



# Prologis Oakland Global Logistics Center

## Building 1

# Air Quality Plan for Operations of the PODS Facility at CE-1 Warehouse

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*Submitted on:*  
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# 1. INTRODUCTION

Prologis is the leading global owner, operator, and developer of logistics real estate. We serve manufacturers, retailers, e-commerce businesses, transportation companies, and logistics providers with the facilities that support local, regional and global trade. Our buildings are located close to transportation infrastructure such as railways, seaports, highways, and airports. We provide our customers with best-in-class facilities and have a long history of industry-leading corporate governance and transparency.

As the ground lessee of 58 acres of the City's former Oakland Army Base site (OAB) property for the next 66 years, we intend to be good stewards of the land, and recognize the concerns of the West Oakland community we and our tenants will operate in. Prologis is also committed to the success of our business and the success of our customer's businesses who will occupy our warehouse buildings at the OAB.

Working towards the goals for improved air quality will require coordination and collaboration from all tenants of these warehouses to plan and implement emission reduction actions that are impactful, practical, and feasible.

## 1.1 Purpose of this Air Quality Plan for Operations of the PODS Facility and General Requirements

The purpose of this Air Quality Plan for Operations of the PODS Facility at CE-1 Warehouse (Plan) is to:

- Provide clear direction for the tenant of this warehouse regarding operational air quality and energy conservation requirements for their on-going operations throughout the duration of their lease as well as for their tenant improvements.
- Provide a documented path of compliance for the Standard Conditions of Approval/Mitigation Monitoring and Report Program (SCA/MMRP) relating to air quality and public outreach as outlined in Mitigation Measure PO-1, which involves public outreach to Oakland Army Base stakeholders.

The Oakland Army Base Redevelopment project was approved in 2002; the project was then refined with an Initial Study/Addendum in 2012 (OAB Project). In both documents, the goals and mitigations were very broad, attempting to cast a wide net over a master plan development that was still in the conceptual stage. One of the objectives of this diesel emission reduction and operational air quality plan for the PODS facility is to clarify and distill which requirements apply to operations of this facility, to clarify any vagueness in the applicable elements of the SCA/MMRP, and to comply with applicable mitigation measures.

**1.1.1:** This document applies to the tenant referred to as PODS Portable Storage on Demand (PODS). PODS is under lease with Prologis to occupy the entirety of the warehouse building referred to as CE-1 address: 55-75 Admiral Robert Toney Way, Oakland, CA. The requirements of this Air Quality Plan apply to PODS operations and are applicable throughout the duration of their lease.

**1.1.2:** This Plan will become a component of Tenant Lease documents.

**1.1.3:** The tenant will be required to demonstrate how compliance with the specific elements of this Plan is achieved on the specific user level.

**1.1.4:** The tenant is required to comply with all applicable state and regional air quality regulations and are required to implement the components of this document.

**1.1.5:** The City of Oakland (City), as the lead agency under the California Environmental Quality Act (CEQA), will determine compliance with the applicable mitigation measures and will determine compliance with this Plan.

## **2. TENANT SUBJECT TO THIS PLAN**

**2.1** This Plan applies to the tenant known as PODS Portable On Demand Storage (PODS). PODS has a lease with Prologis to occupy the entirety of the warehouse (256,136 square feet) located at 55-75 Admiral Robert Toney Way, Oakland, CA, also referred to as to as CE-1. PODS is a nation-wide company which moves goods in portable storage units. Such units are delivered by truck to homes and businesses where they are filled with personal or business belongings, are then picked up again by truck for storage in the PODS warehouse (or outdoor storage around the warehouse) before the storage unit is moved to the location requested by the client. The storage units are warehoused for a short or long duration, and per the client's needs are removed from the warehouse for delivery to a local or national destination. This building is not a refrigerated/cold storage warehouse. PODS will use the entire warehouse and portions of the parking area for storage of the portable storage units.

**2.2** Upon termination of the PODS lease, or if there are significant changes in PODS operations from that described in section 2.1, a different air quality plan or an addendum to this Plan may be required as determined by the City.

**2.3:** If an amendment or exception to this Plan is requested or determined to be necessary, the City will evaluate the scope of the amendment/exception and shall determine the necessary process for undertaking such an amendment/exception. Stakeholder notification will be provided for amendments or exceptions which the City determines to be substantive.

See Fig. 1 for Site Plan.

