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August 24, 2023

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

**RE: 3600 Alameda Avenue Project – Draft Environmental Impact Report (DEIR) -
State Clearinghouse #2022040061**

Dear Peterson Vollmann,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the 3600 Alameda Avenue Project (Project) and appreciate the opportunity to share the following comments concerning any potential Air Quality and GHG impacts.

Summary

As we understand it, the project applicant proposes to demolish all existing structures on the 13.9-acre site and will construct an approximate 430,000 square foot, 56-foot-tall distribution warehouse. The facility will include 48 truck loading bays and 228 truck parking spaces on the west side of the site (furthest away from existing residential uses) and will include 295 employee parking spaces on the east side of the site (with total of 10% EV capacity plus an additional 40% EV “capable”). The project includes one proposed 350 hp emergency back-up generator. This project is in the East Oakland/Fruitvale Estuary area and has a designated “Heavy Industrial” General Plan land use and a corresponding applicable zone in the Port of Oakland’s Estuary Plan. This project area is also within the East Oakland AB617 Community Emissions Reduction Planning boundary.

We note that all areas of air quality (sec. 4.1) and GHG (sec. 4.3) have been found to be less than significant with reasonable analysis conducted to support these findings. Nevertheless, given the location within the adversely and disproportionately air pollution impacted AB617 community, we encourage the project sponsors to explicitly and specifically include additional air quality protection measures to minimize potential air quality impacts to the greatest extent possible.

Review

We appreciate the diligence the project sponsors took to include many of our initial comments and recommendations on the IS/NOP (May 10, 2022). In addition to these measures, there are a few areas for greater air quality protection we would like to highlight and encourage the City and project sponsors to undertake given that the East Oakland community has been historically and is currently disproportionately impacted by air pollution.

As the Air District has worked for 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, we maintain that it is imperative that future developments do not increase emissions and exposure in the community and that all feasible steps be taken in new developments to minimize cumulative added air pollutants even beyond what is nominally required. Towards this, we encourage the


applicants to also review the Air District's recently released CEQA Guidelines (<https://www.baaqmd.gov/ceqa-guidelines>) [Chapter 2, "Best Practices for Centering Environmental Justice, Health and Equity"](#). Specifically, Air District staff recommends the project sponsors and the FEIR include the following additional air quality protection measures to minimize air quality and climate impacts to the greatest extent possible:

- **Further the electrification of all construction activities.** While the DEIR addressed many of the best practice construction related measures, we recommend further electrification of construction equipment to minimize cumulative risk from emissions during the 17-month construction phase.
 - Require all diesel-fueled off-road construction equipment be equipped with EPA Tier 4 Final complaint engines or better as a condition of contract. Include requirement in bid documents, purchase orders, and contracts with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
 - SCA Air-2 highlights the use of grid electric power for construction activities whenever possible, but it also states that if grid power is not available the project proposes to use propane or natural gas or diesel as backup for such activities. Instead, we strongly suggest explicitly stipulating the use of alternative power such as battery storage, hydrogen fuel cells, or renewable fuels and if no other options are available, use Final Tier 4 diesel backup generators.
- **Further the electrification of all on-going operational activities.** The project also proposes to use diesel material handling equipment during operations (2-diesel yard tractors @ 8hrs/day-365 days a year) and propane driven vehicles for in-warehouse (5 forklifts @ 4hrs/day). We recommend the project uses electric forklifts and yard tractors and installs all associated charging stations including outdoor electrical receptacles for charging or powering of electric landscape equipment.
- **Enhanced Employee TDM provisions.** While the TDM standard conditions of approvals (sec. 4.6) show a projected goal of 20% trip reduction we recommend the project explicitly includes TDM incentives as part of any leasing agreements. We recommend provisions for employee trip reduction policies, transit subsidies, and/or transit passes as well as scheduling employee work shifts to be compatible with the schedules of local transit services and incentivize construction workers, employees, and building tenants to carpool, use EVs, or use public transit to commute to and from the site. Additionally, project design of off-site amenities such as lighting and street trees will promote safe pedestrian usage.
- **Address measures to prevent additional truck trips along Fruitvale Avenue.** The DEIR implies that 100% of truck traffic will be on Alameda Avenue to High Street, however the maps (p.4.6-37) show portions of truck traffic going to Alameda Avenue. We note that any additional heavy-duty truck traffic on Fruitvale Avenue (under construction for the bicycle-pedestrian oriented Fruitvale Alive! Streetscape project) heading towards Jingle Town and community-oriented shopping area is highly undesirable, as was noted in NOP comments. We recommend the use of appropriate traffic signals and signage to prohibit heavy-duty trucks from exiting the facility by turning right towards Fruitvale Avenue.

- **Enhance vegetative buffers to protect adjacent residential areas.** We recommend the project better define the landscape buffers between the project and the residential areas to the north. The DEIR suggests a 91-foot by 20-foot landscaping area. We recommend the project considers a vegetative buffer of dense trees combined with a soundwall of minimum 10-foot height be developed along the project perimeter with the residential area to the north.
- **Include measures for Zero-Emission trucks.** As part of fleet management plan: require or incentivize zero emission trucks for facility operations to the greatest degree feasible, and prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>).¹
 - As a condition of lease operator contract, require all on-road heavy-duty trucks to be zero emissions or meet the most stringent emissions standard, such as model year (MY) 2024 to 2026 as available.
 - Though no refrigerated units were modeled or planned, because this is a speculative project, make provisions to install electric connections for transportation refrigeration units if any lessee/operator includes these. Also note that the 2022 CalGreen update includes requirements for EV capability for off-street loading docks for warehouses projects. The DEIR only references the 2019 update of Cal Green code (p. 4.3-9).
- **Enhanced Renewable Energy Infrastructure.** Consider implementing 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.

Finally, for the aspects of the project that may require a permit from the Air District (for example, back-up diesel generators, any asbestos abatement (per Air District Reg 11-2), and any enhanced construction dust mitigation requirements (per Reg 6-6) please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

Thank you and please contact Alison Kirk, akirk@baaqmd.gov, or David Ralston, dralston@baaqmd.gov, for any follow up questions on these comments.



Greg Nudd, Deputy Executive Officer
Bay Area Air Quality Management District