

2. Responses to Comments on the Draft EIR

In accordance with Section 15088 of the CEQA Guidelines, the WPWMA has reviewed the comments received on the Draft EIR for the Renewable Placer: Waste Action Plan Project. This chapter contains the written comments received on the Draft EIR during the 75-day public comment period (October 29, 2021, to January 12, 2022). No oral comments were received during the public comment period. The comment responses follow each letter. A set of master responses was prepared to comprehensively respond to multiple comments that raised similar issues is provided, where relevant, in Section 2.2. Comment letters are organized in chronological order by the date they were received. Comment letters and responses are included in Section 2.3.

2.1 Comment Letters

Table 2-1 presents a summary of the written comment letters received during the public comment period. Information in Table 2-1 for each letter includes the letter designation, commenter, and date of each letter.

Table 2-1. Comment Letter Details

Letter Designation	Commenter	Date of Letter
A	Zanker Recycling	November 4, 2021
B	Ann Martin Bowler	December 3, 2021
C	Ann Martin Bowler	December 5, 2021
D	Kris Johnson	December 5, 2021
E	Ann Martin Bowler	December 6, 2021
F	County of Placer	January 3, 2022
G	Phillips Land Law, Inc., On behalf of Placer Athens LP and Placer Athens II LP	January 7, 2022
H	Buzz Oates Construction, Inc.	January 10, 2022
I	Cheryl Berkema	January 12, 2022
J	Ann Martin Bowler	January 12, 2022
K	California Environmental Protection Agency – CalRecycle	January 12, 2022
L	Glen Kramer	January 12, 2022
M	Placer County Air Pollution Control District	January 12, 2022
N	Cox, Castle & Nicholson LLP, On behalf of the Placer 962 property landowners	January 12, 2022
O	County of Placer Office of County Executive	January 11, 2022
P	JEN CA Placer LLC	January 12, 2022
Q	California State University, Sacramento & Sierra College	January 11, 2022
R	Trainor Fairbrook, On behalf of the United Auburn Indian Community	January 12, 2022
S	Central Valley Regional Water Quality Control Board	January 12, 2022

2.2 Letters

2.2.1 Letter A

From: [Michael Gross](#)
To: EIR.comments@renewableplacer.com
Subject: [EXTERNAL] Comments to the EIR
Date: Thursday, November 4, 2021 11:43:52 AM
Attachments: [Untitled.pptx](#)

Subject: RE: EIR Notice of Availability: WPWMA Renewable Placer Waste Action Plan

Please see attached our brief comments to the EIR.

Operation of the inerts operation and yard waste composting operation in Module 9 which will be a disposal cell in the future. No specific details regarding the inerts operation were addressed.

A-1

The Materials Yard was not included in the project. I would guess that it has little to no impact on the EIR.

A-2

Chapter 2, pg. 2-37, Mitigation Measure 10-1: WPWMA and their operation contractor(s) shall document their capability and commitment to implement the GHG BMPs and project design measures identified in Table 10-1 as part of their contracts and plan submittals.

A-3

Table 10-1 details a number of measures we'll need to adhere to, including:

- Electrically powered equipment is used to the extent feasible
- A biofilter cover composed of 12 inches of finished compost shall be applied over ASP piles. - Our proposal states 6 – 12 inches.

Michael Gross



Michael Gross
Director of Sustainability
O (408) 263-2384 | C (408) 828-4953
675 Los Esteros Rd, San Jose, CA 95134
www.zankerrecycling.com

Letter A Comment Responses

Zanker Recycling Michael Gross, Director of Sustainability November 4, 2021	
<i>Comment:</i>	<i>Response:</i>
A-1	The commenter states that no specific details regarding the inerts operation were addressed. For a description of the existing inerts operations, the commenter is referred to the discussion on page 1-18 of the Draft EIR. For a discussion of the proposed inerts operations associated with Plan Concept 1, the commenter is referred to page 3-21 of the Draft EIR and for Plan Concept 2, the commenter is referred to page 3-59 of the Draft EIR.
A-2	The commenter states the materials yard was not included in the project. The comment is unclear concerning which materials yard the commenter is referring to; therefore, no further response is required.
A-3	The commenter proposes that 6 to 12 inches of biofilter cover be applied to aerated static piles (ASPs). The comment is acknowledged and, because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

2.2.2 Letter B

Stephanie Ulmer

From: Stephanie Ulmer <renewableplacer@gmail.com>
Sent: Tuesday, December 7, 2021 9:02 AM
To: Stephanie Ulmer
Subject: [EXTERNAL] Fwd: Concerned about the huge, poorly planned expansion of WPWMA
Attachments: NOA_FINAL.pdf

----- Forwarded message -----

From: **Ann Martin Bowler** <amartinbowler@gmail.com>
Date: Fri, Dec 3, 2021 at 12:36 PM
Subject: Concerned about the huge, poorly planned expansion of WPWMA
To: <EIRcomments@renewableplacer.com>, Ann Martin Bowler <amartinbowler@gmail.com>

Dear WPWMA board members,

As a longtime resident of Placer County, I am very concerned about the environmental impact that the proposed huge and poorly thought out expansion of Western Placer Waste Management Authority (WPWMA) would have on the Sunset region of south Placer County.

I am concerned that SB1383 will not be implemented properly. I am specifically concerned about the increased methane that will be produced when household food scraps are placed into the "one big bin" rather than into the "greens" bin, which is WPWMA plan for implementation of SB1383, according to Recology Auburn Placer executives. Representatives from Nortech Waste, told me, "We have a process to extract kitchen scraps from trash." If this is the method you choose, I wonder what percentage of kitchen scraps would be collected and how many recyclables would be wrecked in the process. Kitchen scraps should be placed in with garden waste, that is for sure! And most certainly, the amount of methane created from using the One Big Bin approach would be unacceptable to both the California Air Resource Board and CalRecycle!

B-1

I wonder if WPWMA expansion plans meet other CalRecycle mandates. Expanding the "One Big Bin" system would be very costly for your customers. One big bin will at best capture a small percentage of recyclables. We can, we must, do better than this in 2021!

B-2

I encourage each of you to take a look at what many cities and counties across California are doing to recycle. NO ONE IS USING THE ONE BIG BIN system, as it is expensive to implement and will never capture the amount of recycling that is needed to meet California standards moving forward. Here's the link to Davis' waste management program. This is what every jurisdiction is moving towards. Why aren't we?
<https://www.cityofdavis.org/city-hall/public-works-utilities-and-operations/solid-waste-and-recycling>

B-3

When the dump expands, the landfill would move even closer to the many homes that are planned to be built nearby. These homes would be built further into the landfill's unhealthy "smell zone," which is a major concern for those who live in the region and beyond.

B-4

The many pristine vernal pools that are near to the current dump site that will be overtaken when the dump expands. This is one of south Placer County's last pieces of pristine land and waterways. Aren't these pools protected?

} B-5

There will be a huge (70,000 car) Carvana dealership going in near the WPWMA which will add more oil, tires and car parts to the dump and potentially into the waterways in the area. This car lot was applied for in a piecemeal manner, so that the full impact of this gigantic used car lot was not known until there was no way to fight it.

} B-6

I speak for many in Placer County who are concerned about the impact the dump's expansion will have on the region. I feel WPWMA is squandering the potential positive impact that SB1383 and a more aggressive recycling program could have on our region. I have notified the California Air Resource Board, California Water Commission, the local enforcement division of CalEPA as well as CalRecycle of my concerns. Each organization will each be commenting on the legality of EIR for WPWMA expansion plans.

} B-7

Thank you for considering my thoughts and concerns,
Ann Martin Bowler
916 705-1325
Granite Bay

Letter B Comment Responses

Ann Martin Bowler, Placer County Resident December 3, 2021	
<i>Comment:</i>	<i>Response:</i>
B-1	<p>The commenter raises concerns that SB1383 would not be implemented properly. The WPWMA acknowledges this comment regarding implementation of Senate Bill 1383 (SB 1383). As described in Chapter 3, Project Description, of the Draft EIR, both plan concepts are intended to help achieve a 75 percent reduction in the level of organic waste disposed of by 2025. The project is designed to address the waste streams of the Participating Agencies as indicated in Chapter 3, regardless of the waste collection methods used by these agencies. The waste collection methods used by the Participating Agencies is outside of the control of WPWMA and is outside of the scope of this EIR.</p> <p>Additionally, as discussed in Chapter 10, Greenhouse Gases and Emissions, the project would be consistent with state laws and local plans and policies, including SB 1383. The comment is acknowledged and, because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
B-2	<p>The commenter raises concerns about the cost of the "One Big Bin" system. The project is designed to address the waste streams of the Participating Agencies as indicated in Chapter 3, regardless of the waste collection methods used by these agencies. The waste collection methods used by the Participating Agencies is outside of the control of WPWMA and is outside of the scope of this EIR.</p>
B-3	<p>The commenter raises concerns that some communities use collection methods other than the "One Big Bin" system. Please refer to the response to comment B-2.</p>
B-4	<p>The commenter raises concerns about the landfill's "unhealthy smell zone." As described in Chapter 6, Air Quality, of the Draft EIR, odorous compounds are evaluated in the EIR, and the Draft EIR concludes that impacts associated with odors are significant. Mitigation Measure 6-6 requires the WPWMA to implement odor-reduction measures. However, the impact would remain significant and unavoidable even after mitigation. The commenter also raises concerns about future home development near the landfill. The Draft EIR, in Chapter 19, Cumulative Impacts, Section 19.2.2, Air Quality, concludes that the cumulative impacts for odors would be significant and unavoidable, which is consistent with the Sunset Area Plan/Placer Ranch Specific Plan (SAP/PRSP) EIR (Placer County 2019).</p>
B-5	<p>The commenter asks if vernal pools on the project site are protected. Chapter 3, Biological Resources, describes vernal pool resources on the site, describes impacts on vernal pools, and requires implementation of Mitigation Measure 7-2 (Impacts on Vernal Pool Branchiopods and Western Spadefoot) to reduce the level of impacts.</p>
B-6	<p>The commenter raises concerns regarding the approval of a Carvana dealership within the vicinity of the WPWMA facility. Consideration for the approval of the Carvana dealership was outside the WPWMA's control and outside the scope of this EIR. The comment is acknowledged and, because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
B-7	<p>The commenter raises concerns about the project's expansion in the region. This comment is acknowledged and, because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>

2.2.3 Letter C

Stephanie Ulmer

From: Stephanie Ulmer <renewableplacer@gmail.com>
Sent: Tuesday, December 7, 2021 9:02 AM
To: Stephanie Ulmer
Subject: [EXTERNAL] Fwd: How San Francisco

----- Forwarded message -----

From: **Ann Martin Bowler** <amartinbowler@gmail.com>
Date: Sun, Dec 5, 2021 at 10:48 AM
Subject: Fwd: How San Francisco
To: <EIRcomments@renewableplacer.com>, <proccucci@roseville.ca.us>, <Dan.Karleskint@lincolncalifornia.gov>, Supervisor Gore <SupervisorGore@placer.ca.gov>, <rweygand@placer.ca.gov>, <bill.halldin@rocklin.ca.us>

Good Morning WPWMA board members,

<https://fb.watch/9IE48rHWXK/>

The video link above explains how San Francisco composts 550 tons of waste every day. It also explains how, in doing so, San Francisco has greatly diminished the amount of trash that ends up in the landfill while drastically reducing the amount of harmful greenhouse gases kitchen scraps create. Composting done in this way can create a rich compost which is valuable resource for every community. The video explains how SF incentivizes its customers to participate in their composting program which actually makes money for their city.

I, along with many citizens of Placer County, would appreciate it if you would watch this video and consider the many benefits that a large scale food waste and yard greens composting program could have before any decisions are made to enlarge Placer County's current landfill. We need to enact a similar program here in Placer County!

I hope you will take the time to watch this video

Thank you,
Ann Martin Bowler
Granite Bay
916 704-1325

C-1

Letter C Comment Responses

Ann Martin Bowler, Placer County Resident December 5, 2021	
<i>Comment:</i>	<i>Response:</i>
C-1	The commenter provided a video link describing San Francisco's composting operations, requesting the WPWMA Board of Directors watch the video prior to deciding on the proposed project, and stated that a similar program should be enacted in Placer County. These comments are acknowledged. Because they do not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

2.2.4 Letter D

Stephanie Ulmer

From: Stephanie Ulmer <renewableplacer@gmail.com>
Sent: Tuesday, December 7, 2021 9:03 AM
To: Stephanie Ulmer
Subject: [EXTERNAL] Fwd: WPWMA EIR

----- Forwarded message -----

From: **Kris Johnson** <kmjohnson7245@gmail.com>
Date: Sun, Dec 5, 2021 at 2:47 PM
Subject: WPWMA EIR
To: EIRcomments@renewableplacer.com <EIRcomments@renewableplacer.com>
Cc: Kris Johnson <kmjohnson7245@gmail.com>

Please do not go down the one bin path. There are so many better alternatives being used in cities across the country. Placer needs to find ways to reduce our waste management footprint, not enlarge it. We need to incentivize reduction of waste overall, not facilitate mindlessly tossing everything into a single trash bin. } D-1

The county has already approved housing to be WPWMA neighbors. Expansion won't be a benefit to the new neighbors. } D-2

Letter D Comment Responses

Kris Johnson December 5, 2021	
<i>Comment:</i>	<i>Response:</i>
D-1	The commenter states that the WPWMA should not use a one-bin collection system and that waste reduction should be incentivized. The WPWMA has designed this project to address the waste streams of the Participating Agencies as indicated in Chapter 3, Project Description, regardless of their waste collection method. The waste collection methods of the Participating Agencies are outside the scope of this EIR. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
D-2	The commenter states that Placer County has approved housing next to the WPWMA and that expansion will not benefit those future residents. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

2.2.5 Letter E

Stephanie Ulmer

From: Stephanie Ulmer <renewableplacer@gmail.com>
Sent: Tuesday, December 7, 2021 9:03 AM
To: Stephanie Ulmer
Subject: [EXTERNAL] Fwd: FCC creates a stink

----- Forwarded message -----

From: **Ann Martin Bowler** <amartinbowler@gmail.com>
 Date: Mon, Dec 6, 2021 at 10:01 AM
 Subject: FCC creates a stink
 To: <ELRcomments@renewableplacer.com>, <proccucci@roseville.ca.us>, <Dan.Karleskint@lincolncalifornia.gov>, Supervisor Gore <SupervisorGore@placer.ca.gov>, <rweygand@placer.ca.gov>, <bill.halldin@rocklin.ca.us>

Hello Commissioners,

When I started looking into FCC Environmental, the company that WPWMA is in the process of contracting with, I found some alarming information about their poor service and the outdated composting system they use, which creates terrible (and I am assuming unhealthy) odors around many of the landfills they run. Below are a few links to articles about FCC but please do your own research before any contracts are signed.

many thanks for your consideration,
 Ann Martin Bowler
 Granite Bay
 916 705-1325

<https://www.facebook.com/FCC.Environmental.Services/reviews>

<https://www.orlandosentinel.com/politics/os-trash-hauler-fcc-defends-its-performance-in-orange-county-20160323-story.html>

<https://www.delawareonline.com/story/news/local/2014/10/21/odor-plagued-compost-plant-ordered-shut/17674401/>
<https://www.delawareonline.com/story/news/local/2014/09/19/wilmington-stink-map-brings-shout/15892761/>

<https://rightondailyblog.com/2021/11/as-the-western-placer-waste-management-agency-prepares-to-adopt-a-new-contract-lets-summarize-the-vendor-fcc-and-why-it-is-not-wise-to-do-business-with-them/>

E-1

<https://www.seattletimes.com/seattle-news/cedar-grove-composting-odor-should-lessen/>

<https://rightondailyblog.com/2021/11/western-placer-waste-management-agency-update-why-hire-a-provider-with-a-history-of-corruption-and-stinking-up-american-cities/>

<https://rightondailyblog.com/2021/11/as-the-western-placer-waste-management-agency-prepares-to-adopt-a-new-contract-lets-summarize-the-vendor-fcc-and-why-it-is-not-wise-to-do-business-with-them/>

<https://rightondailyblog.com/2021/11/western-placer-waste-management-authority-update-staff-recommends-a-provider-with-a-long-sordid-history-and-does-so-with-a-last-minute-trick/>

E-1

Letter E Comment Responses

Ann Martin Bowler, Placer County Resident December 6, 2021	
<i>Comment:</i>	<i>Response:</i>
E-1	The commenter raises concerns regarding FCC Environmental's operations at other facilities. This comment is acknowledged and, because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

2.2.6 Letter F



January 3, 2022

Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, CA 95747
Attn: Stephanie Ulmer

Subject: Western Placer Waste Management Authority (WPWMA) Draft EIR comments

Dear Ms. Ulmer:

Placer County Environmental Health (PCEH) has reviewed the "Renewable Placer: Draft Environmental Impact Report" (DEIR) which was made available for review on October 29, 2021. PCEH staff have the following comments:

- 1) In "Chapter 1 – Introduction", on pages approximately 1-25 though 1-27, there should be discussion of fire/disaster debris as is currently allowed at the facility. } F-1
- 2) In "Chapter 11 – Hazards, Hazardous Materials, and Wildfire", on page 11-6 in the first paragraph, "In accordance with Title 27 Section 20921 requirements for the closed part of the landfill and Section 29025 for the active parts, these probes are monitored on a monthly basis." The "29025" is incorrect and should be replaced with the appropriate "20925" (in reference to Title 27 section 20925). } F-2

If you have any questions about this letter, please contact this office at phollowa@placer.ca.gov or 530-745-2345.

Sincerely,

Paul Holloway, REHS
Hazardous Materials/Solid Waste Section

cc: CalRecycle

Environmental Health ■ 3091 County Center Drive, Suite 180 ■ Auburn, CA 95603
(530) 745-2300 Office ■ (530) 745-2370 fax ■ environmentalhealth@placer.ca.gov
Tahoe Administration Building, 775 North Lake Blvd, Suite 203, P.O. Box 1909, Tahoe City, CA
96145 Office: (530) 581-6240 Fax (530) 581- 6242 envhealth@tahoecity.org



Letter F Comment Responses

Placer County Environmental Health Paul Holloway, Registered Environmental Health Specialist January 3, 2022	
<i>Comment:</i>	<i>Response:</i>
F-1	The commenter states that there should be discussion in Chapter 1, Introduction, about fire/disaster debris, which is currently allowed at the facility. As indicated in Chapter 3 of this Final EIR, the following text is hereby added to Section 1.6.3 on page 1-27 of the Draft EIR: "Fire Debris – The WPWMA may temporarily accept and discharge into the WRSL waste derived from cleanup of local emergency/disaster-impacted areas."
F-2	The commenter states that in Chapter 11, on page 11-6, the text referencing "Section 29025" should be replaced with the correct "Section 20925". As indicated in Chapter 3 of this Final EIR, the reference to Section 29025 on page 11-6 of the Draft EIR is hereby revised to Section 20925.

2.2.7 Letter G

PHILLIPS LAND LAW, INC.

5301 Montserrat Lane
Loomis, California 95650
Telephone (916) 979-4800
Telefax (916) 979-4801

January 7, 2022

VIA EMAIL

Western Placer Waste Management Authority
3013 Fiddymment Road
Roseville, CA 95747
Attn: Stephanie Ulmer

Re: Renewable Placer: Waste Action Plan Draft EIR

Dear Ms. Ulmer:

On behalf of Placer Athens LP (PA) and Placer Athens II LP (PA II), collectively (Placer Athens) we submit this comment letter on the Renewable Placer: Waste Action Plan draft EIR (DEIR).

Historical Background

Placer Athens purchased 320 acres immediately east and adjacent to the 155-acre Eastern Property (East Property) as defined in the DEIR in 2002. In 2003 Placer Athens II purchased an additional 79 acres east of North Foothills Boulevard. The properties are outlined in red on the attached map. The intent of its purchase was to develop the properties consistent with their industrial designations originally under the Sunset Industrial Area Plan and their Innovation Center designations under the new Sunset Area Plan. To date, development of the property has not been economically feasible due to the lack of infrastructure, primarily sewer. At the time of these land purchases, the East Property was under private ownership.

Over the next several years, different private development proposals for the East Property were pursued, one specifically as a motocross facility, none of which moved past the concept stage. Thereafter, WPWMA completed its purchase of the East Property in 2011.

The staff report supporting WPWMA's acquisition of the East Property stated "... WPWMA will be holding the Property in reserve for buffer purposes for the indefinite future ...". Emphasis added. Additionally, since WPWMA's

G-1

acquisition, the East Property has been commonly referred to within the development industry as the "Landfill Buffer Property". Until the discussions regarding the Waste Action Plan first surfaced, Placer Athens had thought the intended purpose of the East Property was to provide a buffer for surrounding properties to the active landfill operation.

Because no specific use of the East Property was proposed at the time of WPWMA's acquisition, the purchase was deemed exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). If expansion of the landfill operation onto the East Property had been WPWMA's plan for the property at that time, it would have had to comply with CEQA concurrent with the property's acquisition and evaluated the environmental impacts to the surrounding properties of expanding landfill operations to the east. Had this been done, Placer Athens would have had the opportunity to participate in the CEQA process and, prior to WPWMA's acquisition, voiced its concerns and strong opposition to such a proposal.

