

Attachment A

Approved Master Air Quality Plan Memorandum for Operations of Prologis
Warehouses and Trucking Facilities



INTER OFFICE MEMORANDUM


TO: Jestin D Johnson
City Administrator

FROM: William Gilchrist
Director, Planning & Building

SUBJECT: Master Air Quality Plan for Tenant
Operations at Prologis
OAB Warehousing and Trucking
Facilities

DATE: April 4, 2025

City Administrator
Approval


Jestin Johnson (May 2, 2025 20:23 EDT)

Date

04/29/2025

RECOMMENDATION

Approve the operations-related Master Air Quality Plan (Air Quality Plan) dated January 27, 2025 (*Attachment A*) for tenant operations of Prologis Mesquite LLC (Prologis) warehousing and trucking Facilities in the former Oakland Army Base (OAB) in the City of Oakland (City).

EXECUTIVE SUMMARY

In accordance with the Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) for the former Oakland Army Base (OAB) redevelopment project, Prologis has prepared a Master Air Quality Plan to reduce air quality impacts during the tenant operations of warehousing and trucking facilities that will be located at the former OAB. The Master Air Quality Plan was developed in accordance with public process described below and revised in response to public comments. The mitigation measures for the OAB redevelopment project require City Administrator approval of the Master Air Quality Plan. Staff recommends such approval.

BACKGROUND

The [SCA/MMRP](#) approved in the 2012 Initial Study/Addendum for the OAB redevelopment project contains mitigation measures for reducing the potential environmental impacts of the redevelopment project, including requirements for the preparation and implementation of the following plans and strategies to reduce air quality impacts related to warehousing and trucking:

- Truck Management Plan (Mitigation 4.3-7)
- Maritime and Rail-Related Emissions Reduction Plan (Mitigation 4.4-3b)
- Truck Diesel Emission Reduction Plan (Mitigation 4.4-4)
- Transportation Control Measures (Mitigation 4.4-5)

- Energy-Conserving Fixtures and Designs (Mitigation 4.4-6)
- Demonstration Projects (Mitigation 5.4-1)
- Parking and Transportation Demand Management (SCA TRANS-1)

Each developer compiles applicable requirements into air quality plans, and Mitigation Measure PO-1 (Stakeholder Review of Air Quality and Trucking Plans) requires the City to conduct a public process in the development and review of the air quality and trucking components of these mitigation measures and requires City Administrator approval of these plans.

In 2013, 2016 and 2017 the City Administrator [approved plans](#) to comply with air quality mitigation measures for construction of the public infrastructure and for construction of various private improvements at the OAB. The subject of this memorandum and of the submitted Master Air Quality Plan is for the tenant operations of Prologis warehouse and trucking facilities.

The Master Air Quality Plan is the fifth operational plan that has been submitted for the new development at the OAB. In May 2018, the City Administrator approved an air quality plan for operations of the first new warehouse at the OAB, located at 55 Admiral Toney Way, occupied by the company called PODS (personal storage on demand). In December 2018, the City Administrator approved an air quality plan for operations of a shipping container storage/repair facility operated by ConGlobal, in September 2019, the City Administrator approved an air quality plan for a prepared foods distribution facility operated by Good Eggs and in December of 2022, the City Administrator approved an air quality plan for operations of the Custom Goods facility located at 2001 Maritime Street. Custom Goods has since ceased operations at 2001 Maritime Street.

SUMMARY OF THE PUBLIC INPUT PROCESS

On September 12, 2024, the City released a 45-day Notice of Preparation of the draft Master Air Quality Plan to the official stakeholder list per Mitigation Measure PO-1. On June 5, 2024, Prologis submitted its first draft of this Air Quality Plan to the City. The intent of this Notice of Preparation is to provide advance notice before the Plan is released for an official 17-day public review period.

On November 12, 2024, the City held a quarterly meeting attended by air quality stakeholders, including community-based organizations, community residents, and interested government air quality agencies. Prologis made a presentation, including a description of typical warehousing and trucking operations covered by the plan, presented the components of the draft Air Quality Plan and described how such components were based on the list of emission reduction actions developed by the staff of the Bay Area Air Quality Management District (BAAQMD) to the extent applicable. The specific diesel emission reduction actions contained in the draft Air Quality Plan were presented and discussed, so as to provide information and input prior to release of the draft Air Quality Plan for the official 17-day public review period.

Prologis revised the draft Air Quality Plan following input from the Stakeholder meeting and

submitted a revised draft Air Quality Plan on November 21, 2024 (see *Attachment B*). On December 3, 2024, draft A was released to stakeholders for the official 17-day public review period public as required by Mitigation Measure PO-1. The City received comments from California Air Resources Board (CARB), which are summarized and discussed in the “Key Issues” section below.

Following the end of the public review period, City staff met with Prologis to discuss enhancements to the draft Air Quality Plan and to address public comments. In response to these comments, Prologis revised the plan. The final Air Quality Plan dated January 27, 2025 is attached (see *Attachment A*) along with City staff responses to CARB’s comments on the previous versions of the draft Air Quality Plan (see *Attachment C*).

KEY ISSUES

The purpose of this Master Air Quality Plan is to reduce diesel emissions during operations of warehouse and trucking operations of City-owned properties in buildings sub-leased by Prologis. Emissions during these operations are generated from diesel trucks transporting import/export goods to and from the site and from the forklifts and other off-road equipment used to transport and store these products.

Public comments received on the draft Master Air Quality Plan are summarized below. Also, refer to the responses to public comment letters prepared by City staff (see *Attachment C*), which contain detailed response to written public comments.

- The Master Plan does not specify which measures would be implemented in each subsequent facility; it leaves it up to the City to determine which measures apply to each project without any oversight. The Master Plan requires that each tenant submit a checklist and provides that “[a]n informational community meeting held by the tenant is required prior to approval of the checklist.” Therefore, there is an opportunity for public input prior to the City approval.
- If the Master Plan is amended or includes any exceptions to mitigation measures, then the Master Plan should be recirculated for public review. The City, under its sole discretion and in consultation with the City Attorney, will determine whether a submitted checklist constitutes a substantial change requiring an amendment or exception to the Master Plan. If the City does determine that either an amendment or exception is necessary, the revised Master Plan or exception to the Master Plan will be recirculated for public review.
- Require a restrictive covenant over the parcel that prohibits the applicant’s use of diesel-powered TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use. Section 3.2 of the Master Plan includes mitigation measures to reduce diesel emissions from heavy-duty trucks. Sub-section 3.2.1(3) provides language to

specifically mitigate the potential impact from diesel powered TRUs requiring that electrical outlets shall be planned and required to be installed at the loading docks serving the refrigerated portion of the facility so trucks can run refrigeration with electricity while loading and unloading. Tenant shall undertake informational efforts such as posting signs on the loading dock indicating plug-in availability and send email notification to vendors encouraging the use of plug-in capable vehicles at the facility to maximize the number of deliveries with electric plug-in refrigeration compatible delivery trucks with the goal of 100 percent utilization.

- The City is allowing future Prologis tenants a way out of participating in demonstration projects and the technology review program. Section 3.6 of the Master Plan includes the participation in Emission Reduction Demonstration Projects that is reflective of Mitigation 5.4-1 of the 2013 SCA/MMRP. This is the same requirement of all OAB tenants. The City has, and will continue to, review compliance with this requirement in the Technology Reports required by each OAB tenant every three years.

CONCLUSION

The stakeholder review requirements for the proposed Air Quality Plan have been satisfied and the Air Quality Plan has been revised in response to comments from the City, the public and agencies. Staff recommends that the City Administrator approve the Plan.

Pursuant to Mitigation Measure PO-1 (Stakeholder Review of Air Quality and Trucking Plans), following the City Administrator's approval of the Air Quality Plan staff will prepare an informational presentation to the City Council about the Air Quality Plan.

Please contact Corey Alvin, Environmental Coordinator for the OAB, at (510) 238-6316 if you have any questions.

William Gilchrist

William Gilchrist (Apr 4, 2025 15:26 PDT)

WILLIAM GILCHRIST

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To: Jestin D. Johnson, City Administrator

Subject: Master Air Quality Plan for Operations of Prologis Sub-Tenants

Date: April 4, 2025

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Attachments

- A. Air Quality Plan Operations of the Custom Goods Facility (January 27, 2025)*
- B. Draft Prologis Master Air Quality Plan for Operations, prepared by Prologis, dated June 5, 2024*
- C. City response to public comment letters (February 25, 2025)*

Attachment A

Master Operational Air Quality Plan Prologis Oakland Global Logistics Center City of Oakland, Alameda County, California

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Revised January 27, 2025

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
AB	Assembly Bill
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
CI	Commercial Interior
CNG	compressed natural gas
DOORS	Diesel Off-road Online Reporting System
DPM	diesel particulate matter
DTR	Drayage Truck Regulation
EIN	Equipment Identification Number
EPA	United States Environmental Protection Agency
EV	electric vehicle
GSE	ground support equipment
GVWR	gross vehicle weight rating
HD I/M	Heavy-duty Inspection and Maintenance
hp	horsepower
IBC	International Building Code
ITE	Institute of Transportation Engineers
LED	light-emitting diode
LEED®	Leadership in Energy and Environmental Design
LSI	Large Spark-Ignition
MM	Mitigation Measure
NO _x	nitrogen oxide
NST	Notice to Submit to Testing
OAB	Oakland Army Base
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PV	photovoltaic
REMD	roadside emission monitoring device
ROG	reactive organic gases
SCA/MMRP	Standard Conditions of Approval/Mitigation Monitoring and Report Program

SO _x	sulfur oxide
TAC	toxic air contaminant
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TI	Tenant Improvements
TRU	Transport Refrigeration Unit
TRUCRS	Truck Regulation Upload, Compliance and Reporting System
USGBC	United States Green Building Council
ZEV	Zero-Emission Vehicle

EXECUTIVE SUMMARY

Prologis is the leading global owner, operator, and developer of logistics real estate. Prologis serves manufacturers, retailers, e-commerce businesses, transportation companies, and logistics providers with the facilities that support local, regional, and global trade. As the ground lessee of 58 acres of the City of Oakland (City) former Oakland Army Base (OAB) property for the next 61 years, Prologis is committed to being a good steward of the land and recognizes the concerns of the West Oakland community adjunct to which Prologis and associated tenants operate.

The Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) for the 2002 Oakland Army Base Redevelopment Project and subsequent 2012 Initial Study/Addendum (OAB Project) contain mitigation measures for reducing the potential environmental impacts of proposed projects, including requirements for the implementation of the following measures to reduce environmental impacts related to air quality:

- Truck Management Plan (Mitigation Measure [MM] 4.3-7)
- Truck and Equipment Diesel Emission Reduction Plan (MM 4.4-4)
- Transportation Control Measures (MM 4.4-5)
- Energy Conserving Fixtures and Design (MM 4.4-6)
- Demonstration Projects (MM 5.4-1)
- Parking and Transportation Demand Management (SCA TRANS-1)

Furthermore, MM PO-1 (Stakeholder Review of Air Quality and Trucking Plans) requires the City to conduct a public process in the development and review of air quality plans developed to implement these measures.

In compliance with these requirements and in consultation with the City, Prologis has developed, submitted, and implemented City Administer-approved plans to comply with the air quality mitigation measures for construction of improvements at the OAB site. Separately, working with tenants at the Prologis-leased OAB sites, Prologis has submitted four operational plans for current tenants, ConGlobal, Good Eggs, PODS, and Custom Goods, demonstrating how tenants at the OAB will comply with the air quality and trucking requirements of the SCA/MMRP on an ongoing basis.