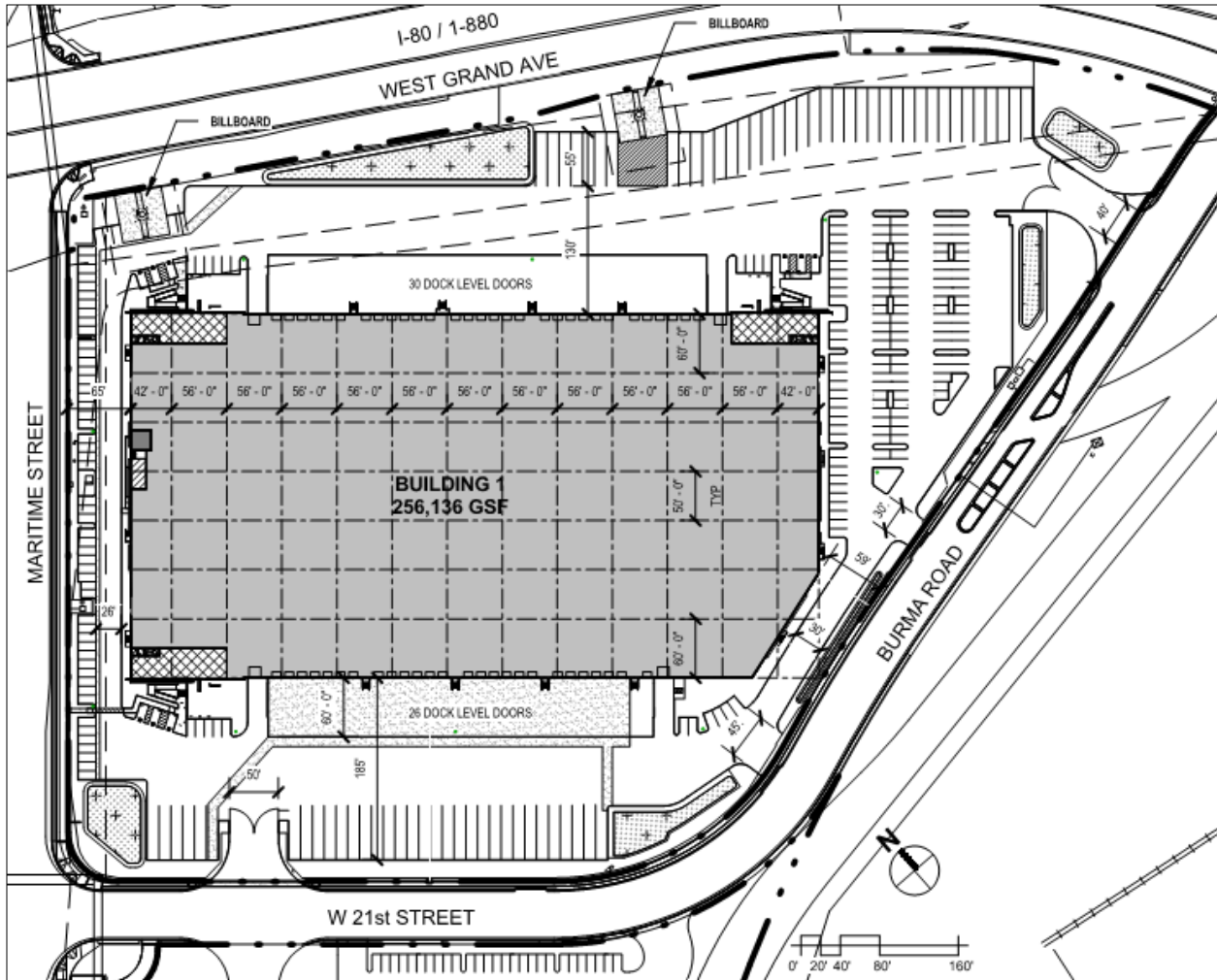


Figure 1: Site Plan – building subject to this Plan

### 3. SCA/MMRP REQUIREMENTS

The City of Oakland prepared a Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) for the OAB Project which was approved by the Oakland City Council on July 16, 2013 superseding a previous version dated October 15, 2012.

This Plan will focus on the air quality Conditions of Approval and Mitigation Measures (together “MM’s”) identified in the SCA/MMRP. The entirety of the SCA/MMRP is available on the City of Oakland website.

