



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

May 20, 2019

Corey Alvin
City of Oakland 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 the Good Eggs Fulfillment Center

Dear Mr. Corey Alvin:

ALAMEDA COUNTY

John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
Mark Ross

MARIN COUNTY

Katie Rice
(Chair)

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

Gordon Mar
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY

David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY

Margaret Abe-Koga
Cindy Chavez
(Secretary)
Liz Kniss
Rod G. Sinks
(Vice Chair)

SOLANO COUNTY

James Sperring
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Bay Area Air Quality Management District (Air District) staff has reviewed the Air Quality Plan for Operations (Plan) for the Good Eggs Fulfillment Center (Project). The Project will occupy over 110,000 square feet of the Southeast Gateway warehouse. The Southeast Gateway site is part of the Oakland Army Base (OAB) and therefore 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 buildout of the OAB. The OAB is adjacent to West Oakland, which is one of the most disproportionately impacted communities for Toxic Air Contaminants (TACs) and Particulate Matter (PM) in the Bay Area, and the focus of substantial efforts by the Air District and others to reduce public exposure to these emissions.

Air District staff recognizes that the tenant, Good Eggs, has *voluntarily* 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 emission 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
- *If capable of plugging in*, delivery trucks with transport refrigeration units are expected to do so 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, simply complying with the law is not a mitigation.

To reduce emissions beyond what is required by law, the Plan should *require*:

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

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

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- All cargo handling and material handling equipment to be zero-emissions, or at least the lowest emission equipment available at the time of occupancy.

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

- **West Oakland Zero-Emission Grant Program:** Grants for new zero-emission vehicles, infrastructure and equipment in and around the West Oakland community (www.baaqmd.gov/WestOaklandZEV),
- **Charge! Program:** Grants for the purchase and installation of publicly accessible electric vehicle charging stations (www.baaqmd.gov/Charge), and
- **Carl Moyer Program:** Grants to upgrade or replace on-road vehicles as well as off-road equipment (www.baaqmd.gov/Moyer).

Since the OAB was approved in 2012, more stringent health based ambient air quality standards have been promulgated by the U.S. EPA. Therefore, the adverse air quality impacts resulting from development at the OAB will be more severe on public health than the impacts identified in the OAB Environmental Impact Report. In addition, AB 617 was approved by the State Legislature in 2017, which established the Community Air Protection Program. The focus of AB 617 is to reduce TACs and PM emissions and exposure in communities most impacted by air pollution. Because of the disproportionate impacts occurring within West Oakland, the community has been selected by the Air District for the first AB 617 Community Health Protection Action Plan in the Bay Area.

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 415-749-5169, or at akirk@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