

# Memorandum

**Date:** December 8, 2023

**To:** Corey Alvin, Environmental Coordinator, City of Oakland

**From:** Phil Ault, Director of Noise and Air Quality, FirstCarbon Solutions  
Tsui Li, Senior Air Quality Scientist, FirstCarbon Solutions  
Sara Landucci, Air Quality Associate II, FirstCarbon Solutions

**Subject:** Good Eggs 2023 Technology Review for the Oakland Army Base Project

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FirstCarbon Solutions (FCS) staff have prepared the 2023 Good Eggs Technology Review. This memorandum has been prepared in consultation with Good Eggs and Prologis and is being submitted to the City on behalf of Prologis.

The Standard Conditions of Approval/Mitigation Monitoring and Reporting Program (SCA/MMRP) for the 2002 Oakland Army Base (OAB) Redevelopment Project (project) Environmental Impact Report (EIR) and the subsequent 2012 Addendum prepared for the project includes specific requirements to support the continued deployment of clean-air technology equipment at the OAB. Per the SCA/MMRP, and as outlined in Section 4.3 of the Air Quality Plan for Operations of the Good Eggs Facility at CE-2 Warehouse, the OAB tenant, Good Eggs, shall: “use cleaner technology over time as it becomes more readily available, practical, and economically feasible.” To accomplish this, Good Eggs shall review new technology every 3 years and with equipment turnover (prior to acquisition of, or lease of) additional or replacement of Good Eggs fleet trucks or on-site equipment to see if zero or near-zero equipment is economically feasible and practical. Good Eggs shall investigate and make part of such analysis, any grant, voucher, or other type of program that would help offset the cost and/or otherwise make such equipment available, practical, and economically feasible. Good Eggs 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 emission, is available, practical, and economically feasible as determined by Good Eggs, then Good Eggs shall implement such technology within 12 months from the date of the completed technology review.

To this end, Good Eggs has reviewed the current equipment at their operations at the OAB. Good Eggs and Prologis would like to extend their appreciation to the City staff involved in the assessment of this Technology Review Memorandum.

## GOOD EGGS TECHNOLOGY REVIEW

Located at 55-75 Admiral Robert Toney Way, the Good Eggs operation at the OAB consists of an online grocery and meal kit delivery service that provides fresh local produce, meal kits, grocery staples and beer, wine and spirits. Groceries and meal kits are provided as a same day delivery service. Inbound deliveries, such as produce and packaging material, are sent to the facility by local and regional companies using gasoline powered box trucks, vans, cars and reefer trucks. Electrical outlets at the refrigerated portion of the warehouse provide power to run refrigerated trucks (if applicable) while unloading (rather than running their engines). During year 2022-2023, Good Eggs leased one diesel

reefer truck from Ryder that was used at this location. However, as of November 2023, in an effort to reduce operational costs, Good Eggs no longer leases or operates the diesel reefer truck at this location. All outbound deliveries are made using third-party delivery programs in which individual drivers using their personal vehicle. Regarding off-road equipment, staff at the tenant operation utilize manually powered or zero-emissions electric carts for unloading and moving produce and associated material. The use of zero emissions off-road equipment technology demonstrates consistency with the Good Eggs Operational Air Quality Plan providing zero on-site air quality emissions.

To this end, Good Eggs has completed its review of on-road and off-road equipment used onsite, and the preceding documentation demonstrates that they have satisfied the relevant requirements of the Good Eggs' Air Quality Plan and the Development Agreement (DA) to investigate and use cleaner technology wherever feasible.

Although Good Eggs does not have control over the types of trucks used by other vendors that deliver to the site, nor the types of vehicles used by third-party couriers, all trucks and other vehicles are subject to rigorous State regulatory deadlines to transition to zero or near-zero technology.

For example, Executive Order N-79-20 establishes as a goal that, where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. Other recent regulatory actions such as AB1279, the "California Climate Crisis Act" focuses on the goal of achieving net zero GHG emissions on or before 2045. These regulatory drivers along with specific regulations such as the Advanced Clean Trucks and the Advanced Clean Fleets Regulation will continue to increase the proportion of zero-emission vehicle (ZEV) trucks each year.

In addition, there are also new requirements for truck mounted Transport Refrigeration Units (TRUs). Recent 2022 Amendments to the California Air Resource Board (ARB) TRU Airborne Toxic Control Measures Regulation<sup>1</sup> require the transition of diesel-powered truck TRUs to zero-emission units. The phased-in compliance deadlines are based on truck fleet size and goes into effect beginning as early as December 31, 2023.

Therefore, these additional regulations that came into effect since the execution of the DA provide even further emission reductions beyond what was anticipated and accounted for in the EIR, thereby further advancing the emission reduction objectives outlined in Good Eggs' Air Quality Plan.

We hope that this document provides sufficient information to support the City's review and approval of the 2023 Good Eggs Technology Review. Please feel free to contact myself at [pault@fcs-intl.com](mailto:pault@fcs-intl.com), or Tsui Li, Senior Air Quality Scientist, at [tli@fcs-intl.com](mailto:tli@fcs-intl.com), with any additional questions or comments. We appreciate the City's review and coordination on this compliance effort.

Sincerely,



Phil Ault, Director of Noise and Air Quality

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<sup>1</sup> California Air Resources Board: New Transport Refrigeration Unit Regulation in Development. Website: <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/new-transport-refrigeration-unit-regulation>. Accessed: September 29, 2023.