



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

August 22, 2012

California Transportation Commission
1120 N Street
Room 2221 (MS-52)
Sacramento, CA 95814
Via email: ctc@dot.ca.gov; bimla.rhinehart@dot.ca.gov

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Re: Agenda Item 21 - Approval of Project for Future Consideration of Funding: Alameda County Redevelopment plans for a 1,800 acre project area, including the former Oakland Army Base, 16th/Wood Area, and Maritime Areas of the Port in the City of Oakland

Chairperson Tavaglione, Commissioners and Director Rhinehart:

The Bay Area Air Quality Management District (BAAQMD) and the Alameda County Public Health Department (ACPHD) are writing to comment on the environmental review process to date for the Oakland Army Base Redevelopment. This project is proposed to receive funding from the CTC under the agenda item noted above. The mission of the BAAQMD is to protect and improve public health and air quality for all residents of the San Francisco Bay Area. As the agency responsible for protecting the public health of Alameda County residents, ACPHD analyzes public health impacts of planning processes for consideration in decision-making.

Freeways, operations at the Port of Oakland, and goods-transport activity continue to be an important source of air pollution in West Oakland and throughout the County. The City of Oakland published an Environmental Impact Report ("EIR") in 2002 for the Oakland Army Base Development Project to create 300,000 square feet of warehouse/distribution and about 1.5 million square feet of office/R&D. The current Project proposal is to build about 2.5 million square feet of warehouse/distribution and maritime-related logistics uses and 175,000 square feet of office/R&D.

In the 2002 EIR, the City of Oakland committed to a number of mitigation measures for criteria air pollutants, toxic air contaminants, and greenhouse gases, including creating a plan to reduce criteria pollutants in Mitigation 4.4-3, written as follows:

Mitigation 4.4-3: The Port shall develop and implement a criteria pollutant reduction program aimed at reducing or off-setting Port-related emissions in West Oakland from its maritime and rail operations to less than significant levels,

consistent with applicable federal, state and local air quality standards. The program shall be sufficiently funded to strive to reduce emissions from redevelopment related contributors to local West Oakland air quality, and shall continually reexamine potential reductions toward achieving less than significant impacts as new technologies emerge. The adopted program shall define measurable reductions within specific time periods.

To our knowledge, the City has not begun the process to develop this pollution reduction plan. Therefore, in order to protect public and environmental health, BAAQMD and ACPHD urge the CTC and the City of Oakland to commit to ensuring this pollution reduction plan is developed and implemented. The CTC can emphasize the importance of air quality mitigations as part of its funding decisions, while the City can lead the development of a robust air quality mitigation program.

While recognizing the importance of this project as an economic engine to the region, we believe it is essential to minimize potential air quality impacts of the project so as to protect the health of West Oakland residents. In order to ensure that public health is a key consideration, we also urge that this pollution reduction plan be developed and implemented in an open, proactive and collaborative process with the participation of BAAQMD, ACPHD and City of Oakland residents.

Thank you for considering our recommendations for protecting public health on this historic project. We look forward to continuing discussions and collaboration with the City of Oakland, CTC and other agencies to address public and environmental health issues. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

Jack Broadbent
Executive Officer/APCO
Bay Area Air Quality Management District

Anita Siegel
Director
Alameda County Public Health Department