Given the fast-paced nature of industrial tenant leasing, and to facilitate timely review and submittal of an Operational Air Quality Plan for each subsequent new tenant, this document serves as the Master Operational Air Quality Plan (Plan) for any and all subsequent tenants moving into the OAB site after approval of this Plan.

This Plan details the air quality and trucking requirements of the SCA/MMRP and provides a general description of how future tenants will show compliance with these requirements on an ongoing basis. The Plan shall expire on July 30, 2034, unless reviewed and approved by Staff prior to the expiration date.

Future tenants tiering from the Plan will be required to submit a checklist that 1) details their operation at the OAB site and 2) shows consistency with the Plan's air quality and trucking requirements of the SCA/MMRP that are relevant to their operation. City approval of each checklist is required prior to tenant operations.

An informational community meeting held by the tenant is required prior to approval of the tenant checklist. Prologis shall facilitate a community meeting and utilize the services of an outreach consultant familiar with West Oakland residents. The noticing period of the informational community meeting shall be ten days. The Informational Meeting shall discuss the operation characteristics of the leased facility including the size of the facility, number of heavy-duty trucks, number and type of on-site equipment and applicable mitigation measures listed in the Master Plan.

This Plan contains the following elements:

- Truck and Equipment Diesel Emission Reduction Program (MM 4.4-4), including:
 - Measures to reduce on-site truck idling;
 - A requirement to comply with the West Oakland Truck Management Plan and to provide annual proof of compliance with all applicable California Air Resources Board (ARB) regulations to reduce trucking emissions and impacts to nearby communities; and
 - Commitments to utilize only zero and near-zero emissions off-road equipment on-site.
- Truck Management Plan (MM 4.3-7) to ensure all trucks serving tenant facilities use designated truck routes entering and exiting the tenant site use designated truck routes to arrive and depart from the tenant facility and throughout circulation in the City.
- Transportation Control Measures and Parking/Transportation Demand Management (SCA TRANS-1, MM 4.4-5) to reduce passenger vehicle trips and related traffic at the OAB.
- Sustainable Design and Construction (SCA TRANS-1, MM 4.4-6) requirements, including:
 - Leadership in Energy and Environmental Design (LEED®) building certification;
 - Measures to support renewable energy use; and
 - Infrastructure to support charging of electric vehicles.
- Participation in Emission Reduction Demonstration Projects (MM 5.4-1) to support the utilization of innovative clean air technology equipment.
- Technology Review Program (MM 4.4-4) requirements to ensure the regular assessment of the feasibility of implementing additional clean air technology.

Measures included in this Plan serve to implement the SCA/MMRP and reduce emissions of criteria pollutants and toxic air contaminants (TACs) from the operation of the facility. In addition, this Plan includes an implementation section, which discusses monitoring and reporting that will be submitted to the City on an annual basis to demonstrate ongoing compliance with the SCA/MMRP requirements into the future. This Plan is being submitted in accordance with the SCA/MMRP and MM PO-1 for review and approval by the City.

SECTION 1: INTRODUCTION

1.1 - Prologis

Prologis is the leading global owner, operator, and developer of logistics real estate. Prologis serves manufacturers, retailers, e-commerce businesses, transportation companies, and logistics providers with the facilities that support local, regional, and global trade. Prologis buildings are located close to transportation infrastructure such as railways, seaports, highways, and airports. Prologis provides their customers with best-in-class facilities and has a long history of industry of industry-leading corporate governance and transparency. As the ground lessee of 58 acres of the City's former OAB property for the next 61 years, Prologis is committed to being a good steward of the land and recognizes the concerns of the West Oakland community within which Prologis and associated tenants operate.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill (AB) 617 (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those near the OAB property. The West Oakland community is located in a designated disadvantaged community, as defined by the California Environmental Protection Agency (Cal/EPA). The health impacts of air pollution are well-documented and studied, including the risks for cardiovascular diseases and the elevated effects of exposure to air pollution for children and other sensitive receptors. Prologis and associated tenants are committed to ensuring that the operations of their business do not adversely impact the West Oakland community.

Through the implementation of the comprehensive emission reduction measures required by the SCA/MMRP and set forth in this Plan, Prologis and future new tenants will support ongoing efforts at the State and community levels to further protect the residents of the West Oakland community, and surrounding areas, from the adverse impacts of air pollution.

Prologis is also committed to the success of their business and the success of their customer's businesses that occupy the warehouse buildings at the OAB site. Working toward shared goals of improved air quality shall require coordination and collaboration from all tenants of these warehouses to plan and implement emission reduction actions that are impactful, practical, and feasible.

1.1.1 Purpose of the Operational Air Quality Plan

The purpose of this Plan is to:

- Provide clear direction for the tenant regarding operational air quality and energy conservation requirements for tenant improvement and for ongoing operations throughout the duration of the property lease.
- Provide a documented path of compliance for the SCA/MMRP relating to air quality and public outreach as outlined in MM PO-1, which involves public outreach to OAB stakeholders.

The OAB Redevelopment project was initially approved in 2002; the project was then refined with an Initial Study/Addendum in 2012. 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 is to clarify and distill which requirements apply to operations of the tenant facilities that will operate on the Prologis OAB sites and to comply with applicable mitigation measures.

SECTION 2: TENANT OPERATIONS AT THE OAKLAND ARMY BASE

2.1 - Tenant Subject to the Plan

All future tenants are required to comply with all applicable State and regional air quality regulations and are required to implement the applicable components of this document. The relevant requirements of this Plan apply to the tenant operations and are applicable throughout the duration of the lease. All future tenants shall be required to demonstrate how compliance with the specific elements of this Plan are achieved on the specific user level. This Plan, and the tenant-specific checklist, shall become a component of tenant lease documents. The City, as the lead agency under the California Environmental Quality Act (CEQA), shall determine compliance with the applicable mitigation measures and shall determine compliance with this Plan. Upon termination of the tenant lease, or if there are significant changes in operations from that described in the tenant-specific checklist, a revised checklist may be required as determined by the City.

If an amendment or exception to this Plan is requested or determined to be necessary, the City, under its sole discretion and in consultation with the City Attorney, shall evaluate the scope of the amendment/exception and shall determine the necessary process for undertaking such an amendment/exception. If the City does determine an amendment or exception is necessary, the revised Master Plan or exception to the Master Plan will be recirculated for public review.

2.2 - Tenant Operations at the Oakland Global Logistics Center

In the tenant-specific checklist, the following aspects of operation shall be described:

- Tenant location within the OAB site and lease site size
- Detailed description of operations
- Number of employees
- Days of operation per year and operational hours per day
- Proposed tenant improvements
- Proposed daily truck trips to and from OAB site, including trucks with Transport Refrigeration Units (TRUs) if applicable
- Proposed daily passenger vehicle trips to and from OAB site
- List of on-road fleet (owned by tenant and owner-operation fleets)
- List of off-road equipment including fuel type, engine model and year, and ARB compliant verification
- Procedures in place to comply with air quality and truck requirements detailed in this Plan, including transition to zero-emission off-road equipment and truck fleet pursuant to applicable ARB regulations as detailed in Section 3.2 of this document

- Number and location of EV charging stations for on and off-road electric equipment

SECTION 3: AIR QUALITY PLAN FOR TENANT OPERATIONS

3.1 - SCA/MMRP Requirements

The OAB Project was approved in 2002, and then revised with an Initial Study/Addendum in 2012. The City prepared a SCA/MMRP, which was approved by the Oakland City Council on July 16, 2013, superseding a previous version dated October 15, 2012. This Plan focuses on the air quality conditions of approval and mitigation measures related to the operation of the tenant facility, as included in the SCA/MMRP. The entirety of the SCA/MMRP is available on the City website: <https://www.oaklandca.gov/topics/oakland-army-base-environmental-documents>.

Table 1 below lists the air quality-related mitigation measures included in the SCA/MMRP, as well as the section of this Plan where the mitigation measure is addressed in further detail. Please note that SCA/MMRP requirements related to construction have already been addressed through the preparation of the “Diesel Emissions Reduction and Air Quality Plan for Construction of CE-2: Southeast Gateway Parcel and CC-1: New Central Gateway Parcel” (Construction Management Plan) and “Northeast Gateway Construction Management Plan,” which together cover the entire OAB site, as approved by the City Administrator in 2016 and 2017.^{1,2}

Table 1: Summary of Air Quality Standard Conditions of Approval and Mitigation Measures, and the Associated Response Method

SCA/MM	Description	Response Method	Section of Plan
MM 4.3-7	Truck Management Plan	Air Quality Operational Plan	3.3
MM 4.4-4	Truck Diesel Emissions Reduction Plan	Air Quality Operational Plan	3.2
MM 4.4-5	Transportation Control Measures	Air Quality Operational Plan	3.5
MM 4.4-6	Energy Conserving Fixtures/Design	Air Quality Operational Plan	3.4
SCA TRANS-1	Parking and Transportation Demand Management	Air Quality Operational Plan	3.5
MM 5.4-1	Demonstration Projects	Air Quality Operational Plan	3.6
MM PO-1	Stakeholder Review of Air Quality and Trucking Plans	Air Quality Operational Plan	Public review

3.1.1 Mitigations Measures not Addressed Through this Air Quality Plan

¹ City of Oakland. 2017. City Administrator Approval of Construction-Related Air Quality Plan for Southeast and Central Gateway Sites at the Oakland Army Base. November.

² City of Oakland. 2016. City Administrator Approval of Construction-Related Air Quality Plan for Northeast Gateway Sites at the Oakland Army Base. September.

Prior to receiving the building shell and sitework permits for construction of this building, Prologis prepared (and the City approved) the Construction Management Plan for the site, which addressed the construction-related air quality MMs included in the SCA/MMRP.

SCA Air-3 and MM 4.4-3b, as included in the OAB Project SCA/MMRP, do not apply to Prologis tenant operations at OAB. SCA Air-3 applies only to buildings that would contain sensitive receptors (e.g., hospitals, schools, etc.) and MM 4.4-3b applies only to maritime uses at the West Gateway bulk marine terminal.

3.1.2 Elements of the Air Quality Plan for Operations of the Tenant Facility

To address the required air quality and trucking emission reduction measures included in the SCA/MMRP and outlined above, this Plan contains the following components:

1. Truck and Equipment Diesel Emission Reduction (MM 4.4-4)
2. Transportation Control Measures and Parking/Transportation Demand Management (SCA TRANS-1, MM 4.4-5)
3. Truck Management Plan (MM 4.3-7)
4. Sustainable Design and Construction (SCA TRANS-1, MM 4.4-6)
5. Participate in Emission Reduction Demonstration Projects (MM 5.4-1)
6. Technology Review Program (MM 4.4-4)
7. Quantification of Diesel Emissions (MM 4.4-4)

3.2 - Truck and Equipment Diesel Emission Reduction Program

The requirements listed below would reduce diesel emissions, including diesel particulate matter (DPM) and nitrogen oxide (NO_x), produced during the operation of this warehouse. Because this is a master document, not every measure listed below will be applicable to each future tenant, dependent on their proposed operations. The tenant-specific checklist shall include all applicable measures from this list.

3.2.1 Measures to Reduce Emissions from Heavy-duty Trucks

The infrastructure for electrification of on-site equipment and vehicles have been installed at all OAB Prologis sites. Sites where tenants receive refrigerated goods include electric plug-in stations to accommodate the operation of electrified TRU equipped trucks. As technology advances and tenants transition to operating at zero or near-zero emission levels, Prologis will evaluate the need for additional on-site equipment to accommodate heavy-duty trucks.