Now, under Concept 1, years after its acquisition of the East Property, WPWMA proposes to expand the active landfill operation to the East Property with no buffer afforded to immediately adjacent properties. We believe that the DEIR fails to fairly disclose and analyze the impacts of Concept 1, or adequately compare and contrast the environmental impacts of Concepts 1 and 2.

G-1

Existing Conditional Use Permit on the West Property

The DEIR notes that years ago the 459-acre Western Property (West Property) was the subject of environmental review and approval by Placer County of a conditional use permit to operate a landfill. Although additional permits are required prior to landfill operations occurring on the West Property, adjacent property owners have therefore known that landfill operations were likely to occur on the West Property and to plan the future uses of their properties accordingly. Concept 1, however, shifts this historical reference point by introducing new impacts on properties east of the landfill not heretofore anticipated.

G-2

Aesthetics

The aesthetic analysis contained in the DEIR is misleading and inadequate in that it fails to analyze impacts to properties more proximate to the landfill. The vantage points from Sun City Lincoln Hills or the City of Roseville included in the DEIR does not accurately analyze the aesthetic impacts presented by constructing a 300+ foot hill adjacent to nearby properties planned for industrial, research and development, residential and entertainment mixed use. Plans for attracting high end job-rich uses and future entertainment venues near an expanded open face landfill will be compromised. The DEIR aesthetic analysis should therefore be augmented to include vantage points from these more proximate properties to allow decision makers to assess the true aesthetic impacts of Concept 1.

G-3

Biological Resources

On page 7-40 of the DEIR, it states that “Plan Concept 2 would result in the same level of impacts on vernal pool branchiopods and western spadefoot as Plan Concept 1 because the same areas would be disturbed . . .” thereby concluding that the impacts to biological resources resulting from Concepts 1 and 2 are essentially the same. This is a gross oversimplification of the impacts and ignores the values of the resources affected. The conclusion that the biological impacts are the same is only supported by the assumption that nearly all wetland features on both properties will be destroyed to accommodate the development envisioned. While this is likely the case for Concept 1, where the expansion of the landfill footprint onto the East Property takes up the entire site, a more environmentally friendly development footprint of various uses envisioned for the East Property in Concept 2 could instead avoid and preserve many of its biological resources.

As shown in DEIR Figure 7-2, the quantity and location of wetland resources on the two sites differ dramatically. Wetland resources on the West Property are all located at the north end of the property providing the opportunity for a very large development footprint while still avoiding much of the wetland resources at the north end. In contrast, the resources on the East Property are scattered throughout the site. Only a development footprint that can place uses more discretely on the East Property should occur. Expanding the footprint of the landfill onto the East Property as proposed by Concept 1 requires the destruction of essentially 100% of the wetland resources on the site. Such a cavalier attitude utilized by a private developer would not be tolerated by the processing jurisdiction and the applicable regulatory agencies and should not be tolerated with a public agency developer here.

Some level of resource avoidance and preservation must be analyzed for the East Property in the DEIR to accurately compare and contrast the biological resource impacts between Concepts 1 and 2. Additionally, even though mitigation for impacts to biological resources will be mitigated pursuant to the PCCP, the Regulatory Agencies will appropriately require a percentage of on-site wetland resources to be avoided and preserved. A private development proposal would experience nothing less. The DEIR should therefore quantify and disclose the differences in wetland impacts and mitigation costs associated with Concepts 1 and 2.

G-4

Land Use Compatibility

The Compatible Technology uses proposed on the East Property under Concept 2 are consistent with historical references to the property as the “Landfill Buffer Property” allowing the transition to urban industrial, research and development and existing and planned entertainment uses to the east. Concept 2 should be viewed as a further catalyst to the circular economy idea at the heart of the Waste Action Plan. Proximity to comparable and compatible uses to the

G-5

east (the Placer Athens properties), and south (Placer Ranch and the Sac State/Sierra College Placer Center) creates the synergy in uses envisioned for the Sunset Area Plan for decades. Concept 2 therefore presents the more complimentary land use interface with the existing and planned future uses at Thunder Valley, Placer Ranch and plans for the Placer Athens properties. However, the DEIR largely ignores how Concepts 1 and 2 compare from a land use compatibility perspective within the context of the Sunset Area Plan. This analysis should be included in the DEIR.

G-5

Life Span of the Landfill

The DEIR should disclose in a consolidated and easily understandable fashion the difference in life span and overall costs associated with Concepts 1 and 2. In doing so, Concept 2, while more costly, provides a longer life span for the facility, and when that additional cost is amortized over those different life spans, the difference in cost between the two is negligible.

G-6

New Development Proposal

Consistent with the original intent behind the purchase of its properties, Placer Athens is currently in escrow with the largest industrial developer in the region, the Buzz Oates Group of Companies (Oates). Oates intends to file an application with Placer County in the coming weeks for the Placer Commerce Center, an innovation and commerce center comprised of millions of square feet of research and development, warehousing and logistics space consistent with the properties' Innovation Center designation under the updated Sunset Area Plan. Plans for Placer Commerce Center include an investment of approximately \$1 billion over the life of the project and thousands of construction and permanent jobs.

G-7

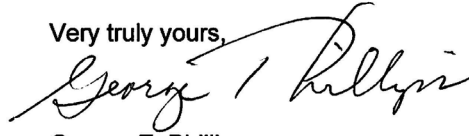
The proposal comes at a time when the County is reviewing plans for the extension of major infrastructure to the area. How the puzzle piece that is the Waste Action Plan fits into the larger vision for the Sunset Area Plan, Placer Ranch, Sac State/Sierra College and Thunder Valley is critical to the economic vitality of south Placer County. WPWMA's Plan can either play the role of a additional catalyst for economic growth or inhibit it. Concept 2 is the superior option to fill that role as an additional catalyst. We believe the DEIR fails to accurately and adequately compare the differences in environmental impacts between Concepts 1 and 2. Were it to do so, Concept 2 would be superior from the environmental and land use perspective. The DEIR can and should do better.

Conclusion

For the reasons set forth above, Placer Athens requests that the DEIR be revised and/or augmented sufficiently to address the issues set forth above, and express its strong support for Concept 2. Thank you for your thoughtful consideration of these comments.

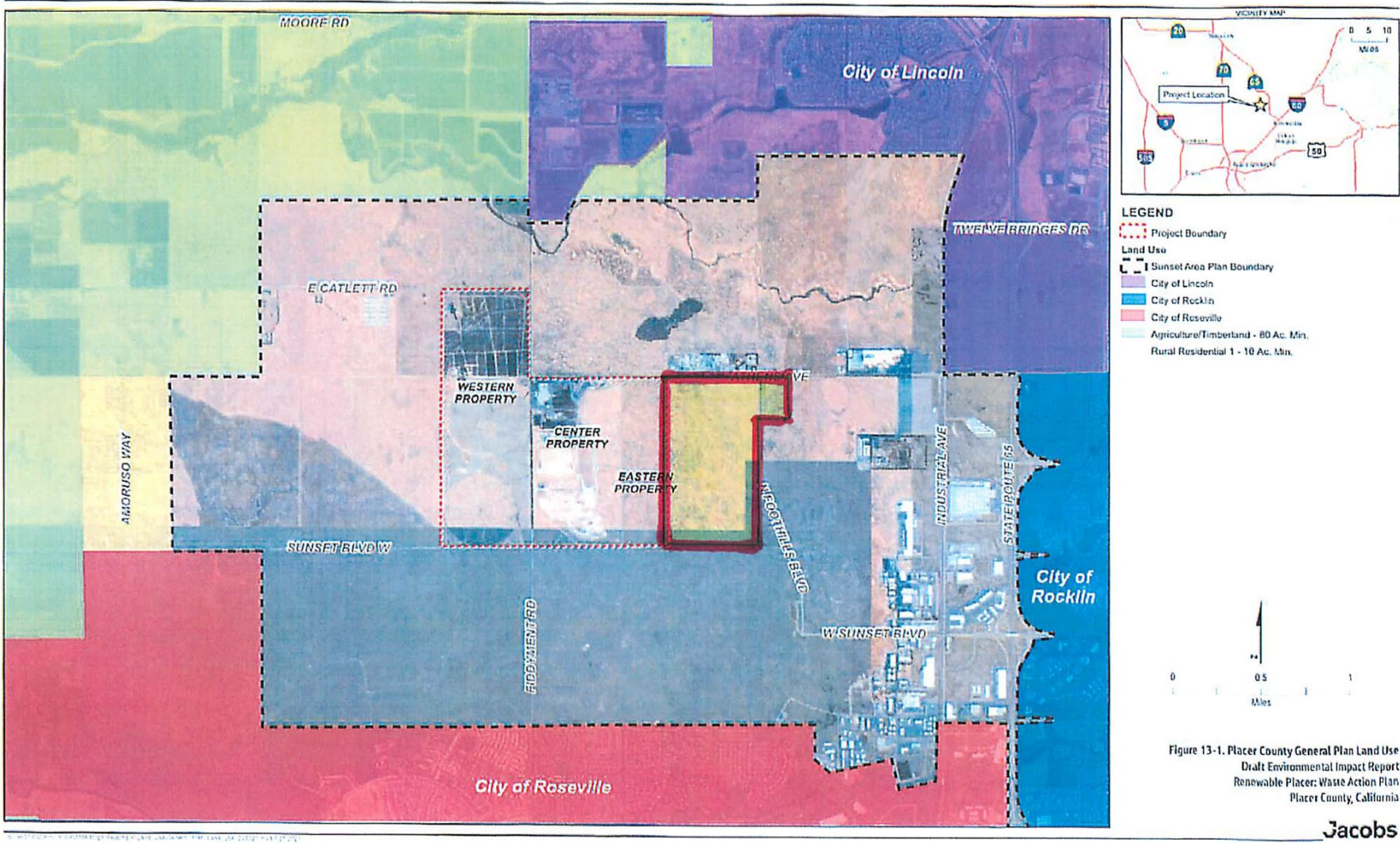
G-8

Very truly yours,

A handwritten signature in black ink, appearing to read "George E. Phillips". The signature is fluid and cursive, with a large initial "G" and "P".

George E. Phillips

cc: Bill Halldin, WPWMA Board Chair
Bonnie Gore, WPWMA Board Member
Dan Karleskint, WPWMA Board Member
Pauline Roccucci, WPWMA Board Member
Robert Weygandt, WPWMA Board Member
Ken Grehm, Executive Director
Kevin Bell, Deputy Executive Director
Eric Oddo, Program Manager
Daniel Lee, Placer Athens
Tim Kwan, Placer Athens
Joe Livaich, Oates Group of Companies
Marcus LoDuca, Esq. for Oates Group of Companies
Kate Hart, Esq. for Placer Ranch
Holly Tiche, Consultant to Placer Ranch



Letter G Comment Responses

Phillips Land Law, Inc., On behalf of Placer Athens LP and Placer Athens II LP George Phillips January 7, 2022	
Comment:	Response:
G-1	<p>The commenter states that they believed the Eastern Property was intended as a buffer for surrounding properties from active landfill operations and references a WPWMA staff report as justification for this assumption. However, the staff report references the WPWMA's intended use at the time of purchase and does not reference any restrictions to the WPWMA's future use of the Eastern Property.</p> <p>The commenter states that because no specific use of the Eastern Property was proposed at the time of WPWMA's acquisition, the purchase was deemed exempt from CEQA. The commenter further states that if the expansion of landfill operations onto the Eastern Property had been WPWMA's plan for the property at that time, it would have had to comply with CEQA. This statement is correct. However, the WPWMA did not propose plan concepts that included development on the Eastern Property until the Waste Action Plan was proposed in 2019, at which time the WPWMA initiated the CEQA process consistent with Sections 21000 et seq. of the CEQA Statute and Sections 15000 et seq. of the CEQA Guidelines. This process included release of the Draft EIR.</p> <p>The commenter states that they believe the Draft EIR fails to fairly disclose and analyze the impacts of Plan Concept 1 or adequately compare and contrast the environmental impacts of Plan Concepts 1 and 2. However, the commenter does not identify any specific impact disclosure failures in the Draft EIR or deficiencies in the discussion of impacts for Plan Concepts 1 and 2; therefore, no further response is required.</p>
G-2	<p>The commenter states that property owners adjacent to the Western Property have known that landfill operations were likely to occur on that property and that Plan Concept 1 shifts this historic reference point by introducing new impacts on properties east of the landfill. The WPWMA Board of Directors did not implement the project that was described in the Conditional Use Permit approved by Placer County in the 1980s for the Western Property. Therefore, no environmental impacts were generated by that Placer County permit approval. Neither plan concept was previously approved at the project site and as summarized in Chapter 2, Executive Summary, of the Draft EIR, both plan concepts are expected to have significant environmental impacts with implementation that were not previously identified prior to release of the Draft EIR.</p>
G-3	<p>The commenter states that the Draft EIR fails to analyze impacts to properties more proximate to the landfill. In Chapter 5, Aesthetics, Section 5.3.3, the Draft EIR analyzes locations within the 4-mile visual study area that could be the most sensitive to the proposed project's potential visual impacts. The Draft EIR determined that both plan concepts would result in significant and unavoidable impacts to visual character and quality, and that changing the Key Observation Points to locations more proximate to the facility would have no change in the impact determination.</p>
G-4	<p>The commenter states that the conclusion that the two plan concepts would result in the same level of impacts on vernal pool branchiopods and western spadefoot is a gross oversimplification and ignores the values of the resources affected. The commenter states that a more environmentally friendly development footprint of the various uses envisioned for the Eastern Property with Plan Concept 2 could avoid and preserve many of its biological resources. The entire site includes a single land use designation (EI) and a single zoning designation (ECO); therefore, the uses allowed within those land use and zoning designations were presumed in the Draft EIR to be acceptable anywhere on the site that does not include a conflicting use. Because it cannot be known how the complementary/programmatic elements would be developed to meet the demands of the future site users, the Draft EIR conservatively assumed that implementation of</p>

Phillips Land Law, Inc., On behalf of Placer Athens LP and Placer Athens II LP George Phillips January 7, 2022	
Comment:	Response:
	<p>either Plan Concept 1 or Plan Concept 2 would result in the entire loss of the existing habitat on the project site.</p> <p>As referenced in Figure 3-1 on page 3-10 of the Draft EIR, Plan Concept 1 proposes the development of solid waste and compatible/programmatic elements on the entire Western Property and expansion of the existing Western Regional Sanitary Landfill (WRSL) footprint onto the entire Eastern Property. As referenced in Figure 3-7 on page 3-51 of the Draft EIR, Plan Concept 2 proposes the development of new landfill cells on the northern portion of the Western Property and the development of compatible/programmatic elements in the southern portion of the Western Property and entire Eastern Property. Both plan concepts assume full development of the Center Property. Therefore, the impacts on special-status wildlife species that rely on vernal pool-type wetland, including vernal pool fairy shrimp, vernal pool tadpole shrimp, and western spadefoot, would be similar for either plan concept.</p> <p>The Draft EIR acknowledged that the timing of the impacts to these species may differ between the two plan concepts depending upon how each plan is phased. Both plan concepts would be required to secure appropriate permits through the Placer County Conservation Program (PCCP) prior to any disturbance to sensitive habitat (Placer County 2020).</p> <p>For alternatives that do not include development of the Eastern Property, the commenter is referred to Alternative A: No Project Alternative, Alternative B: Prioritize Waste Recovery, and Alternative D: Three-Bin Clean Material Recovery Facility (MRF) Alternative included in Chapter 18, Project Alternatives, of the Draft EIR.</p>
G-5	The commenter states that the Draft EIR ignores how Plan Concepts 1 and 2 compare from a land use compatibility perspective within the context of the Sunset Area Plan. As described in Chapter 13, Land Use and Planning, and as discussed in Impact 13-1 and 13-2, neither plan concept would have an impact on land use plans and policies, including the Sunset Area Plan.
G-6	The commenter states that the Draft EIR should disclose the difference in life span and costs between the two plan concepts. For a comparison of the life spans for both plan concepts, the commenter is referred to the discussion of waste disposal on page 3-5 within Table 3-1 of the Draft EIR. As discussed in Table 3-1 of the Draft EIR, the site life span is projected to increase by approximately 43 years for Plan Concept 1 and by approximately 52 years for Plan Concept 2. For a discussion of costs for each plan concept, the commenter is referred to Section 4.2, Preferred plan concept, on page 4-3 of the Draft EIR.
G-7	The commenter states that Plan Concept 2 is the superior option and that the Draft EIR fails to accurately and adequately compare the differences in environmental impacts between Plan Concepts 1 and 2. The commenter does not identify specific locations within the Draft EIR that the commenter considers deficient. For a summary of the impacts anticipated with both plan concepts, the commenter is referred to the Executive Summary Table included in Chapter 2, Executive Summary.
G-8	The commenter expresses support for Plan Concept 2. These comments are acknowledged. Both Plan Concept 1 and Plan Concept 2 were evaluated at an equal level in this EIR and the WPWMA Board will select the project within the framework of the EIR process.

2.2.8 Letter H



January 10, 2022

Ms. Stephanie Ulmer
Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, CA 95747

RE: Renewable Placer: Waste Action Plan Draft EIR

Dear Ms. Ulmer,

Buzz Oates is under contract to purchase a sizeable land interest directly adjacent to the 160-acre potential eastern landfill expansion site. We have significant concerns with Concept 1 (i.e., eastern expansion) jeopardizing the viability of one of, if not the largest, single job creating projects in Placer County.

The Placer Commerce Center will promote positive contributions to the local Placer County economy and greater Sacramento Region via new capital investment, significant creation of new jobs, traffic impact minimization, environmental impact minimization, along with the expansion and diversification of the local tax base.

Placer County has laid the foundation over the last 40 years to accommodate growth and economic expansion in South Placer County. Buzz Oates intends to partner with the County in fulfilling the vision laid out in the Sunset Area Plan.

Buzz Oates will establish an entitled innovation/commerce center serving significant unmet demand for new research and development along with warehousing and logistics space; which will create a competitive advantage attracting new businesses and job creation to Placer County. At final buildout, the Placer Commerce Center will bring several million square feet of new space to Placer County.

H-1

Preliminary economic impacts of the Placer Innovation Center include but not limited to:

- **3,500 – 5,000 new full-time jobs**
- **\$500 - \$750 million one-time construction impacts**
- **2,000+ construction jobs**
- **\$1.4 billion in annual economic impacts (direct, indirect, and induced)**
- **Over \$1 billion invested at buildout**

Jobs-Housing Balance: The Sunset Area presents an important opportunity to achieve better balance between local jobs and the local workforce. The predominantly residential areas currently surrounding the Sunset Area house a highly skilled labor force that will find new opportunities for employment closer to home as the Sunset Area develops with employment-supporting uses. This can result in less commuting out of the area for work, which will have the benefit of reducing vehicle miles travelled, peak hour congestion and freeing up capacity on regional roadways for commercial and industrial users.



The Placer Commerce Center site provides a unique opportunity to create a destination regional innovation center on an underutilized site along a regional corridor attracting new business to Placer County.

H-1

Importantly, the WPWMA Board should consider how each concept will further other project objectives (e.g., create opportunities for innovation and economic growth, enhance opportunities to increase recycling and landfill waste diversion, and enhance ability to comply with regulations). These project elements include the following:

- Compatible Technologies – Space would be reserved for third-party commercial or full-scale compatible technologies and manufacturing operations that would take materials and products primarily from the WPWMA's facility to produce beneficial products, including renewable energy, fuels, and marketable commodities.
- Pilot Study Area – Space would be reserved for third parties to conduct pilot studies, using materials and products primarily from WPWMA's facility and processing them in new ways or producing beneficial products, including renewable energy, fuels, and marketable commodities.
- University Research Area – Space would be reserved for university-led research, using materials and products primarily from the WPWMA's facility and processing them in new ways or producing beneficial products, including renewable energy and marketable commodities. This could also include more general solid waste-related research to, for example, improve facility diversion, increase efficiencies, and lower environmental impacts.
- Landfill Gas (LFG)-to-Compressed Natural Gas Area – Space would be reserved for a potential third-party or WPWMA-led facility that would convert LFG to compressed natural gas, hydrogen, or other renewable fuel that could be used to fuel vehicles operated by local governments, waste hauling or other private companies, or otherwise be transferred to other end users.

H-2

Concept 2 (i.e., the western expansion option) optimizes synergistic and/or co-development opportunities of "eco-industrial" uses. "Eco-industrial" uses focus on the "circular" or "zero-waste economy." "Eco-industrial" uses include alternative waste-to-energy technologies, recovery and reuse of materials, solid waste-related research and development, and related advanced manufacturing, perhaps in conjunction with nearby universities. Placer Innovation Center's proximity to the California State University, Sacramento – Placer Campus provides an opportunity to site academically-related and innovation-related businesses near campus.

