

TOWN OF POMFRET
Zoning Board of Adjustment

Memorandum of Decision

Permit: ZP23-30
Property Address: 35 Wayside Road, Pomfret
Parcel No.: 4802
Parcel Size: 2.19 +/- acres

Property Owner: ABRA LLC
35 Wayside Road
Pomfret, Vermont

Permittee: Abracadabra Holding Co.
35 Wayside Road
Pomfret, Vermont

This Memorandum of Decision (this “Decision”) is issued by the Pomfret Zoning Board of Adjustment (the “ZBA”) in connection with the appeal by Christopher and Bailey Markwell (“Appellant”) of the Certificate of Compliance (the “Certificate”) issued by the Pomfret Zoning Administrator (the “ZA”) on February 17, 2025, to Abracadabra Holding Co., a Vermont corporation (d/b/a Abracadabra Coffee) (“Permittee”), in respect of zoning permit ZP23-30 (the “Permit”). The Permit was issued upon conditional use approval by the ZBA in a decision dated April 4, 2024 (the “Prior Decision”). Capitalized terms used but not defined herein are defined in the Prior Decision.

For the reasons discussed below, the ZBA concludes that not all conditions set forth in the Prior Decision have been satisfied, the Certificate was issued in error, and the Certificate is void and of no further force or effect.

I. Procedural History

A. Prior Permits and Conditional Use Approvals

Proceedings related to the Permit, Permittee’s prior permit applications and conditional use approvals are more particularly described in Prior Decision, which is available on the ZBA’s page on the Town of Pomfret’s website (the “ZBA Webpage”)¹ and incorporated by reference herein.

B. Certificate of Compliance and Appeal

Permittee applied for the Certificate on February 14, 2025, and the same was approved and issued by the ZA on February 17, 2025. The Certificate is attached as Exhibit A and certified that Permittee “completed the project in full compliance with all applicable provisions of the Pomfret Zoning Ordinance and the conditions of Zoning Permit #ZP23-30”.

¹ Town of Pomfret, Zoning Board of Adjustment, *available at* <https://pomfretvt.us/index.php/dep/planning-zoning/zo>.

Appellant timely filed a notice of appeal (the “Notice of Appeal”) on March 4, 2025, by email to the ZA and ZBA chair. The Notice of Appeal is attached as Exhibit B and alleges that not all conditions set forth in the Prior Decision were satisfied, in particular the condition relating to “year-round visual screening for the benefit of [Appellant’s] residential property”.

The Notice of Appeal was referred to the full ZBA on March 4, 2025. The Notice of Appeal and all supporting documents are on file with the ZA and available on the ZBA Webpage. On March 10, 2025, notice of a site visit and public hearing was posted at the Town Office, North Pomfret Post Office, and Teago General Store. On March 13, 2025, notice of the same was published in *The Vermont Standard*, a newspaper of general circulation in Pomfret. The ZBA chair also timely notified abutters of Permittee’s property of the site visit and public hearing as required by 24 V.S.A. § 4464.

C. Site Visit and Public Hearing

Following a site visit (the “Site Visit”) on April 8, 2025, at 6:00 pm, the ZBA considered this matter at a public hearing (the “Hearing”) at 7:00 pm at the Town Office and by Zoom. Present at the Site Visit were ZBA members Benjamin Brickner, Susan Burgess, Kyle Hansen, and Shaun Pickett. Also present were Antoinette Hunt, Clint Hunt, Sarah Yetter, and Jack Willey (each an officer of Permittee), the ZA, Appellant, Dana Pape, Doug Tuthill, and Cynthia Hewitt.

Proceedings related to the Hearing are more particularly described in the draft meeting minutes, which are available on the ZBA Webpage and incorporated by reference herein. These minutes identify those persons who participated in the Hearing and will be approved at a future ZBA meeting.

II. Applicable Regulations

A. Pomfret Zoning Ordinance

Section 6.8 of the Pomfret Zoning Ordinance provides in part:

All permits obtained upon a conditional use approval shall require a certificate of compliance before use of the approved structure or commencement of the approved use is authorized. The certificate shall show that the premises comply with all applicable provisions of this ordinance and the conditions of the permit as issued . . . and shall remain in effect as long as such building or use is in compliance with the standards and conditions authorized by the permit.²

The Permit was obtained upon conditional use approval by the ZBA following the Prior Decision. As such, a certificate of compliance was required before Permittee could commence the uses approved by the Prior Decision, and a certificate of compliance must remain in effect for Permittee to continue such uses.³

² See Pomfret Zoning Ordinance, adopted May 6, 2020, *available at* https://pomfretvt.us/index.php/download_file/view/1280/225/.

