



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

January 13, 2022

Francisco Avila
Principal Planner
Contra Costa County
30 Muir Road
Martinez, CA 94553

RE: CenterPoint Properties Warehouse Project Draft Environmental Impact Report

Dear Mr. Avila,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Environmental Impact Report (DEIR) for the CenterPoint Properties Warehouse Project (Project). The Project proposes to build three warehouse buildings totaling 555,537 square feet on a 31.48-acre site in unincorporated Contra Costa County (County) in the North Richmond area. The proposed project includes demolition of all existing foundations associated with former structures, as well as asphalt, concrete, fence poles, and retaining walls. The proposed project also includes the construction of approximately 438 auto parking spaces and 266 trailer parking spaces.

The Air District commends the County for the commitment to Tier 4 construction equipment, and vehicle electrification, including 100% electric drayage trucks from the Project's start, which are available now and used in relatively low quantity at the site, and the transition to a zero-emission fleet domiciled at the project site for Class 2 through 6 trucks by December 31, 2027, for Class 7 and 8 trucks by December 31, 2025 or when commercially available, and for delivery vehicles (such as vans) by December 31, 2027. The Air District commends the inclusion of electric vehicle charging stations and necessary infrastructure to support electric equipment operating on-site, including twelve electric forklifts and six electric yard trucks. Additionally, the Project has committed to the installation of rooftop solar to provide up to 8,083,000 kWh/year of renewable energy, which is anticipated to cover the electricity demand of the proposed project, and the commitment to pursue carbon-free electricity service if on-site renewables do not meet the full electricity demand.

The North Richmond community is disproportionately impacted by air pollution. The Air District has worked for many years to improve air quality and reduce health risks in this area, including current efforts to develop a community-led Richmond-North Richmond-San Pablo Area Community Emissions Reduction Plan as part of the AB 617 Program. As such, it is imperative that future development not increase emissions and exposure in the community.

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To protect this community from further air quality impacts the Air District strongly recommends that all Mitigation Measures that either directly or indirectly reduce health risks and have air quality benefits, including MM GHG-1a through MM GHG-1g and MM TRANS-1, be required as conditions of approval. Additionally, the County should ensure the Mitigation Monitoring and Reporting Program (MMRP) assures rigorous enforcement of these measures and maximizes the community benefits from all Mitigation Measures included in the DEIR.

We encourage the County to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Kelly Malinowski, Senior Environmental Planner, at 415-749-8673 or kmalinowski@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

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