H-3

Unlike many developers, the developer of the Placer Commerce Center is a vertically integrated company that entitles property, vertically constructs buildings, finds high quality tenants for building use, and manages buildings as long-term investments. The long-view focus of assets means the developer makes decisions based on improving the quality of properties, and that quality passes directly to developer's investors and tenants. This approach creates a long-term



commitment to Placer County its residents. Buzz Oates is a long-term partner in every community we invest in.

Buildout of the Placer Commerce Center site must not only be strategic in planning for the present, but ultimately the future. The developer expects to invest significant capital in Placer County spanning the course of multiple decades, which will result in significant employment opportunities for the community. Again, Concept 1 significantly threatens the viability of the Placer Commerce Center project.

The developer will build the project in multiple phases; optimizing the buildout to meet current and future market demands, minimizing traffic impacts, minimizing environmental impacts, and maximizing community benefits by not overbuilding all at once.

The thoughtful approach to site development not only targets the successful buildout of the entire site, but also capitalizes on the County's infrastructure investments.

Buzz Oates has developed millions of square feet of commercial space in Placer County and we look forward to working with Placer County and the WPWMA Board on this endeavor to create further lasting community benefits.

For the reasons mentioned above, we strongly encourage the WPWMA Board to adopt Concept 2 as their preferred landfill expansion alternative.

H-3

All the best,

Joe Livaich
Vice President, Planning and Preconstruction Services
Buzz Oates Construction, Inc.

Cc: Bill Halldin, WPWMA Board Chair
Bonnie Gore, WPWMA Board Member
Dan Karleskint, WPWMA Board Member
Pauline Roccucci, WPWMA Board Member
Robert Weygandt, WPWMA Board Member
Ken Grehm, Executive Director
Kevin Bell, Deputy Executive Director
Eric Oddo, Program Manager
Daniel Lee, Placer Athens LP
George Phillips, Esq. for Placer Athens LP
Tim Kwan, Placer Athens LP
Marcus Lo Duca, Esq. for PW Fund B Development, LLC
Kate Hart, Esq. for Placer Ranch
Holly Tiche, Consultant to Placer Ranch

Letter H Comment Responses

Buzz Oates Construction, Inc. Joe Livaich, Vice President, Planning and Preconstruction Services January 10, 2022	
<i>Comment:</i>	<i>Response:</i>
H-1	The commenter states that his company has significant concerns with Plan Concept 1 jeopardizing the viability of its proposed project adjacent to the WPWMA's Eastern Property. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
H-2	The commenter states that the WPWMA Board should consider how each plan concept will further project objectives. The commenter is referred to the summaries provided in Chapter 3, Project Description, following the discussion of the individual project components for each plan concept. The summaries are provided under the heading Achievement of Project Objectives and describe how each project component would achieve specific project objectives.
H-3	<p>The commenter states that Plan Concept 1 significantly threatens the viability of his company's project and identifies reasons the company believes Plan Concept 2 is the preferred project alternative.</p> <p>The impacts associated with implementation of the proposed project were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned Placer Commerce Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not yet been constructed, it was not specifically considered when describing the impacts of the proposed project on the existing environment.</p>

2.2.9 Letter I

Cheryl Berkema
Granite Bay, CA

January 12, 2022

Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, CA 95747

Re: Public comment on the DEIR for the Waste Action Plan

Dear Ms. Ulmer:

The DEIR has not adequately answered the need for expansion of the landfill nor has it answered the risks and costs associated with the expansion of the landfill at this time. Additionally, the EIR does not adequately address sustainability measurement, monitoring, and enforcement.

I-1

Plan Concept 1 vs. consideration of the Alternatives

The Sunset Area Plan, the largest regional plan in Placer County was so egregious for impacting air quality that out of state credits had to be purchased for mitigation. Cumulative impacts of subsequent projects have been ignored merely riding upon the coat tails of the environmentally destructive programmatic EIR (55 significant impacts). Not changing course to drastically improve air quality would indicate a course of no action would be preferable.

I-2

The Plan Concept 1 is supported yet is not the least environmentally impactful alternative. CEQA demands the least impactful alternative be chosen.

The EIR fails to identify why Alternative D would provide a shorter landfill life. Please provide evidence from other landfills in the industry that a one bin system has provided a longer landfill life than a 3 bin system provides.

I-3

The DEIR fails to identify why a pilot approach on the current landfill is not being attempted. The project is not time bound (the higher urgency would appear to be to find the solution that produces the least emissions and most recovery. What is the cost to run a pilot simultaneously with the one bin system?

I-4

Please respond to why Carvana, which Placer County the lead Agency approved, will impact the landfill disposing car parts and toxic chemicals for 70,000 vehicles a year was not identified in the DEIR as being a major contributor to the shortening life the landfill? It would appear that rather than making attempts to reduce landfill impacts, WPM is operating with businesses to actually increase landfill consumption.

I-5

Regarding current landfill management, please provide an answer to why the DEIR does not address GHG emissions for Carvana VMT for vehicles traveling to and from

Carvana to the landfill. Please see attached document submitted to Caltrans and to WPMWA Board on VMT generated by Carvana. }

I-5

The DEIR does not address the selection of a landfill management vendor prior to the DEIR being approved. Please explain how vendor qualifications are known prior to an EIR certification? Management operations are a significant consideration in evaluating alternatives. Is an alternative being selected based upon a certain vendor's experience? }

I-6

Residents have been told that WPM has a way for cleaning and separating wastes from recyclables. Please explain why China (one of the largest known polluters) refused to continue to take WPM recyclables because they were considered unclear? Also please explain the economics of using a 3 bin system and using China (or an outsourced vendor) as a possible way to reduce landfill consumption reducing the need for expansion. }

I-7

Economic analysis for the different options is lacking. Please provide the economic analysis (Varshnay study) for the Sunset area Plan and identify what specific economic factors and analysis support Plan Concept 1 over Option D and the other alternatives in the DEIR. }

I-8

The Sunset Area Plan/ Placer Ranch EIR reduced the "smell zone" which already had significant resident complaints. Expanding the landfill operations puts the landfill at risk of lawsuits from residents. WPMWA hired an attorney to defend the resource, obviously knowing the risks that the Sunset Area /Placer Ranch proposed. Despite the fact that WPMWA engaged in a last minute deal with Placer County, the risks still exist. }

I-9

Please ensure that PCWA has been included in review as their sustainability plan has been approved. <https://www.rosevilletoday.com/news/auburn/placer-county-groundwater-sustainability-update/> }

I-10

Please respond how sustainability goals required by the state will be measured, monitored and enforced for each alternative. }

I-11

Summary

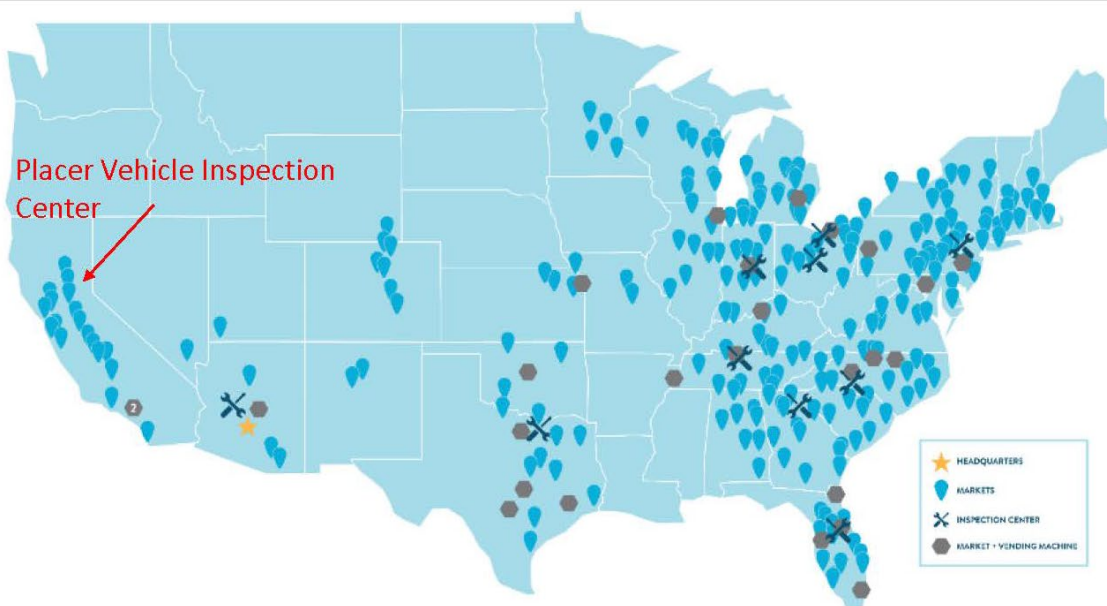
I encourage WPMWA to consider Alternate D as the superior alternative and also encourage a pilot be considered to provide a real proof of concept prior to moving forward. We have one landfill and we need to get this right for the air we breathe. }

I-12

Thank you again for your consideration.

Sincerely,
Cheryl Berkema
Cheryl.berkema@gmail.com

Carvana Markets, Vehicle Inspection Centers, & Vending Machines




*Represents facilities and markets as of October 29, 2020



For a complete list of our market opening history, estimated populations, and estimated total industry used vehicle sales by market, along with details on our IRCs, please see: investors.carvana.com/resources/investor-materials.

Carvana Markets & Vehicle Inspection Center Capacities

investors.carvana.com/resources/investor-materials



INVESTOR MATERIALS

Description	Download
Carvana Market Launches, Population Estimates, and IRC Capacity	
Carvana 101 - Q1 2019 Finance Platform Update	

Placer Vehicle Inspection Center is documented by the County to have 4 production lanes with 2 shifts
And ~10,500 parking spaces

Inspection & Reconditioning Centers				
No.	IRC Location ⁽¹⁾	IRC Launch Quarter	Maximum Production Lines	Estimated Annual Capacity ⁽²⁾ (In thousands)
1	Atlanta, GA	Q4 2012	3	50.0
2	Dallas, TX	Q4 2014	3	50.0
3	Philadelphia, PA	Q4 2015	3	50.0
4	Phoenix, AZ	Q3 2017	4	66.7
5	Indianapolis, IN	Q4 2018	4	66.7
6	Cleveland, OH	Q1 2019	2	33.3
7	Nashville, TN	Q2 2019	2	33.3
8	Charlotte, NC	Q1 2020	4	66.7
9	Columbus, OH	Q3 2020	4	66.7
10	Orlando, FL	Q4 2020	4	66.7
11	Memphis, TN	Q4 2020	4	66.7

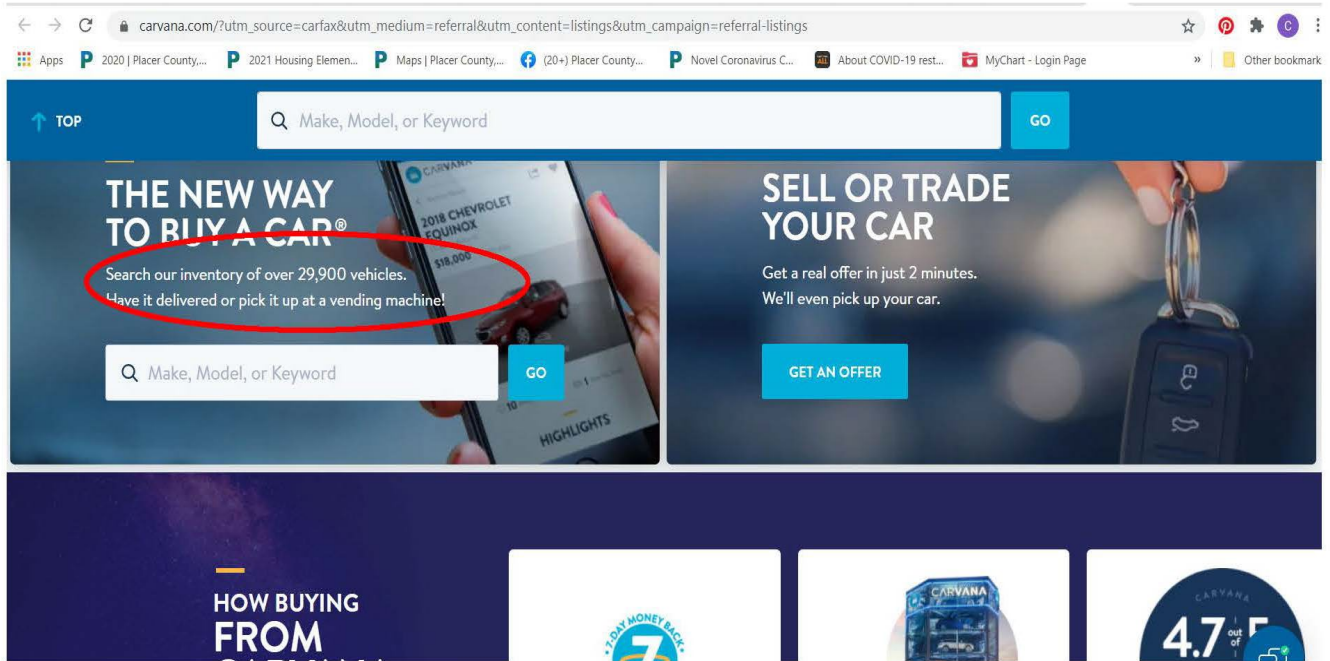
Placer Vehicle Inspection Center
comparison to other Vehicle Inspection Centers
with capacity of **66,700 vehicles**,

Note: Placer Vehicle Inspection Center also has
more parking than other centers to store vehicles

(1) Labeled by nearest major MSA

(2) Estimated annual capacity calculation assumes each production line runs 2 daily shifts with a capacity of ~8,333 per line per shift at full utilization.

Referral listings provide constant supply of vehicles to cycle into the Placer Vehicle Inspection Center



Vehicles purchased in Sacramento being transported from inspection center (VMT)

The screenshot shows the Carvana website interface. The browser's address bar displays the URL [carvana.com/cars/in-sacramento-ca?utm_source=google&utm_medium=sem_b&utm_term=1&utm_campaign=11367777725&utm_content=108210837501&utm_term=1](https://www.carvana.com/cars/in-sacramento-ca?utm_source=google&utm_medium=sem_b&utm_term=1&utm_campaign=11367777725&utm_content=108210837501&utm_term=1), which is circled in red. The search bar contains the text "Search makes, models or keywords". The results count "RESULTS: 19,689" is circled in red. The main content area displays a grid of vehicle listings. The first row includes a 2019 Ford Fusion SEL for \$16,590 (37,851 miles) and a 2015 Mazda CX-5 for \$13,990 (102,390 miles). A callout box on the right, also circled in red, features a truck icon and states "Fastest delivery time to Sacramento, CA" and "73 HOURS". A red arrow points from the text "VMT" to this callout box. The bottom of the page shows the URL <https://www.carvana.com/vehicle/1638152>.

Vehicle	Price	Miles	Shipping
2019 FORD FUSION SEL	\$16,590	37,851	Free Shipping
2015 MAZDA CX-5	\$13,990	102,390	Free Shipping

Vehicles listed in San Diego (virtually) transported from a Carvana Vehicle Inspection Center to San Diego translates to Vehicle Miles Traveled (VMT)

carvana.com/cars/in-san-diego-ca

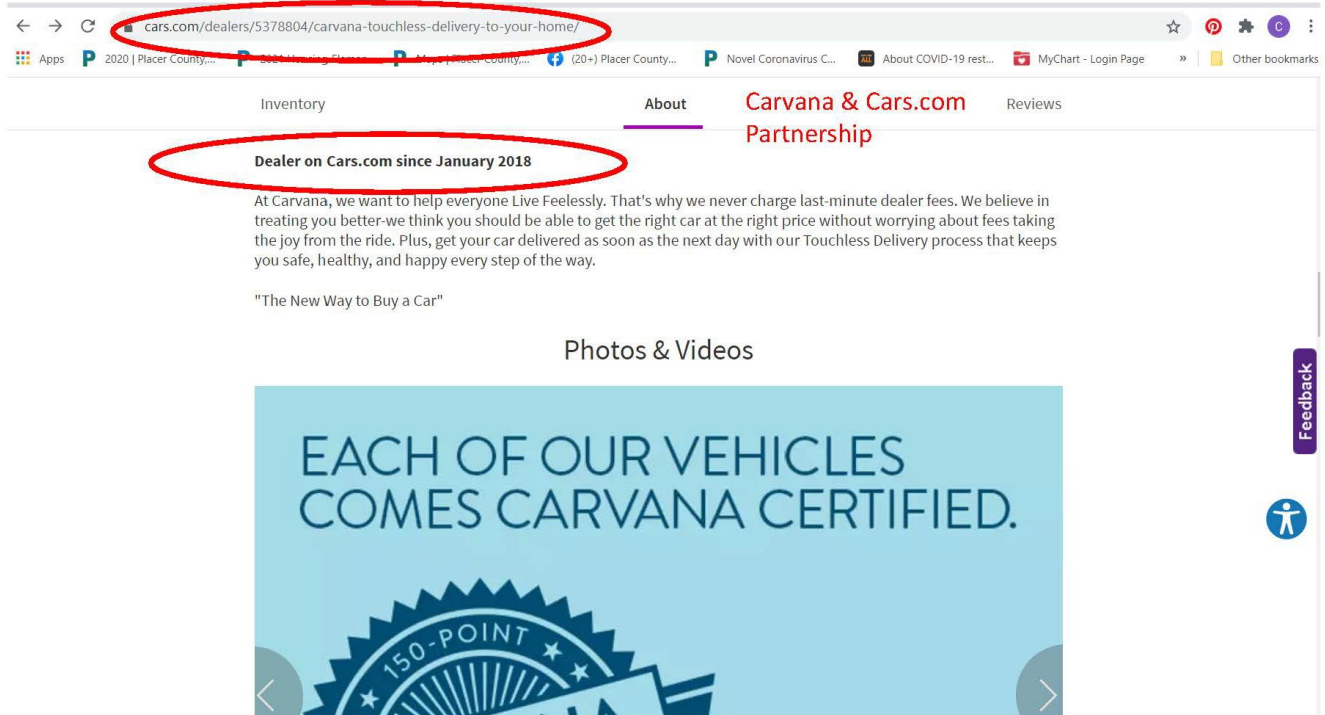
USED CARS FOR SALE IN SAN-DIEGO, CA

Search makes, models or keywords

PRICE MAKE & MODEL BODY TYPE YEAR & MILEAGE FEATURES MORE FILTERS

RESULTS: 20,120 LOCATION: SAN-DIEGO, CA SORT BY: RECOMMENDED

Car Model	Price	Est. Monthly Payment
2017 MAZDA MAZDA3 Touring 2.5	\$17,990	est. \$316/mo
2016 BMW i3	\$17,590	est. \$310/mo
2015 LEXUS RX RX 450h	\$23,990	est. \$421/mo



cars.com/dealers/5378804/carvana-touchless-delivery-to-your-home/

Apps

2020 | Placer County,...

2021 Housing Elemen...

Maps | Placer County,...

(20+) Placer County...

Novel Coronavirus C...

About COVID-19 rest...

MyChart - Login Page

cars.com

Cars for Sale

Sell Your Car

Service & Repair


Research

Videos & Reviews

Contact Us

Sign Up

Dealers / San Diego, CA / Carvana-Touchless Delivery To Your Home



CARVANA

★★★★☆

4.2

4562 reviews

ONLINE ONLY - No Retail Location

🕒

Sales 5:00 AM - 6:00 PM

Open Now

All Hours

🌐

Dealer website

📞

Used (619) 502-9059

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Inventory

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Reviews

Inventory


Cars.com partnership shows vehicles in San Diego that Carvana delivers (VMT)

FES0708210729BAO


2-37

cars.com/dealers/5378804/carvana-touchless-delivery-to-your-home/


Inventory About Reviews



USED
\$9,500
2015 smart ForTwo Pure
Exterior Color: White • Interior Color: Black • Transmission: 5-Speed Automatic with Auto-Shift • Drivetrain: RWD
Free CARFAX Report



USED
\$14,990
2014 Volkswagen Jetta SportWagen TDI
Exterior Color: Black • Interior Color: Black • Transmission: 6-Speed Automatic with Auto-Shift • Drivetrain: FWD
Free CARFAX Report



USED
\$17,590
2014 Toyota RAV4 Limited
Exterior Color: Silver • Interior Color: Ash • Transmission: 6-Speed Automatic • Drivetrain: FWD
Free CARFAX Report

The screenshot shows the Carvana website interface. The browser's address bar contains the URL `carvana.com/cars/in-sacramento-ca?gclid=CJ0KCQIA3NX...`, which is circled in red. Below the address bar is a search bar with the placeholder text "Search makes, models or keywords" and a button labeled "RESULTS: 17,597", also circled in red. The main content area features a large image of a city skyline and a section titled "CAR OWNERSHIP FAST FACTS". This section lists various top-selling vehicles and delivery times. A red circle highlights the "Fastest Delivery Time to Sacramento" entry, which states "73 hours". A red arrow points from the text "VMT from Carvana Vehicle Inspection Center" to this entry.

carvana.com/cars/in-sacramento-ca?gclid=CJ0KCQIA3NX...