³ During the Hearing, Appellant questioned whether the appeal of a certificate of compliance automatically stays the effect of that certificate. The ZBA concludes that it does not. Rather, the automatic stay described in 24 V.S.A. § 4449 applies only to the original issuance of a land use permit, not to later approvals given under a permit previously issued. For this reason, it is the ZBA’s view that certificates of compliance are valid and effective when issued and remain valid and effective until deemed otherwise. This view is also consistent with Section 6.8 of the Pomfret Zoning Ordinance, which provides in part that “a certificate of compliance . . . shall remain in effect as long as [the permitted] building or use is in compliance with the standards and conditions authorized by the permit.” By itself, the filing of an appeal is not a determination of noncompliance.

B. Prior Decision

Section VI of the Prior Decision includes the following conditions (among others) intended by the ZBA to ensure the uses approved therein meet the applicable development standards in the Pomfret Zoning Ordinance:

[...]

- I. Prior to commencing the Contemplated Uses, Applicant shall plant trees or other native vegetation sufficient to provide year-round visual screening for the benefit of [Appellant's] residential property located immediately southeast of the Property. Such trees and vegetation shall be integrated into the surrounding landscape and sufficient to substantially screen the parking area and rear lawn but need not fully screen the Building.

[...]

- L. The Contemplated Uses approved by this Decision shall conform to all applicable federal, state, and local laws, ordinances, and regulations, whether or not the same have been expressly referenced herein.

III. Findings of Fact

The ZBA received written submissions and heard testimony from Appellant, the ZA, Permittee, and Cy Benoit of ArborScape, Inc. in South Pomfret, Permittee's arborist ("ArborScape"). The ZBA evaluated the parties' submissions and testimony. The findings of fact described below reflect the evidence the ZBA found most relevant and compelling. All submissions and testimony are available on the ZBA Webpage.

A. Vegetative Screening

At Permittee's direction, last fall ArborScape planted seven American arborvitae (*Thuja occidentalis* 'Nigra') along a portion of the southeast boundary of Permittee's property, which abuts Appellant's property (the "Screening Trees"). A memorandum from ArborScape describing this work is attached as Exhibit C. Photos of this work provided by Appellant are attached as Exhibit D.

In the Notice of Appeal, Appellant asserts the Screening Trees "do not provide sufficient visual screening [nor] meet the criteria for a sufficient or substantial screen." The photos in Exhibit D and observations made during the Site Visit show that the screening now provided by the Screening Trees is limited for two reasons.

First, the Screening Trees were 6–7 feet tall at planting and installed six feet on center. The trees have yet to grow significantly beyond their original height or narrow width. As a result, portions of Permittee's parking area and rear lawn can still be seen from Appellant's property over and between each Screening Tree. Mr. Benoit testified that once established (about one year after planting), the species will grow 1–2 feet annually, to a maximum height of 12–16 feet, and ultimately will merge into an unbroken vegetative screen.

Second, the Screening Trees were planted in a single line approximately 60 feet long. However, the parking area and rear lawn are visible along more than 60 feet of Permittee and Appellant's shared property line. A recent aerial photo of Permittee's property is attached as Exhibit E and shows the

vegetative gap to be +/- 90 feet long, with the remainder of the shared property line screened by preexisting mature trees and/or stockade fencing.

The ArborScape memorandum proposes several options to address the issues described above: “doubling the number of trees, larger plantings, or installing a stockade fence.” An evergreen hedge quotation by E.C. Browns’ Nursery, Inc. in Thetford Center obtained by Appellant and attached as Exhibit F describes several options for additional trees at varying price points.

B. Compliance with Applicable Law

Prior to the Hearing, Appellant submitted additional materials, including a Notice of Alleged Violation from the Vermont Department of Environmental Conservation Agency of Natural Resources (“ANR”) dated November 6, 2024, and attached at Exhibit G (the “NOAV”).

