



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 15, 2021

Corey Alvin
Environmental Coordinator
City of Oakland Planning and Building Department
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

RE: Air Quality Plan for the Operations of Custom Goods

Dear Mr. Corey Alvin:

ALAMEDA COUNTY

John J. Bauters
(Secretary)
Pauline Russo Cutter
David Haubert
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
(Vice Chair)
Mark Ross

MARIN COUNTY

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Bay Area Air District:



Bay Area Air Quality Management District (Air District) staff has reviewed the Air Quality Plan for Operations (Plan) for Custom Goods (Project). The Project will occupy 189,038 square feet of warehouse at the Oakland Global Logistics Center, located at 2001 Maritime Street and referred to as the CC-1 Warehouse. The CC-1 Warehouse is part of the Oakland Army Base (OAB) and subject to Standard Conditions of Approval (SCAs) and Mitigation Measures (MM) adopted by the Oakland City Council (City) and Port of Oakland (Port) to lessen the significant air quality impacts anticipated with OAB buildout. The OAB also is adjacent to West Oakland, which suffers from disproportionately high exposure to toxic air contaminants (TACs) and particulate matter (PM) emissions.

Due to TACs and PM emissions in the community, West Oakland is the focus of substantial efforts by the Air District and others to reduce public exposure to these emissions. For example, West Oakland was selected for the first AB 617 Community Health Protection Action Plan in the Bay Area. Approved by the State Legislature in 2017, AB 617 established the Community Air Protection Program to improve conditions in communities like West Oakland. Co-led by the Air District and the West Oakland Environmental Indicators Project, *Owning Our Air: The West Oakland Community Action Plan*, illustrates both the community's disproportionate exposure to emissions and strategies to reduce emissions and exposure.

Air District staff recognizes that the tenant, Custom Goods, has committed to the following measures that mitigate Project emissions:

- Limiting idling to two minutes for all in-bound and out-bound delivery vehicles,
- Developing a dock management program,
- Implementing zero and near-zero emissions off-road equipment,
- Installing LEED gold features, including bike storage, low-flow plumbing fixtures, energy-efficient lighting, and natural ventilation,
- Using renewable energy, including on-site solar photovoltaic power, and
- Encouraging delivery trucks with electrified transport refrigeration units to plug in during loading and unloading at the dock.

While these actions will mitigate Project emissions, many of the other actions cited in the Plan simply require the tenant to comply with existing regulations. Complying with existing regulations, such as the California Air Resources Board Truck and Bus Regulation, Drayage

Truck Regulation, Tractor-Trailer Greenhouse Gas Reduction Regulation, and City of Oakland truck routes and other truck regulations, is extremely important. However, regulatory compliance is not considered a mitigation.

To meet the spirit of *Owning Our Air* and to reduce emissions beyond what is required by law, staff strongly recommends the Plan also should *require*:

- An aggressive schedule to transition the tenant's diesel Tier 4 interim and Tier 4 fleet to zero-emissions equipment and vehicles,
- All trucks entering the OAB property to meet 2010 diesel emission standards immediately (i.e., ahead of regulatory deadlines), and
- All trucks with transport refrigeration units to be electric plug-in ready and to plug in when at the loading dock.

In addition, Air District staff encourages the tenant to take advantage of the following Air District programs to reduce emissions from vehicles and equipment:

- **Incentives and Grants:** To learn more about the Air District's incentive programs which may be available to help Custom Goods fund equipment replacements, visit the website baaqmd.gov/funding-and-incentives.
- **Demonstration Projects:** To support demonstration projects, please contact Areana Flores (aflores@baaqmd.gov), Senior Staff Specialist in our Technology Implementation Office to learn about how the Air District can assist Custom Goods with projects that demonstrate alternative energy generation, including on-site solar photovoltaic power.

Air District staff continues to be willing and ready to work with the City, Port, developers, and tenants to develop an Air Quality Plan for Operations that will do more to protect the health of the West Oakland community. If you have any questions or would like to discuss Air District recommendations further, please contact Alison Kirk, Principal Environmental Planner, at akirk@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Secretary John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director David Haubert
BAAQMD Director Nate Miley