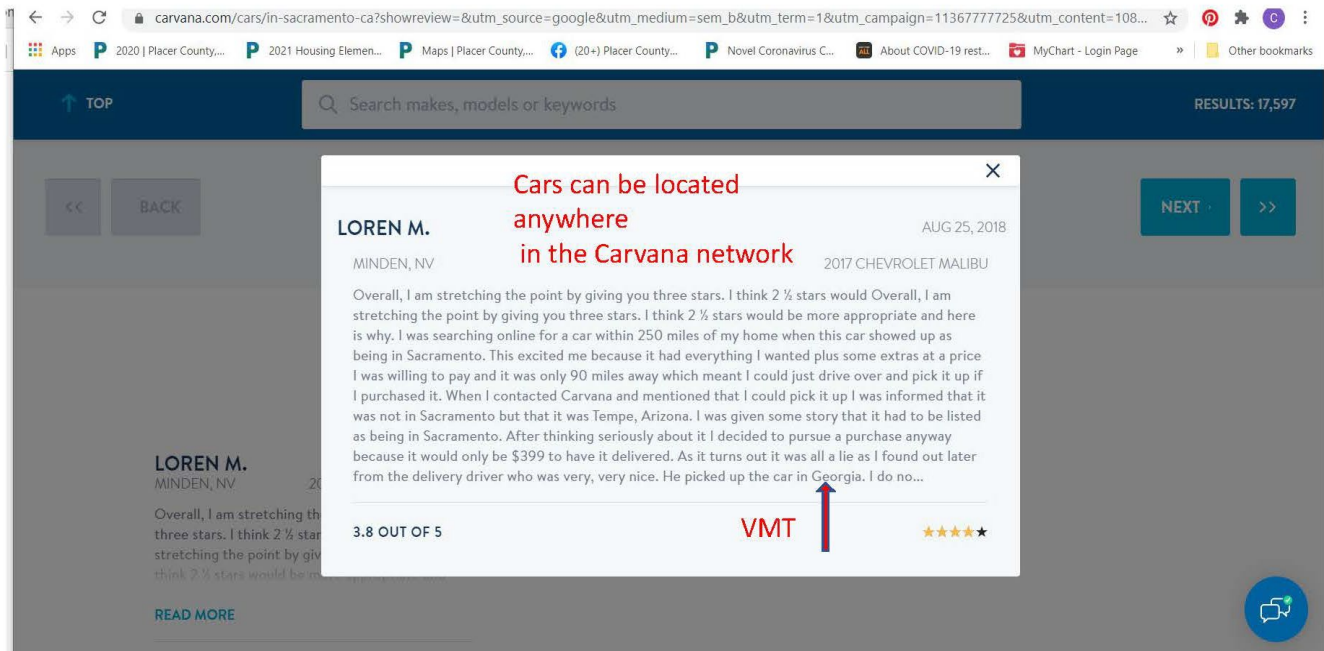
Search makes, models or keywords

RESULTS: 17,597

CAR OWNERSHIP FAST FACTS

- Top Selling SUV
2016 Toyota RAV4
- Top Selling Sedan
2017 Hyundai Elantra
- Top Selling Van
2016 Toyota Sienna
- Top Selling Truck
2017 Ram Ram Pickup 1500
- Top Selling Luxury Vehicle
2016 BMW 3 Series
- Fastest Delivery Time to Sacramento
73 hours

VMT from Carvana Vehicle Inspection Center



Vehicles delivered to Vending Machines in different Carvana Markets (VMT)

carvana.com/vending-machine

FIND A VENDING MACHINE NEAR YOU

ZIP CODE: 95746 GO

1. Carvana Ontario	380 mi
520 Turner Ave Ontario, CA 91761	
2. Carvana Westminster	387 mi
13950 Springdale St Westminster, CA 92683	
3. Carvana Tempe	633 mi
707 E Gilbert Dr Tempe, AZ 85281	
4. Carvana Oklahoma City	1315 mi

Letter I Comment Responses

Cheryl Berkema January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
I-1	The commenter states that the EIR does not adequately justify the need for landfill expansion. The commenter is referred to the project objectives included in Chapter 1, Section 1.4, for a discussion of the need for the proposed project. The commenter also states that the EIR does not address risks and costs of landfill expansion. The commenter is referred to the discussion of these issues in Chapter 4, Sections 4.1 and 4.2. The commenter also states that the EIR does not adequately address sustainability measurement, monitoring, and enforcement. The commenter does not identify specific locations within the Draft EIR that the commenter considers deficient. Therefore, no further response is required.
I-2	<p>The commenter describes air quality impacts and mitigation measures related to the Sunset Area Plan. The Sunset Area Plan was evaluated in an Environmental Impact Report that was certified by the Placer County Board of Supervisors. The Renewable Placer: Waste Action Plan is a separate project being proposed by the WPWMA. Because the WPWMA has no regulatory authority related to the Sunset Area Plan, no response is provided to the Sunset Area Plan comments contained in this letter.</p> <p>The commenter states that cumulative impacts of subsequent projects have been ignored. The commenter does not identify what subsequent projects have been ignored; therefore, it is not possible to determine how these projects have been considered. The proposed project evaluated in this EIR was foreseen by the Sunset Area Plan and Sunset Area Plan EIR (Placer County 2019) and is included in the cumulative project list in that EIR. Consequently, the cumulative impacts of the proposed project were addressed in the Sunset Area Plan EIR. In addition, the commenter is referred to the detailed air quality impact analysis included in Chapter 6, Air Quality, of the Renewable Placer: Waste Action Plan Draft EIR.</p> <p>The commenter states that Plan Concept 1 is not the least environmentally impactful alternative and states that CEQA demands the least impactful alternative be chosen. As described in Section 15002 of the CEQA Guidelines, the basic purposes of CEQA include informing governmental decision makers and the public about the potential significant environmental effects of proposed activities; identifying the ways that environmental damage can be avoided or significantly reduced; preventing significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the government agency finds the changes to be feasible; and disclosing to the public the reasons a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. As indicated by these basic purposes, CEQA does not demand that the least impactful alternative be chosen by the WPWMA Board of Directors.</p>
I-3	The commenter states that the EIR fails to identify that Alternative D provides a shorter landfill life. Alternative D is described in Chapter 18, Project Alternatives, and the description states that the landfill capacity would be exhausted by 2048 because waste disposal would be limited to use of the Center Property. Alternative D describes how the WRSL will be reduced in size from the proposed project (Module 9 will be used for waste recovery options and there will be no excavation and relocation of the pre-subtitle D landfill), which will in turn restrict long-term waste disposal capacity. Additionally, there will be no construction and demolition (C&D) processing or recovery onsite and only limited organics (only source separated); therefore, any organics, recyclables, or C&D that is mixed in the black bin will be disposed of (further reducing the landfill capacity).
I-4	The commenter states that the EIR does not identify a pilot approach. The comment is acknowledged, and since it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
I-5	The commenter asks why the Carvana project and GHG emissions associated with the generation of vehicle miles traveled by the Carvana project is not identified in the Draft EIR. The impacts associated with implementation of the proposed project are compared to the baseline existing conditions throughout the Draft EIR, which are those that existed when the Notice of Preparation was released on March 15, 2019.

Cheryl Berkema January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	Because the Carvana project did not exist when the Notice of Preparation was released it was not considered when describing the impacts of the proposed project on the existing environment. In addition, the cumulative impacts associated with implementing the Sunset Area Plan, of which the Carvana project is a part, are described in detail in Chapter 19, Cumulative Impacts, of the Draft EIR.
I-6	The commenter asks for explanation of WPWMA's vendor certifications prior to EIR certification and if an alternative is evaluated based on vendor experience. The selection of operating contractors is outside the scope of this EIR. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
I-7	The commenter requests an explanation regarding why WPWMA recyclables are refused by China. Because practices in China are outside the scope of this EIR and the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
I-8	The comment states that economic analysis for the different options is lacking. An economic analysis of alternatives is outside the scope of this EIR. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
I-9	The commenter states that landfill expansion puts the landfill at risk of lawsuits from residents and that the "smell zone" was reduced in the SAP/PRSP EIR (Placer County 2019). As described in Chapter 6, Air Quality of this Draft EIR, odorous compounds are evaluated in the EIR, and the Draft EIR concludes that impacts associated with odors are significant. Mitigation Measure 6-6 requires WPWMA to implement odor reduction measures. However, the impact would remain significant and unavoidable even after mitigation.
I-10	The commenter requests that Placer County Water Agency (PCWA) be included in the Draft EIR review. The project site currently receives potable water from PCWA and would continue to do so with project implementation. No specific approvals would be required to continue to receive PCWA water at the project site. Therefore, PCWA is not required to review the Draft EIR. In addition, the water demand associated with buildout of the project site was evaluated in the Water Supply Assessment prepared for the Sunset Area Plan. According to the Water Supply Assessment, PCWA has sufficient water rights, contracts, and entitlements to supply the service area during normal, single dry, and multiple dry water years at full Sunset Area Plan buildout. For more detailed information regarding the project's water demands, the commenter is referred to the water supply discussion included in Chapter 17, Utilities and Services Systems and Energy, of the Draft EIR.
I-11	The commenter asks how sustainability goals required by the state will be measured, monitored, and enforced. Because specific sustainability goals were not identified by the commenter, it is not possible to determine to which goals the commenter is referring.
I-12	The commenter encourages the WPWMA to consider Alternative D as the superior alternative and encourages a pilot be considered. These comments are acknowledged; as they do not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.

2.2.10 Letter J

Ann Martin Bowler
7170 Morningside Dr.
Granite Bay, CA

SENT VIA E-MAIL
January 12, 2022

Western Placer Waste Management Authority
Attn: Stephanie Ulmer
3013 Fiddymont Road
Roseville, CA 95747

Re: Comments on the DEIR for the Waste Action Plan

Dear Ms. Ulmer:

Thank you for the opportunity to respond to the Draft Environmental Impact Report for the Waste Action Plan.

Single or three bin system?

WPWMA's plan seems to have been written to support the status quo as far as waste disposal operations and not aggressively pursue diversion beyond the limits of what the state minimally requires. For example, Alternative D (Three-Bin Clean MRF) is portrayed as a weak alternative, even though it is the most environmentally friendly system under consideration.

When I consider the current WPWMA recovery rate of 13.9%* and the proposed recovery rate for 2050 of 14%,** I question the effectiveness of Single Stream Processing system. I question if this system will successfully divert paper, cardboard, plastics, glass and other recyclable materials from the waste stream. Single stream processing, while possibly more convenient for the average household, impairs recovery of recyclable materials because they become contaminated with food and other waste in the process. As the numbers in the Notes below show a single bin system is not effective enough for today's world; a three-bin approach must be implemented to improve recycling and recovery efforts.

My family recycles cardboard, paper, plastics and all metals directly to recycling centers or by placing recyclables in blue bags and composts in our backyard. Because of these efforts, my family recycles or composts more than 75% of the waste we generate. Many customers are eager to recycle as much as possible. Utilizing a three bin system along with robust educational program would greatly improve Placer County's recovery rate.

It seems to me that WPWMA would be eager to rapidly improve the current 39% recovery rate stated in the EIR, and the 50% goal shown as being achieved by 2050, 28 years in the future.

J-1

Wouldn't it be better to work with customers to reduce the volume of waste they create rather than go for a huge expansion? This link <https://www.ecocycle.org/> offers many examples of ways to easily recycle or repurpose just about any item that is currently filling the landfill.

In light of these facts, I request a further review of Alternative D using a configuration similar to what was done for Plan Concept 1. Additionally, I request that a better explanation of exactly how Alternative D would be inconsistent with the Sunset Area Plan as that was not clearly detailed in the EIR.

J-1

Landfill expansion

The EIR narrative describes the need for a much larger landfill. While most municipalities are working towards a zero waste stream model, WPWMA's plan seems to be doing much the opposite. As Table 3-1. lays out, WPWMA plans to double the capacity of the landfill and triple the area the landfill will consume over the next 25 years. In doing so, many pristine vernal pools near to the current landfill, (some of the last in south Placer County,) will be destroyed. Additionally, when the landfill expands, it would move even closer to the many homes that are planned to be built nearby. These homes would be built in the landfill's unhealthy "smell zone."

J-2

Wouldn't it be wise to adopt a system that would recycle as much garbage as possible? This would reduce the volume of waste deposited into the landfill which would extend the life of the current landfill.

Implementation of SB1383

I didn't find it outlined clearly in the 1500 page EIR, but I have spoken with staff about your plans for the implementation of SB1383. I am specifically concerned about the increased methane that will continue to be produced if households are allowed to put their food scraps into the "one big bin" rather than into the "greens" bin. I am also concerned that kitchen scraps will continue to contaminate paper and other recyclables as they travel together to the landfill.

J-3

In light of these facts, I urge you to tell all customers to utilize the "greens" bins for all kitchen scraps.

Thank you for your consideration of this matter,
Ann Martin Bowler

Effectiveness of Single Stream Processing

*Figure 1-4 shows the current tonnage processed in the various categories, including the Materials Recovery Facility. That figure shows 31,124 tons of recovered material for market or reuse from the 240,068 tons going in which suggests a recovery rate of 13.9%.

**Figure 3-2 shows the 2050 estimated tonnage in the various categories. That figure shows 58,600 tons of recovered material for market or reuse from the 416,600 tons going in which suggests a recovery rate of 14.0%.

Letter J Comment Responses

Ann Martin Bowler, Placer County Resident January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
J-1	<p>The commenter asks whether it would be better to work with customers to reduce the volume of waste they create rather than propose a facility expansion. Based on the project objectives identified on page 1-6 of the Draft EIR, the WPWMA intends to expand the site's capacity to divert materials from landfill disposal and to reduce greenhouse gas emissions through expanded organics management, improved recovery of C&D materials, recycling, and public buyback activities. Although the WPWMA has the ability to expand its recycling initiatives at the project site, it does not control how waste is initially disposed of by individuals and businesses.</p> <p>The commenter questions the effectiveness of a single-stream system in recovering recyclable materials and states that a three-bin system must be implemented to improve recycling and recovery efforts. The WPWMA, in consultation with the Member Agencies, implemented a mixed waste processing system intended to meet the regulatory needs of the jurisdictions and their residential and commercial customers. The MRF is capable of processing mixed waste and single-stream waste; should a Member Agency choose to implement a three-bin collection system, the MRF could accommodate that waste stream.</p> <p>The commenter requests additional review of Alternative D, Three-Bin Clean MRF Alternative, using a configuration similar to that identified for Plan Concept 1. For the Clean MRF Alternative, the current mixed-waste system for waste collection would convert to a three-bin system that would require all Participating Agencies and their designated waste haulers to comply accordingly. This conversion assumption was included in Alternative D solely for analysis purposes. With this change, the existing "dirty" MRF (one that sorts incoming mixed municipal waste) would be converted to a "clean" MRF, one that only sorts source-separated mixed recyclables (no mixed waste, green waste, or food waste). Because there would be no mixed-waste processing, the waste bin (referred to as a black bin) of the three-bin system would be delivered straight to the WRSL for disposal. Consequently, when black bin waste material is received onsite, there would be no opportunity for removing organics, recyclable materials, or other materials of concern such as improperly disposed of household hazardous waste from that part of the waste stream. With the exception of this difference, the implementation of the three-bin system consistent with the proposed site changes identified for Plan Concept 1 would be expected to result in impacts similar to those identified for Plan Concept 1 in Chapters 5 through 17 of the Draft EIR.</p> <p>The commenter also requests that a better explanation be provided of how Alternative D would be inconsistent with the Sunset Area Plan. The Sunset Area Plan envisioned development on the Western and Eastern Properties consistent with the Eco-Industrial land use and zoning designations. The intent of the Eco-Industrial land use designation is to provide areas for industrial uses that emphasize ecology, waste reuse and sustainable salvaging, and remanufacturing. Because Alternative D assumed, similar to the No Project Alternative, that no development would occur on the Western or Eastern Properties, the analysis of land use impacts is included in Section 18.4.4, Alternative D: Three-Bin Clean MRF Alternative, under the sub-heading, "Land Use and Planning," on page 18-24 of the Draft EIR concluded that this alternative would not be consistent with the development envisioned in the Sunset Area Plan.</p>
J-2	<p>The commenter states that while most municipalities work toward zero waste, the WPWMA's plan seems to do the opposite. This comment is acknowledged. Because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p> <p>The commenter also states it would be wise to adopt a system that would recycle as much garbage as possible. The EIR does not preclude jurisdictions and the WPWMA from implementing practices to further divert waste from disposal, and approval of the EIR would allow WPWMA to develop the infrastructure to expand critical waste recycling and diversion operations and</p>

Ann Martin Bowler, Placer County Resident January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	implement compatible manufacturing aimed to increase waste recycling and diversion opportunities and markets.
J-3	The comment addresses implementation of SB 1383. Please refer to the response to Comment B-1.

2.2.11 Letter K

California Environmental Protection Agency



**Department of
Resources Recycling and Recovery**

Gavin Newsom
California Governor

Jared Blumenfeld
Secretary for Environmental Protection
Rachel Machi Wagoner
CalRecycle Director

January 12, 2022

Ms. Stephanie Ulmer
Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, CA 95747

Subject: SCH No. 2019039087 – Draft Environmental Impact Report for Renewable Placer Waste Action Plan – Placer County

Dear Ms. Ulmer:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The Western Placer Waste Management Authority (WPWMA), acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (EIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Renewable Placer Waste Action Plan is located at 3013 Fiddymont Road Roseville, CA 95747 and 3195 Athens Road, Lincoln, CA 95648. The site is located on property owned by the WPWMA, generally at the intersection of Athens Avenue and Fiddymont Road, in parts of Sections 5, 6, and 31 of Township 11 North, Range 6 East, Roseville, California, 7.5-minute quadrangle, Mount Diablo Baseline and Meridian. The project site is approximately 928 acres, and the site is zoned as a Special-Purpose Overlay that reflects the presence of the Western Regional Sanitary Landfill. The site's immediate surroundings include rural agricultural lands and a materials recovery facility and compost facility, which are both owned by WPWMA. The nearest residence is approximately 2,000 feet away on land owned by WPWMA.

The EIR analyzed for two scenarios. Both proposed projects would:

1001 I Street, Sacramento, CA 95814 | P.O. Box 4025, Sacramento, CA 95812
www.CalRecycle.ca.gov | (916) 322-4027

Draft EIR for Renewable Placer Waste Action Plan
January 12, 2022
Page 2 of 3

- Combine the tonnage of the material recover facility (MRF) and landfill and increase the maximum tonnage to a rolling 7-day average of 4,000 tons per day (TPD).
- Eliminate the permitted vehicle limit.
- Add food material as a feedstock for composting.
- Transition from windrow composting to using aerated static pile (ASP) technology and utilize a biofilter on compost files.
- Analyze the construction of a food waste receiving building.
- Expand, redesign, and relocate the public waste drop-off area to the western property. New Facilities would include a public tipping area, material buy-back center, household hazardous waste drop-off area, reuse store, and an entrance kiosk with vehicle queuing.
- Increase the peak elevation for the landfill 30 feet above the currently permitted conditions.
- Expand the waste footprint. Plan Concept 1 would expand the waste footprint by 89 acres. Plan Concept 2 would expand the waste footprint 131 acres.
- Increase the landfill disposal capacity. Landfill disposal capacity would increase approximately 45.1 million cubic yards for Plan Concept 1 or 50.2 million cubic yards for Plan Concept 2.
- Increase the site life of the landfill. The estimated site life would increase by approximately 43 years for Plan Concept 1 or 52 years for Plan Concept 2.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft EIR, in addition to the specific location noted.

Comment for the Draft EIR is summarized below:

- | | |
|---|-------|
| <ul style="list-style-type: none"> • The proposed project would increase the daily tonnage from 1,750 TPD for the MRF and 1,900 TPD for the landfill to a combined 4,000 TPD. This will be an overall increase of 350 TPD. The operator is proposing to have the 4,000 TPD entitlement on a rolling weekly average. What day would the rolling 7-day average start and stop? | } K-1 |
| <ul style="list-style-type: none"> • The proposed entitlement would eliminate the current vehicle limits of 1,014 vehicles per day (VPD) for the MRF and 624 VPD for the landfill. | |
| <ul style="list-style-type: none"> • The proposed entitlement would add food material as a feedstock for composting activities. | } K-2 |
| <ul style="list-style-type: none"> • The proposed project would increase the peak elevation for the landfill from 295 ft. above mean seal level (AMSL) to 325 ft. AMSL. | |
| <ul style="list-style-type: none"> • The proposed entitlement would expand the waste footprint from 231 acres to 320 acres for Plan Concept 1 and 362 acres for Plan Concept 2. | |

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Draft EIR for Renewable Placer Waste Action Plan

January 12, 2022

Page 3 of 3

- The proposed project would increase the landfill disposal capacity from 36.3 million cubic yards to approximately 81.4 million cubic yards for Plan Concept 1 or 86.5 million cubic yards for Plan Concept 2.
- The proposed entitlement will change the estimated closure year from 2058 to approximately 2101 for Plan Concept 1 or 2110 for Plan Concept 2.

