



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

January 7, 2019

Peterson Vollmann
Planner IV
City of Oakland
Bureau of Planning
250 Frank H. Ogawa, Suite 2114
Oakland, CA 94612

RE: Oakland Waterfront Ballpark District – Notice of Preparation of a Draft Environmental Impact Report

Dear Peterson Vollmann,

The Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Oakland Waterfront Ballpark District (Project) Draft Environmental Impact Report (DEIR). The proposed Project could result in significant regional & local air quality impacts in the San Francisco Bay Area Air Basin and the West Oakland Community, a community identified by the Air District's Community Air Risk Evaluation (CARE) program and Assembly Bill (AB) 617 as disproportionately impacted by air pollution.

Air District staff recommends the DEIR include the following information and analysis:

1. The DEIR should provide background information on the Bay Area Air Basin's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. In addition, the DEIR should provide background information regarding existing sources of air pollution and air pollution concentrations in the West Oakland Community. The DEIR should include a discussion of the health effects of exposure to air pollution in general and the existing health impacts occurring in the West Oakland Community specifically.
2. As identified by the Air District's CARE program and AB 617, the West Oakland Community is currently cumulatively impacted with air pollution, which makes any additional air pollution from this Project a potentially significant localized impact. The project should use a no net increase of any air pollutant as the significance threshold to base impacts and mitigation requirements.
3. The Project may require Air District permits for demolitions/renovations, internal combustion engines > 50 horsepower, boilers, and other stationary equipment that may cause air pollution. The DEIR should disclose all potential stationary sources of air pollution and disclose daily and annual emissions from these sources. The following type of permits may be required:

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
(Chair)
Karen Mitchoff
Mark Ross

MARIN COUNTY
Katie Rice
(Vice Chair)

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Rafael Mandelman
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
Liz Kniss
Rod G. Sinks
(Secretary)

SOLANO COUNTY
James Sperring
Lori Wilson

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



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- a. Asbestos J-Number Permit: Issued for demolitions and renovations of buildings and structures that may contain asbestos. To apply online use the following link <http://www.baaqmd.gov/permits/asbestos>.
 - b. Authority to Construct: Issued before construction and after Air District engineers review project to ensure it will comply with air quality laws. To apply online use the following link <http://www.baaqmd.gov/permits/apply-for-a-permit>
 - c. Authority to Operate: Issued after project is built and compliance is demonstrated. Must be renewed annually. To apply online use the following link <http://www.baaqmd.gov/permits/apply-for-a-permit>
4. The DEIR should list the Air District as a responsible agency with permitting approval required for stationary sources of air pollution.
 5. The DEIR should quantify the Project's potential construction and operational emissions from all sources, including restaurants and food vendors, for ozone precursors, particulate matter, toxic air contaminants, and greenhouse gases. The Air District's CEQA Guidelines (May 2017) provide guidance on how to evaluate project alone and cumulative air quality impacts. The GHG impact analysis should include an evaluation of the Project's consistency with the California Air Resources Board 2017 Scoping Plan and State and Air District climate stabilization goals for 2050. Please be advised that the Air District is in the process of updating the CEQA guidelines/thresholds. You may download a copy of the CEQA Guidelines from the Air District's website <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
 6. The DEIR should 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 operation. Air District staff recommends that the DEIR include a cumulative site-specific health risk assessment that includes all stationary and mobile sources from this project and the existing sources within the West Oakland Community, including the Port of Oakland. We encourage consultants and lead project managers to meet with Air District staff prior to conducting the health risk assessment to discuss the methodology and assumptions that should be included in the assessment.
 7. The DEIR should include a description of the cleanup/remediation that has occurred at the Project Site, including the nature of the contamination, and any remaining site cleanup/remediation. The emissions associated with the remediation should be included in the cumulative health risk assessment and emission estimates associated with this project.
 8. The DEIR should evaluate all feasible mitigation measures, both onsite and offsite, for all potentially significant air quality and GHG impacts identified in the DEIR. The DEIR should prioritize onsite mitigation measures, followed by offsite mitigation measures within the West Oakland Community and near the proposed Project. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:

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- Implementing green infrastructure in the West Oakland Community and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.
 - Implementing a zero-waste program consistent with SB 1383 organic waste disposal reduction targets including the recovery of edible food for human consumption.
 - Prohibiting the use of diesel fuel on-site, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
 - Develop an offsite mitigation program in collaboration with the City of Oakland and Port of Oakland to eliminate the use of diesel fuel at the Oakland Army Base and Port of Oakland.
 - Providing funding for zero emission transportation projects in the West Oakland Community, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.
 - Create an on-going community engagement process through a Community Benefits Agreement (CBA) with the West Oakland Community to develop an enforceable mitigation plan that includes long term resilience measures, climate justice and adaptation plans, funding, and other resources to ensure measurable and tractable improvements to air quality in the community.
9. The DEIR alternative analysis should include analysis of a project site outside of an AB 617 community.
 10. The DEIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The DEIR should provide a table that lists relevant 2017 CAP measures to the Project in one column and the Project's consistency with the measures in the second column. The 2017 CAP can be found on the Air District's website <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 11. The DEIR should evaluate the Project's consistency with the City of Oakland's West Oakland Specific Plan and Climate Action Plan.
 12. 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>.
 13. The DEIR should 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, Air District staff may be unable to review the air quality and GHG analyses.

January 7, 2019

We encourage the City of Oakland, applicant and DEIR consultants to meet with Air District staff to discuss the air quality analysis during the environmental review process. 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 Ms. Margaret Gordon
WOEIP Brian Beveridge