



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

December 20, 2011

Alicia Parker
City of Oakland
Strategic Planning Division
Community and Economic Development Agency
250 Frank Ogawa Plaza, Suite 3315
Oakland, CA 94612

Subject: Notice of Preparation for the Draft Supplemental Environmental Impact Report for the Central Estuary Implementation Guide

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Dear Ms. Parker:

The Bay Area Air Quality Management District (District) staff reviewed the City's Notice of Preparation for a Draft Supplemental Environmental Impact Report (DSEIR) for the Central Estuary Implementation Guide (CEIG). We understand the CEIG is being developed in accordance with the City's 1999 Estuary Policy Plan. This includes an area encompassing approximately 419 acres of waterfront property in South/East Oakland. The CEIG proposes to maintain existing industrial uses while allowing for an increment of new residential, commercial, and office development. In total, the City anticipates this area to accommodate approximately 391 new residential units, 31 live/work units, 374,857 square feet of industrial space, 712,022 square feet of commercial units, and 10.7 acres of park space. If approved, the CEIG would serve as a 20-year planning document that would modify or otherwise clarify land uses and associated densities within the Central Estuary Area.

The Central Estuary Area is arranged into four distinct zoning districts as illustrated in the CEIG. This includes a west zone that is planned for commercial, light industrial, park space, and waterfront development; a central-west zone that is planned for mixed-use residential development; a central-east zone that is planned for heavy industrial uses and general commercial development; and an east zone that is planned for light industrial uses, waterfront development, and additional park space. Implementation of the CEIG would result in changes to the City's General Plan land use maps and the zoning code, the development of design guidelines to reconcile conflicting land use priorities, and the implementation of transportation improvements to address infrastructure deficiencies.

The District has the following specific comments on the air quality analysis for the DSEIR.

Toxic Air Contaminants

District staff understands that the CEIG would not directly result in any new development. Rather, the proposed land use changes, design guidelines, and

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infrastructure improvements aim to enhance the overall quality of the surrounding environment and to guide future development in the area. Staff is concerned, however, about potential health impacts associated with sensitive receptors being located next to incompatible land uses such as heavy industry, a major regional highway, and active heavy rail lines.

District staff encourages the City to use the tools and resources on the District's web site to evaluate the potential local risk and hazard impacts to existing and future sensitive populations within the CEIG. They can be downloaded from <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>. This analysis should include permitted stationary sources, highways, major roadways, and active rail lines in or near the CEIG planning area boundary. The District offers its assistance on developing strategies and measures that could be included in the design guidelines to minimize potential local air quality impacts.

Air Quality Analysis

In addition to the comments above, the District has the following specific comments on the air quality analysis that should be included in the DSEIR.

1. The DSEIR 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.
2. The DSEIR should provide a map that clearly identifies the planning area boundary; current and future planned sensitive receptors (e.g. residencies, schools, day cares, hospitals, and nursing care facilities) and all stationary sources, major roadways, highways, and rail lines within 1,000 feet of the planning area boundary.
3. The District's *CEQA Air Quality Guidelines (May, 2011)* 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 DSEIR 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 estimating both maximum daily and annual emissions of reactive organic compounds (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 the significance thresholds in the District's *CEQA Air Quality Guidelines*.
5. The DSEIR should evaluate the potential health risks from construction and operation activities to existing and future sensitive populations within the CEIG planning boundary.

6. The DSEIR 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 CEIG design guidelines 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.

The District appreciates the on-going collaboration on air quality issues with the City and looks forward to continue working with the City in the future. If you have any questions, please contact Ian Peterson, Environmental Planner, at (415) 749-4783.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

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