K-2

Solid Waste Regulatory Oversight

The Placer County Department of Health & Human Services, Environmental Health Services is the Local Enforcement Agency (LEA) for Placer County and is responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at 530.745.2345 to discuss the regulatory requirements for the proposed project.

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the EIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.324.3753 or by e-mail at Patrick.Snider@calrecycle.ca.gov.

Sincerely,

Patrick
Snider

Digitally signed by Patrick
Snider
Date: 2022.01.12
16:31:39 -08'00'

Patrick Snider
Senior Environmental Scientist (Supervisor)
Permits & Assistance North Section, Central Unit
Permitting & Assistance Branch
Waste Permitting, Compliance, and Mitigation Division
Department of Resources Recycling and Recovery - CalRecycle

cc: Nevin Yeates, Permits & Assistance North Section Manager
Paul Holloway, Placer County Local Enforcement Agency

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Letter K Comment Responses

CalRecycle Patrick Snider, Senior Environmental Scientist (Supervisor) January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
K-1	The commenter asks what day the 7-day rolling average would start and stop, in reference to the daily tonnage increase from 1,750 tons per day (tpd) for the MRF and 1,900 tpd for the landfill to a combined total of 4,000 tpd. Because the project proposes a rolling average, the day used to calculate the average would always be the current day and the prior 6 days.
K-2	The commenter provides a series of statements about various project components. These comments do not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR; therefore, no further response is required.

2.2.12 Letter L

Glen Kramer
880 El Oro Drive
Auburn, CA 95603-3578

SENT VIA E-MAIL

January 12, 2022

Western Placer Waste Management Authority
Attn: Stephanie Ulmer
3013 Fiddymont Road
Roseville, CA 95747

Re: Comments on the DEIR for the Waste Action Plan

Dear Ms. Ulmer:

Thank you for the opportunity to respond to the Draft Environmental Impact Report for the Waste Action Plan. The extension to January 12, 2022 for a response was helpful in fully evaluating the plan and is appreciated.

Plan Concept 1 vs. Alternatives

The Plan appears to have been written to support the status quo as far as waste disposal operations, and not aggressively pursue diversion beyond the limits of what is minimally required. For example, Alternative D (Three-Bin Clean MRF) is portrayed as an undesirable alternative, even though it is the most environmentally beneficial. The narrative describes a shorter life of the landfill due to the fact that it can only be implemented on the center parcel. While no serious exploration of this alternative was presented in detail, it is unclear to me why the site plan could not have been reconfigured to support both the Three-Bin Clean MRF and the consolidation of the landfill on the center and eastern parcels to accommodate increased capacity.

The plan documents argue that by adopting Plan Concept 1 with a potential landfill life extension to 2101 is the best alternative, while common sense indicates that by reducing the volume of waste deposited into the landfill through aggressive diversion equally effective in extending the life of the landfill.

I would ask that a further review of Alternative D using a configuration similar to Plan Concept 1 be done, or that a better explanation of the reason that cannot be done be articulated. Further, a better explanation is needed of exactly how Alternative D would be inconsistent with the Sunset Area Plan, not facilitate the siting and development of compatible technologies, and impair WPMMA facility from being a hub of innovation that promotes the development of a circular economy in Placer County. In fact, developing a circular economy is impaired by the continued lack of diversion and burying of recyclables in the landfill.

Effectiveness of Single Stream Processing

Figure 1-4 shows the tonnage processed in the various categories, including the Materials Recovery Facility. That figure shows 31,124 tons of recovered material for market or reuse from the 240,068 tons going in. That suggests a recovery rate of 12.9%.

L-1

L-2

Figure 3-2 shows the 2050 estimated tonnage in the various categories. That figure shows 58,600 tons of recovered material for market or reuse from the 416,600 tons going in. That suggests a recovery rate of 14.0%.

Given the current numbers, I would question the effectiveness of single stream processing to successfully divert plastics, glass and other recyclable materials from the waste stream. The projection expands the processing capacity but does not materially improve the effectiveness of the operation. In my opinion, there needs to be serious consideration to improving the recovery rate.

I separate out recyclables at home and participate in the blue bag program through Recology. By volume, the recyclable material is easily 75% of my total household waste generation. Therefore, it would seem to me there is room for significant improvement here.

Single stream processing, while more convenient for the average household, impairs recovery of recyclable materials because they become contaminated with food and other waste in the process. A three-bin approach must be implemented to improve recycling and recovery efforts. Many customers, including myself, wash our recyclables and participate in the blue bin program. An aggressive approach and education would, in my mind, greatly improve this recovery rate.

It would seem to me that WPWMA would be eager to rapidly improve the current 39% recovery rate stated in the EIR, and the 50% goal shown as being achieved by 2050, 28 years in the future.

L-2

Complementary/Programmatic Elements

The choice to include areas for compatible technologies, a pilot study area, and a university research area are useful complementary uses and could greatly assist with the development of alternative technologies to deal with recyclable materials, particularly plastics. Such technological advances are rapidly moving from research to market as the need to find a use for discarded plastic increases.

From an improved environmental standpoint, I would encourage the use of solar wherever possible (perhaps on the MRF) to generate clean energy for operations, and to consider reserving space for fast charging stations that support an electric maintenance fleet.

L-3

Conclusion

I encourage WPWMA to reconsider Alternate D and at least incorporate a three-bin option for member agencies and customers to supplement the single stream operation currently provided.

L-4

Thank you again for the opportunity to comment on this matter.

Sincerely,

Glen Kramer

Glen Kramer

Letter L Comment Responses

Glen Kramer January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
L-1	The commenter requests further review of Alternative D using a configuration similar to Plan Concept 1, and states that a better explanation is needed of how Alternative D would be inconsistent with the Sunset Area Plan. Please refer to the response to Comment J-1.
L-2	The commenter expresses opinions about the effectiveness of single-stream processing. The comment is acknowledged; as it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
L-3	The commenter encourages the use of solar energy for operations and to consider reserving space for fast charging stations that support an electric maintenance fleet. The comment is acknowledged; as it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
L-4	The commenter encourages WPWMA to reconsider Alternative D. Please refer to the response to Comment J-1.

2.2.13 Letter M



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placerair.org

Erik C. White, Air Pollution Control Officer

January 12, 2022

Western Placer Waste Management Authority
 Attention: Stephanie Ulmer
 3013 Fiddymont Road
 Roseville, CA 95747

Email: EIRcomments@RenewablePlacer.com

Subject: Draft Environmental Impact Report for the Renewable Placer: Waste Action Plan

Dear Ms. Ulmer

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report for the Renewable Placer: Waste Action Plan (Project). The District has the following comments on the Project's DEIR for your consideration.

1. The DEIR Mitigation Measure 6-2(b) proposes to designate a person or persons to monitor fugitive dust emissions and enhance implementation of the Dust Control Plan to minimize dust complaints, reduce visible emissions to below 20% opacity and prevent transport of dust offsite. The District recommends a designated person or staff obtain the certificate of Visible Emissions Evaluation (VEE) from California Air Resources Board's (CARB) field training program. The CARB's VEE certificate will ensure that the trained person or staff have the abilities and skills to implement these tasks proposed by the mitigation measure.

M-1

In addition, the District recommends the following mitigation measures to MM 6-2(b):

- Develop a particulate matter (PM) monitoring by using low-cost PM sensors at the southern fence line when the nearby residential units are built out.
- Contact the PCAPCD engineer for permit requirement if there is any portable equipment used for the project.

2. The DEIR Mitigation Measure 6-3(a) proposes participation in the District's Off-site Mitigation Fee Program by paying the equivalent amount of money to mitigate the net project contribution of NOx emissions. In the measure it states that the initial cost-effectiveness rate was adopted by the PCAPCD's Board in 2017. Although the measure mentions that the actual amount to be paid shall be determined and based on the selected program and applicable cost-effectiveness rate agreed by the WPWMA and PCAPCD, the District recommends updating the cost-effectiveness rate to \$20,873 which is the latest rate beginning in July 2021. The latest CEQA cost-effectiveness date can be found at <https://www.placerair.org/1806/District-Off-Site-Mitigation-Fee-Program>.

M-2

Ms. Stephanie Ulmer
January 12, 2022
Page 2 of 3

3. The DEIR Mitigation Measure 6-3(b) proposes to mitigate excessive PM10 emissions by paying the equivalent fee and proposes the cost-effectiveness rate of \$6,050 per ton for the fee calculation. The DEIR cites the rate was used for the PM10 offset in the Sunset Area Plan DEIR. Please note that the Placer Ranch Specific Ranch EIR proposed to offset its PM10 emissions by participating in the Placer County's biomass program to remove biowaste (excessive vegetation) from the Placer's forested lands. If the DEIR would apply this cost-effectiveness rate to offset Project's PM10 emissions, the mitigation measure should explicitly indicate that the applicant will participate the County's biomass program to apply the cost-effectiveness rate to offset PM10 emissions. M-3
4. On page 6-60 of the DEIR Impact 6-5 Discussion, it states "The HRA results for the location of the grounds keeper residence are presented in Appendix D of the Health Risk Assessment Modeling Report (Appendix C.5 of this EIR) for information purpose...". The District believes this statement means "Appendix C- Air Quality" and not "Appendix D – Project Applicable Conditions."

In addition, Table 13 and Table 14 in the Appendix C.5 present the health risk assessment summary for Plan Concept 1 and Plan Concept 2. Both tables present the risk of Maximum Exposure Individual at a Residential Location (MEIR) is 56.9 and 57.1 per one million, respectively. However, the risk for MEIR in Table 6-14 and 6-15 in the DEIR (on pages 6-60 and 6-61) are not consistent with the results shown in Appendix C.5. Furthermore, both the DEIR Impact 6-5 analysis and Appendix C.5 do not discuss and interpret the risk report completely. The District recommends adding additional discussion to complete the risk assessment in the DEIR and Appendix C.5. M-4
5. The DEIR Impact 6-6 discusses the potential to create objectionable odors affecting a substantial number of people. Odors are an existing issue at the proposed project, the approval of the Sunset Area Plan/Placer Ranch Specific Plan (SAP/PRSP) by Placer County would create more odor complaints due to the residential buffer zone surrounding the proposed Project being reduced from 1 mile to 2,000 feet. Because of this, a Memorandum of Understanding (MOU) was developed between the Western Placer Waste Management Authority (WPWMA) and Placer County in December 2019 to identify the SAP/PRSP fair share contribution towards reducing odors and odor impacts due to reduction of the landfill buffer. The District recommends Impact 6-6 discuss this MOU how it would assist the project to mitigate the odor impacts to future nearby residents.

In addition, there may be no quantifiable thresholds of significance for odor that have been developed. The Project shall commit to the continuation of evaluating new technology that can assist in establishing suitable criteria for determining the level of odor impact and to take actions for mitigating odor impact to the maximum extent. M-5
6. The DEIR Mitigation Measure 6-4 proposes to implement the BMPs and project design measures listed in Table 6-1 and to identify six (6) additional measures to mitigate the Project related odor impacts. The Attachment has the District's comments and recommendations in detail on these proposed measures. The District would like to work with M-6

Ms. Stephanie Ulmer
January 12, 2022
Page 3 of 3

the applicant to verify the feasible mitigation measures to mitigate the Project related odor impacts.

M-6

7. The DEIR Mitigation Measure 10-1 proposed implementing the GHG BMPs and project design measures identified in Table 10-1 to mitigate the Project's related GHG emissions. In addition to the measures in Table 10-1, the District recommends the Project should consider additional measures which will be benefit reducing non-biogenic GHG emissions from mobile source (onsite vehicles, offsite vehicles and off-road equipment) since mobile sources are the largest GHG emission sources shown in Table 10-5. The measures under consideration could include upgrading the authority's light vehicle fleet to zero emission vehicles, installing solar panels on the existing and future buildings in the property, providing EV charging stations for employees and public, use alternative fuel such as biodiesel for off-road equipment or electrifying equipment.

M-7

In addition, the measure also proposed participating in PCAPCD's Offsite Mitigation Fee Program by paying the equivalent amount of money to mitigate the Project's GHG emissions. Please note that the District's Offsite Mitigation Fee Program is only designed for criteria pollutants and not for GHG. If the applicant considers this option of paying in lieu of fee, the District recommends that the Project to participate in the Placer County's GHG offsite Fee Program that will be developed for the Sunset Area Plan (SAP)/Placer Ranch Specific Plan (PRSP) project. The detail mitigation measure language can be found in the SAP/PRSP DEIR Mitigation Measure 4.7-2b.

Thank you again for the opportunity to review and comment on the Project's DEIR. If you have any questions, please feel free to contact me at 530-745-2325 or ychang@placer.ca.gov.

Sincerely,



Yushuo Chang
Planning and Monitoring Section Supervisor
Placer County Air Pollution Control District

Enclosure: PCAPCD Comments on Proposed Odor Mitigation Measures

Cc: (via email)
Adam Baughman, Deputy Air Pollution Control Officer
Bruce Springsteen, Compliance and Enforcement Section Manager
Ann Hobbs, Associate Planner

Attachment

Placer County Air Pollution Control District Comments on
the Proposed Odor Mitigation Measures Proposed for the Renewable Placer: Waste Action Plan

Impact 6-6 analyzes the potential odor impact resulting from the buildout of the proposed project. The DEIR Mitigation Measure 6-4 proposes to implement the BMPs and project design measures in Table 6-1 and identifies additional six (6) measures to mitigate the Project's related odor impacts.

1. The District has the following comments on the odor mitigation measures proposed in Table 6-1:

On Page 6-4 under the 2nd bullet "WRSL odor management practices are implemented to minimize the potential to offset odors:"

- Minimize the size of the working face to that necessary to maintain operator and customer safety.

Comment: The District recommends adding to the measure that the size of the working face will generally be limited to between ¼ to ½ acre and will not exceed 1 acre Also add that the new MSW should be continually used to cover in-place MSW as the day progresses as recommended in the WPWMA Landfill Active Face Odor Management Handbook (Schmidt 2017).

M-8

- Bury sludges and other highly odiferous loads immediately upon receipt.

Comment: The District recommends adding to the measure that biosolids are not spread out to dry prior to covering and when they are unloaded, they are immediately covered with fresh MSW or a foam product or similar odor control product (Odor-Shell or Rusmar AC-645 Foam) prior to compaction, as recommended in the WPWMA Landfill Active Face Odor Management Handbook.

M-9

- Use soil or "fines" recovered from the MRF or C&D processing as ADC as follows:
 - A 6-inch minimum layer of onsite, native soil.
 - A 6-inch layer of MRF fines covered by a 6-inch layer of onsite, native soil.
 - A 6-inch layer of MRF fines covered by a 6-inch layer of C&D fines.
 - Restrict use of ADC fines to areas that will receive additional fill within 24 hours.
 - Exposure of ADC fines more than 24 hours is prohibited.

M-10

Comment: The WPWMA Landfill Active Face Odor Management Handbook identifies that the lowest odor emission rate daily cover is C&D fines over MRF fines. Therefore, the District recommends that the measure should be stated that this will be the preferred and predominant ADC. In addition, the Local Enforcement Agency has indicated that tarping would be an effective cover. We recommend that tarping is added to this list.

- Daily cover soil may be removed at the start of the operational filling day to minimize overall soil disposal rates. MRF fines and dried sewage sludge used as ADC remain in place once applied.

M-11

Comment: The District recommends removing reference to dried sewage sludge. It is not on the list of ADC options.

On page 6-4 under the 3rd bullet, "Compost (organics management) odor management practice:"

<p><u>Comment:</u> The District recommends adding the following compost odor management measures:</p> <ul style="list-style-type: none">• Wash down and remove any accumulated liquids, solids and semi-solids that may have leached from the active ASP piles at least once per day.• Continuously operate the compost pond aeration system to the degree that: 1) the aerators are fully submerged and 2) the dissolved oxygen level in the pond is less than 1 milligram per liter.• Utilize a dedicated continuous dissolved oxygen meter to monitor oxygen levels in the compost ponds.• On a quarterly basis, sample the compost leachate for the following parameters: pH, dissolved oxygen, total dissolved solids, fixed dissolved solids, total nitrogen, and specific conductance.• Clean and remove sediments from the south composting pond forebay and the north compost pad drainage channel at least quarterly. Collected sediments shall be promptly mixed with ground green waste and reintroduced to the active composting system or immediately transported to the WRSL for disposal and managed in the same method as wastewater treatment plant sludges. In no event shall the collected sediments be stored overnight without first being mixed or covered with ground green waste.	}	M-12
<p>On page 6-5 under the 1st bullet “LFG odor management practices implemented at the WRSL to minimize the potential for LFG odors:”</p> <ul style="list-style-type: none">- Comply with the provisions of 40 Code of Federal Regulations (CFR) Part 60 Subpart WWW and Title 17, California Code of Regulations (CCR) Section 95460, et seq.		
<p><u>Comment:</u> The District recommends including Part 60 Subpart Cf and Part 63 Subpart AAAA. In addition, add as a measure, identify, and allocate the additional resources necessary to improve responsiveness to exceedances that are to be corrected within 120 days. The facility has a history of requesting extensions to achieve compliance and therefore odor issues persist. The ability to correct exceedances within 120 days is a regulatory requirement and, therefore; the ability to implement the necessary corrective actions to achieve compliance without an extension should be a standard operating procedure.</p>	}	M-13
<p>On page 6-6 under “Operational Emission Reduction BMPs Incorporated as Project Design Measures:”</p> <p><u>Comment:</u> The District recommends adding the following to the Project design measures:</p> <ul style="list-style-type: none">• Make the operational and monitoring improvements necessary to reduce the number of smoke and fire incidents in the compost piles (stockpiles, windrows and ASP).		
<p>2. The District has the following comments on the additional measures proposed by Mitigation Measure 6-4 on page 6-65:</p> <ul style="list-style-type: none">• <u>Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations).</u>	}	M-14
<p><u>Comment:</u> The District recommends modifying the measure as “Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations). To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response if target reductions are not being achieved.”</p> <p>The District also recommends that the measure shall provide more details, as the other measures under</p>		

MM 6-4, describing how the annual odor emissions testing will be performed and response actions that will be implemented. The description should include the justification and cost-effectiveness of this mitigation measure and the impact on odor reduction.

M-15

- Increase Screening of LFG and Implement Response Actions (Tier 1, Landfill Operations). Quarterly screening for fugitive LFG shall be conducted to identify “hot spots” of LFG emissions through interim and final landfill covers. Such screening reduces the time between identification and repair of surface hot spot emissions, and thus odor.

Comment: The quarterly screening is an existing requirement. Since the measure proposes to increase screening, the frequency identified by the measure must be more than quarterly and include response actions. The Technical Report #2 (Schmidt 2019) suggests monthly screening. The District recommends the measure specify at least monthly screening as suggested in Technical Report #2.

M-16

In addition, the District also recommends that the measure include use of improved interim or intermediate covers (including Posi-Shell) to minimize exceedances of the surface emission standard by preventing escape of fugitive LFG through the cover.

- Enhance LFG Collection (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, the WPWMA shall establish stricter protocols for LFG collection. Because LFG must be used, flared, or stored in a leak-free container, minimizing odorous emissions involves operating the system for maximum containment of gas as well as cost-effective performance of the gas-to-energy system.

Comment: Maximizing the effectiveness of the GCCS and compliance with the surface emission standards are existing requirements. The District recommends that the measure should also provide more detail and define the parameters that will be used to demonstrate that landfill gas collection has been enhanced and to specify the stricter protocols that will be established. The measure should also specify landfill gas banking will not be a management practice and that the GCCS will be operated at the maximum, safe gas extraction rate that exceeds regulatory requirements.

M-17

- Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies, and Operations). To monitor odor emissions in areas around the WRSL, odor sensors shall be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the WPWMA's dispersion modeling capabilities shall also be implemented to better predict the nature, location, and intensity of odor issues.

Comment: The District has concerns about the effectiveness of this measure to reduce odors because the White Paper (Suffet and Braithwaite, 2019) indicates that electronic noses are not capable for odor monitoring due to lack of sensitivity and quantification for most odorous chemical species). The District recommends the measure should include more detail about what kind of odor sensors will be used and what they will measure, such as ambient odor concentration, ambient odor intensity and/or source emission odor concentration. In addition, what thresholds will be established to act in response to the data collected by the odor sensors.

M-18

As an alternative or in addition to odor sensors, the District recommends developing and implementing a daily odor monitoring protocol using a scentometer such as the Nasal Ranger. The Nasal Ranger is routinely used for detection and quantification of odor can reliably measure odors down to 7.5 dilution to threshold (DT) (McGinley 2000).

- Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies, and Operations). Trees with aromatic foliage, such as pine or eucalyptus, shall be planted around the WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.

M-19

Comment: The District recommends using the Cal Poly Urban Forestry Ecosystems Institute (UFEI) Tree Selection Guide (<https://selectree.calpoly.edu/>) to select native tree species and scrubs that are suited to the area if feasible.