Table 1 below lists the air quality related MMs applicable to this tenant/building. Under direction from the City, Prologis bifurcated these MMs related to air quality into construction vs. operational requirements. Prior to receiving the building shell and sitework permits for construction of each building, Prologis prepared (and the City approved) the Construction Management Plan, which

addressed the construction related air quality MMs. The table below shows how the applicable air quality MMs are addressed. Additionally, it should be noted that SCA Air-3 applies only to buildings which will contain sensitive receptors (e.g., hospitals, schools, etc.) and MM4.4-3b applies only to maritime uses at the West Gateway. PODS is a warehouse, so it is not categorized as containing sensitive receptors and it is located inland, therefore SCA Air-3 and MM 4.4-3b do not apply.

**Table 1: Summary of Air Quality Standard Conditions of Approval and Mitigation Measures, and the Response Method which addresses each one**

SCA/MM #	Description	Response Method
AIR-1	Construction Management Plan	Construction Mgmt Plan
AIR-2	Construction Related Air Pollution Controls	Construction Mgmt Plan
TRANS-2	Construction Traffic & Parking	Construction Mgmt Plan
MM 4.3-13	Traffic Control Plan – Hazmat	Construction Mgmt Plan
MM 4.4-6	Energy Conserving Fixtures/Design	Air Quality Operational Plan
MM 4.4-4	Truck Diesel Emissions Reduction Plan	Air Quality Operational Plan
MM 4.4-5	Transportation Control Measures	Air Quality Operational Plan
TRANS-1	Parking and Transportation Demand Mgmt	Air Quality Operational Plan
MM 5.4-1	Demonstration Projects	Air Quality Operational Plan

#### **4. Elements of this Air Quality Plan for Operations of the PODS Facility**

This Plan contains the following components:

- 4.1) Truck and Equipment Diesel Emission Reduction (MM 4.4-4)
- 4.2) Encourage, Lobby, and Participate in Emission Reduction Demonstration Projects (MM 5.4-1)
- 4.3) Technology Review Program (MM 4.4-4)
- 4.4) Sustainable Design and Construction (SCA TRANS-1, MM 4.4-6)
- 4.5) Transportation Control Measures and Parking/Transportation Demand Management (SCA TRANS-1, MM 4.4-5)
- 4.6) Quantification of Diesel Emissions (MM 4.4-4)

## **4.1 Truck and Equipment Diesel Emission Reduction**

The requirements listed below will reduce the diesel emissions including diesel particulate matter and nitrogen oxides produced during the operation of this warehouse.

### **Trucks**

**4.1.1) On-Road Trucks** – All diesel trucks with a gross vehicle weight rating over 14,000 pounds entering the site of this warehouse which are not transporting cargo directly to or from the Port of Oakland or an intermodal rail yard must comply with the Truck and Bus Rule of the California Air Resources Board (CARB) which is in effect at the time of operation of the truck(s).

**4.1.2) Drayage Trucks<sup>1</sup>** – PODS will move storage units in and out of this warehouse to homes, businesses and various locations. The operation of this business is not associated with moving freight by container in and out of the Port of Oakland. While from time-to-time some of the storage units may enter/exit via the Port, PODS is not a business which moves its product by container. However, it is required that if a truck entering the site of this warehouse is transporting a shipping container containing PODS or other cargo destined for this warehouse from the maritime terminals, an intermodal rail yard, or the Port of Oakland, the trucks doing so must comply with the Drayage Truck Rule of CARB which is in effect at the time of operation of the truck(s). See CARB's Drayage Truck Rule for more details, including truck engine year requirements and truck registry requirements.

**4.1.3) Trucks with transport refrigeration units (TRUs)** – No TRU's are associated with this use.

**4.1.4) Idling Rules for diesel trucks** - All classes of diesel trucks shall be prohibited from idling more than 2 minutes when loading and unloading, staging, or when not in active use at this site. See CARB regulation for diesel trucks for description of what is considered idling. The idling rules shall be posted in easily-visible locations on-site and shall be enforced by PODS.

**4.1.5) Management of Loading Docks or loading/unloading** - A dock management or loading/unloading system shall be developed and implemented specific to PODS delivery requirements. Such dock management or loading/unloading system shall ensure that truck idling times do not exceed two minutes when the trucks are on site.

