



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

May 20, 2013

Mr. James Heilbronner, President
Architectural Dimensions
300 Frank Ogawa Plaza, Suite 375
Oakland, CA 94612

Subject: Air District comments on Air Quality Monitoring Program Work Plan

Dear Mr. Heilbronner,

Thank you for the opportunity to comment on the Air Quality Monitoring Program Work Plan for the OAB Redevelopment Project. Our main, on-going concern continues to be that the Project has not made a clear commitment to implementing all feasible emission reduction measures. The Monitoring Program Work Plan, along with other future communications, should reflect a strong commitment to mitigation measures in all phases of the project.

In general, the placement of the monitors and the measurements to be collected reflect our previous discussions. However, additional background in the Work Plan on the mitigations that are planned and the Project air pollution emissions is needed to provide context for the monitoring plan. The Air District believes that we should track air pollution trends in the community near the OAB, but the main objective should be to minimize emissions.

Our comments, both general and specific, are listed below.

General Comments:

1. As we discussed, it would be difficult and expensive to design a monitoring plan to determine what air quality impacts are due specifically to activity from the Project. The Work Plan is careful to point out that measurements will be used for evaluating the impact of the Project *plus* the impact of non-Project activities. This is reasonable. However, it would be helpful to provide some additional context that likely can be extracted from the Project environmental impact documentation and the West Oakland Health Risk Assessment:
 - a. How do the projected diesel PM emissions from the Project compare to existing sources in West Oakland?
 - b. Briefly, what mitigations are in place to minimize construction impacts from the Project? This added context will be helpful in explaining why the actions are set as they are. The point of providing context for the emissions is not to minimize the construction impacts, but to emphasize that directly detecting the construction impacts alone would be difficult. The point of discussing mitigations in this document is to evaluate what more might be done if actions are required.
2. The Air District's strong recommendation is to take meaningful measures up front to avoid emissions in this area where emissions are already high. Such measures could include requiring installation of PM filters, requiring that newer engines be used, and limiting the use of older engines. Specifying in this Work Plan measures already in place to reduce emissions will provide additional justification for not spending extensive resources to gather measurement data to directly detect construction impacts.
3. The Work Plan should emphasize that the monitoring specified in the Work Plan is consistent with Air District methods to enable comparison with existing measurement sites.

Specific Comments:

1. The footnote on page 4 states that an operations-related air quality monitoring program will be developed for rail and maritime operations associated with the West Gateway Phase during Vertical Construction through the terms of the Ground Lease. This important point should be highlighted with more than a footnote. The implication is that the construction monitoring may not meet the objectives of an operational monitoring program.
2. Section 3.2.1.4 states that the air quality monitoring procedures need to be in place by April 2013. Since that deadline is past, the report should include a revised schedule.
3. Section 3.2.2.1 states that the principal question is to understand the air quality impacts on and around the Site. Is not the goal to evaluate the impacts to the West Oakland community? Please clarify to be consistent with the decision statement.
4. What criteria will be used to site the meteorological station?
5. Please provide some timeline for operating the webcams and retention of data.
6. In Section 4.9, please clarify what time increment the project construction activities will be tracked and documented. It would be ideal if the activities were documented daily to correspond to 24-hour PM concentrations.
7. Section 5.2 states that air modeling may be used to estimate the proportional contribution of local sources to ambient levels at the monitoring stations. This significant undertaking requires more than a brief mention if it is truly under consideration.

Please contact me if you would like to discuss anything further.

Sincerely,



Philip Martien, Ph.D.

cc:

Phil Tagami
Fred Blackwell
Doug Cole
Marc Stice
Stuart Block
Dan Nourse
Deni Chambers
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