1. **On-road Trucks:** All diesel trucks with a gross vehicle weight rating over 14,000 pounds entering the site of this warehouse must comply with the Truck and Bus Regulation of the ARB. As of January 1, 2023, nearly all trucks and buses are required to have 2010 or newer model year engines to reduce PM and NO_x emissions.

2. **Drayage Trucks:** Should the tenant receive cargo from the maritime terminals, an intermodal railyard, or property of the Port of Oakland, the trucks doing so must comply with the ARB Drayage Truck Regulation (DTR) that is in effect at the time of operation of the truck(s). As of January 1, 2023, all drayage trucks operating in California must have a 2010 model year engine standard or newer.
3. **Trucks with TRUs:** If applicable, electrical outlets shall be planned and required to be installed at the loading docks serving the refrigerated portion of the facility so trucks can run refrigeration with electricity while loading and unloading. Tenant shall use “good faith” efforts, such as posting signs on the loading dock indicating plug-in availability and emailing notifications to vendors encouraging the use of plug-in capable vehicles at the facility, to maximize the number of deliveries with plug-in refrigeration compatible delivery trucks with the goal of 100 percent. The tenant shall ensure use of electrical outlets during loading and unloading per Section 3.2.1.4, below.
4. **Idling Rules for All Trucks:** All size and types of in-bound and out-bound delivery vehicles shall be prohibited from idling more than 2 minutes when loading and unloading or staging at this site. Idling rules shall be posted in easily visible locations on-site and shall be enforced by the tenant.
5. **Management of Delivery and Pickup:** To ensure that truck idling times do not exceed 2 minutes when the trucks are on-site, the tenant shall be responsible to manage on-site operations to ensure compliance with the 2-minute idling requirement.
6. **ARB Compliance for Trucks:** Compliance with applicable air quality regulations for commercial trucks and vans are required, including but not limited to:
 - a. **ARB Tractor-Trailer Greenhouse Gas Reduction Regulation**—The ARB requires owners of 53-foot or longer box-type trailers older than model year 2014 to either use United States Environmental Protection Agency (EPA) “SmartWay” certified tractors and trailers or be retrofitted with SmartWay verified technologies.
 - b. **Periodic Smoke Inspection Program**— All California-based fleets of two or more heavy-duty diesel vehicles over 6,000 pounds gross vehicle weight rating (GVWR) with engines over 4 years old are required to perform annual smoke opacity tests (1998 and newer diesel vehicles between 6,000–14,000 pounds GVWR subject to biennial smog checks are not subject to the Periodic Smoke Inspection Program).
 - c. **Clean Truck Check Heavy-duty Inspection and Maintenance (HD I/M) Regulation**— Clean Truck Check began in January 2023 with the use of roadside emissions monitoring devices (REMDs) to screen for vehicles that may have high emissions. Vehicles flagged as potential high emitters will receive a Notice to Submit to Testing (NST) from the ARB enforcement to ensure the vehicle is operating with properly functioning emissions control systems. Upon receipt of an NST, the truck owner will have 30 calendar days to submit to ARB a passing emissions compliance test performed by a credentialed tester; the owner should allow enough time in case repairs are required. Additionally, vehicles deemed non-compliant or subject to enforcement action may be subject to additional compliance testing and penalties.

- d. **In-use On-road Heavy-duty Diesel-fueled Vehicles**— All not otherwise exempt in-use on-road diesel vehicles, including drayage trucks, are required to have a 2010 model year emissions equivalent engine as of January 1, 2023.

In addition to the regulations above, the tenant-specific checklist shall include any newly adopted State trucking regulations or revisions to the existing trucking regulations.

All truck fleets owned by the tenant, or under long-term contract with the tenant to provide delivery services to/from the tenant site, shall provide proof of compliance through ARB certificates of compliance or copies of annual smoke test results.

Exhibit 1: Truck Routes and Prohibited Streets In and Around West Oakland

3.2.2 Measures to Reduce Emissions from Off-road Equipment

Tenants with off-road equipment shall comply with the following measures. Because this is a master document, not every measure listed below will be applicable to each future tenant depending on their proposed operations. The tenant-specific checklist shall include all applicable measures from this list.

1. **Zero and Near-zero Emissions Off-road Equipment:** Off-road equipment over 25 horsepower, including but not limited to yard equipment, exterior forklifts, cargo handling, yard hostler/truck and side picks shall be near-zero or zero-emission equipment. This includes Tier 4 Interim and Tier 4 Final 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. The tenant is encouraged to participate in pilot programs, grant funding, and vouchers from the Bay Area Air Quality Management District (BAAQMD) for electric and alternative-fuel trucks, yard hostlers, and off-road equipment and shall report on these efforts as part of the Technology Review Program included in Section 3.6.
2. **Clean Air Indoor Off-road Equipment:** Indoor off-road equipment, including but not limited to interior forklifts, scissor lifts, and pallet jacks, shall be electric, propane, or alternative-fueled equipment.
3. **Off-road Equipment Disclosure List:** The tenant shall submit an equipment list of all off-road equipment to be used at this site 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.
4. **Equipment Maintenance:** All off-road equipment shall be properly serviced and maintained throughout the life of the equipment.
5. **Idling Prohibitions for Off-road Equipment:** Diesel off-road equipment shall be prohibited from idling for more than 2 minutes when loading and unloading, staging, or when not in active use. See ARB 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.
6. **Regulations Achieving Further Emission Reductions:** Compliance with all applicable ARB 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). The tenant is responsible for ensuring that all off-road equipment is in compliance with applicable local, State, and federal regulations.
 - a. **In-use Off-road Diesel-fueled Fleets Regulation (Off-road Regulation)—**This regulation phases) – Phase out the oldest and highest-emitting off-road engines—Tiers 0, 1, and 2—from operation. Engine “tier” refers to the emissions certification level of an engine and is defined in the Off-road Regulation Section 2449I. This provision has a staggered implementation by fleet size and engine tier. Large fleets may no longer operate vehicles with Tier 0 off-road engines. The tenant is required to report in DOORS.

- b. **Large Spark-Ignition Engine Fleet Requirements Regulation—Regulation-** Requires operators of in-use fleets to report, label Large Spark-Ignition (LSI) equipment, and continue existing recordkeeping requirements. The regulation applies to self-propelled vehicles (except some ground support equipment [GSE]) with LSI engines (gasoline, propane, and compressed natural gas [CNG] fuel) 25 horsepower (hp) or greater and greater than 1 liter displacement, including forklifts and industrial tow tractors and sweeper scrubbers. This regulation does not apply to small fleets (three or fewer forklifts and/or pieces of non-forklift LSI Engine equipment). The tenant is required to report in DOORS.

In addition to the above measures, the tenant is also required to conduct a regular review of advancements in clean air technology and shall implement feasible technology identified as a part of this technology review within 12 months. Please see Section 3.6 of this Plan related to the Technology Review Program for additional details.

3.3 - Truck Management Plan

Compliance with Truck Routes and with the West Oakland Truck Management Plan: All trucks serving the tenant facility are required to use designated truck routes to arrive and depart from this facility and throughout circulation in the City. Additionally, such trucks shall comply with the West Oakland Truck Management Plan, as approved by the City and Port in April 2019, or with other City-approved truck regulations in effect at the time of operation of the truck serving this tenancy. City truck route information will be provided by Prologis to each tenant.

3.4 - Sustainable Design Construction

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

1. **LEED® Gold:** The core and shell of the three buildings within the OAB site achieved a "G"old" level certification per the United States Green Building Council (USGBC) LEED® rating system, which surpass 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 tenant improvements shall be performed under separate scope and contain a provision to include the following sustainable design measures in tenant improvements not a part of the shell build-out.

Prologis shall provide the with 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 2022, the guidelines of LEED® Gold include items such as:

- Bike storage, changing rooms, and showers.
- Low-flow plumbing fixtures.
- Energy-efficient lighting, including light-emitting diode (LED) fixtures.

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

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 to satisfy MM 4-4.6. This shall be required in order to obtain a building or tenant improvement permit from the City.
3. **Support for Renewable Energy Utilization:**
 - a. The City encourages use of a renewable energy system or combination of systems (solar/wind/mechanical/tidal/hydrogen) designed to offset 20 percent of a building's annual electrical consumption. Depending on the proposed operation and any proposed tenant building improvements, Prologis and the tenant will evaluate installation of solar panels to offset electricity demand with the plan to install once the exact electrical loads are determined.
 - b. Rooftop solar photovoltaic (PV) power is preferred and is in the feasibility assessment stages.
 - 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. **BAAQMD Permit for painting:** The tenant shall maintain a BAAQMD permit for their painting operations, if applicable to tenant's operations. All paint shall be applied in ventilated and filtered paint-booths. A copy of the tenant's permit shall be submitted to the City once obtained from the BAAQMD.

3.5 - Transportation Control Measures and Parking/Transportation Demand Management

The Transportation Control Measures (TCMs) included in MM 4.4-5 are intended to provide alternative ways for employees to commute to work at this facility. Some of these TCMs could be initiated and implemented by the City and the Port for the OAB project as part of a Fair Share Program and others would be implemented directly by the tenant. To ensure compliance with MM 4.4-5, the tenant is subject to the following requirements:

Transportation Control Measures

Separate from the Fair Share Program, the tenant is required to implement TCM 9 and TCM 11 per MM 4.4-5:

- | | |
|---------------|--|
| TCM 9 | Provide preferential parking for carpool and vanpool vehicles per City and LEED® standards. |
| TCM 11 | Secure, weather protected bicycle parking shall be provided on-site, such as through bike lockers. |

Additionally, electric vehicle (EV) charging stations for cars are installed in the parking lot of the tenant facility, and necessary infrastructure is in place for future truck charging stations.

Fair Share Participation

Prologis is participating in the City's fair share program and has fully contributed to its fair share funded TCM programs, as described in the Fair Share Program³. The City shall take the lead on implementing the Fair Share Program.

Parking and Transportation Demand Management

Each tenant with over 50 employees working on-site shall prepare and implement a Parking and Transportation Demand Management Plan per SCA TRANS-1, with the goal of reducing drive-alone commute trips during peak traffic periods. Actions to consider include the following:

- a) Inclusion of additional long-term and short-term bicycle parking that meets the design standards set forth in Chapter Five of the Bicycle Master Plan and the Bicycle Parking Ordinance, and shower and locker facilities in commercial developments that exceed the requirement.
- b) Construction of and/or access to bikeways per the Bicycle Master Plan; construction of priority bikeways, on-site signage, and bike lane striping.
- c) Installation of safety elements per the Pedestrian Master Plan (such as crosswalk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient and safe crossing at arterials.
- d) Installation of amenities such as lighting, street trees, trash receptacles per the Pedestrian Master Plan and any applicable streetscape plan.
- e) Construction and development of transit stops/shelters, pedestrian access, way-finding signage, and lighting around transit stops per transit agency plans or negotiated improvements.
- f) Provision of direct on-site sales of transit passes purchased and sold at a bulk group rate (through programs such as AC Transit Easy Pass or a similar program through another transit agency).
- g) Employee or resident subsidies, determined by the project sponsor and subject to review by the City, if the employees or residents use transit or commute by other alternative modes.
- h) Provision of ongoing contribution to AC Transit service to the area between the development and nearest mass transit station. If that is not available, an ongoing contribution to an existing area shuttle service between the development and nearest mass transit station. The last option is establishment of a new shuttle service between the development and nearest mass transit station. The contribution required for the service (any option) will be based on the cost of the last option.

