



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

October 24, 2016

Lina Velasco, Project Manager II  
City of Richmond Planning Department  
450 Civic Center Plaza, 2<sup>nd</sup> Floor  
Richmond, CA 94804

Subject: Richmond Bay Specific Plan Draft Environmental Impact Report (Draft EIR)

**ALAMEDA COUNTY**

Tom Bates  
Scott Haggerty  
Rebecca Kaplan  
Nate Miley

**CONTRA COSTA COUNTY**

John Gioia  
David E. Hudson  
(Secretary)  
Karen Mitchoff  
Mark Ross

**MARIN COUNTY**

Katie Rice

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

John Avalos  
Edwin M. Lee  
Eric Mar  
(Chair)

**SAN MATEO COUNTY**

David J. Canepa  
Carole Groom  
Warren Slocum

**SANTA CLARA COUNTY**

Cindy Chavez  
Liz Kniss  
(Vice-Chair)  
Jan Pepper  
Rod G. Sinks

**SOLANO COUNTY**

James Spering  
Osby Davis

**SONOMA COUNTY**

Teresa Barrett  
Shirlee Zane

Dear Ms. Velasco:

Bay Area Air Quality Management District (Air District) staff appreciates the opportunity to review the City of Richmond's (City) Draft EIR prepared for the Richmond Bay Specific Plan (Plan). The Plan presents policies and specific regulations to guide the development of approximately 430 acres located in the City's South Shoreline area through the year 2045. The Plan anticipates development of up to 5,700 residential units, 5.69 million square feet of research and development/business/service uses, and 190 thousand square feet of retail space.

Air District staff commends the City for including baseline Performance Measures within the Plan to reduce air pollution and greenhouse gas (GHG) emissions, such as a transportation demand management program, designated electric vehicle parking with charging capabilities, and bicycle infrastructure improvements, including bike share facilities. We also appreciate the opportunity to work with the City in developing the list of additional baseline Performance Measures, which are summarized in "Attachment A." Successful implementation of these additional measures could further reduce the significant air quality and GHG impacts anticipated with buildout of the Plan. Based on discussions with City staff, we understand that these additional baseline Performance Measures will be included in the revised Plan, which will provide clarity and certainty to future project applicants by stipulating in the Plan the baseline emission reduction measures expected to be implemented by all projects in the Plan area.

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Air District staff is available to assist the City in the implementation of the baseline Performance Measures in the Plan and those identified in "Attachment A." If you have any questions, please contact Josh Pollak, Environmental Planner at 415-749-8435 or [jpollak@baaqmd.gov](mailto:jpollak@baaqmd.gov).

Sincerely,

*for* 

Jean Roggenkamp  
Deputy Executive Officer

**Attachment A: Additional Baseline Performance Measures**

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

**Attachment A: Additional Baseline Performance Measures**

<b>Recommended Performance Measure/Mitigation Measure Title</b>	<b>Measure Description<sup>1</sup></b>	<b>Basis/Source of Measure<sup>2</sup></b>	<b>Potential Location to Include in RBSP</b>
<b>Construction</b>			
GHG Best Management Practices (BMPs) for Construction	All construction projects shall incorporate the most recent BMPs to reduce GHG emissions as indicated by the Air District. Construction projects shall also discourage the use of diesel-powered generators, and give preference to the use of grid power.	Richmond 2030 General Plan EIR	4.9 (Supplemental Standards)
Particulate Matter BMPs for Construction	All construction projects shall incorporate the most recent BMPs to reduce particulate matter emissions as indicated by the Air District.	Richmond Bay Specific Plan (RBSP) Draft EIR	4.9 (Supplemental Standards)
Construction and Demolition Air Quality Impacts	Consistent with the Richmond 2030 General Plan EIR, construction and demolition activities that take place within the Plan area shall reduce energy use and air quality-related impacts, with the goal of reducing such impacts by 75 percent.	Richmond 2030 General Plan EIR	4.9 (Supplemental Standards)
Require Tier 4 Engines on Construction Equipment	All construction equipment shall operate on Tier 4 engines, or Tier 2 or Tier 3 engines with verified diesel emissions control strategies (VDECS), for the duration of construction activities.	RBSP Draft EIR	4.9 (Supplemental Standards)
Require Construction Fleet to Use Renewable Diesel	All construction equipment shall operate on renewable diesel for the duration of construction activities to the extent commercially available. Renewable diesel is currently commercially available in Berkeley and Oakland.	RBSP Draft EIR	4.9 (Supplemental Standards)
<b>Buildings</b>			
Residential Green Building Standards	If feasible, all new residential development shall be required to be Zero Net Energy (ZNE) by 2020, in order to meet the projected CALGreen requirements described in the state's New Residential Zero Net Energy Action Plan.	Richmond 2030 General Plan EIR; Draft Richmond Climate Action Plan	4.9.1 (Green Building Standards)
Commercial Green Building Standards	If feasible, all new commercial buildings shall be ZNE by 2030. Prior to 2030, all new commercial development with structures over 10,000 square feet in size shall meet LEED certification	Draft Richmond Climate Action Plan	4.9.1 (Green Building Standards)