**4.1.6) Compliance with Truck Routes and with the West Oakland Truck Management Plan** – All trucks serving the PODS warehouse must use designated truck routes to arrive and depart from this building and throughout circulation in the city of Oakland. Additionally, such trucks shall comply with the West Oakland Truck Management Plan, upon its approval, or with other City-approved truck regulations in effect at the time of operation of the truck serving this tenancy.

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<sup>1</sup> Drayage trucks are defined by CARB as diesel-fueled Class 7 or Class 8 Trucks with gross vehicle weight rating 26,001 lbs. or more that transport cargo, containers, or chassis to or from a port or intermodal rail yard in CA.



#### **4.1.7) CARB Compliance for Trucks –**

- a. Compliance with applicable air quality regulations for medium and heavy duty-diesel trucks is required including, but not limited to, the CARB Tractor-Trailer Greenhouse Gas Reduction Regulation, Periodic Smoke Inspection Program, Truck and Bus Rule or Drayage Rule.
- b. All truck fleets owned by PODS, or under contract with PODS to provide delivery services to/from this warehouse, shall provide proof of compliance through CARB certificates of compliance or copies of annual smoke test results.

#### **Off-Road Equipment used in the PODS operation**

#### **4.1.8) Off-Road Equipment**

- a. Off-road equipment over 25 horsepower, including but not limited to yard equipment, exterior forklifts and the Podzilla machine used to move the pods, shall be near-zero or zero emission equipment. This includes Tier 4i or Tier 4 diesel equipment (or equivalent if Tier system is not applicable to a particular piece of equipment); such equipment can also be electric, propane, bio-diesel, unleaded gasoline and alternative-fueled equipment.
- b. Indoor off-road equipment including but not limited to interior forklifts, scissor lifts and reach trucks shall be electric, propane, unleaded gasoline or alternative-fueled equipment.
- c. PODS shall submit an equipment list of all off-road equipment to be used both indoors and outdoors to demonstrate that zero and near-zero emission (including Tier 4 or 4i diesel equipment or equivalent) equipment, or electric, propane, bio-diesel, unleaded gasoline or alternative-fueled equipment will be used during operations.
- d. PODS is encouraged to use electric or alternative-fueled off-road equipment and to participate in pilot programs, grant funding and vouchers from the BAAQMD for electric and alternative fuel off-road equipment.
- e. All off-road equipment shall be properly serviced and maintained throughout the life of the equipment.
- f. Compliance with all applicable CARB regulations for off-road diesel equipment used at this site is required, including but not limited to the Diesel Off-Road Online Reporting System (DOORS) and the Equipment Identification Number (EIN).

g. Also see Section 4.3 of this Plan related to the Technology Review Program.

**4.1.9) Idling Rules for off-road equipment** - Diesel off-road equipment shall be prohibited from idling more than 2 minutes when loading and unloading, staging, or when not in active use. See CARB regulation for in-use off-road diesel vehicles for clarification of what is considered idling. The idling rules shall be posted in easily-visible locations on-site.

## **4.2 Participation in Emissions Reduction Demonstration Projects**

**4.2.1)** PODS shall evaluate and participate, as feasible, in emission reduction demonstration projects that promote technological advances in improving air quality. Examples of some demonstration projects include but are not limited to: hybrid or electric yard hostlers and fork lifts, biodiesel powered yard equipment, CNG/LNG technology implementation, energy generation via mechanical systems using truck weight to generate electricity.

**4.2.2):** PODS is encouraged to utilize innovative and cleaner technology/equipment from operations in other PODS locations.

**4.2.3)** PODS will provide contact information to the BAAQMD for receipt of information regarding grants, vouchers and other funding opportunities for demonstration opportunities.

**4.2.4)** PODS will report on demonstration projects considered per the Technology Review Program (see section 4.3 of this Plan).

## **4.3. Technology Review Program**

**4.3.1)** PODS shall use cleaner technology over time as it becomes more readily available, practical and economically feasible. To accomplish this, PODS shall review new technology every three years and with equipment turnover (prior to acquisition of, or lease of) additional or replacement off-road equipment to see if zero or near-zero equipment is economically feasible and practical.

**4.3.2)** PODS shall investigate and make part of such analysis, any grant, voucher or other type of program that would help offset cost and/or otherwise make such equipment available, practical and economically feasible. PODS shall submit such technology review to the City.