The NOAV states that ANR “has determined a violation” of the state’s Air Pollution Control Regulations concerning “uncontrolled emissions from coffee roasting” at Permittee’s facility. The NOAV also explains that such emissions can be controlled to acceptable levels “by the installation of a thermal or catalytic oxidizer or other control method approved by ANR on the roasting stack.”

Permittee testified that it is in the process of acquiring an ANR-approved thermal oxidizer (also known as an afterburner control unit) and expects to have the same installed and operating within six weeks, at which time the violation will be deemed by ANR to have been resolved.

IV. Conclusions of Law

A. Standard and Scope of Review

Appeals from decisions of administrative officers in Vermont are reviewed *de novo*, meaning that the ZBA may develop its own facts and reach its own legal conclusions without reference or deference to findings or decisions made previously by the ZA. Nonetheless, the ZBA appreciates the myriad complex issues addressed by the Certificate and does not lightly disturb the ZA’s prior conclusions.

The purpose of a notice of appeal being to inform the appellate tribunal of a request for a hearing, the issues raised on appeal need not be stated exhaustively therein. Accordingly, the ZBA did not limit its review to the sole matter described in the Notice of Appeal (adequacy of vegetative screening); the ZBA also considered issues raised by Appellant in its written submissions and testimony, namely Permittee’s compliance with applicable law.

B. Vegetative Screening

The Screening Trees do not now provide year-round visual screening for the benefit of Appellant’s property that substantially screens Permittee’s parking area and rear lawn. Nor are they likely to do so, even when fully grown, as they span only a portion of Permittee and Appellant’s shared property line not already screened by preexisting mature trees and/or stockade fencing. For this reason, the condition in Section VI.I of the Prior Decision has not been satisfied.

Complete screening is not required by the Prior Decision, only substantial screening. Recognizing that vegetation – even if planted at greater density and length – needs time to establish and grow before becoming an effective visual screen, a non-vegetative solution that is integrated into the surrounding landscape would be acceptable to satisfy Section VI.I of the Prior Decision in the meantime.

C. Compliance with Applicable Law

The Certificate certifies that Permittee “completed the project in full compliance with all applicable provisions of the Pomfret Zoning Ordinance and the conditions of [the Permit].” The compliance with applicable law condition (Section VI.L) of the Prior Decision authorizing the Permit relates only to the “Contemplated Uses” as defined therein, which are (1) service of prepared food for on-site consumption during breakfast and lunch hours, (2) service of alcohol with those meals on weekends and during Special Events, and (3) increased occupancy not to exceed 70 patrons.

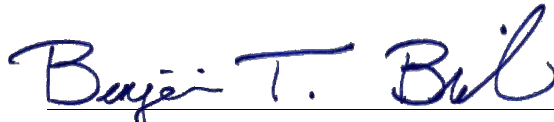
By contrast, the NOAV and Appellant’s assertion that Permittee is not in compliance with applicable law relate only to Permittee’s coffee roasting activities that were approved by a prior permit (ZP22-05), for which a certificate of compliance was issued in February 2024 and from which certificate no appeal was taken. For this reason, the compliance issue raised by Appellant is beyond the scope of the challenged Certificate and the ZBA expresses no view on its merits. Appellant may still pursue this matter by other appropriate means.

V. Decision

Based on information presented to the ZBA and the findings and conclusions described above, the ZBA concludes that not all conditions set forth in the Prior Decision have been satisfied, the Certificate was issued in error, and **the Certificate is void and of no further force or effect**. The ZBA is directed to add a record of this Decision to Permittee’s zoning file.

* * * * *

This Decision approved at Pomfret, Vermont, as of this 22nd day of April, 2025, and signed by the chair of the Pomfret Zoning Board of Adjustment on its behalf pursuant to 24 V.S.A. § 1141.


Benjamin Brickner, chair
Zoning Board of Adjustment

ZBA members Benjamin Brickner, Susan Burgess, Kyle Hansen, Lindsay Hyde, and Shaun Pickett voted in the affirmative. ZBA members Michael Schmell and Seth Westbook did not participate in this Decision.

NOTICE: This Decision may be appealed to the Environmental Division of the Superior Court by an interested person who participated in the proceedings before the Zoning Board of Adjustment. Such appeal must be taken pursuant to 24 V.S.A. § 4471 and Rule 5(b) of the Vermont Rules for Environmental Court Proceedings.

EXHIBIT A

Certificate of Compliance

Attached.

