

October 20, 2025

Jamar Stamps
Principal Planner
Contra Costa County
30 Muir Road
Martinez, CA 94553

RE: FSRE Industrial Concord Project Draft Environmental Impact Report (DEIR)

Dear Jamar Stamps,

The Bay Area Air District (Air District) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed FSRE Industrial Concord Project (Project) and prepared the following comments.

The Project proposes to construct a single-story concrete tilt-up logistics warehouse totaling 223,145 square feet, with 3.11 acres of stormwater treatment areas, approximately 46,070 square feet of landscaping, and construction of 223 auto parking stalls (including seven Americans with Disabilities Act compliant stalls), 38 trailer parking stalls, 26 bicycle parking spaces, 38 trailer stalls, and 36 truck docks in unincorporated Contra Costa County. The Project also proposes the construction of off-site improvements including roadway improvements, sidewalks, curbs, gutters, utility connections, traffic calming, a driveway to Sally Ride Drive, a new intersection at Marsh Drive and Sally Ride Drive, lane striping related to the bike lane, landscaping, security lighting, fencing, and the removal of one Peruvian pepper tree.

The Project is located adjacent to an Air District Overburdened Community, as defined by Regulation 2: Permits, Rule 1: General Requirements, Section 243 – Overburdened Communities¹. This community includes the mobile home residential park on Marsh Drive and the impacts to this vulnerable community are further substantiated by CalEnviroScreen (CES) 4.0. According to CES 4.0, this community is within the 83rd percentile for pollution burden, 96th percentile for traffic, 79th percentile for Diesel Particulate Matter (DPM), 88th percentile for asthma, 82nd percentile for low birth weight, and 67th percentile for cardiovascular disease. Further, CES 4.0 shows that the Project is located within a census tract that has a population of 7,430 people, 57 percent of which are people of color.

Given the proximity of the Project to an Overburdened Community the Air District appreciates that Contra Costa County has included Tier 4 construction equipment, zero-emission cargo handling equipment, electric vehicle (EV) infrastructure, Transportation Demand Management (TDM) strategies, a solar-ready rooftop, and several best practices from the California Attorney General's guidance document, "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act."

¹ Bay Area Air District. (2021, December 15). *Regulation 2: Permits, Rule 1: General Requirements*. https://www.baaqmd.gov/~/_media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1&sc_lang=en

However, due to the close proximity of the Project to Overburdened Community members, the Air District recommends improvements to mitigation measure MM-AIR-1 and incorporation of additional measures to reduce impacts further, as described below.

Improvements to mitigation measures MM-AIR-1

The Air District recommends implementing additional mitigation measures to control construction-related fugitive dust. See Air District's California Environmental Quality Act (CEQA) Guidelines Chapter 5: Project-Level Air Quality Impacts. Specifically, update MM-AIR-1 to include:

Basic Best Management Practices for Construction-Related Fugitive Dust Emissions:

- B-6: All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- B-7: All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- B-8: Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
- B-9: This Basic Best Management Practice is included in part, *"a publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints per Bay Area Air District standards,"* but should also include that *"this person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations."*

Enhanced Best Management Practices for Construction-Related Fugitive Dust Emissions:

- E-1: Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities.
- E-2: Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- E-3: Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and water appropriately until vegetation is established.
- E-4: Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- E-5: Minimize the amount of excavated material or waste materials stored at the site.
- E-6: Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.

Additional measures

The Air District recommends implementing additional measures to further protect Overburdened Community members, particularly those living adjacent to the Project.

Zero-emission vehicles:

- Require all heavy-duty vehicles entering, or operated on, the Project site to be zero-emission beginning in 2030, as feasible.

Backup generators:

- Require all backup emergency generators to be powered by non-diesel fuel or zero-emissions, as feasible.

Signage and truck routes:

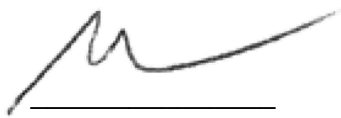
- Post interior and exterior facing signs, including signs at all dock and delivery areas, identifying idling restrictions and contact information to report violations to the California Air Resources Board (CARB) and the building manager.
- Post signs at every truck exit driveway providing directional information to nearby truck routes.
- The Lead Agency should work with the Project Sponsor to design, clearly mark, and implement truck routes. These routes should avoid the mobile home residences on Marsh Drive, and any other sensitive receptors, and be incorporated as a condition in the project's Conditional Use Permit.

Siting and design:

- Site the warehouse facility at least 1,000 feet from the closest residence.
- Create physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between the Project and nearby residences.

Additionally, the Project should consider offering air filtration systems to nearby residents, including those living in the mobile home residential park adjacent to the Project.

Thank you for the opportunity to provide comments on this Project. Please contact Kelly Malinowski, Senior Environmental Planner (kmalinowski@baaqmd.gov), for any follow-up questions.



Greg Nudd, Deputy Executive Officer of Science and Policy
Bay Area Air District

CC: Director Dionne Adams
Director Ken Carlson
Director John Gioia
Director Gabe Quinto