**4.3.3)** If the technology review demonstrates that new technology/equipment will be effective in substantially reducing emissions, is available, practical and economically feasible as determined by PODS, then PODS shall implement such technology within 12 months.

#### **4.4 Sustainable Design and Construction**

Sustainable design has a beneficial impact on long-term emissions reduction, improved air quality and reduced energy consumption. Tenants are required to comply with all applicable state and local building/zoning codes related to sustainable design, and are required to implement the following:

**4.4.1) LEED Gold** – The core and shell of this building achieved a “Gold” level certification per the United States Green Building Council’s (USGBC’s) Leadership in Environmental and Environmental Design (LEED) rating system, which surpassed the requirements of the statewide Title 24 building code requirements and the requirements of the SCA/MMRP. As part of the Gold-level Core and Shell certification, it is expected that the tenant improvements (TI) will be performed under a separate scope and includes a provision to include the following sustainable design measures in the TI, not a part of the shell build-out.

PODS must follow the design guidelines set forth under LEED Gold Core and Shell system. This LEED addenda shall be included by Prologis as an exhibit to the tenant’s lease. In 2018, requirements of LEED Gold include items such as:

- Bike storage, changing rooms and showers
- Low flow plumbing fixtures
- Energy efficient lighting, including light emitting diode fixtures (LED)
- Natural ventilation
- Recycling mandate of construction materials and operational materials

PODS is also encouraged, but not required, to obtain LEED-CI (Commercial Interiors) certification, preferably also at a Gold level.

**4.4.2) Title 24 Compliance** – Tenant construction and improvements shall meet Title 24 (Building Energy Efficiency Program) of the International Building Code (IBC)/California Code of Regulations (CCR) to satisfy Mitigation Measure 4-4.6. This will be required in order to obtain a building or TI permit from the City of Oakland.

#### **4.4.3) Renewable Energy** –

- a. PODS is highly encouraged to provide a renewable energy system or combination of systems (solar/wind/mechanical/tidal/hydrogen) designed to offset 20% of building’s annual electrical consumption.
- b. Rooftop solar photovoltaic (PV) power is preferred.
- c. The shell building roof structure of this warehouse building has been designed to support solar panel load.
- d. The electrical room has been sized for additional future solar PV infrastructure.

## **4.5 Transportation Control Measures & Parking/Transportation Demand Management**

Transportation Control Measures (TCMs) in MM4.4-5 are intended to provide alternative ways for employees to commute to work at this warehouse. Some of these TCM's could be initiated and implemented by the City and the Port for the OAB project as part of a fair share program and others will be implemented directly by the tenant.

**4.5.1) Transportation Control Measures** - Separate from a fair share program, PODS is required to implement TCMs 9, 11, and 13 per MM 4.4-5:

9 – Provide preferential parking for carpool and vanpool vehicles per City of Oakland and LEED standards.

11 – Secure, weather protected bicycle parking shall be provided on-site, such as through bike lockers.

13 – Showers and lockers will be provided part of the tenant improvements.

Additionally, electrical vehicle charging stations for cars will be installed in the parking lot of this warehouse and as well as necessary infrastructure in place for future truck charging stations.

**4.5.2) Fair Share Participation** – In addition to 4.5.1, this tenant may be required to contribute to fair share funded TCM programs, as described in MM 4.4-5. City shall take lead on establishing Fair Share Plan, and implementing a fair and equitable allocation amongst projects.

**4.5.3) Parking and Transportation Demand Management** – PODS shall prepare and implement a Parking and Transportation Demand Management Plan per SCA TRANS-1, consistent with the number of on-site employees, with the goal of reducing drive-alone commute trips during the peak traffic periods.

## **4.6 Quantification of Diesel Emissions**

The 2012 Initial Study/Addendum analyzed whether the OAB Project (as defined in Chapter 2 of the Initial Study/Addendum) would result in total OAB Project emissions which exceed Thresholds of Significance as specified in the 2012 Addendum. Such Thresholds are established for reactive organic gases, nitrogen oxides (NO<sub>x</sub>), particulate matter (PM) 10. The applicable Threshold for each of these pollutants as clarified on pages 132 and 133 of the Initial Study/Addendum was 15 tons per year; a Threshold for PM<sub>2.5</sub> was not established at that time. Table 3.3-8 on page 150 of the Initial Study/Addendum shows that OAB Project emissions of NO<sub>x</sub> exceed the Threshold of Significance, while also showing that the other pollutants do not exceed the Threshold of Significance.