Recommended Performance Measure/Mitigation Measure Title	Measure Description <sup>1</sup>	Basis/Source of Measure <sup>2</sup>	Potential Location to Include in RBSP
	standards for building design and construction (BD+C).		
<b>Energy</b>			
Renewable Energy Generation	All new commercial development with structures over 10,000 square feet in size and new residential development with 10 or more dwelling units shall include installation of at least 1.5 kW of solar PV for each residence, or each 5,000 square feet of commercial structure. These requirements shall be waived or reduced, by the minimum extent necessary, where production of electric energy from solar panels is technically infeasible, for example due to lack of available and feasible unshaded areas, and/or for cases in which the City's Design Review Board determines that an unacceptable aesthetic impact (an impact related to design or public views) would occur. The analysis and conclusions regarding the feasibility of project solar PV installations and the City's review of these conclusions will ensure the projects are consistent with General Plan Policy EC-3.1.	Richmond 2030 General Plan EIR, Draft Richmond Climate Action Plan	5.6 (Electrical Power)
Renewable Energy Use	For utility-provided electricity (e.g., not generated on-site via solar PV), commercial and residential buildings shall receive the maximum amount available from renewable sources through participation in Marin Clean Energy's "Deep Green" program, or equivalent.	Air District	5.6 (Electrical Power)
<b>Transportation/Land Use</b>			
Anti-idling Policy	Signage shall be posted along truck routes stating the State idling laws enforced by BAAQMD.	State Regulation	4.9 (Supplemental Standards)
Electrification of Loading Docks	All new loading docks for retail, light industrial or warehouse uses shall be electrified, and all delivery trucks with Transportation Refrigeration Units shall be required to use electrification hook-ups. Signage shall be posted adjacent to	RBSP Draft EIR	4.9 (Supplemental Standards)

<b>Recommended Performance Measure/Mitigation Measure Title</b>	<b>Measure Description<sup>1</sup></b>	<b>Basis/Source of Measure<sup>2</sup></b>	<b>Potential Location to Include in RBSP</b>
	loading docks stating this requirement.		
Car Share	The City shall work with project applicants to identify a carshare provider, and identify locations to be reserved for use by carshare vehicles.	Richmond 2030 General Plan EIR	TMA Responsibility
Bike Share	The City shall work with the TMA to establish 4 bike share facilities within the Plan Area identified in the Bicycle Facility Network map.	Richmond 2030 General Plan EIR	TMA Responsibility
Transportation Demand Management	<p>In order to meet the TDM goals for the RBSP, in addition to the strategies already listed in the RBSP, the following measures will be included:</p> <ul style="list-style-type: none"> <li>• Build infrastructure to be EV plug-in station-ready. Include designated PEV parking spots with adequate space/infrastructure to accommodate future EV plug-in stations, which shall constitute approximately 17 percent of total spaces to match PEV proliferation goals set by the City;</li> <li>• Work towards reducing headways for AC transit currently serving the area by at least 10 percent in the short term (3 to 5 years), and at least 30 percent in the long term (longer than 5 years);</li> <li>• Work towards extending AC transit bus rapid transit service to the Plan Area;</li> <li>• Work towards a goal of providing half of the citywide goal of 400 daily commute trips through ferry service from residents and workers located within the South Richmond PDA;</li> <li>• Work towards ensuring that 75 percent of residents and employees are within half a mile of a carshare location;</li> <li>• Consider establishing a Neighborhood Electric Vehicle (NEV) network;</li> </ul>	RBSP Draft EIR, Draft Richmond Climate Action Plan, Air District	TMA Responsibility