- Implement additional measures in accordance with the Odor Mitigation MOU (Churchwell White, LLP 2019; Schmidt and Card 2019).

Comment: The District is supportive of implementing these additional measures and requests this list include which measures will be implemented and the timeline for implementation. The following are the District's suggested mitigation measures to be considered:

- Identify additional best management practices for aerated static piles and develop and implement training protocols.
- Conduct a feasibility study for the addition of an anaerobic food waste digester.
- Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations). To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting.
- Reference the recommendations in the Landfill Active Face Odor Management Handbook (Schmidt 2017) when determining if and how to apply odor neutralizers to the sorted refuse and the landfill face. This handbook indicates that many of the products and application methods are not effective. The handbook states that NCM Neutralizer SL-950 Citrus reduces compacted MSW odor emissions by about 50% with about four hours of control at the high dose rates. If this approach is implemented, the likely least expensive application procedure would be to put a spray bar on the compaction equipment and set it at the low dose rate (1 quart per 80 ft² at 250:1 dilution).
- Evaluate the feasibility of significantly reducing or eliminating the acceptance and burial of biosolids or the installation of digesters for these bio-wastes.
- Improve community outreach and response to odor notifications both during operating hours and after hours and on weekends. Expand the community outreach to include:
 - Maintain a contact list (email and/or physical addresses for those without email) of all those that express interest in receiving updates and/or submit an odor notification. Send emails to neighboring communities on planned work that may generate odors and reoccurring meetings and other workshops.
 - Increase the frequency of the annual community odor meeting to two times per year (Jan-March and October) to address the seasonal impacts on odors. Invite all those on the contact list and utilize social media and other channels to promote meeting attendance.
 - Conduct direct outreach to the Homeowner and Neighborhood Associations of the impacted neighborhoods, utilizing the Roseville Coalition of Neighborhood Associations (RCONA) as a resource.
 - Ask impacted neighborhood associations to appoint a volunteer to represent the association on odor issues.
 - Identify and train members of the neighboring residential communities to be odor monitors.

M-20

- Identify additional mitigation measures specific to the MRF such as an additional collection system and biofilter for exhaust air. List or discuss why closing MRF doors and roof vents is not a measure.
- Develop a plan with the District that will minimize LFG emissions prior to disconnection or relocation of GCCS components and prior to movement of solid waste.

M-20

3. The District has the following comment on Appendix C.6 - Site Wide Odor Plan for the WPWMA Solid Waste Processing and Disposal Facility:

The Site Wide Odor Plan (SWOP) has Appendix F – LFG and Leachate Management SOP. This SOP includes Appendix A – Landfill Gas Collection and Control System (GCCS) Design Plan which was developed in October 2016. The District requests to update this GCCS design plan to 2021 version as the latest update.

M-21

References

Schmidt, CE, 2017. *Western Placer Waste Management Authority Landfill Active Face Odor Management Handbook*.

Schmidt, CE and TR Card. 2019 (August 2). *Technical Report #2: Odor Mitigation Measures Related to Proposed Development within the WRSL Buffer Zone*. Letter memorandum to Robin Baral of Churchwell White, LLP. Red Bluff, CA. (<https://www.placer.ca.gov/DocumentCenter/View/40789/Appendix-I---WPWMA-Correspondence-regarding-Odor-Mitigation-Measures-PDF>)

Suffet, Irwin and Scott Braithwaite, 2019. *White Paper on Odor Complaints, Health Impacts and Monitoring Methods prepared by UCLA for the California Air Resources Board*. (<https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/18rd010.pdf>)

McGinley, Charles, 2000. *Enforceable Permit Odor Limits, presented at the Air and Waste Management Association Environmental Permitting Symposium II in Chicago, IL*. (<http://www.fivesenses.com/Documents/Library/34%20%20Enforceable%20Permit%20Odor%20Limits.pdf>)

Letter M Comment Responses

Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Supervisor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
M-1	<p>The commenter recommends an addition to Draft EIR Mitigation Measure 6-2(b), which outlines requirements for all construction contracts and plans to include designated personnel to monitor fugitive dust emissions and enhance implementation of the required Dust Control Plan(s). In addition, the commenter recommends adding a requirement to Mitigation Measure 6-2(b) that Placer County Air Pollution Control District (PCAPCD) engineers be contacted regarding permitting requirements if any portable equipment is to be used for construction. As indicated in Chapter 3 of this Final EIR, the following text is hereby added to Mitigation Measure 6-2(b) on pages 2-16 and 6-44 of the Draft EIR: "The designated monitoring personnel shall obtain the certificate of Visible Emissions Evaluation (VEE) from the California Air Resources Board (CARB) field training program, or equivalent. PCAPCD engineers shall be contacted regarding permitting requirements if any portable equipment is to be used for construction of the project elements."</p> <p>The commenter also recommends adding a requirement to Mitigation Measure 6-2(b) for development of a particulate matter (PM) monitoring network using low-cost PM sensors at the southern fence line when the nearby residential units are built out. Monitoring and management of particulate matter is addressed in operations plans, permits, and construction management plans. The use of a particulate matter monitoring network using low-cost PM sensors will not be included as a requirement to Mitigation Measure 6-2(b).</p>
M-2	<p>The commenter recommends updating the cost-effectiveness rate cited in Mitigation Measure 6-3(a) of the Draft EIR to reflect changes to the rate adopted by PCAPCD in July 2021. Mitigation Measure 6-3(a) states that "the actual amount to be paid shall be determined and based on the selected program and applicable cost-effectiveness rate agreed by the WPWMA and PCAPCD." The impacts associated with implementation of the proposed project are compared to the baseline existing conditions throughout the Draft EIR, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the rate was revised after the Notice of Preparation was released and because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
M-3	<p>The commenter recommends that Mitigation Measure 6-3(b) explicitly state that the WPWMA will use project-related PM₁₀ (particulate matter with diameter of 10 micrometers or smaller) mitigation fees to participate in the County's biomass program if the Sunset Area Plan/Placer Ranch Specific Plan (SAP/PRSP) Draft EIR (Placer County 2019) cost-effectiveness rate of \$6,050 per ton is used to estimate fee amounts.</p> <p>This comment is acknowledged; explicit specification of uses for the future PM₁₀ mitigation funds are not included in this EIR because more cost-effective measures may be identified and negotiated with PCAPCD at the time of fee payment. The Draft EIR for the proposed project is consistent with mitigation measure language from the SAP/PRSP Draft EIR (Placer County 2019) and biomass programs are listed in the mitigation measure as one available option for emission benefits, although such programs are not specified.</p>
M-4	<p>The commenter requests clarification and additional discussion regarding the Health Risk Assessment (HRA) results presented in Chapter 6 and Appendix C.5. The reference to Appendix D on page 6-60 of the Draft EIR in the Impact 6-5 discussion, noted by the commenter, is a reference to Appendix D of Draft EIR Appendix C.5 (HRA Modeling Report). This reference is correct as written.</p> <p>Table 13 and Table 14 in Appendix C.5 (HRA Modeling Report) present the HRA results for both the existing receptors (used for the project-level analysis) and future potential receptors after SAP/PRSP development (used for the cumulative analysis). The results for the hypothetical</p>

Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Supervisor January 12, 2022	
Comment:	Response:
	<p>maximally exposed individual at a residential location (MEIR) in the Appendix C.5 tables are the higher of either the project-level analysis or the cumulative analysis, while the results presented in Tables 6-14 and 6-15 in the Draft EIR (on pages 6-60 and 6-61) are from project-level analysis only. HRA results from the cumulative analysis are presented in Chapter 19 of the Draft EIR (on pages 19-4 and 19-5). Results are correct as presented.</p>
M-5	<p>The commenter recommends that Impact 6-6 discuss the Memorandum of Understanding (MOU) developed between the WPWMA and Placer County and how it would assist the project in mitigating odor impacts to future nearby residents given the reduction in landfill buffer associated with future SAP/PRSP development.</p> <p>The MOU establishes a list of potential odor mitigation measures and a funding mechanism whereby fair-share contributions from future SAP/PRSP development projects will go toward programs and measures at the WPWMA facility to mitigate cumulative odor and air quality impacts. Reference to future implementation of measures in the MOU is included as part of Mitigation Measure 6-6 on page 6-65:</p> <ul style="list-style-type: none"> ▪ Implement additional measures in accordance with the Odor Mitigation MOU (Churchwell White, LLP 2019; Schmidt and Card 2019). <p>The WPWMA adheres to site operations plans and other documents, such as the Sitewide Odor Plan (SWOP) and Odor Impact Minimization Plan (OIMP) to identify, monitor, and implement odor-reduction measures to meet current and future goals. Revisions to these plans and documents are made periodically to optimize environmental, safety, and operational conditions onsite. The WPWMA's commitment to evaluating new technology, including measures identified in the MOU, will be continued as part of this operations plan revision and implementation process.</p>
M-6	<p>The WPWMA appreciates the willingness of the PCAPCD to discuss and verify feasible odor impact mitigation measures, such as those provided in the attachment to the District's comment letter.</p>
M-7	<p>The WPWMA acknowledges the PCAPCD's comments regarding suggestions of additional GHG mitigation measures.</p> <p>The commenter recommends that the project consider additional measures that would reduce nonbiogenic GHG emissions from mobile sources (onsite vehicles, offsite vehicles, and offroad equipment). Many of the recommended mobile source best management practices (BMPs) and mitigation measures are listed as Project Design Measures in Table 10-1 of the Draft EIR, including electrification of vehicles and equipment, energy-efficient buildings, renewable energy systems (such as solar), and installation of electrical charging infrastructure for vehicles. Feasible measures will be implemented as part of the proposed project, as indicated. Requirements for construction contractors and building permits also are listed. The WPWMA has no jurisdiction or control over offsite vehicles.</p> <p>Mitigation Measure 10-1 states that the offsite GHG mitigation fee program shall be coordinated with the PCAPCD and is consistent with the SAP/PRSP EIR (Placer County 2019) regarding GHG mitigation fees. Further, Mitigation Measure 10-1 reflects the PCAPCD GHG mitigation fee principles as documented in the Review of Land Use Projects under CEQA policy adopted by the PCAPCD's Board of Directors in 2016 (PCAPCD 2016).</p>
M-8	<p>The commenter recommends the addition of language to minimize the size of the landfill working face. The addition of specific facility operational details would not impact the outcome of this EIR. The WPWMA adheres to site operations plans, permits, and other documents to optimize environmental, safety, and operational conditions onsite and identifies, monitors, and implements corrective and preventative actions to meet current and future goals. Revisions to the site operations plans and other documents are made periodically as conditions require.</p>

Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Supervisor January 12, 2022	
Comment:	Response:
M-9	The commenter recommends addition of language related to biosolids management and use of odor control products. Please refer to the response to Comment M-8.
M-10	The commenter recommends addition of language related to use of alternative daily cover (ADC) and tarping at the landfill face. Please refer to the response to Comment M-8.
M-11	The commenter recommends removal of language related to use of dried sewage sludge as ADC. Use of dried sewage sludge as ADC is a permitted practice. Please refer to the response to Comment M-8.
M-12	The commenter recommends addition of compost odor management and monitoring measures. Please refer to the response to Comment M-8.
M-13	<p>The commenter recommends the addition of language to Table 6-1 to list other Clean Air Act requirements for landfill operations.</p> <p>As indicated in Chapter 3 of this Final EIR, the following text is hereby added to the Current Emission Reduction Measures section of Table 6-1, Current Emission Reduction Measures and Best Management Practices Incorporated as Project Design Measures:</p> <p>"Comply with the applicable requirements of 40 Code of Federal Regulations (CFR) Part 60 Subpart Cf and 40 CFR Part 63 Subpart AAAAA."</p> <p>In addition, the commenter points out historical issues related to compliance within mandated time frames. The comment is acknowledged, and because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
M-14	The commenter recommends operational and monitoring improvements to reduce the number of compost smoke and fire incidents. Please refer to the response to Comment M-8.
M-15	<p>The commenter recommends additional details in Mitigation Measure 6-6 regarding the Annual Odor Emissions Testing at the composting facility to describe how testing will be performed and the response actions that will be implemented. As indicated in Chapter 3 of this Final EIR, the following text is hereby added to the title and description of Mitigation Measure 6-6:</p> <p>"Compile and Evaluate Weekly Odor Emissions Monitoring (Tier 1, Composting Operations) Weekly odor emissions monitoring from various points on and offsite, conducted pursuant to the SWOP, will be compiled annually to evaluate odor emission trends and the strength and character of odors generated at different phases and sources in the composting process. Response actions will be implemented as indicated in site operational documents such as the SWOP and OIMP."</p>
M-16	<p>The commenter recommends additional details in Mitigation Measure 6-6 regarding increased screening for landfill gas beyond existing requirements for quarterly screening, as well as improved interim or intermediate cover to prevent fugitive landfill gas.</p> <p>As indicated in Chapter 3 of this Final EIR, the following text is hereby added to the title and description of Mitigation Measure 6-6:</p> <p>A "hot spot" is defined as any area where surface methane standards established by the CARB are exceeded for at least two quarters in any consecutive four quarter period. CARB requires that, "any area where solid waste has been buried; the landfill methane surface concentration must not exceed the 500 parts per million by volume (ppmv) instantaneous or 25 ppmv (averaged) integrated surface methane emission standards, excluding the working face." (CARB 2022) For instances where the integrated surface methane emission standard of 25 ppmv (averaged) of a monitoring grid is exceeded, the grid area will be monitored again at 15-foot centers (instead of the routine 25-foot centers) to further identify the area(s) of highest emissions. The noted areas of exceedance will be monitored again and corrective actions from the site operations and</p>

Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Supervisor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	<p>maintenance manual will be implemented as necessary to reduce emissions below the allowable level. For instances where the instantaneous surface methane emission standard of 500 ppmv is exceeded, the area will be monitored weekly for up to 3 weeks or until emissions are reduced enough to no longer constitute an exceedance. Corrective actions from the site operations and maintenance manual will be implemented as necessary to reduce emissions below the allowable level."</p>
M-17	<p>The commenter recommends additional details in Mitigation Measure 6-6 regarding stricter protocols for landfill gas (LFG) collection to demonstrate improvements in the gas collection and control system (GCCS) and to specify that the GCCS will be operated at the maximum safe gas extraction rate that exceeds regulatory requirements. The WPWMA acknowledges that the GCCS will be operated at the maximum safe gas extraction rate and that doing so may exceed current and future regulatory requirements.</p>
M-18	<p>The commenter recommends additional details in Mitigation Measure 6-6 regarding odor sensor use and measurement. As the timeframe for installing odor sensors is unclear, it is infeasible to provide details about the odor sensors that will be used. The WPWMA will evaluate and select the technology that best suits the needs of the facility, permit and regulatory requirements, and the goals of Mitigation Measure 6-6 at the time of installation.</p> <p>The commenter also recommends developing and implementing a daily odor monitoring protocol using a scentometer such as the Nasal Ranger. Odor monitoring using a Nasal Ranger currently takes place weekly pursuant to the SWOP. Please refer to the response to Comment M-8.</p>
M-19	<p>The commenter recommends using the Urban Forest Ecosystems Institute (UFEI) Tree Selection Guide. The WPWMA acknowledges the commenter's recommendation and anticipates use of the Cal Poly UFEI Tree Selection Guide (https://selecttree.calpoly.edu/) to select native tree species and shrubs that are suited to the area, if feasible.</p>
M-20	<p>The commenter recommends consideration of additional measures for odor mitigation. Please refer to the response to Comment M-8.</p>
M-21	<p>The commenter requests an update to the GCCS design plan that was included in the SWOP in Appendix C.6 of the Draft EIR. The impacts associated with implementation of the proposed project are compared to the baseline existing conditions throughout the Draft EIR, which are those that existed when the Notice of Preparation was released on March 15, 2019. The 2016 version of the GCCS design plan referenced in the SWOP was the most current version of the GCCS plan at the time the Notice of Preparation was released and, therefore, it will not be updated in the Final EIR. Further, changes to information in the SWOP would not impact the findings of the EIR.</p>

2.2.14 Letter N



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Rachel Jones
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January 12, 2022

VIA E-MAIL

EIRcomments@RenewablePlacer.com

Western Placer Waste Management Authority
Attn: Stephanie Ulmer
3013 Fiddymont Road
Roseville, CA 95747

Re: Renewable Placer: Waste Action Plan Draft Environmental Impact Report

Dear Ms. Ulmer:

We write on behalf of the landowners of the Placer 962 property, and we appreciate the opportunity to comment on Western Placer Waste Management Authority's Draft Environmental Impact Report (DEIR) for the Renewable Placer: Waste Action Plan (Project).¹ Placer 962 appreciates Western Placer Waste Management Authority's (WPWMA) forward-looking approach to long-term planning for the expansion of its facilities.

Placer 962 owns the property immediately west of the southern two thirds of WPWMA's Western Property depicted on Figures 3-1 and 3-17 in the DEIR. As with the Project site, this land is included in the Sunset Area Plan adopted by Placer County in 2019. Designated "Innovation Center" in the Sunset Area Plan, the Placer 962 property is envisioned to accommodate a mix of information technology, life sciences, and other knowledge-based and creative industries, "in an amenity-rich setting with a high level of finish," and could include housing to support new employment centers created within the Sunset Area Plan.²

By expanding WPWMA's facilities westward, the Project would result in the siting of odor-generating facilities immediately adjacent to this Innovation Center land. In particular, we are concerned that siting the proposed Organics Management Operation and/or Landfill Expansion Area on WPWMA's Western Property would expose future residents and businesses to significant odor impacts. Although the DEIR includes high-level analysis of odor impacts and concludes impacts would be significant and unavoidable, we cannot ascertain from the DEIR's analysis the magnitude of anticipated odor impacts on Placer 962's Innovation Center land. The EIR should be revised to include this analysis, including a more detailed discussion of the extent to which odor impacts are expected to be reduced by implementation of the DEIR's proposed

N-1

¹ The Placer 962 property is owned by Angelo K. Tsakopoulos ("AKT") and the Cummings Trust.

² Placer County Sunset Area Plan, pp. 1-3, 1-7.

Western Placer Waste Management Authority
Attn: Stephanie Ulmer
January 12, 2022
Page 2

odor reduction measures, and whether additional feasible mitigation measures could be implemented to further reduce impacts and better protect the Sunset Area Plan already approved by the County.

N-1

The DEIR identifies two potential conceptual plans for the Project. To minimize the siting of odor-generating facilities immediately adjacent to its land, Placer 962 encourages WPWMA to select and implement Plan Concept 1.³ Placer 962 also offers for WPWMA's consideration the following proposed modifications or clarifications of Plan Concept 1:

- Siting the Organics Management Operation: The proposed Organics Management Operation should be sited as close as possible to Fiddymont Road to minimize potential odor impacts on properties to the west of the Project. DEIR Figure 3-7 should be revised accordingly.
- Complementary/Programmatic and Supporting Elements as an Odor Buffer: Complementary/Programmatic and Supporting Elements with lower odor-generating potential than the Organics Management Operation should be sited along the western boundary of the Western Property. Those uses could form an odor buffer between properties west of the Project site like Placer 962's land planned for innovative, high technology and residential uses.
- Siting Complementary/Programmatic Elements on the Western Property: The Complementary and Programmatic uses proposed for development in the northern one-third of the Western Property should be sited south of Athens Avenue and immediately adjacent to Placer 962's Innovation Center property.⁴ Assuming these uses would be less odorous than the Organics Management Operation, siting these uses in this way could provide an odor buffer between the Placer 962's land and WPWMA's Landfill and Organics Management facilities. It would also cluster compatible land uses by locating innovative and research-based uses proposed for WPWMA's land immediately adjacent to the innovative and creative industrial and technology land uses proposed for Placer 962's land.

N-2

These minor modifications to Plan Concept 1 would reduce the Project's impacts on Placer 962's land. They would also improve overall Project compatibility with future land uses to the west of WPWMA's facilities, and within the Sunset Area Plan.

³ See DEIR, Figure 3-1.

⁴ Athens Avenue is proposed to be extended to the west as part of the Sunset Area Plan. (See Sunset Area Plan, p. 2-3.)

Western Placer Waste Management Authority
Attn: Stephanie Ulmer
January 12, 2022
Page 3

Placer 962 appreciates WPWMA's time considering the issues raised in this letter and is available to meet and discuss any questions that may arise.