Town of Pomfret

5218 Pomfret Road
North Pomfret, VT 05053

APPLICATION FOR CERTIFICATE OF COMPLIANCE

IMPORTANT: Please read Notice to Applicants on next page.

The applicant is required to obtain a Certificate of Compliance from the Town of Pomfret before use of a structure or commencement of a use that has received conditional use approval. See Section 6.8 of the Pomfret Zoning Ordinance adopted May 6th, 2020 on next page.

Until this application has been received by the Zoning Administrator, counter-signed below and returned to the applicant, use of an approved structure or commencement of an approved use may not begin, and the related permit will remain open in the Pomfret land records. The purpose of the Certificate of Compliance is to ensure the applicant has completed the project in compliance with all applicable provisions of the Pomfret Zoning Ordinance and the conditions of the permit as issued.

* * * * *

I/we certify that I/we have completed the project in full compliance with all applicable provisions of the Pomfret Zoning Ordinance and the conditions of Zoning Permit # ZP23-30.

Clint Hunt
#1 APPLICANT NAME (PRINTED)

[Signature]
#1 APPLICANT SIGNATURE

02/14/25
DATE

ANTOINETTE HUNT
#2 APPLICANT NAME (PRINTED)

[Signature]
#2 APPLICANT SIGNATURE

2/14/25
DATE

* * * * *

I certify that the applicant has completed the project in full compliance with all applicable provisions of the Pomfret Zoning Ordinance and the conditions of Zoning Permit # ZP23-30 and direct that such permit be shown as closed in the Pomfret land records.

Preston Bristow
ZONING ADMINISTRATOR (PRINTED)

[Signature]
ZONING ADMINISTRATOR SIGNATURE

2/17/2025
DATE

Comments: See attached Event Compliance and
Safety Plan dated Feb. 14, 2025

Completed Certificate of Compliance to be attached to permit
and filed in the Land Records of the Town of Pomfret.

ABRACADABRA COFFEE COMPANY
EVENT COMPLIANCE AND SAFETY PLAN

February 14, 2025

Special Events at Abracadabra Coffee Company at 35 Wayside Road have been approved by the Town of Pomfret through Zoning Permits ZP22-35 and ZP23-30. A summary of the permit conditions for Special Events is as follows:

- A total of 12 Special Events may be held per calendar year.
- Special Events may extend beyond normal business hours from 2 pm to no later than 9 pm or one-half hour after sunset, whichever is earlier.
- Combined indoor and outdoor occupancy at Special Events is limited to 70 patrons.
- Beer, wine and/or spirits (if permitted by the Select Board) may be sold and served at Special Events.
- Consistent with the conditions applied to Purple Crayon Productions, sound levels at outdoor events shall not exceed a one-hour equivalent average of 70 dBA or an instantaneous slow-response maximum of 80 dBA as measured at the property line.

The primary contact for Special Events is Antoinette Hunt. Secondary contacts are Clint Hunt, Sarah Yetter and John Willey. The Abracadabra Coffee Company landline is **802-332-0045** and the email is abracadabracoffee@gmail.com. Unrestricted (not password protected) Wi-Fi calling is and will remain available within and around the building.

Additional permit conditions are:

- The seven arborvitae trees planted by ArborScape Inc. as visual screening shall be maintained and trees that are damaged or die will be replaced.
- The directional signs at the entrance and exit to the parking lot and for incoming and outgoing traffic from Wayside Road will be maintained.

Public safety, traffic and parking procedures will be as follows:

- For special events outside of regular service we will use a ticket system (Eventbrite, etc...) to monitor and cap attendance. A minimum of 2 parking attendants in high visibility vests will be stationed strategically to control traffic flow. Emergency services will be contacted prior to each event. There will be no parking on Rt.12, Wayside Road, or the bridge connecting the two. Emergency services will have normal clearance and right of way. At least one employee will be floating the premises and monitoring guests and attending to their needs. This employee will be equipped with a walkie talkie to communicate with the ownership team.

EXHIBIT B

Notice of Appeal

Attached.

Chris and Bailey Markwell
21 Wayside Road
Woodstock, VT 05091

March 4, 2025

Benjamin Brickner
Pomfret Zoning Board Chair
Town of Pomfret
5218 Pomfret Road
North Pomfret, VT 05053

Dear Ben,

Please accept this notice of appeal of the Certificate of Compliance issued by Zoning Administrator Preston Bristow on February 17, 2025 to Abracadabra Coffee Co.

