



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

May 10, 2022

Peterson Vollmann, Planner IV  
City of Oakland  
250 Frank H. Ogawa Plaza, Suite 2214  
Oakland, CA 94612

RE: 3600 Alameda Avenue Project – Notice of Preparation for a Draft Environmental Impact Report (**SCH Number: 2022040061**)

Dear Peterson Vollmann,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the 3600 Alameda Avenue Project (Project). The Project applicant is proposing to demolish all existing structures on the project site and construct an approximately 426,022 square foot, 56-foot-tall industrial building. The applicant proposes the Project on a speculative basis as the end-user and nature of the use are unknown at this time. For the purposes of the EIR, the end use is assumed to be a distribution warehouse. The new facility would include up to 30,000 square feet of accessory office space. The Project would include an employee parking lot to the north of the building as well as loading docks and truck parking areas in the southern part of the project site.

The East Oakland community is disproportionately impacted by air pollution. The Air District has worked for many years to improve air quality and reduce health risks in this area, including current efforts to develop a community-led East Oakland Area Community Emissions Reduction Plan as part of the AB 617 Program. As such, it is imperative that future development not increase emissions and exposure in the community.

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

- **The East Oakland community is currently cumulatively impacted with air pollution, which highlights the urgency of avoiding additional air pollution in these communities.** Increases in air pollution exposure in areas that are already overburdened would be of concern; therefore, the EIR should fully evaluate potential significant impacts and implement all feasible measures to minimize air quality impacts to the greatest extent possible.
- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM2.5) as a result of the Project’s construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM2.5 emissions on sensitive receptors near the Project area.

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- **The Climate Impacts (GHG emissions) analysis should include a discussion of how the Project will implement land use and design elements to achieve the State's 2045 climate target.** The Air District's current recommended land use project thresholds of significance for climate impacts are based on the State's climate target of achieving carbon neutrality by 2045. If the City chooses to use the Air District's recommended thresholds for climate impacts, the EIR should demonstrate how the Project a) will incorporate the recommended design elements to do its fair share to achieve the goal of carbon neutrality by 2045; or b) is consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). Further information on the recently updated climate impacts thresholds of significance can be found here: <https://www.baaqmd.gov/ceqa-guidelines> The recommended design elements are:
    1. The Project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
    2. The Project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    3. The Project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA.
    4. The Project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
  - **The EIR should evaluate all feasible measures, both onsite and offsite, to reduce air quality impacts to a less-than-significant level.** The EIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
    - Require or incentivize zero emission trucks for facility operations to the greatest degree feasible
    - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
    - Require construction vehicles to operate with Tier 4 or zero-emission engines as commercially available
    - Use grid power for construction activities whenever possible; if grid power is not available, use alternative power such as battery storage, hydrogen fuel cells, or renewable fuels. If no other options are available, use Final Tier 4 diesel generators
    - Prohibit trucks from idling for more than two minutes or prohibit idling altogether

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- Implement a program that incentivizes construction workers and building tenants to carpool, use EVs, or use public transit to commute to and from the site. The program may include the following features, as feasible:
    - Provide a shuttle service to and from BART
    - Provide preferential parking to carpool vehicles, vanpool vehicles, and EVs
    - Schedule work shifts to be compatible with the schedules of local transit services
  - Install electric vehicle charging infrastructure
  - Install electric connections for transportation refrigeration units
  - Require electric forklifts and install associated charging stations
  - Install outdoor electrical receptacles for charging or powering of electric landscape equipment
  - Implement green infrastructure 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, and commit to pursue carbon-free electricity service if on-site renewables do not meet the full electricity demand
  - **The EIR should require all possible measures to ensure the impact of a distribution warehouse use is minimized to the greatest extent feasible.** The Air District recommends that the City review the California Air Resources Board's (CARB) [Concept Paper for the Freight Handbook](#) and the State Attorney General's [Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act](#). The Air District also recommends that the City review the Air District's comments and recommendations for logistics center/warehouse projects on our website, <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-comment-letters>. See specifically the CenterPoint North Richmond Warehouse Project EIR and the Scannell Properties, LLC North Richmond Warehouse Project NOP letters.

The Air District's current recommended land use project thresholds of significance for climate impacts, described above, could apply to a warehouse project. The design elements for building energy use can be applied to warehouses, as can the EV parking and the VMT elements. The 2022 CalGreen update includes requirements for EV capability for off-street loading docks for warehouses, retail, and grocery store projects. Additionally, the Air District is available to support lead agencies in their determination of how to apply these thresholds of significance and will be sharing guidance and best practices for certain distinct project types including warehouses.

- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP). The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>**

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- **The EIR should evaluate the Project's consistency with the Oakland 2030 Equitable Climate Action Plan and the 2021 Local Hazard Mitigation Plan.**

**The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <https://www.baaqmd.gov/ceqa-resources>

- **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov) to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, or would like to schedule a meeting, please contact Alesia Hsiao, Senior Environmental Planner, at 415-749-8419, or [ahsiao@baaqmd.gov](mailto:ahsiao@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

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