<b>Recommended Performance Measure/Mitigation Measure Title</b>	<b>Measure Description<sup>1</sup></b>	<b>Basis/Source of Measure<sup>2</sup></b>	<b>Potential Location to Include in RBSP</b>
	<ul style="list-style-type: none"> <li>• Work to increase bicycle commute trips to reach 10 percent of total trips taken within the Plan Area;</li> <li>• Work towards establishing employer-funded transit fare subsidies;</li> <li>• Work towards instituting workplace parking pricing; and</li> <li>• Increase transit accessibility.</li> </ul>		
Shuttle Network	To provide connectivity to a major transit hub, the Transportation Management Agency shall evaluate and adopt, as feasible, transit options connecting to BART and the Richmond ferry to support TDM plan goals, which may include a partnership opportunity with UC Berkeley.	Air District	TMA Responsibility
Require Use of Low VOC Coatings	Per Richmond Bay Specific Plan EIR Mitigation Measure AIR-3a.SP, future developer(s) of projects within the Plan Area shall require all residentially developed parcels to use low VOC coatings, which exceed the VOC limits in BAAQMD rules and regulations and meet “super-compliant” standards of VOC content (generally, but not exclusively, VOC content of less than 10 grams per liter), for maintenance of future interior spaces through CC&Rs and ground leases.	RBSP Draft EIR	4.7 (Standards for Specific Uses)
Promote the Use of Green Consumer Products	Per Richmond Bay Specific Plan EIR Mitigation Measure AIR-3b.SP, property managers shall provide electronic correspondence annually to residential and/or commercial tenants to encourage the purchase of commercial products that generate lower than typical VOC emissions.	RBSP Draft EIR	4.7 (Standards for Specific Uses)
Backup Generators (BUGs)	For development projects that propose or require backup diesel generators, the City shall encourage the use of fuel cell-based BUGs. If diesel BUGs are used, they shall be required to meet the lowest commercially available emission standards in addition to permitting requirements by the Air District.	RBSP Draft EIR/Air District	4.7 (Standards for Specific Uses)
Risk Reduction Plan for	Developers of projects proposed within the Plan Area that	RBSP Draft EIR	4.7 (Standards for Specific

<b>Recommended Performance Measure/Mitigation Measure Title</b>	<b>Measure Description<sup>1</sup></b>	<b>Basis/Source of Measure<sup>2</sup></b>	<b>Potential Location to Include in RBSP</b>
Stationary Sources	include stationary sources shall submit an authority to construct and permit application to the Air District for approval consistent with Air District regulations.		Uses)
Toxic Air Contaminant and Particulate Matter Exposure for Sensitive Land Uses	Consistent with Richmond Bay Specific Plan EIR Mitigation Measure AIR-4a.SP, for development that includes sensitive land uses, project applicants shall prepare a project-specific Health Risk Assessment. If the HRA demonstrates that the cancer risk exposures for on-site receptors will be greater than BAAQMD project-level thresholds, then applicants shall prepare or include a mitigation plan to reduce risk below project-level thresholds.	RBSP Draft EIR	4.7 (Standards for Specific Uses)
<b>Waste</b>			
Waste Reduction/Zero Waste	Consistent with the City's Climate Action Plan (CAP) and as part of the City's ongoing efforts, projects developed within the Plan Area shall work to achieve a 75 percent solid waste diversion rate by 2020 and a 90 percent diversion rate by 2030 for all non-construction waste streams.	Richmond 2030 General Plan EIR, Draft Richmond Climate Action Plan	4.7 (Standards for Specific Uses)
Zero Waste from Construction	Consistent with the City's CAP, the City will explore the feasibility of diverting 90 percent of construction and demolition waste originating from within the Plan Area from landfills by 2030.	Draft Richmond Climate Action Plan	4.7 (Standards for Specific Uses)

**Notes:**

<sup>1</sup>The measure description may have been modified (in most cases) from the original policy or measure description as it existed in the source document to allow for implementation in the RBSP.

<sup>2</sup>The basis/source of measure is where the original policy and/or measure was derived from.