

BAY AREA Air Quality

MANAGEMENT

DISTRICT

ALAMEDA COUNTY John J. Bauters Pauline Russo Cutter Scott Haggerty Nate Miley

CONTRA COSTA COUNTY John Gioia David Hudson Karen Mitchoff Mark Ross

> MARIN COUNTY Katie Rice (Chair)

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY Gordon Mar Shamann Walton Tyrone Jue (SF Mayor's Appointee)

SAN MATEO COUNTY David J. Canepa Carole Groom Doug Kim

SANTA CLARA COUNTY Margaret Abe-Koga

Cindy Chavez (Secretary) Liz Kniss Rod G. Sinks (Vice Chair)

SOLANO COUNTY James Spering Lori Wilson

SONOMA COUNTY Teresa Barrett Shirlee Zane

Jack P. Broadbent EXECUTIVE OFFICER/APCO

Connect with the Bay Area Air District:



September 23, 2019

Andrew Young Senior Planner Alameda County CDA/Planning Dept. 224 W. Winton, Room 111 Hayward, CA 94544

Subject: Sand Hill Wind Project Draft Subsequent Environmental Impact Report

Dear Mr. Young,

Bay Area Air Quality Management District (Air District) staff has reviewed the County of Alameda's (County) Draft Subsequent Environmental Impact Report (DSEIR) prepared for the Sand Hill Wind Project (Project). The Project applicant proposes to develop or repower 15 project parcels with up to 40 new fourthgeneration wind turbines, including supporting roadways, power collection systems, transformers and other infrastructure.

Air District staff greatly appreciates the opportunity to work with the County to address the potentially significant air quality impacts estimated for this Project. Project design features and the mitigation measures identified in the DSEIR will substantially lessen the local and regional air quality impacts from construction and operation of the Project.

However, even with these Project design features and on-site mitigation measures, the DSEIR finds that air quality impacts from the Project still exceed the County's thresholds of significance. Therefore, Mitigation Measure AQ-2c: Reduce construction-related air pollutant emissions to below BAAQMD NOx thresholds (M-AQ-2c) proposes the Project applicant provide funds to achieve additional emission reductions to reduce air emissions below the thresholds of significance. To this end, M-AQ-2c states that the Project applicant would provide funding to the Air District to fund emissions reduction projects in the region in order to offset the remaining criteria pollutant emissions generated by project construction.

Please be aware that the Air District does not currently have a fee program for offsetting emissions. These are occasionally conducted on a case-by-case basis based on available projects. We recommend that M-AQ-2c replace "Air District" with "governmental entity". This will allow the project applicant to seek additional options if the Air District has no available projects at the time.

Air District staff is available to assist the County to address these comments. If you have any questions, please contact Areana Flores, Environmental Planner, at (415) 749-4616 or aflores@baaqmd.gov.

Young Page 2

Sincerely,

Greg Nudd Deputy Air Pollution Control Officer

cc: BAAQMD Director John J. Bauters BAAQMD Director Pauline Russo Cutter BAAQMD Director Scott Haggerty BAAQMD Director Nate Miley