



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

March 20, 2014

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

Subject: Draft Environmental Impact Report for the West Oakland Specific Plan

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EXECUTIVE OFFICER/APCO

Dear Ms. Jonsson:

Bay Area Air Quality Management District (Air District) staff reviewed the Draft Environmental Impact Report (DEIR) for the West Oakland Specific Plan (Plan). The Plan will guide future development in the area generally bounded by Interstate 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. The Plan area is approximately 2 square miles 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.

In 2008, the California Air Resources Board (CARB) released the report *Diesel Particulate Matter Health Risk Assessment for the West Oakland Community* (Report), which concluded that the West Oakland community is exposed to diesel PM ambient concentrations that are almost three times higher than any other area in the Air District's jurisdiction. The Report anticipated that these levels of exposure would drop in future years due to the implementation of CARB's diesel regulations. However, the Report also concluded that this decrease in exposure is not enough to protect health in West Oakland, and that much more needs to be done to ensure that potential cancer risks are reduced even lower as quickly as possible.

The Air District assisted CARB with the Report, and has been involved in other efforts to evaluate and reduce risks caused by toxic air contaminants (TACs) and diesel particulate matter (DPM) in West Oakland. The Air District has identified West Oakland as a Community Air Risk Evaluation (CARE) Community and made it a priority to spend incentive funds in CARE communities. The Air District also participated in the West Oakland Truck Survey (Survey) and the West Oakland Measurement Study (Study). Both the Survey and the Study helped refine the information available on the health risks faced by West Oakland residents.

Impact Air-7 and Impact Air-9: Operational-Related Criteria Air Pollutants and TAC Emissions

The DEIR finds that development facilitated by the Plan would result in operational-related criteria air pollutants that are significant and unavoidable, and that no

mitigations are available. The DEIR also finds that development facilitated by the Plan would result in operational-related TAC emissions that are significant and unavoidable with mitigations.

While the Air District strongly supports the City's Standard Conditions of Approval, Air District staff also believe that there are additional mitigation measures that the City can implement to address both of these significant and unavoidable impacts. The Air District recommends that the City require that all new projects that would attract diesel truck trips, such as retail and commercial outlets, be required to meet the following conditions:

- Place loading docks as far from residences as feasible, and never within 200 feet of residences.
- If the project includes a truck fleet of any size that is registered to the project applicant, the trucks brought into the Plan area must meet CARB's highest engine tier available at the time that building permits are issued, through:
 - new clean diesel trucks,
 - lower-tier diesel engine trucks with added PM filters,
 - hybrid trucks, alternative energy trucks, or
 - another method that achieves the same emission standards as the highest engine tier available.
- New development should offset 100 percent of its TAC emissions within the Plan area through a mitigation program administered by the City.

Impact Air-5: Construction-Period Criteria Pollutants

The DEIR finds that development facilitated by the Plan would result in construction-period criteria pollutant emissions that are significant and unavoidable with mitigations. The DEIR requires that construction projects within the Plan area implement the City's Standard Conditions of Approval (SCA), either the 'Basic' or 'Enhanced' measures, depending on the size of the project.

Again, while the District strongly supports the City's Standard Conditions of Approval, we do not believe that these measures represent *all* feasible measures available to reduce the significant impacts or to protect the health of Plan area residents. Therefore, the District recommends that the City require all construction projects within the Plan area implement the 'Enhanced' measures, and the following additional measures:

- All off-road equipment and on-road equipment used for construction projects within the Plan area shall be no older than eight years at the time the building permit is issued. This requirement will ensure that these projects use the newest and cleanest equipment available.
- Portable diesel engines shall be prohibited at construction sites within the Plan area. Where access to grid power is available, grid power electricity should be used. If grid power is not available, propane and natural gas generators may be used.

In summary, Air District staff believes that the City should require that future construction and operational activities in the Plan area do not contribute to unhealthy air and take extra precautions to protect residents from additional exposure. For more information about CARB's Health Risk Assessment of West Oakland, download the report from <http://www.arb.ca.gov/ch/communities/ra/westoakland/westoakland.htm>. For more information about the Air District's work in West Oakland, see <http://www.baaqmd.gov/Divisions/Planning-and-Research/CARE-Program.aspx>.

If you have any questions regarding these comments, please contact Alison Kirk, Senior Environmental Planner, at 415-749-5169.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

C: BAAQMD Director Tom Bates
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley (Chair)