood development plans.

It is very interesting to note that the CEHD has identified many of the same “environmental hazards” that the GOGP has discovered, and yet it does not demand that the GHA build in different locations. In fact, **CEHD is acting as a cheerleader for the GHA’s mixed-income building plan** by pretending that these “environmental hazards” are not harmful to mixed-income developments; an impossibility using any form of objective “scientific” analysis.

After all, how can building in a flood zone be a threat to development in general, but not to mixed-income development? Flood waters are repelled due to the mix of residents in the latter type?

How can building in a contaminated industrial area be unsuitable for most residential development, but acceptable for mixed-income development? Explain how that makes a difference?

How can building on a busy truck route be unsuitable for most residential development, but acceptable for mixed-income development? Explain how that makes any sense?

Of course, now that we know that **the CEHD is a paid consultant for the GHA**, it raises a whole lot of questions about why the CEHD doesn’t publish all of the reasons why GHA’s proposed development sites are unsuitable for any form of subsidized housing whether it is 100% Public Housing, or a mix of Public Housing, tax-credit housing and market-rate housing.

The 09 February 2012 GHA Board meeting, on scattered sites, included a discussion of one of these “environmental hazards”; **flooding**. A GHA staff member presented the following slide, but then added the very significant “confession” that most of the Island is in a **high-risk flood zone!** (Click on link below)
<http://www.GalvestonOGP.org/GHA/floodplain.wma>

Floodplain Information

- All properties lie within the 100 yr floodplain
- All properties have a flood zone designation of AE
- Base flood elevation for ten of the sites is set at 11'
- Base flood elevation for two of the sites is set at 12' (1027 & 1017 63rd Street)

Since the **GHA admits that most of the Island is in a high-risk flood zone**, then why does it insist on building here?

And, finally, why doesn't CEHD's "independent", "objective", "scientific", analysis identify and recognize this risk and demand that their client build in a safer location as required by Executive Order 11988?

“Executive Order 11988 requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, “each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities” for the following actions:”

“to minimize the impact of floods on human safety, health, and welfare”, almost sounds like the Mission Statement of the CEHD!!

So once again, **why is the CEHD ignoring the fact that their client, the GHA, intends to build in a high-risk flood zone that will MAXIMIZE the impact of floods on human safety, health and welfare?**