



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

October 17, 2014

Devan Reiff
City of Oakland Strategic Planning Division
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

Subject: Coliseum Area Specific Plan Draft Environmental Impact Report (DEIR)

Dear Mr. Reiff:

Bay Area Air Quality Management District (Air District) staff reviewed the Draft Environmental Impact Report (DEIR) for the Coliseum Area Specific Plan (Plan). The Plan is a policy document that would guide development in the Plan area until 2035. The Plan area is 800 acres, and includes the Oakland Coliseum complex, the Oakland Airport Business Park north of Hegenberger Road, and properties on the north side of 66th Avenue. The DEIR analyzes plan-level impacts for the Plan area, with the exception of the Coliseum subarea and some additional adjacent properties (Coliseum District), which are analyzed for project-level impacts. Air District staff have the following comments on the DEIR.

Support for specific Standard Conditions of Approval and Mitigation Measures in the DEIR: Air District staff strongly supports the following measures:

- Limiting the idling time of diesel powered construction equipment to two minutes (Standard Conditions of Approval),
- Installing MERV-13 filters at any new residences in the Coliseum District within 100 meters of subsequent construction activity (Mitigation Measure Air 6A-2), and
- Replacing four older emergency generators within the Coliseum District with cleaner Tier 4 engines (Standard Conditions of Approval).

Coliseum District and Plan area operational criteria pollutant impacts: Impact Air-7A and -7B The DEIR concludes that criteria pollutant emissions of ROG, NOx, and PM10 from operations in the Coliseum District and the Plan area would remain significant and unavoidable due to exhaust from mobile on-road sources. The Air District agrees that the implementation of Standard Conditions of Approval (SCA) should be implemented to further reduce single-occupant vehicle use. In support of this goal, the Air District believes the following specific SCA strategies should be implemented in the Coliseum District and the Plan area:

- Provision of safe bicycle and pedestrian routes
- Provision of secure long-term and short-term bicycle parking
- Provision of transit subsidies to employees and residents,

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EXECUTIVE OFFICER/APCO

- Selling/leasing parking spaces separately from residential units,
- Charging employees for parking, and
- Providing a cash incentive or transit pass as an alternative to a free parking space in commercial properties.

Note that the Bay Area Commuter Benefits Program requires all employers with 50 or more employees to provide commuter benefits. This Program will also address congestion in the Coliseum District and Plan area. For more information about the Program, visit the Commuter Benefits webpage on 511.org.

Finally, the Coliseum District presents an opportunity to apply measures that address the specific congestion issues faced in a district that serves as a regional designation for sporting and entertainment events. With this in mind, Air District staff recommends consideration of additional measures that would further lessen the significant impacts identified in the DEIR by:

- Providing pre-paid and discounted transit passes with all event tickets to encourage transit use,
- Offering valet bicycle parking on event days,
- Studying possible applications of parking and road congestion pricing plans to discourage driving to events.

Coliseum District construction period criteria pollutant impacts: Impact Air-5A Construction activities within the Coliseum District and Plan area are expected to generate regional ozone precursor and particulate matter emissions from construction equipment exhaust, and exceed the City of Oakland's thresholds of significance for criteria pollutants and toxic air contaminants. Therefore, in addition to the Standard Conditions of Approval, the Air District recommends that the City require all construction projects within the Coliseum District and the Plan area to meet the following additional measures:

- All off-road and on-road equipment used for construction projects shall be no older than eight years at the time the building permit is issued. This requirement will ensure that additional health impacts on local residents during the construction of these projects will be minimized through the use of low emission engines.
- Portable diesel engines shall be prohibited at construction sites. 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.

Plan area construction period criteria pollutant impacts: Impact Air-5B The DEIR states that the Air District's *California Environmental Quality Act Air Quality Guidelines (Guidelines)* screening criteria indicate that if land use development projects meet specific criteria and are smaller than the stated screening size, these projects would be unlikely to result in a significant impact from criteria air pollutants and precursor emissions (p. 4.2-52 of the DEIR). This statement is based on Table 3-1 that appeared in the 2011 *Guidelines*.

Please note that due to pending litigation, the Air District revised the 2011 *Guidelines* in 2012. The screening tables have been removed in the 2012 *Guidelines*. The data in the old tables are no longer relevant and should not be used or should be updated by the lead agency. Air District staff cannot support at this time a determination that projects that meet the criteria in Table 3-1

would be unlikely to result in a significant impact. Air District staff recommends that projects in the Plan area be analyzed for impacts with CalEEMod to determine if the project exceeds thresholds.

Note that certain pieces of equipment require Air District permits. Please work with the Air District's permitting staff regarding any proposed new or modified stationary sources. Permitting staff can be reached at 415-749-4990.

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

Sincerely,



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Jean Roggenkamp
Deputy Air Pollution Control Officer

- C: BAAQMD Chair Nate Miley
- BAAQMD Director Tom Bates
- BAAQMD Director Margaret Fujioka
- BAAQMD Director Scott Haggerty