³ See MM 4,4-5 and SCA Trans -1 on pages 7 and 50 respectively contained in the [SCA/MMRP](#) based on the Initial Study/Addendum prepared for the 2012 Oakland Army Base Project

- i) Guaranteed ride home program for employees, either through 511.org or through separate program.
- j) Pre-tax commuter benefits (commuter checks) for employees.
- k) Free designated parking spaces for on-site car-sharing program (such as City Car Share, Zip Car, etc.) and/or car-share membership for employees or tenants.
- l) On-site carpooling and/or vanpool program that includes preferential (discounted or free) parking for carpools and vanpools.
- m) Distribution of information concerning alternative transportation options.
- n) Parking spaces sold/leased separately for residential units. Charge employees for parking or provide a cash incentive or transit pass alternative to a free parking space in commercial properties.
- o) Parking management strategies; including attendant/valet parking and shared parking spaces.
- p) Requiring tenants to provide opportunities and the ability to work off-site.
- q) Allow employees to adjust their work schedule in order to complete the basic work requirement of five eight-hour workdays with reduced vehicle trips to the worksite.
- r) Provide or require tenants to provide employees with staggered work hours, involving a shift in the set work hours of all employees at the workplace or individually determined work hours.

3.6 - Participation in Emissions Reduction Demonstration Projects

The tenant shall evaluate emission reduction demonstration projects that promote technological advances in improving air quality. Examples of some demonstration projects include, but are not limited to, zero-emission cargo handling equipment and zero-emission port equipment.

The tenant is encouraged to utilize innovative and cleaner technology/equipment from operations in other tenant facility locations in addition to the site on the OAB property.

The tenant shall provide contact information to the ARB and BAAQMD for receipt of information regarding grants, vouchers, and other funding opportunities for demonstration opportunities.

The tenant shall report on demonstration projects considered per the Technology Review Program below.

3.7 - Technology Review Program

The tenant shall use clean technology over time as it becomes more readily available, practical, and economically feasible. To accomplish this, the tenant shall review new technology every 3 years and with equipment turnover (prior to acquisition of, or lease of, additional or replacement of tenant

fleet trucks or on-site equipment) to see if zero or near-zero equipment is economically feasible and practical.

The tenant 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.

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

SECTION 4: AIR QUALITY PLAN IMPLEMENTATION

4.1 - Plan Implementation

The tenant is required to have an approved checklist demonstrating consistency with the Plan prior to commencing operations on the site. An informational community meeting held by the tenant is required prior to approval of the checklist. Prologis shall facilitate a community meeting and utilize the services of an outreach consultant familiar with West Oakland residents, businesses and neighborhood organizations.. The noticing period of the informational community meeting shall be ten days. The Informational Meeting shall discuss the operation characteristics of the leased facility including the size of the facility, number of heavy-duty trucks, number and type of on-site equipment and applicable mitigation measures listed in the Master Plan.

Table 2 shows a sample operational air quality plan compliance reporting schedule. The tenant-specific checklist shall include a table detailing elements and measures that are applicable to tenant operations, compliance method/description, and required date of compliance.

The tenant shall submit to the City’s OAB Environmental Coordinator documentation of compliance with each element. The City will review and approve the tenant-specific checklist. Prologis will be responsible for maintaining and reporting compliance with the Plan.

Such compliance shall be subject to audit at the City’s discretion, not more than once per year, other than the technology review which is to be submitted to the City every 3 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: Sample Operational Air Quality Plan Compliance Reporting Schedule

ID—Description of Plan Element	Compliance Method/Description	Required Date of Compliance
Truck/Equipment Diesel Reduction Program: 3.2.1—Measures to Reduce Emissions from Heavy-duty Trucks		
1—On-Road Trucks	[provide proof that truck or truck fleet compliance certificates were checked by the tenant for all trucks accessing site]	Continuous; through annual compliance reporting
2—Drayage Trucks	[provide ARB compliance document]	Continuous; through annual compliance reporting
3—Trucks with TRUs	[provide proof that electrical outlets are installed at loading locks, provide proof of posting and distributing plug-in availability information to vendors and on-site]	Prior to occupancy, continuous; through annual compliance reporting

ID—Description of Plan Element	Compliance Method/Description	Required Date of Compliance
4—Idling Rules for All Trucks	[provide idling policy signage]	Prior to occupancy, continuous; through annual compliance reporting
5—Delivery/Pickup Management	[The tenant is responsible for implementing 2-minute idle policy]	Continuous; through annual compliance reporting
6—ARB Compliance for Trucks, list out all applicable requirements	[provide fleet info]	Continuous; through annual compliance reporting
Truck/Equipment Diesel Reduction Program: 3.2.2—Measures to Reduce Emissions from Off-Road Equipment		
1—Off-Road Equipment	[provide off-road equipment fleet info; participate in ARB DOORS program]	Prior to occupancy and upon audit
2—Idling Rules for off-road equipment	[provide idling policy signage]	Prior to issuance of the permanent certificate of occupancy
3.3—Truck Management Plan		
Compliance with Truck Routes and Truck Management Plan	[Provide information to truck drivers who serve this facility, posting within facility]	Continuous; through annual compliance reporting
3.4—Sustainable Design Construction		
1—Title 24 Compliance	[show on building permit plans for administration building, if such building moves forward]	With building permit
2—Renewable Energy and Infrastructure	[show on building permit plans]	With building permit; provide update on renewable energy and infrastructure upon audit.
3—BAAQMD Permit for painting	[maintain a BAAQMD permit for painting operation consistent with BAAQMD regulations]	Prior to issuance of the permanent certificate of occupancy; upon audit
3.5—Transportation Control Measures and Parking/Transportation Demand Management		
1—Transportation Control Measures	[show on building permit plans]	Prior to occupancy
2—Fund Fair Share Programs	[Prologis has contributed to the Fair Share Program in full]	N/A
3—Parking/TDM Program	[provide a plan to reduce employee single-driver traffic]	Prior to occupancy, if applicable
3.6—Participation in Emissions Reduction Demonstration Projects		
Demo Projects Participation	[provide any demonstration projects]	Ongoing with documentation upon audit
3.7—Technology Review		
Technology Review Program	[provide technology review every three years]	Every 3 years continuously

ID—Description of Plan Element	Compliance Method/Description	Required Date of Compliance
Notes: ARB = California Air Resources Board BAAQMD = Bay Area Air Quality Management District DOORS = Diesel Off-Road Online Reporting System TDM = Transportation Demand Management TRU = Transport Refrigeration Unit		

From time to time, the tenant may be required to provide reporting on the progress or maintenance of various Plan elements (for example, updating truck fleet as new vehicles are purchased). Any update requests shall be initiated by the City and tenant shall provide the requested information.

Attachment B

Master Operational Air Quality Plan For Future Tenants Prologis Oakland Global Logistics Center City of Oakland, Alameda County, California

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
AB	Assembly Bill
AERMOD	American Meteorological Society Regulatory Model
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CI	Commercial Interior
DOORS	Diesel Off-Road Online Reporting System
DPM	diesel particulate matter
DTR	Drayage Truck Regulation
EIN	Equipment Identification Number
EV	electric vehicle
LED	light-emitting diode
LEED™	Leadership in Energy and Environmental Design
NO _x	nitrogen oxide
IBC	International Building Code
ITE	Institute of Transportation Engineers
OAB	Oakland Army Base
MM	Mitigation Measure
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PV	photovoltaic
ROG	reactive organic gases
SCA/MMRP	Standard Conditions of Approval/Mitigation Monitoring and Report Program
SO _x	sulfur oxide
TAC	toxic air contaminant
TCM	Transportation Control Measures
TDM	Transportation Demand Management
TI	Tenant Improvements
USGBC	United States Green Building Council
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds

EXECUTIVE SUMMARY

Prologis is the leading global owner, operator, and developer of logistics real estate. Prologis serves manufacturers, retailers, e-commerce businesses, transportation companies, and logistics providers with the facilities that support local, regional, and global trade. As the ground lessee of 58 acres of the City of Oakland's former Oakland Army Base (OAB) property for the next 61 years, Prologis is committed to being a good steward of the land and recognizes the concerns of the West Oakland community that Prologis and associated tenants operate as a part of.

The Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) for the 2002 Oakland Army Base Redevelopment Project and subsequent 2012 Initial Study/Addendum (OAB Project) contains mitigation measures for reducing the potential environmental impacts of the proposed project, including requirements for the implementation of the following measures to reduce environmental impacts related to air quality:

- Construction Management Plan (SCA AIR-1)
- Construction-Related Air Pollution Controls (SCA AIR-2)
- Truck Management Plan (Mitigation Measure [MM] 4.3-7)
- Maritime and Rail-Related Emissions Reduction Plan (MM 4.4.-3b)
- Transportation Control Measures (MM 4.4-5)
- Energy Conserving Fixtures and Design (MM 4.4-6)
- Demonstration Projects (MM 5.4-1)
- Parking and Transportation Demand Management (SCA TRANS-1)
- Construction Traffic and Parking (SCA TRANS-2)
- Traffic Control Plan—Hazardous Materials (MM 4.3-13)

Furthermore, MM PO-1 (Stakeholder Review of Air Quality and Trucking Plans) requires the City of Oakland to conduct a public process in the development and review of these mitigation measures and requires City Administrator approval of the plans.

In compliance with these requirements and in consultation with the City, Prologis has developed, submitted, and implemented City Administer-approved plans to comply with the air quality mitigation measures for construction of improvements at the OAB site. Separately, working with tenants at the Prologis-leased OAB site, Prologis has submitted four operational plans, for current tenants ConGlobal, Good Eggs, PODS, and Custom Goods, demonstrating how tenants at the OAB will comply with the air quality and trucking requirements of the SCA/MMRP on an ongoing basis.

Given the fast-paced nature of industrial tenant leasing and to facilitate timely review and submittal of Operational Air Quality Plan for each subsequent new tenant, this document serves as the Master Operational Air Quality Plan for any and all subsequent tenants moving into the OAB site on or after January 1, 2024.

This Master Operational Air Quality Plan details the air quality and trucking requirements of the SCA/MMRP and a general description of how future tenants will show compliance with these requirements on an ongoing basis.

Future tenants tiering from this Master Operational Air Quality Plan will be required to submit an addendum that details their operation at the OAB site and all air quality and trucking requirements of the SCA/MMRP that are relevant to their operation.

This Plan contains the following elements:

- Truck and Equipment Diesel Emission Reduction Program (MM 4.4-4), including:
 - Measures to reduce on-site truck idling;
 - A requirement to comply with the West Oakland Truck Management Plan and to provide annual proof of compliance with all applicable ARB regulations to reduce trucking emissions and impacts to nearby communities; and
 - Commitments to utilize only zero and near-zero emissions off-road equipment on-site.
- Transportation Control Measures and Parking/Transportation Demand Management (SCA TRANS-1, MM 4.4-5) to reduce passenger vehicle trips and related traffic at the OAB.
- Sustainable Design and Construction (SCA TRANS-1, MM 4.4-6) requirements, including:
 - Leadership in Energy and Environmental Design (LEED™) building certification;
 - Measures to support renewable energy use; and
 - Infrastructure to support charging of electric vehicles.
- Participation in Emission Reduction Demonstration Projects (MM 5.4-1) to support the utilization of innovative clean air technology equipment.
- Technology Review Program (MM 4.4-4) requirements to ensure the regular assessment of the feasibility of implementing additional clean air technology.
- Quantification of Diesel Emissions (MM 4.4-4), to disclose the mobile source emissions estimated to be generated by the tenant operations.

