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Connect with the
Bay Area Air District:



December 9, 2019

Francisco Avila, Senior Planner
Contra Costa County
Department of Conservation & Development
Community Development Division
30 Muir Road
Martinez, CA 94553

RE: Scannell Properties, LLC North Richmond Warehouse Project – Notice of Preparation for a Draft Environmental Impact Report (**County File Number: DP17-3045**)

Dear Mr. Avila,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the CenterPoint North Richmond Warehouse Project (Project). The Project proposes to develop two tilt-up warehouse buildings totaling 327,207 square feet, 608 auto parking spaces and 194 trailer parking spaces, and grading of approximately 31,900 cubic yards.

The Richmond-San Pablo community is disproportionately impacted by air pollution. We have identified Richmond-San Pablo as a priority community through our Community Air Risk Evaluation (CARE) program and, more recently, through our Community Health Protection Program. The Air District has worked for many years to improve air quality and health in Richmond, and these efforts continue today as we currently work with community partners to develop a Richmond-San Pablo Area Community Air Monitoring Plan. Accordingly, increased emissions in Richmond-San Pablo would be concerning.

Air District staff recommends the EIR include the following information and analysis:

- **As identified by the Air District's CARE program and our Community Health Protection Program, the Richmond-San Pablo community is currently cumulatively impacted with air pollution, which makes additional air pollution a potentially significant localized impact.** We recommend that the EIR use a very conservative significance threshold to evaluate impacts and mitigation requirements for this Project.

- **The GHG impact analysis should include an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030 and 2050 climate goals.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Project will be consistent with the Scoping Plan.
- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors near the Project area.
- **The EIR should evaluate all feasible measures, both onsite and offsite, to minimize air quality and GHG impacts.** The EIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Require or incentivize zero emission trucks for facility operations to the greatest degree feasible
 - Prohibit or minimize the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>)
 - Require construction vehicles to operate with the Tier 4 or the highest tier engines commercially available
 - Prohibit trucks from idling for more than two minutes or prohibit idling altogether
 - Implement a program that incentivizes construction workers and building tenants to carpool, use EVs, or use public transit to commute to and from the site. The program may include the following features, as feasible:
 - a. Provide a shuttle service to and from BART,
 - b. Provide preferential parking to carpool vehicles, vanpool vehicles, and EVs,
 - c. Schedule work shifts to be compatible with the schedules of local transit services;
 - Install electric vehicle charging infrastructure
 - Install electric connections for transportation refrigeration units
 - Require electric forklifts and install associated charging stations
 - Install outdoor electrical receptacles for charging or powering of electric landscape equipment

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- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
 - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

We encourage the City to contact Air District staff with any questions and/or to request assistant during the environmental review process. If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Henry Hilken
Director of Planning and Climate Protection

cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Director Karen Mitchoff
BAAQMD Director Mark Ross