



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 5, 2019

Tony Tavares
Director, Caltrans District 4
111 Grand Avenue
Oakland, CA 94612

RE: MacArthur Maze Vertical Clearance Project

Dear Director Tavares,

Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study for the MacArthur Maze Vertical Clearance Project (Project), which proposes to increase vertical clearances at three locations within the MacArthur Maze Interchange in the City of Oakland. The Air District is concerned about potential local air quality impacts from the project. We recommend that a more comprehensive analysis be conducted in an environmental impact report, and request an extension of the comment period through May 31, 2019 to allow the public sufficient opportunity to evaluate the Initial Study and provide comments.

The West Oakland community is disproportionately impacted by air pollution, especially diesel particulate matter, a toxic air contaminant. We have identified West Oakland as a priority community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program. The Air District has worked for many years to improve air quality and health in West Oakland, and these efforts continue today as we currently work with community partners to develop a West Oakland Community Action Plan. Accordingly, any increase in emissions in West Oakland would be extremely concerning, as would increased emissions in Emeryville and other affected communities.

We disagree with the Initial Study's conclusion that because the proposed project is exempt from federal Conformity requirements, there would be no air quality impacts. The California Environmental Quality Act requires lead agencies to evaluate potential air quality impacts of a proposed project, regardless of whether it is subject to the Conformity process. We strongly recommend that Caltrans conduct a robust analysis of potential air quality impacts, including: emissions from construction equipment; emissions from re-routed traffic during construction, particularly traffic impacting local streets, and; emissions from long-term operations of the re-built interchange. The evaluation should include an analysis of a no-project alternative. And, the analysis should identify project alternatives and/or comprehensive mitigation measures to assure that no local air quality and health impacts occur.

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Scott Haggerty
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We encourage lead agencies to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Scott Haggerty
BAAQMD Director Nate Miley
WOEIP Co-Director Ms. Margaret Gordon
WOEIP Co-Director Brian Beveridge
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