Measures included in this Plan serve to effectively reduce emissions of criteria pollutants and toxic air contaminants from the operation of the facility and demonstrate future tenant's compliance with all applicable SCA/MMRP requirements. In addition to the mitigation measures listed above, this Plan includes an implementation section, which discusses monitoring and reporting that will be submitted to the City on an annual basis to demonstrate ongoing compliance with the SCA/MMRP requirements into the future. This Plan is being submitted in accordance with the SCA/MMRP and MM PO-1 for review and approval by the City of Oakland.

SECTION 1: INTRODUCTION

1.1 - Prologis

Prologis is the leading global owner, operator and developer of logistics real estate. Prologis serves manufacturers, retailers, e-commerce businesses, transportation companies, and logistics providers with the facilities that support local, regional, and global trade. Prologis buildings are located close to transportation infrastructure such as railways, seaports, highways, and airports. Prologis provides their customers with best-in-class facilities and has a long history of industry of industry-leading corporate governance and transparency. As the ground lessee of 58 acres of the City's former OAB property for the next 65 years, Prologis is committed to being a good steward of the land and recognizes the concerns of the West Oakland community that Prologis and associated tenants operate as a part of.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill (AB) 617 (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those near the OAB property. The West Oakland community is located in a designated disadvantaged community, as defined by the California Environmental Protection Agency (Cal/EPA). The health impacts of air pollution are well-documented and studied, including the risks for cardiovascular diseases, and the elevated effects of exposure to air pollution for children and other sensitive receptors. Prologis and associated tenants are committed to ensuring that the operations of their business do not adversely impact the West Oakland community.

Through the implementation of the comprehensive emission reduction measures proposed in this Plan, and compliance with the mitigation called for as a part of the environmental review conducted for the OAB Redevelopment project, Prologis and future new tenants, will support ongoing efforts at the State and community level to further protect the residents of the West Oakland community, and surrounding areas, from the adverse impacts of air pollution.

Prologis is also committed to the success of their business and the success of their customer's businesses who occupy the warehouse buildings at the OAB site. Working toward shared goals of improved air quality shall require coordination and collaboration from all tenants of these warehouses to plan and implement emission reduction actions that are impactful, practical, and feasible.

1.1.1 Purpose of the Operational Air Quality Plan

The purpose of this Plan is to:

- Provide clear direction for the tenant regarding operational air quality and energy conservation requirements for tenant improvement, and for ongoing operations throughout the duration of the property lease.

- Provide a documented path of compliance for the SCA/MMRP relating to air quality and public outreach as outlined in MM PO-1, which involves public outreach to OAB stakeholders.

The OAB Redevelopment project was initially approved in 2002; the project was then refined with an Initial Study/Addendum in 2012. 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 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.

SECTION 2: TENANT OPERATIONS AT THE OAKLAND ARMY BASE

2.1 - Tenant Subject to the Plan

All future tenants are required to comply with all applicable State and regional air quality regulations and are required to implement the applicable components of this document. The relevant requirements of this Plan apply to the tenant operations and are applicable throughout the duration of their lease. The future tenant shall be required to demonstrate how compliance with the specific elements of this Plan is achieved on the specific user level. This Plan, and the tenant-specific addendum to this Plan, shall become a component of tenant lease documents. The City of Oakland (City), as the lead agency under the California Environmental Quality Act (CEQA), shall determine compliance with the applicable mitigation measures and shall determine compliance with this Plan. Upon termination of the tenant lease, or if there are significant changes in operations from that described in the tenant-specific addendum to the Plan, a revised addendum to this Plan may be required as determined by the City.

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

2.2 - Tenant Operations at the Oakland Global Logistics Center

In the tenant-specific addendum to the Master Operational Air Quality Plan, the following aspects of operation shall be described:

- Tenant location within the OAB site and site size
- Detailed description of operations
- Days of operation per year
- Proposed tenant improvements
- Proposed daily truck trips to and from OAB site, including trucks with transport refrigeration units (TRUs) if applicable
- Proposed daily passenger vehicle trips to and from OAB site
- List of on road fleet (owned by tenant and owner-operation fleets)
- List of off road fleet
- Procedures in place to comply with air quality and truck requirements detailed in this Plan

SECTION 3: AIR QUALITY PLAN FOR TENANT OPERATIONS

3.1 - SCA/MMRP Requirements

The OAB Project was approved in 2002, and then revised with an Initial Study/Addendum in 2012. The City of Oakland prepared a SCA/MMRP, which was approved by the Oakland City Council on July 16, 2013, superseding a previous version dated October 15, 2012. This Plan focuses on the air quality conditions of approval and mitigation measures related to the operation of the tenant facility, as included in the SCA/MMRP. The entirety of the SCA/MMRP is available on the City of Oakland website: <https://www.oaklandca.gov/topics/oakland-army-base-environmental-documents>.

Table 1 below lists the air quality-related MMs included in the SCA/MMRP, as well as the section of this Plan where the mitigation measure is addressed in further detail. Please note that SCA/MMRP requirements related to construction have already been addressed through the preparation of the “Diesel Emissions Reduction and Air Quality Plan for Construction of CE-2: Southeast Gateway Parcel and CC-1: New Central Gateway Parcel” (Construction Management Plan) and “Northeast Gateway Construction Management Plan” which together cover the entire OAB site, as approved by the City Administrator in 2016 and 2017.^{1,2}

Table 1: Summary of Air Quality Standard Conditions of Approval and Mitigation Measures, and the Associated Response Method

SCA/MM	Description	Response Method	Section of Plan
SCA AIR-1	Construction Management Plan	Construction Management Plan	—
SCA AIR-2	Construction-Related Air Pollution Controls	Construction Management Plan	—
SCA TRANS-2	Construction Traffic and Parking	Construction Management Plan	—
MM 4.3-13	Traffic Control Plan-Hazmat	Construction Management Plan	—
MM 4.4-4	Truck Diesel Emissions Reduction Plan	Air Quality Operational Plan	3.2
MM 4.4-5	Transportation Control Measures	Air Quality Operational Plan	3.4
MM 4.4-6	Energy Conserving Fixtures/Design	Air Quality Operational Plan	3.3
SCA TRANS-1	Parking and Transportation Demand Management	Air Quality Operational Plan	3.4
MM 5.4-1	Demonstration Projects	Air Quality Operational Plan	3.5
MM PO-1	Stakeholder Review of Air Quality and Trucking Plans	Air Quality Operational Plan	Public review

¹ City of Oakland. 2017. City Administrator Approval of Construction-Related Air Quality Plan for Southeast and Central Gateway Sites at the Oakland Army Base. November.

² City of Oakland. 2016. City Administrator Approval of Construction-Related Air Quality Plan for Northeast Gateway Sites at the Oakland Army Base. September.

3.1.1 Mitigations Measures not Addressed Through this Air Quality Plan

Prior to receiving the building shell and sitework permits for construction of this building, Prologis prepared (and the City approved) the Construction Management Plan for the site, which addressed the construction-related air quality MMs included in the SCA/MMRP.

SCA Air-3 and MM 4.4-3b, as included in the OAB Project SCA/MMRP, do not apply to operations at OAB. SCA Air-3 applies only to buildings that would contain sensitive receptors (e.g., hospitals, schools, etc.) and MM 4.4-3b applies only to maritime uses at the West Gateway bulk marine terminal.

3.1.2 Elements of the Air Quality Plan for Operations of the Tenant Facility

To address the required air quality and trucking emission reduction measures included in the SCA/MMRP and outlined above, this Plan contains the following components:

1. Truck and Equipment Diesel Emission Reduction (MM 4.4-4)
2. Transportation Control Measures and Parking/Transportation Demand Management (SCA TRANS-1, MM 4.4-5)
3. Sustainable Design and Construction (SCA TRANS-1, MM 4.4-6)
4. Participate in Emission Reduction Demonstration Projects (MM 5.4-1)
5. Technology Review Program (MM 4.4-4)
6. Quantification of Diesel Emissions (MM 4.4-4)

3.2 - Truck and Equipment Diesel Emission Reduction Program

The requirements listed below would reduce the diesel emissions including diesel particulate matter (DPM) and nitrogen oxide (NO_x) produced during the operation of this warehouse. Because this is a master document, not every measure listed below will be applicable to each future tenant depending on their proposed operations. The tenant-specific addendum to this Plan shall include all applicable measures from this list.

3.2.1 Measures to Reduce Emissions from Heavy-Duty Trucks

1. **On-Road Trucks:** All diesel trucks with a gross vehicle weight rating over 14,000 pounds entering the site of this warehouse must comply with the Truck and Bus Regulation of the California Air Resources Board (ARB). By January 1, 2023, nearly all trucks and buses will be required to have 2010 or newer model year engines to reduce PM and NO_x emissions.
2. **Drayage Trucks:** Should the tenant receive cargo from the maritime terminals, an intermodal railyard, or property of the Port of Oakland, the trucks doing so must comply with the ARB Drayage Truck Regulation (DTR) that is in effect at the time of operation of the truck(s). By January 1, 2023, all drayage trucks operating in California must have a 2010 model year engine standard or newer.

3. **Trucks with transport refrigeration units (TRUs):** If applicable, electrical outlets shall be planned and required to be installed at the loading docks serving the refrigerated portion of the facility so trucks can run refrigeration with electricity while loading and unloading. Tenant shall use “good faith” efforts such as posting signs on the loading dock indicating plug-in availability and email notification to vendors encouraging use of plug in capable vehicles at the facility to maximize the number of deliveries with plug-in refrigeration compatible delivery trucks with the goal of 100 percent. The tenant shall ensure use of electrical outlets during loading and unloading per Section 3.2.1.4, below.
4. **Idling Rules for All Trucks:** All size and types of in-bound and out-bound delivery vehicles shall be prohibited from idling more than 2 minutes when loading and unloading or staging at this site. The idling rules shall be posted in easily visible locations on-site and shall be enforced by the tenant.
5. **Management of Delivery and Pickup:** To ensure that truck idling times do not exceed two minutes when the trucks are on-site, the tenant shall be responsible to manage on-site operations to ensure compliance with the 2-minute idling requirement.
6. **Compliance with Truck Routes and with the West Oakland Truck Management Plan:** All trucks serving the tenant facility are required to use designated truck routes to arrive and depart from this facility and throughout circulation in the City of Oakland. See exhibit 1. Additionally, such trucks shall comply with the West Oakland Truck Management Plan, as approved by the City and Port in April 2019, or with other City-approved truck regulations in effect at the time of operation of the truck serving this tenancy.
7. **ARB Compliance for Trucks:** Compliance with applicable air quality regulations for commercial trucks and vans are required including, but not limited to:
 - a. **ARB Tractor-Trailer Greenhouse Gas Reduction Regulation** – Requires owners of 53-foot or longer box-type trailers older than model year 2014 must either use United States Environmental Protection Agency (U.S. EPA) “SmartWay” certified tractors and trailers, or be retrofitted with SmartWay verified technologies.
 - b. **Periodic Smoke Inspection Program** - All California-based fleets of two or more heavy-duty diesel vehicles over 6,000 pounds gross vehicle weight rating (GVWR) with engines over four years old are required to perform annual smoke opacity tests (1998 and newer diesel vehicles between 6,000–14,000 pounds GVWR subject to biennial smog check are not subject to Periodic Smoke Inspection Program).
 - c. **Clean Truck Check Heavy-Duty Inspection and Maintenance (HD I/M) Regulation** - Clean Truck Check began in January 2023 with the use of roadside emissions monitoring devices (REMD) to screen for vehicles that may have high emissions. Vehicles flagged as potential high emitters will receive a Notice to Submit to Testing (NST) from the ARB enforcement to ensure the vehicle is operating with properly functioning emissions control systems. Upon receipt of an NST, the truck owner will have 30 calendar days to submit to CARB a passing emissions compliance test performed by a credentialed tester. Be sure to allow enough time in case repairs are required. Additionally, vehicles deemed non-compliant or subject to enforcement action may be subject to additional compliance testing and penalties.

