



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 24, 2019

Cristin Hallissy
Caltrans District 4
111 Grand Ave, MS 8B
Oakland, CA 94612

RE: MacArthur Maze Vertical Clearance Project – Initial Study with Proposed Mitigated Negative Declaration

Dear Cristin Hallissy,

The Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study (IS) with Proposed Mitigated Negative Declaration (MND) for the MacArthur Maze (Maze) Vertical Clearance Project (Project). The Project proposes to partially lower, raise, replace, or reconstruct connectors in the Maze located near the Oakland/Emeryville border. These four alternatives are being proposed to increase the vertical clearances at three locations in the Maze to meet the current Caltrans standard of 16 feet 6 inches to allow for more efficient travel of freight and oversized vehicles.

The Air District is concerned about potential local air quality impacts from the Project. We recommend that a more comprehensive analysis be conducted in an environmental impact report (EIR).

The West Oakland community is disproportionately impacted by air pollution, especially diesel particulate matter, a toxic air contaminant. We have identified West Oakland as a priority community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program. The Air District has worked for many years to improve air quality and health in West Oakland, and these efforts continue today as we currently work with community partners to develop a West Oakland Community Action Plan. Accordingly, any increase in emissions in West Oakland would be extremely concerning, as would increased emissions in Emeryville and other affected communities.

We disagree with the Initial Study’s conclusion that because the proposed project is exempt from federal Conformity requirements, there would be no air quality impacts. The California Environmental Quality Act requires lead agencies to evaluate potential air quality impacts of a proposed project, regardless of whether it is subject to the Conformity process.

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We strongly recommend that Caltrans conduct a robust analysis of potential air quality impacts and include the following information and analysis in the EIR:

1. Provide baseline information on the Bay Area Air Basin's attainment status for all criteria pollutants and the implications for the region if the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are not attained or maintained by statutory deadlines.
2. Provide baseline information regarding existing sources of air pollution and air pollution concentrations in the Emeryville and West Oakland communities.
3. Quantify the Project's potential construction and operational impacts to local and regional air quality. The analysis should evaluate whether the project will have a cumulatively considerable net increase for construction and operational emissions, including emissions from re-routed traffic during construction.
4. Include a discussion of the current health effects of exposure to criteria pollutants occurring in Emeryville and West Oakland.
5. Estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the project's construction and operations.
6. Staff recommends all feasible measures be implemented, both onsite and offsite, to minimize air quality and GHG impacts. The EIR should prioritize onsite measures, followed by offsite measures within the Emeryville and West Oakland communities and near the proposed Project. Examples of potential emission reduction measures that may be evaluated and considered include, but are not limited to:
 - Stringent, enforceable measures to keep detoured traffic off local residential streets.
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Prohibit trucks from idling for more than two minutes or prohibit idling altogether.
 - Implement a program that incentivizes construction workers to carpool, use EVs, or use public transit to commute to and from construction sites. The program may include the following features, if feasible:
 - a. Provide a shuttle service to and from the nearby BART station;
 - b. Provide preferential parking to carpool vehicles, vanpool vehicles, and EVs;
 - c. Schedule work shifts to be compatible with the schedules of local transit services.
 - Implement waste reduction, disposal, and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen).

- Plant dense rows of trees and other vegetation as environmental biofilters along detour routes, at a minimum near sensitive land uses (e.g. residential, child care centers, schools, elderly facilities, hospitals, etc.).
 - Provide air filtration systems rated at a minimum efficiency reporting value (MERV) 13 or higher in buildings associated with sensitive land uses along detour routes.
7. Evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The 2017 CAP can be found on the Air District's website <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 8. The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing project alone and cumulative air quality impacts. These tools include guidance on quantifying local emissions and exposure impacts. View and download tools at <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
 9. Include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions assessment calculation and the health risk assessment files. Without all the supporting air quality documentation, the public may be unable to effectively review the air quality and GHG analyses in a timely manner.

If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley
WOEIP Co-Director Ms. Margaret Gordon
WOEIP Co-Director Brian Beveridge
CARB Executive Officer Richard Corey
Oakland City Councilmember Lynette Gibson McElhanev