



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

July 27, 2010

Mr. Scott Briggs
Environmental Review Division Manager
Sonoma County PRMD
2550 Ventura Avenue
Santa Rosa, CA 94503-2829

Subject: Roblar Road Quarry Recirculated Portions of Draft Environmental Impact Report

Dear Mr. Briggs:

Bay Area Air Quality Management District (District) staff has reviewed your agency's Recirculated Portions of the Draft Environmental Impact Report (DEIR) for the proposed Roblar Road Quarry (Quarry or Project) located in southern Sonoma County. If the Project is approved, an authority to construct permit and a permit to operate will need to be obtained from the District to allow Quarry operations. Specific operating requirements may be further determined as part of the permitting process.

District staff has the following specific comments on the Recirculated Portions of the DEIR.

1. The County should consider additional mitigation measures to reduce the Project's greenhouse gas (GHG) emissions. Such measures could include, but are not limited to, using alternative fuel (e.g., biodiesel, electric) construction vehicles/equipment for at least 15% of the fleet (as recommended in the District's California Environmental Quality Act (CEQA) Guidelines as a best management practice), and planting trees (low volatile organic compound species) and vegetation for carbon sequestration. All the mitigation measures committed to by the Project applicant should be included as conditions of approval for the Project.
2. Mitigation measure F.6b states that the Project applicant is committed to offsetting all the GHG emissions remaining above the significance threshold. We recommend that the County refer to the District's guidance for establishing offsite mitigation, available on the District's website. We agree with the County that any offsite mitigation should be implemented locally to the maximum extent possible in order for the community to experience any associated co-benefits. In addition, the Project applicant should identify the appropriate offsite mitigation measures to be implemented prior to Project approval. This would allow for full disclosure and the opportunity for public review.

ALAMEDA COUNTY
Tom Bates
(Vice-Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

CONTRA COSTA COUNTY
John Gioia
(Secretary)
David Hudson
Mark Ross
Gayle B. Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht
(Chairperson)

SAN FRANCISCO COUNTY
Chris Daly
Eric Mar
Gavin Newsom

SAN MATEO COUNTY
Carol Klatt
Carole Groom

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Shirlee Zane
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Spare the Air

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper



3. As you know, on June 2, 2010 the District issued revised CEQA Guidelines and adopted new air quality CEQA thresholds of significance. The County is proposing to modify the portion of the DEIR that addresses GHG emissions, and is now using the thresholds of significance for GHGs that the District currently recommends. The County is not, however, proposing to modify any other portions of the DEIR related to air quality impacts to address the revised CEQA guidelines and thresholds of significance. In particular, for emissions of particulate matter (PM), the County is still using the PM₁₀ thresholds of significance from the District's 1999 CEQA Guidelines. New thresholds of significance for PM_{2.5} have been established, including a Project-level concentration based threshold of 0.3 µg/m³ (annual average). Because the County has decided to use the updated air quality thresholds for GHGs, the District recommends that the County also re-evaluate its conclusion that PM emissions from the Project would be less than significant by updating the analysis to address PM_{2.5} impacts through an air dispersion modeling analysis. This modeling analysis should include the screening approach that is recommended where representative meteorological data does not exist for a project site. The results of this screening analysis should be compared with the results of any modeling completed using off-site meteorological data (e.g., data from the Valley Ford station) to better understand the range of potential air quality impacts that might be expected.
4. It is not clear why the County used wind speed data from the Sonoma County Airport in Santa Rosa (Appendix E of DEIR) to estimate PM emissions from material handling and storage, and wind erosion. As is noted in the DEIR, the Project is located in the Petaluma Gap. The mean wind speeds from both the District's Valley Ford and Petaluma meteorological monitoring stations, both of which are located in the Petaluma Gap, are nearly 50 percent higher than the mean wind speed at the Sonoma County Airport. The use of wind speed data from the Sonoma County Airport site is also inconsistent with other aspects of the air quality impact analysis conducted by the County in the DEIR. For example, the air dispersion modeling completed for the Project used meteorological data from the Valley Ford station, while in the FEIR the County assesses the frequency of wind speeds at the Project site above threshold levels (used to trigger mitigation measures) by assuming "a roughly 18 percent increase in wind speeds from the Valley Ford meteorological station to the project site."
5. The District recommends that the County enhance the ongoing monitoring of PM mitigation measures (which the County is relying on to conclude that PM impacts from the Project will be less than significant) by adding a requirement for PM ambient air quality monitoring. The District made a similar recommendation to the County for the proposed Dutra Haystack Landing Asphalt and Recycling Facility, and it is our understanding that the County agreed to include this monitoring into that project's conditions. Accurate and reliable continuous PM monitors, with low operating and maintenance costs, are available for this purpose.

If you have any questions regarding these comments, please contact Sigalle Michael, Senior Environmental Planner, at (415) 749-4683.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Roggenkamp". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Shirlee Zane
BAAQMD Director Pamela Torliatt