- d. **In-Use On-Road Heavy-Duty Diesel Fueled Vehicles** - All not otherwise exempt in-use on-road diesel vehicles, including drayage trucks, are required to have a 2010 model year emissions equivalent engine by January 1, 2023.
- e. **Advanced Clean Fleets**, which includes the following specific requirements for various aspects relevant to operations at OAB:
 - 1. Drayage - Beginning January 1, 2024, trucks must be registered in the ARB Online System to conduct drayage activities in California. Non-zero-emission “legacy” drayage trucks may register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. Beginning January 1, 2025, any legacy drayage truck registered in the CARB Online System must not exceed its minimum useful life threshold, defined as the earlier of 18 years or 800,000 miles, or a minimum of 13 years if the drayage truck has over 800,000 miles. Any legacy drayage truck that exceeds its minimum useful life threshold will be removed from the CARB Online System by March 31 of each calendar year and can no longer provide drayage services in California.
 - ii. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.
Note: On December 28, 2023, ARB announced that ARB will not take enforcement action as to the drayage fleet reporting requirements or registration prohibitions until U.S. EPA grants a preemption waiver or determines a waiver is not necessary.
 - iii. High-priority fleet - The Advanced Clean Fleets (ACF) regulation requires High Priority Fleets to report their California fleet information through the Truck Regulation Upload, Compliance and Reporting System (TRUCRS) by February 1, 2024, and annually thereafter. High priority fleets are entities that own, operate, or direct the operation of at least one vehicle in California, and that have either \$50 million or more in gross annual revenue, or that own, operate, or direct the operation of a total of 50 or more vehicles. Fleet owners must comply with adding ZEVs according to the ZEV Milestone (until January 1, 2030) or Model Year Schedule.
Note: On December 28, 2023, ARB announced that will not take enforcement action as to the high priority fleet reporting requirements or registration prohibitions until U.S. EPA grants a preemption waiver or determines a waiver is not necessary.

In addition to the regulations above, the tenant-specific addendum to the Master Operational Air Quality Plan shall include any newly adopted State trucking regulations or revisions to the existing trucking regulations.

All truck fleets owned by the tenant, or under long-term contract with the tenant to provide delivery services to/from this warehouse, shall provide proof of compliance through ARB certificates of compliance or copies of annual smoke test results.

3.2.2 Measures to Reduce Emissions from Off-Road Equipment

Tenants with off-road equipment shall comply with the following measures. Because this is a master document, not every measure listed below will be applicable to each future tenant depending on their proposed operations. The tenant-specific addendum to this Plan shall include all applicable measures from this list.

1. **Zero and Near-Zero Emissions Off-road Equipment:** Off-road equipment over 25 horsepower, including but not limited to yard equipment, exterior forklifts, cargo handling, yard hostler/truck and side picks shall be near-zero or zero-emission equipment. This includes Tier 4 Interim and Tier 4 Final 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. The tenant is encouraged to participate in pilot programs, grant funding and vouchers from the Bay Area Air Quality Management District (BAAQMD) for electric and alternative fuel trucks, yard hostlers and off-road equipment, and shall report on these efforts as part of the Technology Review Program included in Section 3.6.
2. **Clean Air Indoor Off-road Equipment:** Indoor off-road equipment, including but not limited to interior forklifts, scissor lifts, and pallet jacks, shall be electric, propane or alternative-fueled equipment.
3. **Off-road Equipment Disclosure List:** The tenant shall submit an equipment list of all off-road equipment to be used at this site 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.
4. **Equipment Maintenance:** All off-road equipment shall be properly serviced and maintained throughout the life of the equipment.
5. **Idling Prohibitions for Off-road Equipment:** Diesel off-road equipment shall be prohibited from idling for more than 2 minutes when loading and unloading, staging, or when not in active use. See ARB 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.
6. **Regulations Achieving Further Emission Reductions:** Compliance with all applicable ARB 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). The tenant is responsible for ensuring that all off-road equipment is in compliance with applicable local, State, and federal regulations.
 - a. **In-Use Off-Road Diesel-Fueled Fleets Regulation (Off Road Regulation)** - Phase out the oldest and highest-emitting off-road engines-- Tiers 0, 1, and 2-- from operation in California. Engine "tier" refers to the emissions certification level of an engine and is defined in the Off-Road Regulation section 2449(c). This provision has a staggered

implementation by fleet size and engine tier. Large fleets may no longer operate vehicles with Tier 0 off-road engines. The tenant is required to report in DOORs.

- b. **Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation** - Requires operators of in-use fleets to report, label LSI equipment, and continue existing recordkeeping requirements. The regulation applies to: self-propelled vehicles (except some GSE) with large spark-ignition engines (gasoline, propane, and CNG fuel) 25 hp or greater and greater than 1 liter displacement including forklifts and Industrial tow tractors and sweeper scrubbers. The Regulation does not apply to small fleets (3 or fewer forklifts and/or pieces of non-forklift LSI Engine equipment). The tenant is required to report in DOORs.

In addition to the above measures, the tenant is also required to conduct a regular review of advancements in clean air technology and shall implement feasible technology identified as a part of this technology review within 12 months. Please see Section 3.6 of this Plan related to the Technology Review Program for additional details.

3.3 - Sustainable Design Construction

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

1. **LEED™ Gold:** The core and shell of the three buildings within the OAB site achieved a "Gold" level certification per the United States Green Building Council (USGBC) Leadership in Energy 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 improvement shall be performed under a separate scope and includes a provision to include the following sustainable design measures in the tenant improvements not a part of the shell build-out.

The tenant must be made aware of 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 2022, the guidelines of LEED™ Gold include items such as:

- Bike storage, changing rooms, and showers.
- Low flow plumbing fixtures.
- Energy efficient lighting, including light-emitting diode (LED) fixtures.

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

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 MM 4-4.6. This shall be required in order to obtain a building or tenant improvement permit from the City of Oakland.

3. Support for Renewable Energy Utilization:

- a. The City encourages use of a renewable energy system or combination of systems (solar/wind/mechanical/tidal/hydrogen) designed to offset 20 percent of building's annual electrical consumption. The tenant and Prologis are currently working on evaluating solar panels to offset electricity demand with the plan to install once the exact electrical loads are determined.
 - b. Rooftop solar photovoltaic (PV) power is preferred and is in the feasibility assessment stages.
 - 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. **BAAQMD Permit for painting**—The tenant shall maintain a BAAQMD permit for their painting operations, if applicable to tenant's operations. All paint shall be applied in ventilated and filtered paint-booths. A copy of the tenant's permit shall be submitted to the City of Oakland once obtained from the BAAQMD.

3.4 - Transportation Control Measures and Parking/Transportation Demand Management

The Transportation Control Measures (TCMs) included in MM 4.4-5 are intended to provide alternative ways for employees to commute to work at this facility. 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 would be implemented directly by the tenant. To ensure compliance with MM 4.4-5, the tenant is subject to the following requirements:

Transportation Control Measures

Separate from the Fair Share Program, the tenant is required to implement TCM 9 and TCM 11 per MM 4.4-5:

- | | |
|---------------|--|
| TCM 9 | Provide preferential parking for carpool and vanpool vehicles per City of Oakland and LEED™ standards. |
| TCM 11 | Secure, weather protected bicycle parking shall be provided on-site, such as through bike lockers. |

Additionally, electric vehicle (EV) charging stations for cars are installed in the parking lot of the tenant facility, as well as necessary infrastructure being in place for future truck charging stations.

Fair Share Participation

The developer of this building is participating in the City's defined "fair share" program and has fully contributed to its fair share funded TCM programs, as described in the Fair Share Program. The City shall take the lead on implementing the Fair Share Program.

Parking and Transportation Demand Management

The tenant 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 peak traffic periods. Actions to consider include the following:

- a) Inclusion of additional long term and short term bicycle parking that meets the design standards set forth in chapter five of the Bicycle Master Plan, and Bicycle Parking Ordinance, and shower and locker facilities in commercial developments that exceed the requirement.
- b) Construction of and/or access to bikeways per the Bicycle Master Plan; construction of priority bikeways, onsite signage and bike lane striping.
- c) Installation of safety elements per the Pedestrian Master Plan (such as cross walk striping, curb ramps, count down signals, bulb outs, etc.) to encourage convenient and safe crossing at arterials.
- d) Installation of amenities such as lighting, street trees, trash receptacles per the Pedestrian Master Plan and any applicable streetscape plan.
- e) Construction and development of transit stops/shelters, pedestrian access, way finding signage, and lighting around transit stops per transit agency plans or negotiated improvements.
- f) Direct onsite sales of transit passes purchased and sold at a bulk group rate (through programs such as AC Transit Easy Pass or a similar program through another transit agency).
- g) Employees or residents can be provided with a subsidy, determined by the project sponsor and subject to review by the City, if the employees or residents use transit or commute by other alternative modes.
- h) Provision of ongoing contribution to AC Transit service to the area between the development and nearest mass transit station. If that is not available, an ongoing contribution to an existing area shuttle service between the development and nearest mass transit station. The last option is establishment of a new shuttle service between the development and nearest mass transit station may be developed. The contribution required for the service (any option) will be based on the cost of the last option.
- i) Guaranteed ride home program for employees, either through 511.org or through separate program.
- j) Pre-tax commuter benefits (commuter checks) for employees.
- k) Free designated parking spaces for on-site car-sharing program (such as City Car Share, Zip Car, etc.) and/or car-share membership for employees or tenants.
- l) On-site carpooling and/or vanpool program that includes preferential (discounted or free) parking for carpools and vanpools.
- m) Distribution of information concerning alternative transportation options.
- n) Parking spaces sold/leased separately for residential units. Charge employees for parking, or provide a cash incentive or transit pass alternative to a free parking space in commercial properties.
- o) Parking management strategies; including attendant/valet parking and shared parking spaces.
- p) Requiring tenants to provide opportunities and the ability to work off-site.
- q) Allow employees or residents to adjust their work schedule in order to complete the basic work requirement of five eight-hour workdays by adjusting their schedule to reduce vehicle trips to the worksite.

- r) Provide or require tenants to provide employees with staggered work hours involving a shift in the set work hours of all employees at the workplace or flexible work hours involving individually determined work hours.

3.5 - Participation in Emissions Reduction Demonstration Projects

The tenant shall evaluate emission reduction demonstration projects that promote technological advances in improving air quality. Examples of some demonstration projects include, but are not limited to, zero-emission cargo handling equipment, and zero-emission port equipment.

The tenant is encouraged to utilize innovative and cleaner technology/equipment from operations in other tenant facility locations, in addition to the site on the OAB property.

The tenant shall provide contact information to the ARB and BAAQMD for receipt of information regarding grants, vouchers, and other funding opportunities for demonstration opportunities.

The tenant shall report on demonstration projects considered per the Technology Review Program below.

