



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

November 20, 2024

Colleen Liang
Director of Environmental Programs and Planning
Port of Oakland
530 Water Street Oakland, CA 94607

RE: Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report (FEIR)

Dear Colleen Liang,

Bay Area Air Quality Management District (Air District) staff have reviewed the Final Environmental Impact Report (FEIR) for the Oakland International Airport Terminal Modernization and Development Project (Project). The proposed Project would modernize existing Terminals 1 and 2, construct an expanded Customs and Border Protection (CBP) facility for international arrivals, reconfigure and relocate existing cargo and support facilities, improve the terminal area roadway, parking areas and support facilities, and construct a new terminal at the Oakland International Airport (Airport). To accommodate the construction of new facilities, some existing facilities would be demolished.

The Air District appreciates the Port's response to comments and the commitment in the FEIR to prepare a Carbon Management Plan to guide conversion of building systems from natural gas to electricity, and the use of LEED and Envision to integrate operational carbon reduction measures.

Although the Project acknowledges there may be Air District permitting requirements to operate equipment including boilers, generators, and other stationary sources, there is no mention in the FEIR if the Project will include organic liquid storage tanks that may also require permits. If the Project will include any new or modified organic liquid storage tanks, please add those to the FEIR's list of equipment that may require an Air District permit.

The FEIR also does not specify emergency hours of operation for backup generators despite the recommendation to include 100 hours for non-testing and non-maintenance. When the Air District evaluates project permit applications consideration is given to whether all potential environmental impacts have been reviewed and mitigated where necessary by another public agency. A FEIR that provides a complete and full description of the sources that may need a permit is more transparent and allows CEQA responsible agencies such as the Air District and the public to better understand the project and its potential impacts.

The Air District continues to recommend incorporation of additional controls to mitigate air quality emissions, especially as the Project is located in an Air District-identified Overburdened Community, Disadvantaged Community as per Senate Bill (SB) 1000, and impacts the East Oakland community identified by Assembly Bill (AB) 617. Mitigation measures recommended by the Air District include:

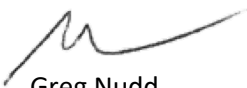
- Mandate the use of zero-emission off-road equipment wherever available. This requirement should be incorporated into relevant bid documents, purchase orders, and contracts. Contractors selected for the Project must demonstrate their capacity to provide the necessary compliant equipment.
- Install additional electric vehicle (EV) charging infrastructure and/or "EV Ready Spaces" to accommodate light, medium, and heavy-duty vehicles.
- Install on-site solar power systems or other zero-emission electricity generation systems to supply renewable power to on-site equipment beyond current requirements.

Given the Project's significant air quality and climate impacts, the Air District continues to urge the Port to implement best practices for environmental justice, health, and equity in Project planning and design, as outlined in the 2022 CEQA Guidelines¹. Consideration of race, demographics, social determinants of health, and land use history of a potentially impacted community is crucial to a proper, thorough, and sensitive environmental and civil rights compliance review. To ensure a robust and consistent review is completed before the FEIR is certified, the Air District recommends preparing a comprehensive joint NEPA and CEQA document with a unified analysis of environmental justice, health and equity considerations. This will ensure the Project fully addresses significant environmental and human health impacts and any associated environmental justice impacts together.

Consistent with the Best Practices for Centering Environmental Justice, Health, and Equity Chapter of the 2022 CEQA Guidelines, the Air District also continues to recommend the Port complete a disparate impact analysis to demonstrate compliance with Title VI of the Civil Rights Act of 1964 and California Government Code section 11135 by evaluating how the proposed Project may affect racial, ethnic, or national origin groups.

Finally, Air District staff are available to assist the Port in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Nervana Fadle, Environmental Planner, nfadle@baaqmd.gov and Mark Tang, Assistant Manager, mtang@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Executive Officer of Science and Policy

Cc: BAAQMD Director Juan Gonzalez
BAAQMD Director David Haubert
BAAQMD Director Nate Miley
BAAQMD Director Mark Salinas

¹ Bay Area Air Quality Management District, 2022 California Environmental Quality Act (CEQA) Guidelines, Chapter 2, Best Practices for Centering Environmental Justice, Health, and Equity.