Operations of the PODS facility shall, as stated in MM 4.4-4, “strive to reduce contributions to West Oakland diesel emissions to less than significant levels”, using the thresholds of significance identified in the 2012 Initial Study / Addendum. Reducing diesel emissions will have two benefits: reducing NO<sub>x</sub>, and reducing diesel particulate matter which is a toxic air contaminant.

**4.6.1)** To determine if the diesel emission reduction actions required by this Plan will reduce emissions associated with operations of the PODS facility to a less than significant level, such emissions shall be quantified by Prologis or by the tenant, prior to occupancy. This shall be done by quantifying the emissions from diesel trucks which will serve the PODS facility using the Institute of Transportation Engineers (ITE) Trip Generation 10<sup>th</sup> edition OR by using actual verifiable data of the PODS daily truck and passenger vehicle trips, and the most recent California Emissions Model (CALEEMod) OR emission data for the specific engine year of the truck fleet, to quantify emissions per ton per year for their operations.

**RESULTS:** This quantification of emissions was undertaken in May, 2018, using data from PODS on the daily truck and passenger vehicle trips and the CALEEMod 2016. This analysis showed that NOx emissions will be 1.03 tons per year (See Exhibit A for summary of this analysis). This amount is below the Threshold of Significance for NOx which, per the 2012 Initial Study/Addendum, was 15 tons of NOx per year. The analysis also found that PM10 emissions will be 0.07 tons/year, which fall well below the Threshold of Significance for PM10 of 15 tons/year, and PM2.5 emissions will be 0.02 tons/year (there was not a Threshold of Significance for PM2.5 applicable to the 2012 project<sup>2</sup>). Although there was not an applicable threshold for PM2.5, PM2.5 is considered a toxic air contaminant, and it should be noted that emissions for PM2.5 will not exceed the BAAQMD 2011 PM2.5 Threshold of Significance 10 tons per year. Further, the 2012 Initial Study/Addendum found that the PM2.5 toxic air contaminants associated with the operations of the OAB Project as a whole fall below the PM2.5 threshold of 0.3ug/m<sup>3</sup> annual average therefore the impacts from PM2.5 emissions from the operations of this facility also fall below these thresholds.

**4.6.2)** As other uses and facilities are constructed at the OAB, the required operational air quality plan for each individual project will quantify its individual emissions and provide a calculation for the cumulative emissions of all permanent or long-term projects at the OAB, based on the prior operational air quality plans, against the Thresholds of Significance.

**4.6.3)** If emissions exceed the Threshold of Significance when added together with other permanent/long term operations under way at the OAB, then tenants of the City's portion of the OAB generating truck diesel emissions will be subject to an apportionment and offset program, or other mechanism, if necessary, to be determined in conjunction with the City. The City will work in good faith to determine the apportionment calculation and offset program, if relevant, by the end of 2018.

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<sup>2</sup> Thresholds of Significance are as specified in the 2012 Initial Study/Addendum, pages 132 and 133.

## 5. PLAN IMPLEMENTATION

PODS shall submit to the City’s Environmental Review Officer documentation of compliance with each element of this Plan per Table 2 below. The City will be responsible for reviewing and approving the compliance.

Such compliance shall be subject to audit at City’s discretion, not more than one per year, other than the Technology Review which is to be submitted to the City every three years. The City shall give 30-day notice prior to audit. The results of the compliance audit shall be available upon request and posted to the City’s website.

Table 2 – Operational AQ Plan Compliance Summary Table Example

<b>ID</b>	<b>Description of Plan Element</b>	<b>Compliance Method/Description</b>	<b>Required Date of Compliance</b>
<b>4.1</b>	<b>Truck /Equipment Diesel Emission Reduction</b>		
	4.1.1 – On Road Trucks	[provide truck fleet compliance certificate]	Prior to occupancy and upon audit
	4.1.2 – Drayage Trucks	[provide truck or truck fleet compliance certificate]	If operations change such that drayage trucks are used
	4.1.3- Trucks with TRU’s	N.A.	N.A.
	4.1.4 – Idling Rules for trucks	[provide idling policy signage]	Prior to occupancy
	4.1.5 – Dock Management	[provide a plan to monitor truck deliveries and potential queuing]	Prior to occupancy
	4.1.6 – Compliance with Truck Routes and Truck Management Plan	Provide information to truck drivers who serve this facility	Continuous
	4.1.7 – CARB Compliance	[provide fleet info]	Continuous
	4.1.8 – Off Road Equipment	[provide off-road equipment fleet info; participate in CARB DOORS program]	Prior to occupancy and upon audit.
	4.1.9 – Idling Rules for off-road equipment	[provide idling policy signage]	Prior to occupancy
<b>4.2</b>	<b>Demonstration Projects</b>		
	4.4.1-4 – Demo Projects Participation	[provide any demonstration projects]	On-going with documentation upon audit
<b>4.3</b>	<b>Technology Review</b>		

