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November 21, 2012

Ulla-Britt Jonsson, Planner II
City of Oakland Strategic Planning Division
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

Subject: West Oakland Specific Plan Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Jonsson:

Bay Area Air Quality Management District (District) staff reviewed your agency's Notice of Preparation (NOP) for the West Oakland Specific Plan (Plan). The City of Oakland (City) is requesting comments on the scope and content of the Draft Environmental Impact Report (DEIR). The City has not prepared an Initial Study and all CEQA topics will be addressed in the DEIR.

The Plan will guide future development in the area generally bounded by Interstates 880 on the west and south; 980 on the east; and 580 on the north. The West Oakland BART station is located in the southern portion of the Plan area, which is approximately 2 square miles subdivided into 6,340 parcels and has a current population of 25,000 residents and 15,000 employees. The Plan area includes a mix of land uses, including residential, commercial, industrial (including diesel truck-related uses), government and institutional uses.

The Plan area is located in a part of the Bay Area with the highest emissions of, and population exposure to, diesel particulate matter. District staff understands the City's interest in further developing West Oakland, but we urge the City to carefully consider the potential for localized exposure to unhealthy air and to plan appropriately.

Air Quality Analysis

1. The DEIR should discuss the District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines; a discussion of the health effects of air pollution (especially on sensitive receptors); and a discussion of greenhouse gas (GHG) emissions and the potential impacts from climate change in the Bay Area. The DEIR should discuss local air quality conditions in West Oakland, especially diesel particulate matter emissions and population exposure.
2. The DEIR should provide a map that clearly identifies the Plan boundary; existing and future planned sensitive receptors (e.g. residences, schools, day cares, hospitals, and nursing care facilities) and all stationary sources, major roadways, highways, and rail lines within 1,000 feet of the Plan boundary.

3. The District's *CEQA Air Quality Guidelines* (May, 2012) provide guidance on how to evaluate potential construction, operational, and cumulative air quality impacts. A copy can be downloaded from <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>.
4. The DEIR should provide a detailed analysis of the potential effects on local and regional air quality from construction and operations (including permitted and non-permitted stationary and area emissions, and mobile emissions). This analysis should include an estimation of both maximum daily and annual emissions of reactive organic gases (ROG), nitrogen oxides (NOx), greenhouse gases (GHGs), and particulate matter (PM2.5 and PM10) that could result from the proposed land uses. These estimates should be compared to appropriate significance thresholds.
5. The DEIR should evaluate the potential adverse impacts to future residents in the Plan area located in close proximity to new and existing sources of air pollution, including freeways, the Port of Oakland, rail yards, stationary sources and loading docks.
6. The DEIR should identify and evaluate measures to reduce criteria pollutants, toxic air contaminants, and GHGs to mitigate potential impacts. These measures should be incorporated into the Plan such that, when implemented on a project-by-project basis, impacts will be below a level of significance. The District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying these measures.
7. Finally, the District thanks the City for including District staff on the Technical Advisory Committee for this Project. Based on careful consideration of the project, District staff believes that the City's Standard Conditions of Approval, which call for the installation of MERV 13 air filtration in buildings serving sensitive receptors, are not stringent enough for this Plan. Due to the Plan's proximity to Interstate 880, the Port of Oakland, the Union Pacific Rail Yard, and the Oakland Army Base, District staff supports the installation of MERV 16 (a higher removal-efficiency filter) air filtration on all buildings serving sensitive receptors.

District staff is available to assist in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

Sincerely,



for
Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Tom Bates
BAAQMD Director Scott Haggerty
BAAQMD Director Jennifer Hosterman
BAAQMD Director Nate Miley