Sincerely,

Cox, Castle & Nicholson LLP


Rachel Jones

RRJ:srw

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Letter N Comment Responses

Cox, Castle & Nicholson LLP. On behalf of the Placer 962 property landowners Rachel Jones January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
N-1	<p>The commenter states that the project would result in siting odor-generating facilities adjacent to the Innovation Center (as designated in the Sunset Area Plan) and is concerned with the project on the Western Property. The commenter requests the Draft EIR be revised to include a more detailed discussion of the extent to which odor impacts are expected to be reduced by implementation of the Draft EIR's proposed odor reduction measures, and whether additional feasible mitigation measures could be implemented to further reduce impacts and better protect the Sunset Area Plan already approved by Placer County.</p> <p>The commenter is referred to Table 6-1 included on page 6-3 of the Draft EIR for a description of the emission reduction measures and BMPs incorporated as project design measures. These include practices that would continue to be implemented during construction and operation of the proposed project to reduce emissions generated from the site, including odor emissions. The commenter is further referred to the discussion of odor issues associated with the existing operations and the proposed project included in Chapter 6 of the Draft EIR. Odor reduction mitigation measures included on page 6-65 of the Draft EIR would further reduce odor emissions and odors in the project vicinity.</p> <p>Because there are no quantifiable thresholds of significance for odor impacts, the Draft EIR concluded that this impact would remain significant and unavoidable even after mitigation.</p> <p>For a discussion of the proposed project's odor impacts associated with cumulative development in the region, the commenter is referred to Chapter 19, Cumulative Impacts, of the Draft EIR. The SAP/PRSP EIR (Placer County 2019) concluded that the development and buildout of the Sunset Area Plan would result in the exposure of a substantial number of people to objectionable odors, a significant and unavoidable cumulative odor impact. While odor abatement approaches and technologies would be implemented by the WPWMA as part of the Renewable Placer: Waste Action Plan, the nature and effectiveness of these measures are unknown at this time, and odor impacts would be cumulatively considerable. Therefore, the cumulative impact for odors from the proposed project would be significant and unavoidable. This finding is consistent with the findings of the SAP/PRSP EIR.</p>
N-2	<p>The commenter encourages the WPWMA to select and implement Plan Concept 1 with modifications to the siting of organics management operations, and the complementary and programmatic elements as an odor buffer. The WPWMA acknowledges this comment and notes that Plan Concepts 1 and 2 were fully evaluated for the range of impacts. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR; therefore, no further response is required.</p>

2.2.15 Letter O



COUNTY OF PLACER

BOARD of SUPERVISORS

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**OFFICE OF
COUNTY EXECUTIVE**

Todd Leopold, County Executive Officer

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January 11, 2021

via email: EIRcomments@RenewablePlacer.com

Western Placer Waste Management Authority
ATTN: Stephanie Ulmer
3013 Fiddymont Road
Roseville, CA 95747

RE: RENEWABLE PLACER WASTE ACTION PLAN, DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Ulmer:

Placer County appreciates the opportunity to engage at this stage in the process. In 2014, the Placer County Board of Supervisors directed initiation of the Sunset Area Plan (SAP) with the overall objective to achieve the County's long-term vision of promoting economic development and job growth within the region. By designing an overall strategy for the Sunset Area, the County intends to attract large mixed-use developments, commercial uses, universities, advanced manufacturing, corporate campuses, institutions, and entertainment venues that encourage businesses with primary wage jobs to locate in the Sunset Area. This work program effort culminated on December 10, 2019, with the Board of Supervisors' approval of the Sunset Area Plan update, Placer Ranch Specific Plan, and associated documents.

Placer County is a member agency of the WPWMA and has participated in the development of the Waste Action Plan (WAP) as a member of the WAP Advisory Committee (composed of key staff from each of WPWMA's member agencies). In addition, throughout the SAP update, County staff worked with landfill staff to help set the stage for the landfill's future operations. The landfill is located entirely within the SAP, and with the SAP update, a new land use was created recognizing the landfill operations and potential for future expansion. The Eco-Industrial land use designation encompasses the current Western Placer Waste Management Authority (WPWMA) property holdings in the Sunset Area. The Eco - Industrial land use provides for ongoing operation of the landfill as well as for industrial and manufacturing uses focused on alternative waste-to-energy technologies, recovery and reuse of materials, solid waste-related research and development, and related advanced manufacturing.

WPWMA facilities are identified in the Countywide Integrated Waste Management Plan and Placer County General Plan as the primary recycling facility and landfill serving western Placer County and have historically assisted the County and other member agencies to comply with State waste management laws and regulations. With the adoption of numerous new and increasingly stringent waste diversion mandates, including AB 341, AB 1826, and SB 1383 (which ultimately will require the diversion of 75% of organic waste from landfills), the expansion and upgrades proposed in the EIR will continue to ensure member agencies' continued compliance.

Western Placer Waste Management Authority
January 11, 2022 | Page Two

The County is supportive of the WAP's long term vision to optimize the waste recovery and disposal services, while enhancing compatibility with future adjacent land uses.

It is important for the County and WPWMA staff to work together to address areas of concern. Attachment 1 summarizes several of the County's general comments raised during its review of the Renewable Placer Waste Action Plan, Draft Environmental Impact Report, and more detailed comments as well by resource chapter. My staff look forward to working with WPWMA staff to address these comments prior to finalization of the EIR.

Should you have any questions, please coordinate with Leigh Chavez, Environmental Coordinator at lchavez@placer.ca.gov or 530-745-3077 and Michele Kingsbury, CDRA Principal Management Analyst at mkingsbu@placer.ca.gov or 530-745-3044.

Sincerely,



TODD M. LEOPOLD
COUNTY EXECUTIVE OFFICER

ATTACHMENT 1

GENERAL COMMENTS**I. General Organization**

It appears there is internal inconsistency among resource chapters in the DEIR relative to treatment of initial impact determinations versus ultimate impact determinations (with mitigation taken into consideration). As an example, Aesthetics Impact 5-1 indicates within the initial impact discussion that the project would result in a significant and unavoidable impact prior to taking into consideration feasible mitigation (if such is available). This initial impact versus ultimate impact (considering mitigation) treatment differs from other resource categories in the DEIR, where an initial determination is made and then an ultimate determination is made once feasible mitigation options are discussed. Conversely, Aesthetics Impact 5-3 (Impacts from Offsite Litter Generation) approaches the ultimate significance determination differently, noting that the impact remains significant without noting that the impact is significant and unavoidable. Similarly, it appears there are several locations where the document identifies an impact as significant but then doesn't identify mitigation. Placer County staff assumes these impacts are significant and unavoidable and advises that the format for conveying impact determinations be consistent throughout the document to minimize reader confusion, and that any feasible mitigation be included for each significant and unavoidable impact.

O-1

II. Tiering of the analysis included in the SAP EIR

The EIR for the Sunset Area Plan notes that "All applications for development entitlement for projects within the plan area that are submitted after approval of the SAP would be required to be reviewed for conformity with the SAP ... These development entitlements would also require review for compliance with CEQA, Public Resources Code Section 21000 et seq. This EIR is intended to serve as the base environmental documents for subsequent entitlement approvals within the plan area...." The DEIR incorporates the SAP EIR information for reference (page 4-1), but it is difficult to ascertain whether the DEIR complies with the SAP EIR, particularly in terms of proposed mitigation. As noted below, unless there are scenarios where the project is not consistent with the SAP/PRSP EIR, a reference to consistency with the SAP/PRSP EIR may be beneficial for understanding the project's impacts.

O-2

III. Cumulative Impacts

The cumulative impact analysis in the WPWMA DEIR relies heavily on the cumulative analysis conducted by the SAP/PRSP EIR; however, individual resource chapters are less reliant, and in some cases not reliant, on the SAP/PRSP EIR. Unless there are scenarios where the project is not consistent with the SAP/PRSP EIR, a reference to consistency with the SAP/PRSP EIR may be beneficial for understanding the project's impacts.

O-3

IV. Tribal Cultural Resources

The DEIR indicates AB 52 consultation is ongoing. Placer County anticipates that AB 52 consultation and any resulting mitigation measures negotiated between the UAIC and the WPWMA will be resolved by the FEIR.

O-4

V. Transportation

Pursuant to SB 743, the DEIR analyzes transportation impacts using VMT as an impact metric; however, the document also continues to discuss Level of Service (LOS) in the context of environmental impacts and mitigation. While the discussion of LOS should remain in the DEIR as a source of information for the reader and for purposes of consistency with the Placer County General Plan and the SAP, impacts related to congestion are no longer considered environmental

O-5

impacts under the CEQA Guidelines. Placer County recommends removal of any reference to LOS as a transportation impact in the WPWMA DEIR. Placer County also encourages WPWMA staff to coordinate with the Placer County Department of Public Works (DPW) on the alignment of Placer Parkway and the new interchange at Fiddymont Road.

The proposed project would also be subject to frontage improvements and right-of-way requirements consistent with the Sunset Area Plan's circulation network. Further, the proposed expansion project would be subject to the Countywide Traffic Fee Program and other regional transportation fee programs. Payment of transportation mitigation fees would represent the project's fair share towards the roadway improvement projects identified in the Sunset Capital Improvement Program. An estimate of the transportation fees can be provided upon consultation with DPW.

O-5

VI. Complementary and Programmatic Elements, Compatible Technologies

The DEIR provided a wide array of Compatible Technologies that may be considered in the future, but these uses can vary greatly in terms of potential odor, visual, and other impacts. While the County acknowledges these Compatible Technologies were only analyzed at a Programmatic Level, more information regarding the priority of the types of Compatible Technologies is needed.

O-6

VII. Local Approvals

The landfill is located entirely within the SAP. Page 1-4, bullet point three notes the "Solid waste uses on this property have already been subject to environmental review, and a conditional use permit to operate a landfill was previously granted by the Placer County Planning Commission; however, the project has not been fully permitted for solid waste related operations." Page 1-7, Section 1.4, bullet point eight notes one of the Project Objectives is to "Develop WPWMA properties consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019)." Any future development projects within the Sunset Area would be subject to the standards in the Sunset Area Plan Implementing Zoning Regulations and the Placer County Zoning Ordinance, and accordingly, all development projects would require review and approval of subsequent permits and entitlements by Placer County (e.g., conditional use permits and modifications, etc.), and consistency with the Placer County General Plan and SAP. Reference is made in the document to existing Conditional Use Permits held by WPWMA for portions of property that may require modification, yet that is not noted in Local Approvals that may be needed to implement the project in Section 1.8.3 of the DEIR. In specific, Conditional Use Permit Numbers 225, 1473 and 1717 are all potentially applicable to the proposed project. In addition, there are inferences that the landfill operations are not subject to local agency review. Placer County is the local land use authority for projects proposed in the Sunset Area. To conform to the SAP, other proposed uses that were not previously contemplated or approved may be subject to administrative reviews, minor use permits or conditional use permits. Please refer to the Sunset Area Plan Implementing Zoning Regulations Table 1-5 for more information regarding the type of land use review that may be needed for the proposed use.

O-7

VIII. Biology

The DEIR indicates mitigation for biological impacts will occur through compliance with the Placer County Conservation Program (PCCP). Coverage under the PCCP as the mechanism for permitting and mitigation cannot be assumed and is subject to approval by the Placer Conservation Authority (PCA). Because PCCP coverage cannot be assumed, the WPWMA should consider identifying avoidance, minimization, and mitigation measures to address biological impacts in the event the PCCP is not ultimately the mechanism for obtaining permitting and take coverage. Alternatively, approval of coverage under the PCCP could be verified by the PCA and discussed in the FEIR.

O-8

Mitigation Measure 7-1 requires implementation of the project as a covered activity under the PCCP and CARP to compensate for loss of special status plants; however, the PCCP does not provide coverage for sensitive plants. In order to address impacts to sensitive plant species, the WPWMA will need to identify species-specific avoidance, minimization and mitigation measures.

O-9

Mitigation Measure 7-7 suggests that tree mitigation would require payment of a land conversion fee pursuant to the PCCP. Because coverage under the PCCP is not a certainty, the WPWMA should consider compensating for loss of protected trees through identification of avoidance, minimization and mitigation measures that do not rely on the PCCP for coverage. Alternatively, approval of coverage under the PCCP could be verified by the PCA and discussed in the FEIR.

O-10

IX. The Placer County Conservation Program (PCCP)

As you are aware, the PCCP was adopted by the local permittee agencies (Placer County, City of Lincoln, Placer County Water Agency, and South Placer Regional Transportation Authority) and received its state and federal permits and became operative on April 22, 2021. The PCCP comprises three integrated program components and the issuance of related state and federal permits:

- The Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan (HCP/NCCP), a joint federal habitat conservation plan and state natural community conservation plan that would protect fish, wildlife, plants, and their habitats and fulfill the requirements of the federal Endangered Species Act (ESA), and the California Natural Community Conservation Planning Act (NCCPA).
- The Western Placer County Aquatic Resources Program (CARP) would protect streams, wetlands, and other aquatic resources and can be used to fulfill the requirements of the Clean Water Act (CWA) and analogous state laws and regulations.
- The Western Placer County In-Lieu Fee Program (ILF) that creates "mitigation credits" that can be used to fulfill compensatory mitigation requirements under Section 404 and 401 of the CWA.

O-11

The HCP/NCCP and its related state and federal Incidental Take Permits cover 14 sensitive species found in western Placer County for at least a portion of their life cycle. The conservation strategy, avoidance, minimization, and mitigation requirements are based upon the need to conserve, restore, or create viable habitat for these species. The Covered Species and their primary associated natural communities covered by the HCP/NCCP include those listed in Table 1 for your reference.

Table 1-Covered Species

Species	Natural Community
Birds	
Burrowing owl	Valley grasslands, pasture, and field agriculture
Tricolored blackbird	Valley and Foothill freshwater marsh complexes, grasslands
California black rail	Freshwater marshes
Swainson's hawk	Valley nesting-Riverine/riparian and any community with trees. Valley foraging-grassland and field agriculture
Reptiles	

Giant garter snake	Valley grasslands near water, wetlands and slow-moving waterways, rice fields
Western pond turtle	Valley and Foothill riverine / riparian and aquatic / wetland complexes
Amphibians	
California red-legged frog	Foothills open water, riverine/riparian and freshwater marshes
Foothill yellow-legged frog	Foothill riverine / riparian
Invertebrates	
Vernal pool tadpole shrimp	Valley grasslands and vernal pool complex
Vernal pool fairy shrimp	Valley grasslands and vernal pool complex
Conservancy fairy shrimp	Valley grasslands and vernal pool complex
Valley elderberry longhorn beetle	Valley oak woodland, riverine / riparian complex and riparian vegetation
Fish	
Central Valley steelhead	Perennial freshwater streams
Chinook Salmon (Central Valley Fall / Late fall-Run)	Perennial freshwater streams

Covered Activities

The permit coverage provided by the PCCP encompasses a range of public infrastructure and private land use activities carried out or authorized by the permit applicants (e.g., private land development approved by the County or City of Lincoln). Chapter 2 of the HCP/NCCP lists the activities covered by the PCCP, as well as certain activities that are not covered. The list identifies general categories of activities that are eligible for coverage, such as "all ground- or habitat-disturbing projects and activities that occur...in the Valley Potential Future Growth Area". The list also describes specific public infrastructure projects such as the Auburn Ravine Force Main Rehabilitation/Replacement project and Placer Parkway. Habitat restoration and enhancement activities necessary to implement the PCCP are also Covered Activities.

O-11

PCCP DEIR COMMENTSCovered Activities

DEIR Section 7.2.3 (p. 7-35) correctly notes that WPWMA is not a Permittee under the PCCP and that WPWMA notified the County in May 2014 of its intent to participate as a "Participating Special Entity" under the Program. The DEIR appears to rely on the PCCP for its applicable state and federal biological resources permitting and mitigation. HCP/NCCP Section 8.9.4 addresses Take Authorization for Participating Special Entities and Section 8.9.4.1 addresses the Application Process for Participating Special Entities, including the submittal and approval of a participation package. This process and the decision to grant take authorization to the entity is discretionary on behalf of the PCA. In addition, the costs associated with the review and granting authorization will need to be determined by the PCA Board. Therefore, reliance on the PCCP for take authorization, state and federal 401/404 permitting, and mitigation is subject to the discretion and approval of the PCA and wildlife and regulatory agencies.

Waters of the U.S. (WOTUS)

We recommend updating DEIR Section 7.2.1 (p. 7-26) and its description of Section 404 of the Clean Water Act for the current implementation of the WOTUS rule. This rule was the subject of recent case law and subsequent practice changes and a new federal rule-making process.

O-12

CDFW Section 1600 (Lake and Streambed Alteration)

DEIR Section 7.2.2 (p. 7-29) correctly addresses CDFW Section 1600 in our view. It is important to note that the CARP does not provide coverage to projects satisfying CDFW's requirements for a Lake and Streambed Alteration Agreement (LSA) as that Agreement can only be entered into between CDFW and the project. However, since the PCCP includes NCCP coverage, in most cases the HCP/NCCP and CARP can be used to implement avoidance, minimization, and mitigation consistent with LSA requirements and mitigation.

O-13

Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State

To the extent the DEIR covers the applicable state regulations and rules for waters and wetlands, we also recommend addressing the requirements for the State's wetland definition and procedures adopted by the State Water Board on April 6, 2021. The PCCP's landscape scale conservation strategy implemented through the HCP/NCCP, and CARP also serve as a "Watershed Plan" for the purposes of Covered Activities.

O-14

PCCP COVERED SPECIESNon-Covered Species:

The PCCP does not provide incidental take permit coverage or mitigation for non-covered species including but not limited to plants, western spadefoot, and listed bat species. Mitigation Measure 7-2 (p. 7-40) should be reviewed by, and concurrence sought from, the state and federal wildlife agencies as the protection of "western spadefoot by proxy", is not directly covered by the PCCP Conservation Strategy and would likely require separate action under Section 7 or 10 of the ESA and CESA by the applicable agencies. However, PCA staff does agree with the premise that participation in the PCCP; implementation of its avoidance, minimization, and mitigation measures; and the implementation of its landscape scale conservation strategy will result in non-covered species benefits and has mitigating effects for the purposes of CEQA.

O-15

APPENDIX D ("APPENDING D: PROJECT-APPLICABLE CONDITIONS ON COVERED ACTIVITIES FROM THE PCCP")

The Application Process for Participating Special Entities in HCP/NCCP Section 8.9.4.1 requires the submittal and approval of a participation package. This process will identify the specific avoidance, minimization and mitigation measures required to comply with the requirements of the PCCP at a site-specific level including pre-construction survey requirements, CARP avoidance and minimization measures, and pre- and post-construction measures as part of the authorization process.

O-16

X. Sphere of Influence

A portion of the Western Expansion Property is located within the City of Lincoln Sphere of Influence. There are several Placer County General Plan policies that address projects proposed within the local jurisdictions' spheres of influence. For instance, Policy 1.A.5 notes that "The County shall not approve intensive forms of development or land divisions into parcels of 10 acres or less within any city's sphere of influence where that City's general plan calls ultimately for urban development except where the County General Plan or applicable Community Plan designates the area for urban, suburban, or rural residential development. The County shall inform cities in a timely manner when applications for development within their sphere of influence are filed with the County and shall consider the city's ultimate plans for the relevant area during project review. In such cases, Policy #16 in Part III shall apply to such development projects." The

O-17

County looks forward to continued conversation with WPWMA and the City of Lincoln as it pertains to development within the City's sphere of influence.

O-17

OTHER COMMENTS

1. Section 1.8.3, titled "Local Approvals" Grading, Drainage and Building Permits are noted under the Placer County Department of Public Works heading but are issued through the Placer County Community Development Resource Agency.

O-18

2. On page 3-35 of the DEIR, the stormwater management infrastructure is proposed to be designed to accommodate the "1,000 year, 24-hour storm event as required by Title 27 CCR 20365". The project is located within the new Sunset Area Plan and includes a regional approach to drainage impacts. The project stormwater flows should be designed at a minimum to comply with the detention and retention mitigation measures contained within the Sunset Area Plan. Page 4-7 of the DEIR states that the project DEIR is tiering from the SAP EIR and incorporating by reference the information included in the SAP EIR; therefore, the project should meet or exceed the stormwater peak flow and volume detention and retention mitigation measures included in the SAP EIR (see SAP Policies PFS-5.5 Stormwater Detention and Policy PFS-5.6 Stormwater Retention – referenced on page 12-33 of the project DEIR).

O-19

3. Chapter 5 – Aesthetics
The SAP includes goals and policies related to aesthetics. The County would require consistency of future projects with SAP policies and SAP Corridor Design Standards and Guidelines. The DEIR notes only a few in this resource chapter. The following SAP policies are relevant to the analysis of aesthetics:
 - Goal LU/ED-3 Design and Land Development Practices
 - Policy LU/ED 3.1 High Quality Design
 - Policy LU/ED 3-2 Environmentally Responsive Design
 - Policy LU/ED 3.9 Lighting
 - Policy LU/ED 3.11 Mirrored or Reflective Glass
 - Goal LU/ED-13 Public Facilities
 - Policy LU/ED 13.2 Minimize Visual Impacts of Public Improvements

Specific standards from the Corridor Design Standards and Guidelines that inform the environmental analysis below include:

- All lighting shall be Dark Sky complaint.
- All lighting should utilize cut-off type of fixtures to minimize glare and visibility from adjacent areas, and should be the appropriate size and height given the activities for which they are designed; and
- Lighting is allowed to illuminate signage at night but should be designed appropriately to not create hazardous glare for pedestrians, bicyclists, and vehicles.