4.3.1-3 – Technology Review Program	[provide technology review every three years]	Every three years continuously
<b>4.4</b>	<b>Sustainable Design</b>	
4.4.1 – LEED Gold components	[show on building permit plans]	With building permit for tenant improvements
4.4.2 – Title 24 Compliance	[show on building permit plans]	With building permit for tenant improvements
4.4.3 – Renewable Energy	[if proposed, describe solar PV or other onsite renewable energy system – how many kW, expected generation]	If proposed
<b>4.5</b>	<b>Transportation Control Measures</b>	
4.5.1 – Transp. Control measures	[show on building permit plans]	With building permit plans
4.5.2 – Fund Fair Share Programs	[City to assess fair share once program is finalized]	Prior to issuance of the permanent certificate of occupancy or upon finalization of Fair Share program by the City
4.3.2 – Parking/TDM Program	[provide a plan to reduce employee single-driver traffic]	Prior to issuance of permanent certificate of occupancy
<b>4.6</b>	<b>Quantifications of Diesel Emissions</b>	
4.6.1: Quantification of emissions	[provide estimate of emissions]	Prior to occupancy
4.6.2: Compare cumulative emissions to CEQA Threshold of Significance	[provide update of emissions estimate when requested by City]	When needed based on development of other permanent/long-term facilities at the OAB
4.6.3: Participation in off-set program or other emission reduction measures, if required.		Same as 4.6.2

## EXHIBIT A

### Quantification of Diesel Emissions for the PODS facility at CE-1

In order to determine if the diesel emission reduction actions required by the *Air Quality Plan for Operations of the PODS Facility at the CE-1 Warehouse* will reduce diesel emissions below the Thresholds of Significance specified in the Initial Study/Addendum for development at the Oakland Army Base Project, the emissions associated with operations of the PODS facility was quantified by Mitchell Air Quality Consulting. This quantification was undertaken in May 2018 using data from PODS on the daily truck and passenger vehicle trips and the CALEEMod 2016.

This analysis showed NOx emissions will be 1.03 tons of NOx per year, which is well below emissions estimated in 2012 for a transloading warehouse of this size, which was 5.85 tons, and well below the Threshold of Significance which is 15 tons per year. The analysis also found that PM10 emissions will be 0.07 tons/year, which fall well below the Threshold of Significance for PM10 of 15 tons/year, and PM2.5 emissions will be 0.02 tons/year (there was not a Threshold of Significance for PM2.5 applicable to the 2012 project). Although there was not an applicable threshold for PM2.5, it should be noted that emissions for PM2.5 will not exceed the BAAQMD 2011 PM2.5 Threshold of Significance, which is 10 tons per year.

Tenant	Size of lease area (SF)	Number of daily truck trips	Number of daily employee trips	NOx emissions estimated in 2012 for a transloading warehouse of this size (tons/year)	NOx emissions estimated in 2018 based on PODS use <sup>2</sup> (tons/year)	PM10 in 2018 based on PODS use <sup>2</sup> (tons/year)	PM2.5 in 2018 based on PODS use <sup>2</sup> (tons/year)
PODS	256,136	60	40	5.85	1.03	.07	.02
Threshold of Significance <sup>1</sup>				15	15	15	N.A., but note current Threshold is 10

<sup>1</sup> Thresholds of Significance are as specified in the 2012 Initial Study/Addendum, pages 132 and 133.

<sup>2</sup> Quantification of emissions from diesel trucks serving the PODS facility was done based on information provided by PODS including: estimated number of daily truck and passenger vehicle trips, 2014 or newer engine year for local truck fleet, and fleet average mix for the long-distance interstate trucks, calculated using the 2016 California Emissions Model (CALEEMod) 2016.