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Via E-Mail and U.S. Mail

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Re: **Ameresco Keller Canyon RNG Processing Facility and Pipeline Project, LP18-2022 (SCH 2020100267)**

We write on behalf of **Contra Costa Residents for Responsible Industry** (“Residents”) to express our support for the Ameresco Keller Canyon RNG Processing Facility and Pipeline Project, LP18-2022 (SCH 2020100267) (“Project”) proposed by Ameresco Keller Canyon RNG LLC (“Applicant”). Residents is an unincorporated association of individuals and labor organizations concerned about the potential public and worker health and safety hazards and environmental and public service impacts of the Project.

We are pleased to report that Residents and the Applicant have negotiated and executed a legally enforceable settlement agreement whereby the Applicant is required to implement additional measures, described below, to address the concerns raised by Residents in its comments on the Project related to air quality, public health and safety, and biological resources. The Applicant is also relocating the Project transmission line, which will further reduce impacts. Based on the legally enforceable settlement agreement and changes in the Project, the concerns of Residents have been settled and resolved and Residents supports approval of the Project.

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A. Air Quality

1. All diesel-powered construction equipment shall be Tier 4 Final construction equipment during all construction phases of the Project, to be confirmed on site by the on-site construction supervisor during each day of use.
2. Mitigation measures recommended by BAAQMD in its CEQA Guidelines Table 8-2 will be implemented to reduce fugitive PM10 and PM2.5 emissions, including, but not limited to, the following:
 - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
 - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
 - All vehicle speeds on unpaved roads shall be limited to 15 mph.
 - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
 - Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
 - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).
 - Clear signage shall be provided for construction workers at all access points.
 - All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications.
 - All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
 - Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

3. In addition to the measures listed in BAAQMD's CEQA Guidelines Table 8-2, Ameresco will implement the following measures at the RNG processing facility:
 - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day, subject to weather conditions.
 - Excavation, grading, and/or demolition activities shall be minimized when sustained, average wind speeds exceed 30 mph, where feasible.
 - All earth-moving equipment, including their tires, shall be washed off prior to leaving the site.
 - Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction.
 - Subject to landowner approval, site accesses to a distance of 100 feet from the paved road shall be treated with a 6-to-12 inch compacted layer of wood chips, mulch, or gravel, where feasible.
 - On-road diesel trucks used for Project construction shall be equipped with BACT to reduce NOx and PM emissions, to the extent feasible.

B. Public Health and Safety

1. Ameresco shall monitor gas levels during Project operation at the Project facilities to detect leaks of hazardous gases at the processing facility, including but not limited to methane and hydrogen sulfide (H₂S), and report any exceedances of applicable thresholds to BAAQMD annually. The Applicant will implement any actions determined necessary by BAAQMD, the County, or other applicable Certified Unified Program Agencies (CUPA) to prevent catastrophic accidents from occurring at the Project facilities, and to mitigate impacts to nearby sensitive receptors related to excess hazardous gases released by the Project.
2. The dust-control measures required under Condition of Approval 20.5 (Dust Suppressants) shall be implemented at night and on weekends, as feasible, to control the release of fugitive dust.

C. Biological Resources

1. Prior to performing preconstruction surveys, Ameresco shall retain an independent biologist to perform surveys to detect the presence of plant and animal species present at the Project site and immediately surrounding area, including but not limited to surveys for Burrowing Owl, Golden Eagle, Nesting and Migratory Birds, American Badger, San Joaquin Kit Fox, Special Status Bats, and all wetland features, in order to determine the distribution of species at the Project site prior to preconstruction surveys.
2. Mitigation measures shall be implemented, to the extent feasible, for species detected by surveys required under Section C.1. of this Agreement that are not covered by the East Contra Costa County Habitat Conservation Plan.

Thank you for your attention to this matter.

Sincerely,



Kendra Hartmann

KDH:acp