3.6 - Technology Review Program

The tenant shall use cleaner technology over time as it becomes more readily available, practical and economically feasible. To accomplish this, the tenant shall review new technology every 3 years and with equipment turnover (prior to acquisition of, or lease of, additional or replacement of tenant fleet trucks or on-site equipment) to see if zero or near-zero equipment is economically feasible and practical.

The tenant 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. The tenant shall submit such technology review to the City upon request.

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 the tenant, then the tenant shall implement such technology within 12 months.

3.7 - Quantification of Diesel Emissions

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 that exceed Thresholds of Significance as specified in the 2012 Addendum. Such Thresholds are established for reactive organic gases (ROG), NO_x, and particulate matter less than 10 microns in diameter (PM₁₀). 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 particulate matter less than 2.5 microns in diameter (PM_{2.5}) 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_x exceed the Threshold of Significance, while also showing that the other pollutants do not exceed the Threshold of Significance.

Operations of all uses at the OAB 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 would have two benefits: reducing NO_x and reducing DPM, which is a toxic air contaminant.

To determine whether the diesel emission reduction actions required by this Plan will reduce emissions associated with operations of the tenant facility to a less than significant level, such emissions shall be quantified by a qualified air quality consultant and shall be submitted to the City along with the tenant-specific addendum to this Plan. This shall be done by quantifying the emissions from diesel trucks that would serve the tenant facility using the Institute of Transportation Engineers (ITE) Trip Generation 11th edition (or the latest version available); OR by using actual verifiable data of the tenant operation’s daily truck and passenger vehicle trips, and the most recent California Emissions Estimator Model (CalEEMod) OR emission data for the specific engine year of the truck fleet, to quantify emissions per ton per year for their operations.

Cumulative Emissions for OAB Site

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 projects at the OAB based on the prior operational air quality plans against the Thresholds.

If emissions exceed the Threshold of Significance when added together with other permanent or 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.

SECTION 4: AIR QUALITY PLAN IMPLEMENTATION

4.1 - Plan Implementation

Table 2 shows a sample operational air quality plan compliance reporting schedule. The tenant-specific addendum to Master Operational Air Quality Plan shall include a table detailing elements and measures that are applicable to the tenant operations, compliance method/description, and required date of compliance.

The tenant shall submit to the City's Environmental Review Officer documentation of compliance with each element. 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 1 per year, other than the technology review which is to be submitted to the City every 3 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: Sample Operational Air Quality Plan Compliance Reporting Schedule

ID-Description of Plan Element	Compliance Method/Description	Required Date of Compliance
Truck/Equipment Diesel Reduction Program: 3.2.1 - Measures to Reduce Emissions from Heavy-Duty Trucks		
1-On-Road Trucks	[provide proof that truck or truck fleet compliance certificates were checked by the tenant for all trucks accessing site]	Continuous
2-Drayage Trucks	N/A	N/A
3-Trucks with TRUs	[provide proof that electrical outlets are installed at loading locks, provide proof of posting and distributing plug in availability information to vendors and on site]	Prior to occupancy, continuous
4- Idling Rules for All Trucks	[provide idling policy signage]	Prior to occupancy, continuous
5-Delivery/Pickup Management	[The tenant is responsible for implementing 2-minute idle policy]	Continuous
6-Compliance with Truck Routes and Truck Management Plan	[Provide information to truck drivers who serve this facility, posting within facility]	Continuous
7-ARB Compliance for Trucks, list out all applicable requirements	[provide fleet info]	Continuous
Truck/Equipment Diesel Reduction Program: 3.2.2 - Measures to Reduce Emissions from Off-Road Equipment		

ID—Description of Plan Element	Compliance Method/Description	Required Date of Compliance
1—Off-Road Equipment	[provide off-road equipment fleet info; participate in ARB DOORS program]	Prior to occupancy and upon audit
2—Idling Rules for off-road equipment	[provide idling policy signage]	Prior to issuance of the permanent certificate of occupancy
3.3—Sustainable Design Construction		
2—Title 24 Compliance	[show on building permit plans for administration building, if such building moves forward]	With building permit
3—Renewable Energy and Infrastructure	[show on building permit plans]	With building permit; provide update on renewable energy and infrastructure upon audit.
4—BAAQMD Permit for painting	[maintain a BAAQMD permit for painting operation consistent with BAAQMD regulations]	Prior to issuance of the permanent certificate of occupancy; upon audit
3.4—Transportation Control Measures and Parking/Transportation Demand Management		
1—Transportation Control Measures	[show on building permit plans]	Prior to occupancy
2—Fund Fair Share Programs	[Prologis has contributed to the Fair Share Program in full]	N/A
3—Parking/TDM Program	[provide a plan to reduce employee single-driver traffic]	Prior to occupancy, if applicable
3.5—Participation in Emissions Reduction Demonstration Projects		
Demo Projects Participation	[provide any demonstration projects]	Ongoing with documentation upon audit
3.6—Technology Review		
Technology Review Program	[provide technology review every three years]	Every 3 years continuously
3.7—Quantifications of Diesel Emissions		
Quantification of emissions	[provide diesel/mobile source emissions quantification documentation prepared by qualified air quality consultant]	To be submitted along with tenant-specific addendum to Master Operational Air Quality Plan
Notes: ARB = California Air Resources Board BAAQMD = Bay Area Air Quality Management District DOORS = Diesel Off-Road Online Reporting System TDM = Transportation Demand Management		

Timing to implement most of these plan elements would happen as the tenant improvements are constructed or as operations begin. However, Prologis nor the tenant controls the implementation timing of the Fair Share Program elements. The fair share elements are City-led programs.

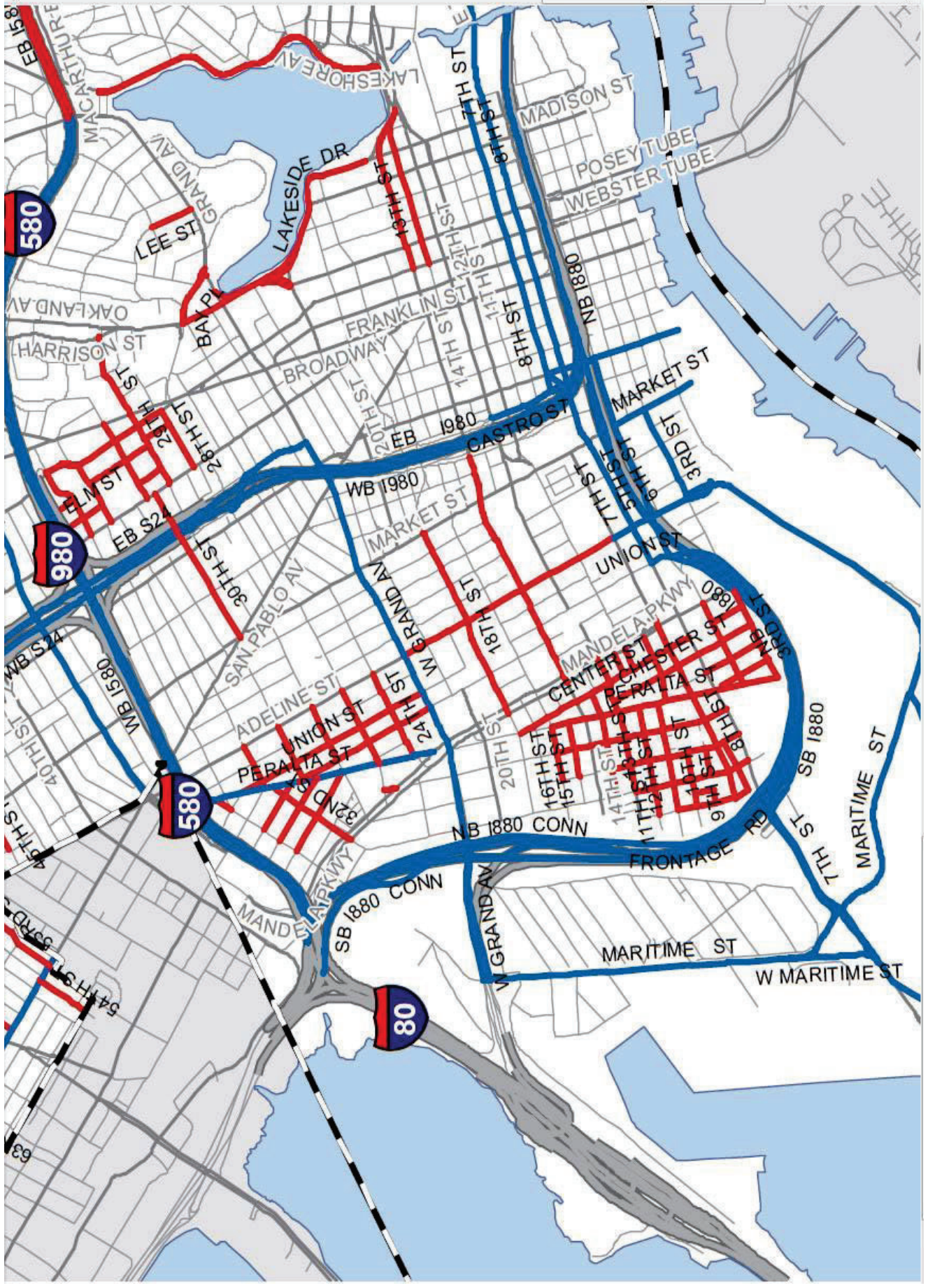
From time to time, the tenant may be required to provide reporting on the progress or maintenance of various plan elements (for example, updating truck fleet as new vehicles are purchased). Any update requests shall be initiated by the City and tenant shall provide the requested information.

Truck Routes and Prohibited Streets In and around West Oakland

Refer to Oakland Municipal Code Chapter 10.52

Blue = truck routes which must be used by through-trucks

Red = prohibited to commercial trucks except when loading/unloading



Attachment C

December 18, 2024

Corey Alvin
Environmental Coordinator
City of Oakland Planning and Building Department
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, California 94612
calvin@oaklandca.gov

Sent via email

Dear Corey Alvin:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Master Operational Air Quality Plan Prologis Oakland Global Logistics Centers (Master Plan) located in the City of Oakland (City). The proposed Master Plan will serve as the operational plan for all subsequent tenants moving into Prologis facilities in the former Oakland Army Base (OAB). The City has previously released operational air quality plans for individual industrial facilities as they are proposed within the OAB as required under the 2013 approved Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) prepared for the 2012 OAB Redevelopment Initial Study Addendum (IS/Addendum).¹ The SCA/MMRP was adopted by the City to mitigate the significant health and air quality impacts in the West Oakland Community and the impacts to regional air quality resulting from the redevelopment of the former OAB.

CARB is concerned the proposed Master Plan, which would expire on July 30, 2034, would allow future Prologis facilities to sidestep some of the mitigation measures listed in the Master Plan, would eliminate public and stakeholder ability to provide comments on future development, and would not provide enough meaningful mitigation measures to reduce air quality and public health impacts to the neighboring West Oakland community. The West Oakland community experiences some of the highest rates of asthma, poverty, and unemployment in the region and has been designated as a disadvantaged community under Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017).² The West Oakland Community was selected for the development of a Community Emissions Reduction Plan due to its high cumulative exposure burden, the presence of a significant

¹ City of Oakland. Standard Conditions of Approval and Mitigation Monitoring and Reporting Program for the 2012 Oakland Army Base Project. July 16, 2013. Accessible at: <https://cao-94612.s3.us-west-2.amazonaws.com/documents/2012-OARB-Project-SCAMMRP-REVISED-7-16-13.pdf>

² Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

number of sensitive populations (children, elderly, and individuals with pre-existing conditions), and the socioeconomic challenges experienced by its residents. To fully mitigate air quality and public health impacts associated with the operation of future Prologis industrial facilities development in the OAB, CARB urges the City to implement all feasible mitigation measures provided in this letter.

