

December 20, 2018

Ms. Andrea Gardner  
Port Associate Environmental Planner/Scientist  
Port of Oakland  
530 Water Street  
Oakland, California 94607

Ms. Patricia McGowan  
Planner IV  
City of Oakland  
250 Frank H. Ogawa Plaza, Suite 3315  
Oakland, California 94612

Dear Ms. Gardner and Ms. McGowan:

Thank you for providing the California Air Resources Board (CARB) the opportunity to comment on the City of Oakland (City) and Port of Oakland's (Port) Draft West Oakland Truck Management Plan (TMP or Plan). The TMP is required as part of the Standard Conditions of Approval and Mitigation Monitoring and Reporting Program, as revised by the Oakland City Council on July 16, 2013, for development of the former Oakland Army Base and provides an opportunity to address longstanding community impacts associated with truck activity in West Oakland. CARB has previously commented on the development of the TMP in our letter to the Port of Oakland on the Northeast Gateway Construction Management Plan dated May 31, 2016.

The goal of the TMP to reduce the effects associated with truck activity in West Oakland align with CARB's long-standing air quality programs, and recent legislation has placed additional emphasis on community-scale impacts. Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017) established a new, community-focused framework to address air pollution disparities at the neighborhood level. Among other provisions, AB 617 requires CARB to identify communities with high cumulative exposure burdens to air pollution and select communities for community-specific emissions reduction programs and/or community air monitoring. In September 2018, CARB's Governing Board selected West Oakland as one of the initial 10 communities for this community-focused action, recognizing the cumulative exposure from air pollution sources impacting the community like freight, freeways, industry, and seaport operations.

The TMP is one of several planning efforts that complements the community emissions reduction program under development for West Oakland. The strategies identified in the TMP are an important starting point for action, but the TMP should do more to tackle the ongoing impacts from truck activity in West Oakland. CARB has reviewed the proposed TMP and offers the following comments to help ensure that TMP implementation is coordinated with other efforts, delivers near-term benefits, promotes community partnerships, and maximizes air quality benefits to the West Oakland community.

- Reducing exposure to diesel particulate matter: Implementation of several TMP strategies in collaboration with the community has the potential to meaningfully reduce exposure to harmful diesel particulate matter (PM). However “Appendix G: Stakeholder Comments Spreadsheet” indicates that air quality is outside of the scope of the Plan, and the TMP does not include a discussion of the air pollution challenges in West Oakland. Reducing exposure to diesel PM is one of the primary reasons to ensure trucks minimize parking and operation on residential streets and near other sensitive receptor locations, and the City and Port should expand the TMP to address the community’s air quality concerns.

CARB commends the Port and the City for working to address not only drayage trucks servicing the Port but also other heavy- and medium-duty trucks that operate in West Oakland. However, the City and Port should be explicit about how reducing exposure will be incorporated into the specifics of TMP strategy implementation. This should include mechanisms to incentivize zero emission vehicles (ZEVs) and infrastructure through both Port and City policies and using reduced exposure as a criterion for truck routing, truck parking, and enforcement efforts. CARB has previously provided several recommendations on mechanisms to accelerate the deployment of ZEVs at the Port in our comment letter to the Port of Oakland on the Draft Seaport Air Quality 2020 and Beyond Plan, dated September 5, 2018. Additional City and Port strategies to incentivize ZEV adoption could include preferential truck parking, reduced fees, or ZEV-only lanes.

- Benchmarking and tracking progress: Although the TMP includes specific timelines for implementation of each strategy, it lacks defined goals and a clear evaluation process that would allow the community and other stakeholders to monitor progress and support changes in implementation. There are several datasets available in West Oakland on truck movements and air pollution exposure, including data from the Metropolitan Transportation Commission and the truck activity data discussed in “Appendix B: Truck Movement and Safety

Technical Memorandum”. The City and Port should identify quantifiable goals and specific metrics and approaches to track progress for each TMP strategy. Identifying metrics for evaluation is particularly important because several TMP strategies will only be implemented after the effects of other TMP strategies are known (e.g., strategies five and six to increase compliance with truck routes will be implemented where challenges remain). For all strategies, it is critical to define what success looks like in order to evaluate whether additional action is needed. CARB staff are available to work with the City and Port to explore analytical options to support goal-setting and evaluation of changes in truck activity and diesel particulate exposure over time. The City and Port should also include a clear process for the public to assess TMP progress, including community meetings and other engagement mechanisms.

- Expeditious implementation and resource identification: The approaches included in the TMP are appropriate for addressing known impacts from trucks in West Oakland, but in some cases the strategies lack specific details and require additional research, planning, and outreach before there will be on-the-ground changes. For example, CARB commends the approach in strategy two to work with individual businesses to identify preferred truck routes, but the TMP should be more specific as to which businesses will be considered. Similarly, strategy three to update the network of truck routes and truck prohibited streets identifies some potential truck routes and prohibited streets, but it is not clear from the implementation steps whether these potential changes are the proposed changes. CARB encourages ongoing, robust collaboration with community members and expeditious implementation of all TMP strategies. In particular, rather than delay targeted enforcement until other TMP strategies have been developed and implemented, CARB recommends that the City and Port accelerate implementation of targeted traffic and parking enforcement based on existing community concerns. Enforcement resources can subsequently be redirected as needed. The City and Port should also provide additional details around the resources needed to support TMP implementation and what funding has been committed.
- Siting of truck parking and truck services: Although the TMP mentions several times that there are challenges associated with insufficient or costly truck parking at the Port of Oakland, it does not include any specific approaches to either increase dedicated truck parking or address other concerns associated with where parking and truck services are located. CARB appreciates the proposed changes to truck parking regulations in strategy eight, and we recommend that the proposed prohibitions for parking near public parks be expanded to prohibit

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truck parking near other sensitive receptors (e.g., daycares, hospitals). However, the City and Port should go beyond enforcing prohibitions on trucks parking in certain areas by establishing safe, clean, and economically-reasonable truck parking facilities that would encourage trucks to congregate away from residential areas. These parking facilities would facilitate proactive development of zero emission charging and fueling infrastructure, reduce exposure to air pollution, and provide an alternative to parking illegally in residential areas. The TMP should discuss any existing plans associated with this issue and consider inclusion of additional concrete steps the City and Port will take to centralize truck activity onto the Port or other existing industrial property.

Thank you again for the opportunity to comment. If you have questions, please contact Ms. Heather Arias, Chief, Community Planning Branch, at 916-322-6054 or by email at [heather.arias@arb.ca.gov](mailto:heather.arias@arb.ca.gov).

Sincerely,



Karen Magliano, Director  
Office of Community Air Protection

cc: See next page

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cc: Margaret Gordon  
Brian Beveridge  
Co-Directors  
West Oakland Environmental Indicators Project  
349 Mandela Parkway  
Oakland, California 94607

Jack Broadbent  
Chief Executive Officer/Air Pollution Control Officer  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, California 94105

Henry Hilken, Director  
Planning and Climate Protection  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, California 94105