

December 5, 2025

Bay Area Air Quality Management District

375 Beale Street

Suite 600

San Francisco, CA 94105

Re: East Oakland Community Emissions Reduction Plan (CERP) Public Comments

Dear BAAQMD and Communities for a Better Environment,

Thank you both for your tireless work on the draft East Oakland Community Emissions Reduction Plan. It is inspiring to see public agency commitment and community-led action coming together to address long-standing air quality and environmental justice issues in East Oakland. The public review draft clearly reflects deep efforts to listen to community concerns, document emissions sources, and propose meaningful strategies to improve air quality and health outcomes.

We strongly believe that meaningful change requires ongoing collaboration, and we would welcome the opportunity to work together with you as the plan moves toward finalization and implementation. Please count on us as a partner committed to helping ensure the CERP's success and bringing cleaner air and environmental justice to Oakland.

Founded in 1993, Greenlining is committed to building a just economy that is inclusive, cooperative, sustainable, participatory, fair, and healthy. We work towards a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change.

Here is a summary of general recommendations for the Air District and specific recommendations for the CERP within this letter:

1. The ISR policy package should build on the South Coast Air Quality Management District Rule 2305, or the WAIRE program, to be more health-protective.
2. Take early action to support Assembly Bill 914 (Garcia) in the 2026 legislative cycle. Oppose any future anti-ISR bills.
3. Ensure that no new general-purpose lanes, or any project that would expand the physical footprint of a highway, are funded or advanced in East Oakland.
4. Add stronger language in the CERP that commits to truck re-routing. Add a "Truck Re-routing Study" as a separate, individual action.
5. Use current, or soon appropriated funding, to start incentivizing owners of older heavy-duty diesel trucks, buses, and off-road equipment to transition to zero emission solutions.

6. Metrics for “Strategy 3. Transition to Zero Emission Vehicles and Related Funding” should include: number of vehicles and types of vehicle replaced.
7. Ensure the Caltrans Office of Racial Equity & Tribal Affairs, and potentially the Interagency Equity Advisory Committee (EAC), are a study partner on the Interstate 580 Truck Access Study.
8. Include execution of the forthcoming recommendations from I-580 Truck Access Study as an individual, separate action.

The summary of recommendations are expanded, below:

Strategy 1. Address Trucking Near Neighborhoods through Proactive Truck Management and Enforcement

Action T&M 1.1 Indirect Source Policy Package

We strongly support the Indirect Source (Magnet Source) Policy Package as a key strategy. Studying the feasibility of a Bay Area wide approach to address the cumulative impacts of large warehouses and other magnet facilities is an essential step toward reducing diesel pollution and protecting the health of frontline communities.

We recommend that BAAQMD structure the ISR policy package to build on and go even further than the South Coast Air Quality Management District Rule 2305, adopted in 2021. Rule 2305 requires owners and operators of large warehouses to reduce emissions by choosing from a menu of compliance options, such as installing or using zero-emission charging infrastructure, installing and using onsite solar panels, and visits from zero-emission trucks. Owners and operators may also develop a custom compliance plan or pay a mitigation fee.¹ We would like to see the ISR policy package be more health-protective than Rule 2305. We also recommend careful consideration for the mitigation fee for use to fund further zero emission transportation programs and restorative justice actions in East Oakland.

We also urge the Air District to take early action to support Assembly Bill 914 (Garcia), Air Pollution: Indirect Sources,² in the upcoming legislative cycle, which would strengthen statewide efforts to regulate indirect sources and provide much-needed protections for communities most impacted by freight and goods-movement pollution. Aligning regional action with statewide policy will ensure a more comprehensive and effective approach.

We thank BAAQMD for its opposition to Senate Bill 34 (Richardson), Mobile Sources: Ports of Long Beach and Los Angeles, a bill that would have undermined California’s ability to adopt

¹South Coast Air Quality Management District, “Rule 2305. Warehouse Indirect Source Rule – Warehouse Actions And Investments To Reduce Emissions (Waire) Program,” accessed December 2025, <https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>

² California Air Resources Board, “2025 – Assembly Bill 914 (Garcia, Robert), Air Pollution: Indirect Sources (2-Year),” accessed December 2025, <https://ww2.arb.ca.gov/2025-assembly-bill-914-garcia-robert-air-pollution-indirect-sources-2-year>

stronger air quality rules and protect vulnerable communities, and we urge the Air District to continue to oppose anti-ISR bills in the future.

