

Operational Phase Mitigation Measures	
Mitigation Measure	Applicability
Mitigation Measures for Unpaved Roads, Driveways, and Parking Areas	Use if project meets any of the following per SLO County APCD's <a href="#">unpaved road screening table</a> : <ul style="list-style-type: none"> <li>• Exceed PM10 Daily threshold</li> <li>• Exceed PM10 Annual threshold</li> </ul>
Diesel Particulate Matter (DPM) Emission Mitigation	Use if project exceeds DPM Daily threshold
Daily and Annual ROG+NOx and PM10 Mitigation	Use if project meets any of the following: <ul style="list-style-type: none"> <li>• Exceeds ROG+NOx Daily threshold</li> <li>• Exceeds ROG+NOx Annual threshold</li> <li>• Exceeds PM10 Daily threshold</li> <li>• Exceeds PM10 Annual threshold</li> </ul>
Activity Management Plan (AMP)	Use if project meets any of the following: <ul style="list-style-type: none"> <li>• Exceeds ROG+NOx Annual threshold (in some cases)<sup>1</sup></li> <li>• Exceeds PM10 Annual Threshold (in some cases)<sup>1</sup></li> </ul>
Operational Phase Off Site Mitigation	Use if project meets any of the following: <ul style="list-style-type: none"> <li>• Exceed ROG+NOx Daily threshold and feasible mitigation measures are not implemented or not feasible</li> <li>• Exceed ROG+NOx Annual threshold</li> </ul>

1. An AMP is needed when a project is a continuous operation such as a new energy or extractive resource.

Operation Phase Special Conditions	
Special Condition	Applicability
Limits of Idling during Operational Phase	Use if project meets any of the following: <ul style="list-style-type: none"> <li>• Sensitive receptor<sup>1</sup> is within 1,000 feet and diesel-powered equipment will be used</li> <li>• Exceeds Daily DPM threshold</li> <li>• Exceeds Daily ROG+NOx threshold</li> </ul>
Health Risk Assessment - Type A: New Toxic Source that Impacts Sensitive Receptors	Use when project has the potential to emit toxic or hazardous air pollutants

1. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s).

## Operational Mitigation Measures

### Mitigation Measures for Unpaved Roads, Driveways and Parking Areas

If the project meets any of the following per [SLO County APCD's unpaved road screening table](#), from daily traffic on unmitigated unpaved roads/driveways/parking areas the following mitigation measures shall be implemented:

- Exceed PM10 Daily threshold
- Exceed PM10 Annual threshold

One of the following mitigation measures shall be implemented:

- a) For the life of the project, pave and maintain the roads, driveways, and/or parking areas; or
- b) For the life of the project, maintain the unpaved roads, driveways, and/or parking areas with a dust suppressant (See Technical Appendix 4.3 of the APCD's CEQA Handbook for a list of APCD-approved suppressants) such that fugitive dust emissions do not exceed the APCD 20% opacity limit for greater than 3 minutes in any 60-minute period (APCD Rule 401) or prompt nuisance violations (APCD Rule 402). Also, to improve the dust suppressant's long-term efficacy, the applicant shall also implement and maintain design standards to ensure vehicles that use the on-site unpaved road are physically limited (e.g., speed bumps) to a posted speed limit of 15 mph or less.

Additionally, if Special Events would occur during the life of the project, the following mitigation for unpaved (roads/driveways/parking areas) shall be implemented.

On the day(s) of a special event:

- a) Any unpaved areas that will be used for the special event shall be maintained with an APCD-approved dust suppressant (see Technical Appendix 4.3 of the APCD's CEQA Handbook) such that fugitive dust emissions do not exceed the APCD 20% opacity limit for greater than 3 minutes in any 60-minute period (APCD Rule 401) or prompt nuisance violations (APCD Rule 402).
- b) Designated parking locations shall be:
  1. Paved when possible;
  2. Planted and maintained with fast germinating non-invasive grass or low cut dense vegetation; or,
  3. Maintained with a dust suppressant such that fugitive dust emissions do not exceed the APCD 20% opacity limit or create nuisance.

General site design:

- a) To improve the dust suppressant's efficacy during and between events, the applicant shall also implement and maintain design standards to ensure vehicles that use on-site unpaved roads are physically limited (e.g., speed bumps) to a posted speed limit of 15 mph or less.

If the project's access involves a city or county owned and maintained road, the applicant shall work with the applicable Public Works Department to ensure that the mitigation follows the agency's road standards for that section of road.

### Diesel Particulate Matter (DPM) Emission Mitigation

Projects that exceed the DPM Daily threshold need to implement on-site Best Available Control Technology measures to reduce the project impacts below the threshold. If sensitive receptors are within 1,000 feet of the project site, a health risk assessment (HRA) may also be required. Sections 3.6.1 and 3.7.4 of the APCD's 2012 CEQA Handbook provide more background on HRAs in conjunction with CEQA review. Guidance on the preparation of a HRA may be found in the CAPCOA report *HEALTH RISK ASSESSMENT FOR PROPOSED LAND USE PROJECTS*, which can be downloaded from the CAPCOA website at [capcoa.org](http://capcoa.org).

