



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

May 14, 2013

Devan Reiff, AICP  
City of Oakland  
Department of Planning and Building - Strategic Planning Division  
250 Frank H. Ogawa Plaza, Suite 3315  
Oakland, CA 94612

Subject: Coliseum Area Specific Plan Notice of Preparation of a Draft Environmental Impact Report

Dear Mr. Reiff:

**ALAMEDA COUNTY**  
Tom Bates  
Scott Haggerty  
Nate Miley  
(Vice-Chair)  
Tim Sbranti

Bay Area Air Quality Management District (District) staff reviewed your agency's Notice of Preparation (NOP) for the Coliseum Area 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.

**CONTRA COSTA COUNTY**  
John Gioia  
David Hudson  
Mary Piepho  
Mark Ross

The Plan will guide future development in an area of approximately 800 acres bounded by 66<sup>th</sup> Avenue to the north, San Leandro Street on the east, Hegenberger Road on the south, and San Leandro Bay and the Oakland International Airport to the west. The Plan area includes the Oakland Alameda County Coliseum and Arena and the Oakland Airport Edgewater Business Park. The Plan Area is uniquely served by transit, including the Coliseum BART station, numerous bus routes, and two I-880 freeway interchanges. Build-out land uses would include sports venues, office, science and technical, science and technical light industrial, airport-related warehouse and logistical use, hotel, retail, and up to 6,370 residential units.

**MARIN COUNTY**  
Susan Adams

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
John Avalos  
Edwin M. Lee  
Eric Mar

**SAN MATEO COUNTY**  
Carole Groom  
(Secretary)  
Carol Klatt

**SANTA CLARA COUNTY**  
Ash Kalra  
(Chair)  
Liz Kniss  
Jan Pepper  
Ken Yeager

**SOLANO COUNTY**  
James Sperring

**SONOMA COUNTY**  
Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

**Air Quality Analysis**

1. District staff recommend that the DEIR include a discussion of 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); a discussion of greenhouse gas (GHG) emissions and the potential effects from climate change in the Bay Area; and local air quality conditions in the Plan area, especially population exposure to diesel particulate matter emissions and other Toxic Air Contaminants (TACs).
2. District staff recommend that the DEIR include a map that clearly identifies the Plan boundary; the location of 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 the Plan area and 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, area, and mobile emissions). This analysis would 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, and would be compared to appropriate significance thresholds.
5. District staff recommend that the DEIR evaluate the potential health impacts to future residents in the Plan area due to sources of TACs and PM2.5 and identify programs and projects to minimize such impacts. Such an evaluation could:
  - Promote effective strategies for reducing exposure and health effects;
  - Potentially support CEQA streamlining for subsequent projects; and
  - Help the City identify comprehensive planning strategies that minimize population exposure to, and health impacts of, air pollution.

A plan-level approach could include the primary elements of a Community Risk Reduction Plan (CRRP). Download a copy of the Air District's CRRP guidance for a plan approach from <http://www.baaqmd.gov/Divisions/Planning-and-Research/CARE-Program/Community-Risk-Reduction-Plans.aspx>.

6. Finally, District staff recommend that the DEIR 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 would be below an appropriate level of significance. The District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying these measures.

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,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Vice Chair Nate Miley  
BAAQMD Director Tom Bates  
BAAQMD Director Scott Haggerty  
BAAQMD Director Tim Sbranti