

MEMO

DATE: August 24, 2022

TO: Board of Zoning Adjustments

FROM: Adam Sharron, Project Planner

SUBJECT: UPE01-0181 – 304 Todd Road – Ghilotti Construction Inc.
Bay Area Air Quality Management District MND Comments & Response


Members of the Board,

On July 20th, 2022, the Mitigated Negative Declaration (MND) for UPE01-0181 was sent to the California State Clearinghouse opening a 30-day public review period. On August 15, 2022, Permit Sonoma received comments from the Bay Area Air Quality Management District (BAAQMD) regarding permitting, mitigation measures, a question regarding a sensitive receptor site, and thresholds of significance. Ghilotti Construction, Inc. (the applicant) responded on August 19, 2022 to the BAAQMD comments in coordination with an air quality consultant. Permit Sonoma responded with a request as to whether the applicant could comply with an enhanced mitigation measure AIR-1 Construction Dust and Air Quality. The applicant accepted the enhanced mitigation measure on August 22, 2022.

The following enhanced mitigation language, approved by County Counsel, has been included in an updated Resolution and Conditions of Approval:

- c. *All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 Final emission standards for NOx and PM (PM10 and PM2.5), if feasible, otherwise:*
 - i. *U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control/NOx controls.*
 - ii. *Use of alternatively fueled equipment with lower NOx emissions compared to traditional diesel fuel.*
 - iii. *This subsection (c) does not apply to equipment used solely to drop off or pick up other equipment used at the site.*

Please see the attached files for a record of communications and the updated project documents.


Adam Sharron, Project Planner