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Bay Area Air District:



April 29, 2020

Lina Velasco, Community Development Director
City of Richmond
Planning Division
450 Civic Center Plaza
P.O. Box 4046
Richmond, CA 94804

RE: Point Molate Mixed-Used Development Project – Draft Subsequent Environmental Impact Report

Dear Ms. Velasco,

Bay Area Air Quality Management District (Air District) staff has reviewed the Draft Subsequent Environmental Impact Report (SEIR) for the Point Molate Mixed-Used Development Project (Project). The Project proposes to develop approximately 82.74 acres of a mixed-used community with approximately 1,260 residential units, rehabilitate approximately 374,572 square feet of existing historic buildings and develop approximately 250,000 square feet of new construction for mixed-use development that could include restaurant, retail, commercial, and/or residential uses. Approximately 10,000 square feet will be for an onsite joint fire and police substation and/or other community service uses and approximately 193 acres of open space, including recreational areas and trails open to the public. In addition, the Project proposes construction of approximately 1.5 miles of the Bay Trail along the shoreline, including a vista overlook and a terminal on the existing pier that may be accessible to ferries, shuttles, and/or water taxis.

Air District staff appreciates and supports efforts to incorporate best practices into the Project's design to minimize air quality impacts such as:

- Committing to using ferries/water taxis equipped with Tier 4 engines,
- Installing additional electric vehicles chargers beyond Title 24 and CalGreen requirements,
- Implementing high-efficiency Transportation Demand Management measures, and
- Installing energy-star rated appliances, electric water heaters, and all-electric appliances

Air District staff further encourages the Project to increase the number of all-electric residential units beyond the proposed 25% of residential units to help reduce the use of natural gas, a high global warming potential greenhouse gas.

Additionally, Air District staff appreciates the Projects' efforts to address air quality and health impacts, however Air District staff are concerned that the Health Risk Assessment does not include existing and new potential sources that may result in a cumulatively considerable impact to future residents at the Project site. Communities in Richmond are already disproportionately impacted by air pollution. The Air District identified Richmond as a priority community needing improvements to air quality through our Community Air Risk Evaluation (CARE) program and, more recently, through the AB 617 Community Health Protection Program.

Air District staff recommends that the site-specific Health Risk Assessment be re-evaluated to include additional cumulative health impacts during operations from permitted and non-permitted sources. This includes impacts from the proposed wastewater treatment plant, fire station, foreseeable emergency generators, and from facilities adjacent to or near the Project, including Chevron Refinery and its marine terminal, Caltrans maintenance facility and storage yard, and Interstate-580 toll plaza and freeway.

We encourage the City 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, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@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