### Daily and/or Annual ROG + NOx Threshold Exceedance Mitigation

If the project meets any of the following, the following guidance shall be implemented:

- Exceeds ROG+NOx Daily threshold
- Exceeds ROG+NOx Annual threshold
- Exceeds PM10 Daily threshold
- Exceeds PM10 Annual threshold

The APCD has developed a list of mitigation measures for residential, commercial, and industrial projects in Table 3-5 in the [2017 Clarification Memo](#). Project mitigation should follow the table listed below.

Combined ROG+NO <sub>x</sub> or PM <sub>10</sub> Emissions (lbs/day)	Mitigation Measures Recommended		
	Residential, Commercial or Industrial	GreenPoint Rated or LEED Certified	Off-Site Mitigation
< 25	None	None	None
25 - <30	4	3	*
30 - <35	8	6	*
35 - <50	10	8	*
≥ 50	All Feasible	12	*
≥ 25 ton/yr	All Feasible	All Feasible	Yes

\* Will be dependent on the effectiveness of the mitigation measures, location of project and high vehicle dependent development. Examples of projects potentially subject to off-site mitigation include: rural subdivisions, drive-through applications, commercial development located far from urban core.

Projects that are GreenPoint rated or LEED certified with a third-party verification may implement a reduced number of mitigation measures. The recommended number of mitigation measures is in addition to the GreenPoint rating or the LEED certification-measures that are used to satisfy requirements of the Green Point rating or LEED certification cannot be used as additional measures (No double counting of measures). Alternate mitigation measures may be suggested by the project proponent if the APCD-suggested measures are not feasible.

### Activity Management Plan (AMP)

If a project meets any of the following, an Activity Management Plan shall be implemented:

- Exceeds ROG+NOx Annual threshold (in some cases) - An AMP is needed when a project is a continuous operation such as a new energy or extractive resource.
- Exceeds PM10 Annual Threshold (in some cases) - An AMP is needed when a project is a continuous operation such as a new energy or extractive resource.

The AMP needs to be approved by the APCD prior to the issuance of the occupancy permit. The AMP should include, but not be limited to, the following elements:

- A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the “dust control measures” section of this letter;
- Listing of the off-road equipment used by the project to include engine model year and tier, any non-OEM installed engine after treatment, horsepower, hours/day and hours/year of typical and worst case operations;
- Definition of whether the on-road heavy-duty fleet that will support the project is a captive fleet managed by the project or if the project has no or limited control of this fleet. If the former, then provide a listing of the on-road heavy-duty trucks used by the project to include class, engine model year, any non-OEM installed engine after treatment, horsepower, miles/day and miles/year of typical and worst case operations; and
- Methods for:
  - Tracking and reporting daily emission threshold exceedances to the APCD on an annual basis,
  - Limiting daily project activity to ensure that air quality significance thresholds are not exceeded; and
  - Define how off-site mitigation will be used to address excess emissions over a calendar year of activity.

### Operational Phase Off-Site Mitigation

If the project meets any of the following, Operational Phase Off-Site Mitigation shall be implemented:

- Exceed ROG+NOx Daily threshold and feasible mitigation measures are not implemented or not feasible
- Exceed ROG+NOx Annual threshold

An off-site mitigation strategy should be developed and agreed upon by all parties at least six months prior to issuance of occupancy permits for the project. The off-site mitigation rate will be based on the cost-effectiveness value(s) reflected in the most current CARB-approved Carl Moyer Guidelines at the start of each project phase. For more information and further guidance, please refer to the Section 3.8.3 of the CEQA Handbook.

## Operational Special Conditions

### Limits of Idling during Operational Phase

Idling diesel engines creates toxic air pollution and may be a public health risk. To help reduce the emissions impact of diesel vehicles that will access the facility, the applicant shall implement Section 2485 of Title 13 of the California Code of Regulations. The specific requirements and exceptions for the on-road regulation can be reviewed at the following web sites:

[arb.ca.gov/regact/2007/ordiesl07/froal.pdf](http://arb.ca.gov/regact/2007/ordiesl07/froal.pdf).

In addition, if the project is within 1,000 feet of sensitive receptors, the applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors.

1. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
2. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
3. Use of alternative fueled equipment and electrification of loading docks (e.g., electrical plug-ins for truck refrigeration units and electrification of loading equipment) is recommended; and
4. Signs that specify the no idling areas must be posted and enforced at the site.

### Health Risk Assessment –Type A - New Toxic Source that Impacts Sensitive Receptors

This project has the potential to emit toxic or hazardous air pollutants and is located in close proximity to sensitive receptors. Sensitive receptor locations include schools, residential dwellings, parks, day care centers, nursing homes, and hospitals. Health impacts may be significant due to increased cancer risk for the affected population, even at a very low level of emissions. Such projects are required to prepare a health risk assessment to determine the potential level of risk associated with their operations.

This project is a new proposed land use project that generates toxic air contaminants (such as loading docks, gasoline stations, distribution facilities or asphalt batch plants) that may impact sensitive receptors indicating it is a Type A project. Air districts across California are uniform in their recommendation to use the significance thresholds that have been established under each district's "Hot Spots" and permitting programs. The APCD has defined the excess cancer risk significance threshold at 10 in a million for Type A projects in San Luis Obispo County.

Prior to completion of the project's environmental assessment, the APCD recommends that the project proponent perform a screening level health risk assessment to determine the potential health risks to residents of the development. If the screening assessment is above 10 in a million, a more comprehensive health risk analysis shall be required. Results of the screening and/or the refined health risk assessment need to be provided to the APCD for review and approval.