



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

June 24, 2015

Tim Leong
Port Associate Environmental Scientist
Port Of Oakland
520 Water Street, Oakland, CA 94607

Subject: Roundhouse Area Improvements Project Initial Study/Negative Declaration

Dear Mr. Leong,

Bay Area Air Quality Management District (Air District) staff has reviewed your agency's Initial Study/Negative Declaration (2015 IS/ND) prepared for the Roundhouse Area Improvements Project (Project). The Project site is approximately 42 acres and the Project would include construction of a grain transloading operation on approximately 22.5 acres and reconfiguration of truck parking on the remaining 19.5 acres.

The environmental analysis for this Project tiers the air quality analysis off the Oakland Army Base Redevelopment Plan 2002 Environmental Impact Report (2002 EIR) and the 2012 Oakland Army Base Project Initial Study/Addendum (2012 IS/AD).

However, the air quality analysis provided in those two previous environmental documents may not be sufficient to accurately characterize potential future impacts to local and regional air quality. Since 2002 the Federal ozone standard was lowered from 0.08 ppm to .075 parts per million (ppm), the Federal 24-hour fine particulate matter (PM_{2.5}) standard was lowered from 65 micrograms per cubic meter (ug/m³) to 35 ug/m³, and the Bay Area is classified as non-attainment for both of these standards. Moreover, in 2002 the State of California adopted an annual PM_{2.5} standard of 12 ug/m³ and in 2012 the Federal annual PM_{2.5} standard was lowered to 12 ug/m³. The Bay Area is classified as non-attainment for both of these standards as well.

These health-protective changes in air quality standards increase the importance of minimizing the impacts to local and regional air quality from new development like the proposed Project. In addition, the Air District has determined that West Oakland experiences the highest concentration of diesel particulates of any location in the Bay Area, further highlighting the need to minimize emissions in this community.

In addition, the 2015 IS/ND for this Project concludes that with the implementation of the mitigation measures from the 2002 EIR and the 2012 IS/AD, all air quality project-related impacts would be reduced to less-than-significant. However, the only air quality mitigations that are specifically referenced in the 2015 IS/ND are SCA AIR-1 and SCA AIR-2. These mitigation measures only address

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construction-related impacts. The 2015 IS/ND does not include any mitigation measures addressing long-term operational emissions from this project consistent with the mitigation measures identified in the 2002 EIR and 2012 IS/AD. Both of the previous environment documents identified significant and unavoidable air quality impacts from build out of the Oakland Army Base. Air District staff believe this Project is not consistent with the mitigation measures required in those previous environmental documents.

Based on a review of the 2002 EIR and the 2012 IS/AD, Air District staff recommends that this project implement Mitigation Measures 4.4-3, 4.4-4, 4.4-5 and 4.4-6 from the 2002 EIR and Mitigation Measure SCA AIR-3 from the 2012 IS/AD.

Air District staff is available to assist the Port of Oakland in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,



foc Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Tom Bates
BAAQMD Director Margaret Fujioka
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley