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Bay Area Air District:



June 3, 2019

Hector Lopez, Senior Planner  
City of Richmond  
Planning and Building Services Department  
450 Civic Center Plaza, Second Floor  
Richmond, CA 94804-1630

**RE: Parkway Commerce Center Project – Initial Study with Proposed Mitigated Negative Declaration**

Dear Mr. Lopez,

The Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study (IS) with Proposed Mitigated Negative Declaration (MND) for the Parkway Commerce Center (Project). The Project proposes to develop a two-story, 96,000 square-foot warehouse-style building that would be subdivided into suites and leased to a variety of light industrial and/or warehouse uses, including 24,000 square-feet to a commercial cannabis cultivator.

The Air District is concerned about potential local air quality impacts from the Project's construction and operational emissions.

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, any increase in emissions in Richmond-San Pablo would be concerning.

Staff recommends all feasible measures be implemented to minimize air quality and GHG impacts. Emphasis should be placed on measures to promote zero emissions equipment during operations and construction. 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/>);

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- Require construction vehicles to operate with 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, if 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.

The project may be an odor-generating use. To help ensure potential odors are adequately mitigated, staff recommends that the City of Richmond require the applicant to properly install, operate, and maintain the odor control filtration and ventilation system. The Odor Control Plan that will be submitted to the City of Richmond should specify actions that will be implemented when odors become an issue or complaint.

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 [aflories@baaqmd.gov](mailto:aflories@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

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