Permit ZP23-30 issued to Abracadabra Coffee Co. on April 2, 2024, states under section VI. Conditions and Limitations, item I. "Prior to commencing the Contemplated Uses, Applicant shall plant trees or other native vegetation sufficient to provide year-round visual screening for the benefit of the residential property located immediately southeast of the property. Such trees and vegetation shall be integrated into the surrounding landscape and sufficient to substantially screen the parking area and rear lawn but need not fully screen the Building."

The applicant planted seven Arborvitae trees along the large expanse of the parking lot and our property line. The seven trees do not provide sufficient visual screening. They do not meet the criteria for a sufficient or substantial screen.

The Certificate of Compliance was issued by Mr. Bristow because, specific to this condition, he feels that the applicant made a "reasonable attempt" to fulfill the criterion. A "reasonable attempt" at meeting a condition is not acceptable.

We ask that this be reviewed by the Pomfret Zoning Board and that Abracadabra Coffee be required to meet the criteria of a 'sufficient and substantial screen of the parking area and rear lawn' by installing additional trees.

We look forward to hearing from you on next steps.

Thank you,

Chris and Bailey Markwell

EXHIBIT C

ArborScape Memorandum

Attached.

To whom it may concern,

Following a ZBA decision we were provided the criteria below.

- I. Prior to commencing the Contemplated Uses, Applicant shall plant trees or other native vegetation sufficient to provide year-round visual screening for the benefit of the residential property located immediately southeast of the Property. Such trees and vegetation shall be integrated into the surrounding landscape and sufficient to substantially screen the parking area and rear lawn but need not fully screen the Building.

The property owners requested to plant a screen between the two properties. We selected Arborvitae after considering a few planting schemes and options. These trees are evergreen and will provide year-round screening. They are a native plant to our region and are cold hardy to tolerate our climate, and site. The Size chosen was 6-7' tall trees for cost-effectiveness, decided upon by the landowners. We planted these trees in the predetermined area, spacing them 6'+/- apart to allow for future growth. The trees were planted in September / October, once they become established (1yr+/-) the trees can be expected to have 12-24" of growth per year and will effectively provide a substantial screen between the properties. The site offered a few space restrictions with drainage swale and property line, along with a generally wet site. Although doubling the number could provide an immediate screen, it was beyond the budget.

An exact sight line to include elevation and angle was not discussed or identified by ZBA or Landowners.

Moving forward a few options could include doubling the number of trees, larger plantings, or installing a stockade fence.

Respectfully,

Cyrus Benoit.

EXHIBIT D

Photos of Screening Trees

Attached.









EXHIBIT E

Aerial Photo of Permittee's Property
(circa spring 2024)



EXHIBIT F

Evergreen Hedge Quotation

Attached.

Shane Stevenson Excavating

Good Morning, Shane. I am writing in response to your request for an evergreen hedge quote.

There are 3 possible options for trees – Emerald Green arborvitae and Thuja occidentalis (native arborvitae). The difference between these 2 trees is the Emerald Green is narrow and only matures at around 12-15' tall and 4-5' wide vs. the Thuja which matures around 30-40' and 10-15' wide. There is a Thuja cultivar 'Techny' that is darker green and doesn't suffer from any brown out due to winter winds. 12-15' and 6-7' wide. The Emerald Green is also denser than the other two. All are susceptible to deer browse and we recommend appropriate fencing upon plant installation.

The following are suggestions for planting distances:

Emerald Green-

Sizes: 5-6' \$195.00, 6-7' \$285.00

4' o.c. x 90' single line = 23 trees

6' o.c. x 90' staggered = 29 trees

8' o.c. x 90' staggered = 23 trees

Thuja occidentalis (Dark American & Techny)-

Sizes: 5-6' \$195, 6-7' \$285.00, 7-8' \$330

5' o.c. x 90' single line = 18 trees

7' o.c. x 90' staggered = 25 trees

9' o.c. x 90' staggered = 19 trees

White pine can also be used instead of the Dark American arb, but it needs pruning as it matures to keep it the height you want.

All prices are subject to change depending on availability and numbers needed.

Niña Klinck, Manager

E. C. Browns' Nursery

Thetford Center, VT 05075

802-785-2167

EXHIBIT G

ANR Notice of Alleged Violation

Attached.