Response: To ensure continuous plan coverage, the Master Plan is revised to require that if the plan expires, a new master plan shall be submitted and approved before any tenant seeking use authorization after expiration of the existing plan is allowed to operate.

It is Unclear if the Measures in the Master Plan would be Implemented in future Prologis Industrial Facilities in the OAB

It is unclear how the City would ensure the implementation of the mitigation measures provided in the Master Plan for each of the subsequent Prologis industrial facilities in the OAB. The Master Plan states, “[b]ecause this is a master document, not every measure listed [in the Master Plan] will be applicable to each future tenant, dependent on their proposed operations.”³ Since the Master Plan does not specify which measures would be implemented in each subsequent facility, it leaves it up to the City to determine which measures apply to each project without any oversight.

Response: The Master Plan provides that “[a]n informational community meeting held by the tenant is required prior to approval of the checklist.” Therefore, there is an opportunity for public input prior to the City approval.

The Master Plan requires future Prologis tenants to prepare a checklist (Table 2 of the Master Plan) showing compliance with each mitigation measure listed in the Master Plan. According to the Master Plan, the checklist would be submitted to the City for approval before tenant operation. To ensure that the mitigation measures listed in the Master Plan are correctly assigned to each industrial facility, the checklist must be posted on the City website for the public and stakeholders to review. The City must also share the compliance checklists during community meetings.

Response: Per Section 4.1, the City will post each tenant checklist to the City’s website.

The Master Plan states that, if an amendment or exception is made to the Master Plan, the City will determine if stakeholder notification is required.⁴ To keep the public and stakeholders informed of changes to future amendments or exceptions to the Master Plan, the City must define in the Master Plan what would be considered a substantial change requiring an amendment or exception. If the Master Plan is amended, or includes any exceptions to mitigation measures, the Master Plan should be recirculated for public review.

Response: The City, under its sole discretion and in consultation with the City Attorney, will determine if a submitted checklist constitutes a substantial change requiring an amendment or exception to the Master Plan. If the City does determine an amendment or exception is necessary, the revised Master Plan or exception to the Master Plan will be recirculated for public review.

³ City of Oakland. Master Operational Air Quality Plan Prologis Oakland Global Logistics Center. November 21, 2024. Page 13. Accessible at https://cao-94612.s3.us-west-2.amazonaws.com/documents/Prologis-MASTER-OPS-AQ-PLAN_Public-Review-Draft.pdf

⁴ City of Oakland. Master Operational Air Quality Plan Prologis Oakland Global Logistics Center. November 21, 2024. Page 5. Accessible at https://cao-94612.s3.us-west-2.amazonaws.com/documents/Prologis-MASTER-OPS-AQ-PLAN_Public-Review-Draft.pdf

The City Must Provide Community and Stakeholders a Chance to Provide Feedback on the Future Industrial Projects

The Master Plan states that the tenant will hold an informational community meeting before the City approves an industrial facility in the OAB. However, the City does not specify in the Master Plan what information about future industrial facilities would be shared during the information meetings. To keep the public and stakeholders fully informed about all future industrial facilities proposed within the OAB through the Master Plan, the City and tenant must share the operational characteristics of the proposed industrial facility such as the use and size of the facility, number of heavy-duty truck trips, number and type of onsite equipment and the number of worker trips. The informational meeting should include a list of mitigation measures that will reduce the facility's air quality impacts and a summary of the air quality and health risk impacts that may result from the operation of the proposed facility. The air quality analysis and health risk impacts should be modeled under an unmitigated and mitigated scenario to show the public and stakeholders the effectiveness of the mitigation measures applied to the facility.

Response: The Master Plan has been revised to specify that the Informational Meeting shall discuss the operation characteristics of the leased facility including the size of the facility, number of heavy-duty trucks, number and type of on-site equipment and applicable mitigation measures listed in the Master Plan.

After sharing all critical operational information and air quality analyses for the proposed industrial facility in the informational meeting, the City and tenant must accept questions and comments from the public and stakeholders. The City and tenant must respond to the questions and comments either verbally during the informational meeting or in writing after the informal meeting.

Response: The Master Plan has been revised to clarify that questions will be accepted and responses provided.

The Master Plan states that the date and time of the informational meeting will be announced 10 days in advance. To provide the public and stakeholders enough time to review and understand the potential air quality and public health impacts associated with the proposed industrial facility, CARB urges the City and tenant to release a notification of the informational meeting 20 days in advance. The notification must include the project's location, a list of mitigation measures, a summary of the facilities operation, and the air pollutant and health risk impacts for the proposed facility.

Response: The informational meeting notification requirements are consistent with all previous stakeholder meeting requirements and consistent with the SCA/MMRP of the 2012 Addendum to the OAB EIR.

The City Must Provide More Meaningful Mitigation Measures to Reduce Operational Air Quality and Public Health Impacts

The City included 20 mitigation measures in the Master Plan to reduce air quality impacts from future Prologis industrial facilities in the OAB. Six of the 20 mitigation measures require future Prologis tenants to comply with existing rules and regulations. The remaining mitigation measures include installing charging infrastructure for trucks and trailers with transportation refrigeration units (TRUs), restricting truck idling to two minutes, use of zero-

to near zero-offroad equipment, requiring compliance with a truck management plan, participating in emissions reduction demonstration projects, and using a technology review program.

Many of the mitigation measures provided in the Master Plan focus on reducing air pollutant emissions generated from onsite equipment and stationary sources. The Master Plan does not include many mitigation measures to reduce air quality impacts associated with the operation of heavy-duty trucks serving future Prologis industrial facilities. Although the future use is unknown, the operation of these facilities will increase the number of heavy-duty trucks idling within the OAB and traveling along roadways within the West Oakland communities, which will expose residences and other sensitive receptors to diesel PM emissions that would pose a health risk impact. To mitigate the air quality impacts associated with heavy-duty trucks, CARB urges the City to include a measure in the Master Plan requiring all heavy-duty trucks serving future Prologis industrial facilities within the OAB to be zero-emission and to require the installation of infrastructure to charge zero-emission trucks. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).⁵ The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the cargo transportation needs of individual industrial uses proposed in the OAB today.

Response: Trucking and warehousing are permitted uses and are not conditional. The operation of a trucking or warehousing facility at the OAB are subject to the requirements stipulated in the SCA/MMRP and their heavy-duty truck fleets associated with such operations are required to meet CARB certification standards. The infrastructure for electrification of on-site equipment and vehicles have been installed at all OAB Prologis sites. Sites where tenants receive refrigerated goods include electric plug-in stations to accommodate the operation of electrified TRU equipped trucks. As technology advances and tenants transition to operating at zero or near-zero emission levels, Prologis will evaluate the need for additional on-site equipment to accommodate heavy-duty trucks. In addition, Prologis is planning to develop an EV mobility hub at 6825 San Leandro Street that will include charging infrastructure, as well as other resources to support zero-emission vehicles and sustainable freight solutions.

Since the future Prologis industrial facilities covered under the Master Plan could be used for cold storage, there is a possibility that trucks and trailers visiting these industrial facilities would be equipped with TRUs.⁶ Residents near the OAB and along truck rounds where TRUs could be operating would be exposed to diesel PM emissions that would result in a significant cancer risk impact. Although the Master Plan includes a measure that would require the installation of infrastructure to charge trucks and trailers equipped with electric TRUs, the measure does not fully mitigate air quality impacts associated with diesel-powered TRUs visiting future Prologis industrial facilities. To fully mitigate the potential air quality impacts associated with future cold storage development in the OAB, CARB urges the City to include one of the following design measures in the Master Plan:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating diesel-powered TRUs within the Project site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the

applicant's use of diesel-powered TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

Response: Section 3.2 of the Master Plan includes mitigation measures to reduce diesel emissions from heavy-duty trucks. Sub-section 3.2.1(3) provides language to specifically mitigate the potential impact from diesel powered TRUs requiring that electrical outlets shall be planned and required to be installed at the loading docks serving the refrigerated portion of the facility so trucks can run refrigeration with electricity while loading and unloading. Tenant shall undertake informational efforts such as posting signs on the loading dock indicating plug-in availability and send email notification to vendors encouraging the use of plug-in capable vehicles at the facility to maximize the number of deliveries with electric plug-in refrigeration compatible delivery trucks with the goal of 100 percent utilization.

⁵ Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

⁶ TRUs are refrigeration systems, these systems may be powered by integral diesel engines; TRUs protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

The Master Plan Must Fully Commit Future Prologis Tenants to Participate in Emission Reduction Demonstration Projects and the Technology Review Program

The Master Plan does not fully commit future Prologis tenants to participate in emission reduction demonstration projects and the technology review program as required under the SCA/MMRP. The Master Plan states that future Prologis tenants will “evaluate emission reduction demonstration projects that promote technological advances in improving air quality” and “use clean technology over time as it becomes readily available, practical, and economically feasible.”⁷ However, the City does not specify, in the Master Plan, how future Prologis tenants will participate in emission reduction demonstration projects or how the City will determine whether new technologies are readily available, practical, and economically feasible. By leaving the language vague in the Master Plan, the City is allowing future Prologis tenants a way out of participating in demonstration projects and the technology review program.

Response: Section 3.6 of the Master Plan includes the Participation in Emission Reduction Demonstration Projects that is reflective of Mitigation 5.4-1 of the 2013 SCA/MMRP. This is the same requirement of all OAB tenants. The City has, and will continue to, review compliance with this requirement in the Technology Reports discussed in the next response.

To fully commit future Prologis tenants to participate in emission reduction demonstration projects and the technology review program, the Master Plan must specify how future tenants will participate in emission reduction demonstration projects, how the City will track future tenants’ involvement in demonstration projects, and how the City will quantify new technologies to be readily available, practical and economically feasible.

Response: Section 3.7 of the Master Plan includes Technology Report requirements that reflect Mitigation 4.4-4 C. Existing Prologis tenants have all submitted Technology Review Reports. Staff reviewed and commented on the draft versions of these reports. The Staff approved versions of these reports can be found [here](#).

Conclusion

To reduce the exposure of toxic diesel PM emissions in disadvantaged communities already impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and NOx emissions, as well as the greenhouse gas emissions that contribute to climate change. CARB encourages the City to implement the recommendations listed in this comment letter to ensure public participation, and to reduce operational air quality and public health impacts associated with future Prologis industrial development within the OAB.

CARB also urges the City to extend the 17-day review and comment period for this and future air quality plans within the OAB to at least 45 days. An extension of the review and comment period will allow stakeholders and members of the community more time to review the plans submitted by the City.

⁷ City of Oakland. Master Operational Air Quality Plan Prologis Oakland Global Logistics Center. November 21, 2024. Page 19. Accessible at https://cao-94612.s3.us-west-2.amazonaws.com/documents/Prologis-MASTER-OPS-AQ-PLAN_Public-Review-Draft.pdf

Given the breadth and scope of projects subject to review under the California Environmental Quality Action (CEQA) throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

Response: The City provides a notice to OAB stakeholders that an air quality plan has been drafted and is under review at least 45-days prior to the 17-day review and comment period. During the 45-day notice period, an OAB stakeholder meeting is held hosted by staff and the project sponsor. The review and comment period complies with the public outreach requirement and is consistent with the review and comment period for all previous OAB operational air quality plans.

CARB appreciates the opportunity to comment on the Master Plan and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



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