Action T&M 1.3 Truck Management Update

We strongly recommend deeper collaboration with regional Caltrans leadership to ensure that no new general-purpose lanes are funded or advanced; East Oaklanders are already facing high cumulative pollution burdens. We recommend feedback to the City of Oakland Department of Transportation (OakDOT) be in alignment with Greenlining's previously run 2024 bill Assembly Bill 2535 (Bonta), Trade Corridor Enhancement Program,³ which originally aimed to prohibit the allocation of state transportation funds to highway projects that add general-purpose lanes or expand highway capacity in communities facing significant pollution impacts as evidenced by CalEnviroScreen.

We strongly support OakDOT engaging with the Community Steering Committee (CSC) to get feedback on truck routing and other management strategies in East Oakland, and also, we believe there should be stronger language in the CERP that commits to truck re-routing. We recommend adding a "Truck Re-routing Study" as a separate, individual action within this section. This study could be similar to the Truck Re-route Study that occurred in South Fresno.⁴ Truck routes must be updated to better reduce truck idling and prevent truck routes from cutting through residential areas.

Strategy 3. Transition to Zero Emission Vehicles and Related Funding

Action T&M 3.4 Replacement of Heavy-Duty Vehicles and Equipment:

We appreciate the strong language in Action T&M 3.4 to provide grants for owners of older heavy-duty diesel trucks, buses, and off-road equipment. Greenlining has advocated for the replacement of older, high-polluting diesel trucks from California's roads, and targeted retirement of heavy-duty diesel trucks after 13 years of service rather than the current 18-year threshold.

As the Air District continues to look for that "10 million over 5 years" multi-year funding to advance this action, we recommend the District use the 2026 AB 617 funds to execute this action in order to make it even more near-term and urgent, as well as coordinate with CARB's incentive programs for medium-heavy duty and off-road equipment.

Additionally, we recommend the CERP Strategy 3 metrics should include the number of vehicles and types of vehicle replaced. This data is useful for identifying the impact of incentive dollars.

³ LegiScan, "Bill Text: CA AB2535 | 2023-2024 | Regular Session | Introduced," accessed December 2025, <https://legiscan.com/CA/text/AB2535/id/2927266>

⁴ City of Fresno, "South Central Fresno AB617 Community Truck Reroute Study and related Health Assessment," accessed December 2025, <https://www.fresno.gov/publicworks/south-central-truck-re-route-study/>

Strategy 4. Restorative Justice Guides Decisions about the Future of the I-580 Truck Ban

T&M 4.1 Study Impacts of I-580 Truck Ban

We strongly support the commitment to study the impacts of the I-580 truck ban and to consider future decision-making grounded in racial equity. To ensure this work is done with the depth and collaboration it deserves, we urge the Air District to also ensure that a partner on this analysis within Caltrans, is the Caltrans Office of Racial Equity & Tribal Affairs, as well as the Interagency Equity Advisory Committee (EAC).⁵ Based on the Interstate 580 Truck Access Study website,⁶ it does not seem like the Caltrans Office of Racial Equity & Tribal Affairs or the EAC are a study partner for the project. Their leadership, assistance, and frameworks can help evaluate historic harm, identify disproportionate impacts, and guide just and community-centered solutions.

T&M 4.2 Consider Racial Equity in Future Decision-making Related to the I-580 Truck Ban

We are excited about this action, and that the recommendations for restorative policy will be based on the Memo findings and engagement with impacted communities, including the East Oakland CSC. Although, we find that within the CERP action there is not clear, strong language to actually *execute* the forthcoming recommendations for restorative justice. Execution of the forthcoming recommendations should be included as an individual, separate action.

Conclusion

Thank you again for your leadership and care. Greenlining is happy to serve as a resource and partner as these efforts move forward.

Sincerely,

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⁵ California Transportation Commission, "Interagency Equity Advisory Committee," accessed December 2025, <https://catc.ca.gov/programs/interagency-equity-advisory-committee>

⁶ Caltrans, "Interstate 580 Truck Access Study," accessed December 2025, <https://dot.ca.gov/caltrans-near-me/district-4/d4-projects/d4-580-truck-access-study>