Vermont Department of Environmental Conservation

Air Quality and Climate Division
Davis Building, 4th Floor
One National Life Drive
Montpelier, VT 05620-3802
(802) 828-1288

Agency of Natural Resources

November 6, 2024

CERTIFIED MAIL

Clint Hunt
Abracadabra Coffee
35 Wayside Road
Woodstock, VT 05091

Subject: **Notice of Alleged Violation
Section 5-261 of the Vermont Air Pollution Control Regulations**

Dear Mr. Hunt:

After receiving several odor and smoke related complaints concerning coffee roasting on your property located at 35 Wayside Road in Pomfret, the Air Quality and Climate Division of the Agency of Natural Resources (Agency) visited your facility on March 26, 2024 to investigate the complaints. During the visit the Agency met with staff to learn about facility operations, performed a visible emissions observation, and received information on the Diedrich IR-12 Auto Roaster used at the facility. While the visible emissions observation performed during the visit did yield compliance with §5-211 of the Air Pollution Control Regulations (APCR) concerning visible emissions, a review of the on-site operations along with the roaster information has determined a violation of §5-261 of the APCR.

The Agency has determined that uncontrolled emissions from coffee roasting at the rate that Abracadabra Coffee roasts contain formaldehyde emissions significantly above the state action level contained in the APCR. Section 5-261(2) of the APCR reads as follows:

(2) Hazardous Most Stringent Emission Rate

For each hazardous air contaminant listed in Appendix B herein and emitted by a stationary source, the source shall apply control technology, production processes or other techniques adequate to achieve the hazardous most stringent emission rate (HMSER). Once the Secretary has determined HMSER for a stationary source and this determination has been included in an order or agreement entered into or issued under the authority of the Act, 3 V.S.A. §2822 or other State statutes, said determination shall remain in effect for five years, unless the source is modified or reconstructed during said five years. At the end of said five years, the determination shall expire unless the source demonstrates to the Secretary that such emission rate still represents HMSER.

HMSER is defined in the APCR as:

A rate of emissions, including a visible emissions standard, which the Secretary, on a case-by-case basis, determines is achievable for a stationary source based on the lowest emission rate achieved in practice by such category of source. If a source demonstrates that due to economic impacts and costs, it cannot achieve the lowest emission rate achieved in practice by such source category, HMSER shall be the lowest emission rate which the

(Continued on Back)

Secretary determines said source is capable of achieving, HMSEER may be achieved through application of pollution control equipment, production processes or techniques, equipment design, work practices, chemical substitution, or innovative pollution control techniques. In no event shall application of HMSEER permit a stationary source to emit any contaminants in excess of any Federal emission standard or any emission standard in these regulations.

The Agency has determined that the HMSEER for hazardous air contaminants associated with coffee roasting to be emissions controlled by the installation of a thermal or catalytic oxidizer or other control method approved by the Agency on the roasting stack. As an emission source of hazardous air contaminants above action levels found in the APCR, and without the required HMSEER, Abracadabra Coffee is in violation of §5-261(2) of the APCR.

In response to the alleged violation, the Agency may issue a Civil Complaint pursuant to 10 V.S.A. Section 8019 which would assess a penalty. The Agency may also issue an Administrative Order pursuant to 10 V.S.A. Section 8008 which would require full compliance with all applicable statutes, rules, and/or permits; assess penalties; and if necessary, require corrective/restorative action and any other measures deemed appropriate. Your correction of the violation through the actions requested below, in the timeframes specified, may lessen the possibility or severity of any enforcement action that may be taken by the Agency.

Compliance Directives:

1. Within 10 business days of receipt of this notice, confirm receipt of the notice with the Agency in writing at the address found at the top of this notification or via the email address listed below. Additionally, provide which of the courses of action below will be taken to return to compliance with the APCR.
2. By **January 17, 2024**, install the appropriate thermal oxidizer or other control device as approved by the Agency on the roasting operations at your 35 Wayside Road property.

Or

By **January 17, 2024**, conduct emissions testing on the roaster for formaldehyde emissions to demonstrate to the Agency that hazardous air contaminant emissions from your facility are below their respective action levels found in the APCR.

If you have any questions about this notification, please contact me (802-279-5674 or john.wakefield@vermont.gov).

Sincerely,



John Wakefield, Compliance Section Chief
Air Quality & Climate Division