O-20

Impact 5-1: the DEIR concludes a significant and unavoidable impact relative to Impact 5-1 (Impacts to Visual Character and Quality) but does not provide feasible mitigation. CEQA requires identification of feasible mitigation even if that mitigation does not ultimately reduce an impact to less than significant. (CEQA Guidelines, §§ 15041, 15043.) While aesthetic impacts may ultimately remain significant despite implementation of

mitigation, there are screening measures, such as planting of tall trees, that are feasible and could reduce the level of impact even if the impact ultimately remains significant.

Impact 5-3 (Impacts to Offsite Litter Generation): the DEIR concludes a significant and unavoidable impact relative to Impacts from Offsite Litter Generation and implies that the existing impact will be exacerbated by the landfill expansion. The DEIR refers to an existing offsite litter control program as well as a load tarping policy. It is unclear whether the load tarping policy is already part of the offsite litter control program or if it is being proposed as a new component of the offsite litter control program to mitigate for the exacerbated impact. Clarification of this impact and its associated mitigation would be beneficial to the reader.

O-20

4. Mitigation Measure 7-7 suggests that tree mitigation would require payment of a land conversion fee pursuant to the PCCP. Because coverage under the PCCP is not a certainty, the WPWMA should consider compensating for loss of protected trees through identification of avoidance, minimization and mitigation measures that do not rely on the PCCP for coverage. Alternatively, approval of coverage under the PCCP could be verified by the PCA and discussed in the FEIR.

5. Page 9-23 of the DEIR states that the County's regulations are not applicable because the County does not have jurisdiction over the project, however, Section 14 of the WPWMA Joint Exercise of Powers Agreement requires that any improvements or structures on the landfill property "shall comply with the applicable laws, ordinances, resolutions or regulations of the County ... in which such improvements or structures are located." Accordingly, the DEIR should include a statement that WPWMA will comply with the County's grading and erosion requirements for the proposed project.

O-21

6. Chapter 11-Hazardous Materials. The DEIR refers to the County's Health and Safety element circa 2013. However, on November 16, 2021, the County approved an update to its Health and Safety Element which can be found at <https://www.placer.ca.gov/DocumentCenter/View/56281/03A>. Information should be updated to reflect current policies within the Health and Safety Element and how the proposed project does or does not adhere to them.

Page 11-19 of the DEIR identifies to the potential for construction activities to expose the public or the environment to hazardous materials as a significant impact and proposes two mitigation measures. However, the SAP EIR also proposed a mitigation measure (4.8-1b) to adhere to American Petroleum Institute and Transportation Research Board recommendations regarding setbacks from pipelines. We recommend inclusion of this mitigation measure unless infeasible.

O-22

In addition, the landfill and proposed project are located within the area served by Placer County Fire Department. Placer County contracts with CAL FIRE for fire protection services in the unincorporated areas of the county, which includes the SAP area.

7. Page 12-28 of the DEIR (Section 12.2.3) states that the County's regulations are not applicable because the County does not have jurisdiction over the proposed project. As noted above, Section 14 of the WPWMA Joint Exercise of Powers Agreement requires any improvements or structures on the landfill property to comply with County regulations.

O-23

- The DEIR should include a statement that t WPWMA will comply with the County's onsite drainage and water quality requirements for the proposed project. } O-23
8. Page 12-41; Impact 12-6 - Potential to Increase runoff and localized or Downstream Flooding: This section provides no evidence that the proposed project would comply with the SAP Policies identified in comment 1 above regarding providing onsite detention and retention for the peak flow rates and flow volumes. The section states that "... the SAP storm drain system would be designed to accommodate buildout stormwater conveyance, so that new development within the SAP area would not generate runoff that exceeds the capacity of the system's ability to handle". Since the SAP requires every project to detain and retain peak flows and volume onsite, no additional flows or volume should be discharged from the site, and any SAP storm drain system would be designed to handle no increases in peak flow or volume within the entire SAP area. The DEIR should demonstrate how the project follows the Mitigation Measures in the SAP for detention and retention since this document is tiering off the SAP EIR (see comment 1 above for the Policies based on the Mitigation Measures). } O-24
9. Page 15-6 of the DEIR (Section 15.2.3) states that the County's regulations are not applicable because the County does not have jurisdiction over the proposed project. As noted above, Section 14 of the WPWMA Joint Exercise of Powers Agreement requires any improvements or structures on the landfill property to comply with County regulations. In addition, the Placer County Department of Public Works (DPW) has jurisdiction over the proposed and required improvements within the existing or required Highway Easements on Athens Avenue, Fiddymment Road, Sunset Boulevard West, and East Catlett Road, and any roadway maintenance impacts associated with those roadways, and the project must obtain approval from the DPW for any changes to or within the Highway Easement/right-of-way by way of an Encroachment Permit/Improvement Plans or revision to any funding mechanisms for maintenance of these roadways. The DEIR should be revised to reflect that the County does have jurisdiction over project elements with the Highway Easement/right-of-way. } O-25
10. Page 15-9; Impact 15-1. The DEIR acknowledges that the proposed project is expected to increase demand for fire protection services. The DEIR should include a Mitigation Measure to revisit the funding mechanism / agreement to address the increase in fire protection services and demand on fire facilities due to the proposed project prior to construction of any project component. } O-26
11. Page 15-13; Impact 15-4 – Require New or Expanded Roadway Maintenance: This section of the DEIR addresses funding for road maintenance and improvements on Athens Avenue in an existing funding mechanism with the Placer County Department of Public Works and acknowledges the potential need to modify that agreement to include Fiddymment Road to provide a similar funding mechanism. The DEIR should include a Mitigation Measure to revisit the funding mechanism/agreement to address the increase in roadway maintenance due to the proposed project prior to construction of any project component. } O-27
12. Page 16-5 of the DEIR (Section 16.2.3) states that the County does not have jurisdiction over the proposed project. Please see Comment No. 9 above for the County's response on that issue. The DEIR should be revised to reflect that the County does have jurisdiction over project elements within the Highway Easement/right-of-way. } O-28

13. Page 16-15; Impact 16-3 – increase in Vehicle Hazards: This section of the DEIR should discuss the proposed overcrossing or undercrossing of Fiddymment Road as well as the proposed new encroachment at what appears to be the fourth leg of the existing Athens Avenue intersection with Fiddymment Road. The proposed features have the potential to increase vehicle hazards if not designed to standards that meet the satisfaction of the Placer County Department of Public Works. This section should also indicate that the project is subject to obtaining an Encroachment Permit from the DPW for this proposed work within the County Highway Easement/right-of-way and any improvements that the DPW determines necessary to ensure that there is no increase in vehicle hazards. } O-29
14. Page 17-7 of the DEIR (Section 17.2.3) again states that the County does not have jurisdiction over the proposed project. Please see Comment No. 9 above for the County's response on that issue. The DEIR should be revised to reflect that the County does have jurisdiction over project elements within the Highway Easement/right-of-way. } O-30
15. Page 17-14; Impact 17-1 – Require the construction or relocation of utility facilities: The DEIR identifies new sewer and water lines constructed from Athens Avenue to Sunset along Fiddymment Road. The existing pavement section of Fiddymment Road may not meet County standards and with the construction of a sewer and waterline along the road, the entire road section may need to be improved rather than just trenching within the existing pavement and trench restoration. The project would be required to obtain an Encroachment Permit for this proposed construction within the Placer County Highway Easement/right-of-way and will be subject to the restoration requirements of the County. The DEIR should reflect these requirements and concerns. } O-31

Letter O Comment Responses

Placer County Todd Leopold, County Executive Officer January 11, 2022	
<i>Comment:</i>	<i>Response:</i>
O-1	<p>The commenter states there is inconsistency in the EIR regarding treatment of initial impact determinations versus final impact determinations (with mitigation) and advises that the format for impact determinations be consistent. The WPWMA acknowledges minor text inconsistencies in the impact sections; however, the conclusions presented are valid and correcting the language would not result in changes to the impact conclusions. As the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
O-2	<p>The commenter states that it is difficult to ascertain whether the Draft EIR complies with the Sunset Area Plan EIR, particularly in terms of proposed mitigation. The SAP is a policy document intended to guide growth in the SAP area during a 20-year planning horizon; buildout of the SAP area is expected to occur throughout 80 years or more. The SAP/PRSP EIR (Placer County 2019) evaluates the potential environmental impacts associated with implementing the SAP/PRSP. In accordance with Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project and, among other things, are related geographically or in connection with issuance of rules, regulations, or plans to govern the conduct of a continuing program. Because of the broad geography, long timeframe anticipated for buildout, and policy-oriented nature of the SAP, the impact analysis of the SAP was prepared at a programmatic level—that is, a more general analysis with a level of detail and degree of specificity commensurate with that of the plan itself, focusing on the effects that can be expected to follow adoption of the plan.</p> <p>In accordance with CEQA Guidelines Section 15161, the Renewable Placer: Waste Action Plan EIR is considered a project EIR for the proposed solid waste management elements. In accordance with CEQA Guidelines Section 15168, the Renewable Placer: Waste Action Plan EIR also is considered a program EIR for the activities that are complementary to the proposed solid waste management activities.</p> <p>The Waste Action Plan evaluated in this EIR was foreseen by the SAP and SAP/PRSP EIR and is included in the cumulative project list in the SAP/PRSP EIR. However, because this EIR includes project-specific components, it inherently includes mitigation measures that are specific to the proposed project. Whichever project concept may be selected by the WPWMA Board of Directors will be required to comply with the mitigation measures included in Table 2-1 of the Draft EIR.</p> <p>Regarding consistency with the SAP/PRSP EIR, Impact 13-2 on page 13-12 of the Draft EIR describes the Sunset Area Plan as the primary plan governing land use for the project area. As noted in Section 13.2, the proposed project would be located on lands both designated and zoned for Eco-Industrial use, which explicitly includes solid waste management and related practices and processes, as well as specific industrial and manufacturing uses.</p> <p>The Sunset Area Plan also includes numerous goals and policies adopted with the intention of avoiding or mitigating adverse environmental impacts, including effects to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Energy. These goals and policies are discussed within the regulatory sections of the Draft EIR in Chapters 6, 7, 8, 9, 12, 14, and 17, respectively. The proposed project would not conflict with these environmental protection policies and would further employ design, construction, and operations best practices to support these policies. The project design would be informed by Policies LU/ED-3.1, LU/ED-3.2, LU/ED-3.4, and LU/ED-3.8 related to High-Quality Design, Environmentally Responsive Design, Land Alteration, and Landscaping, respectively.</p> <p>Also, because the project would not include the development of new residential uses and would not expand beyond the site's long-established property boundary, it would not contribute to the significant and unavoidable land-use compatibility impact identified in the Sunset Area Plan EIR</p>

Placer County Todd Leopold, County Executive Officer January 11, 2022	
Comment:	Response:
	associated with reducing the 1-mile buffer requirement for residential uses included in Placer County General Plan Policy 4.G.11. As such, neither Plan Concept 1 nor Plan Concept 2 would conflict with the goals and policies included in the Sunset Area Plan that have been adopted for the purpose of avoiding or mitigating an environmental effect.
O-3	The commenter states that the cumulative impact analysis in the WPWMA Draft EIR relies on the cumulative analysis conducted as part of the SAP/PRSP (Placer County 2019) EIR, individual resource chapters are less reliant on the SAP/PRSP EIR, and that a reference to consistency with the SAP/PRSP EIR may be beneficial for understanding the project's impacts. Please refer to the response to Comment O-2.
O-4	The commenter states that it is anticipated the Assembly Bill (AB) 52 consultation with the United Auburn Indian Community (UAIC) would be resolved by the Final EIR. As of February 9, 2022, the AB 52 consultation with the UAIC is complete. The WPWMA consulted with the UAIC to determine the appropriate mitigation measures for inclusion in the Draft EIR. The UAIC provided the Unanticipated Discoveries mitigation via email on November 5, 2020, which the WPWMA subsequently included in the Draft EIR as Mitigation Measure 8-2.
O-5	<p>The commenter recommends removal of any references to Level of Service (LOS) as a transportation impact in the Draft EIR and encourages the WPWMA to coordinate with the Placer County Department of Public Works (DPW) on alignment of Placer Parkway and the new interchange at Fiddymont Road. The Draft EIR uses LOS in Impact 16-1, Conflict with Traffic Circulation Plan or Program, to compare the project's projected average daily traffic volumes with identified roadway capacities. However, transportation impacts are evaluated based on total vehicle miles traveled, not on LOS, pursuant to SB 743.</p> <p>The commenter also suggests that the project would be subject to frontage improvements and right-of-way requirements consistent with the SAP circulation network, Countywide Traffic Fee Program and other regional transportation fee programs. As the WPWMA is a Joint Powers Authority (JPA) composed of the County of Placer and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill, the WPWMA considers local regulations and consults with local agencies. While County and city land use regulations are not applicable to WPWMA, as the County and cities do not have land use jurisdiction over the proposed project, project mitigation measures will be structured to include the voluntary action to pay associated land use or traffic fees as though the WPWMA was subject to such fees.</p>
O-6	The commenter states that compatible technologies were analyzed at a programmatic level, and that more information regarding the priority of compatible technologies is needed. As stated on page 3-2 of the Draft EIR, space would be reserved for third-party commercial or full-scale compatible technologies and manufacturing operations that would take materials and products primarily from the WPWMA's facility to produce beneficial products, including renewable energy, fuels, and marketable commodities. A detailed discussion of the compatible technologies that may be developed at the project site are described in the Draft EIR in Chapter 3, Project Description, Sections 3.5.4 and 3.6.4 for both Plan Concepts 1 and 2. As specific complementary and programmatic projects are proposed, they will be evaluated for consistency with the description of potential uses included in Chapter 3 of the Draft EIR. If complementary and programmatic projects are proposed that are determined to be inconsistent with the description of potential uses included in the Draft EIR, additional CEQA evaluation may be warranted for those individual projects.
O-7	The commenter states that the Draft EIR references existing conditional use permits (CUPs) for portions of the property that may require modification but are not included in the Local Approvals Section 1.8.3 of the Draft EIR that may be necessary to implement the project. The WPWMA is a JPA composed of Placer County and the cities of Lincoln, Rocklin, and Roseville to own and

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
	operate a regional recycling facility and sanitary landfill. As a JPA, the WPWMA considers local regulations and consults with local agencies; County regulations are not applicable in this case because the County does not have jurisdiction over the proposed project. Although the WPWMA voluntarily secured a CUP from the County for operations in 2001, the WPWMA is not required to secure a new or modified CUP for the project.
O-8	<p>The commenter states that the Draft EIR indicates mitigation for biological impacts will occur through compliance with the PCCP, that coverage under the PCCP cannot be assumed and is subject to approval by the Placer Conservation Authority (PCA), and the WPWMA should consider identifying avoidance, minimization, and mitigation measures to address biological impacts in the event that PCCP coverage is not available.</p> <p>The commenter is referred to Section 2.6.5.4.1 of the Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP), which states that it is expected that the uses proposed by the WPWMA on the Eastern, Center, and Western Properties would be covered under the PCCP (Placer County 2020). Although providing coverage for the proposed project activities would be discretionary, it is reasonable to assume that because these activities were specifically identified in the HCP/NCCP and the PCCP was specifically designed to facilitate Endangered Species Act (ESA) and California Endangered Species Act (CESA) compliance in Placer County, ESA/CESA compliance for the proposed project would be completed through the PCCP program rather than through separate state and federal Endangered Species Act consultations. The WPWMA clearly identified its intent in May 2014 to participate in the PCCP as a Participating Special Entity and is committed to pursuing endangered species permitting for the proposed project through the PCCP. Additionally, the WPWMA has confirmed with the PCA that the project will be covered by the PCCP. Therefore, it is unnecessary to identify alternative measures to address these biological impacts in the event the PCCP is not used for project permitting.</p>
O-9	<p>The commenter states that Mitigation Measure 7-1 requires implementation of the project as a covered activity under the PCCP and Western Placer County Aquatic Resources Program (CARP) to compensate for loss of special-status plants; however, the PCCP does not provide coverage for sensitive plants and the WPWMA will need to identify species-specific avoidance, minimization, and mitigation measures.</p> <p>The PCCP includes 14 covered species, none of which are plants. The 14 species subject to PCCP coverage were selected from a larger list (Appendix C: Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan), which includes dwarf downingia (<i>Downingia pusilla</i>). Dwarf downingia is not state or federally listed as threatened or endangered, so ESA/CESA do not apply. CEQA would be the mechanism to address the impacts and establish mitigation.</p> <p>As indicated in Chapter 3 of this Final EIR, the following text is hereby added to Mitigation Measure 7-1: Special-Status Plant Species Protection Guidelines. "In the absence of avoidance, minimization, and mitigation measures established by the PCCP for rare plants, WPWMA will implement the Placer County Sunset Area Plan (SAP) Policy NR-2.1: Special-Status Plant Species Protection, and SAP Program NR-5: Special-Status Plant Species Protection Guidelines, to mitigate for the loss of special-status plant species. The WPWMA will retain qualified botanists to conduct protocol-level botanical surveys. The Guidelines, at a minimum, will require the following:</p> <ul style="list-style-type: none"> ▪ All plant species encountered on the project site will be identified to the taxonomic level necessary to determine species status.

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
	<ul style="list-style-type: none"> ▪ The surveys will be conducted no more than 5 years prior and no later than the blooming period immediately preceding the approval of a grading or improvement plan or any ground-disturbing activities, including grubbing or clearing. ▪ If special-status plants are identified on the project site, the project applicants will be required to implement the following measures to mitigate the potential loss of special-status plant species: <ul style="list-style-type: none"> • Avoid special-status plant occurrences through project design to the extent technically feasible and appropriate. Avoidance will be deemed technically feasible and appropriate if the habitat occupied by special-status plants may be preserved onsite while still obtaining the project purpose and objectives and if the preserved habitat features could reasonably be expected to continue to function as suitable habitat for special-status plants following project implementation. • If, after examining all feasible means to avoid impacts to potential special-status plant species habitat through project site planning and design, adverse effects cannot be avoided, then impacts will be mitigated in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species. • Notify CDFW, as required by the California Native Plant Protection Act, if any special-status plants are found on the project site. Notify the USFWS if any plant species listed under the Endangered Species Act are found. • Develop a mitigation and monitoring plan (MMP) to compensate for the loss of special-status plant species found during preconstruction surveys, if any. The MMP will be submitted to CDFW and/or USFWS, as appropriate depending on species status, for review and comment. WPWMA will consult with these entities, as appropriate, depending on species status. Mitigation measures may include preserving and enhancing existing onsite populations, creation of offsite populations on project mitigation sites through seed collection or transplantation and preserving occupied habitat offsite in sufficient quantities to offset loss of occupied habitat or individuals. • If transplantation is part of the mitigation plan, the plan will include a description and map of mitigation sites, details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements, and sources of funding to purchase, manage, and preserve the sites. The following performance standards will be applied: <ul style="list-style-type: none"> ○ The extent of occupied area and the flower density in compensatory re-established populations will be equal to or greater than the affected occupied habitat and will be self-producing. Re-established populations will be considered self-producing when: <ul style="list-style-type: none"> ▪ Plants re-establish annually for a minimum of 5 years with no human intervention, such as supplemental seeding.

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
	<ul style="list-style-type: none"> ▪ Re-established habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types. ▪ If offsite mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, and other details, as appropriate to target the preservation of long-term viable populations."
O-10	The commenter states that coverage under the PCCP is not a certainty and should be verified by the PCA and included in the EIR, or the WPWMA should consider compensating for loss of protected trees in the absence of PCCP coverage. The WPWMA has confirmed the project is covered by the PCCP. Please refer to the response to Comment O-8 regarding coverage under the PCCP.
O-11	The commenter states that the WPWMA is not a Permittee under the PCCP and that WPWMA notified the County in May 2014 of its intent to participate as a "Participating Special Entity" under the Program and that reliance on the PCCP for take authorization, state and federal Section 401/404 permitting, and mitigation is subject to the discretion and approval of the PCA and wildlife and regulatory agencies. The WPWMA has confirmed the project is covered by the PCCP. Please refer to the response to Comment O-8 for additional detail.
O-12	The commenter recommends updating Draft EIR Section 7.2.1 (page 7-26) and its description of Section 404 of the Clean Water Act for the current implementation of the waters of the U.S. rule. The Draft EIR, in Chapter 7, Biological Resources, Section 7.2.1, provides the correct federal regulations applicable at the time of development of the Draft EIR, which includes the 2020 Navigable Waters Protection Rule. On December 7, 2021, the EPA and Department of the Army published a proposed rule, Revised Definition of "Waters of the United States" in the Federal Register here: https://www.federalregister.gov/documents/2021/12/07/2021-25601/revised-definition-of-waters-of-the-united-states . The WPWMA would comply with updated regulations at the time of project implementation. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
O-13	The commenter states that Draft EIR Section 7.2.2 (page 7-29) correctly addresses the CDFW Section 1600 requirements and provides additional information regarding Section 1600 permitting requirements. These comments are acknowledged and, since they do not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
O-14	The commenter recommends addressing the requirements for the state's wetland definition and procedures adopted by the State Water Board on April 6, 2021. The Draft EIR, in Chapter 7, Biological Resources, Section 7.2.2, provides the correct state regulations applicable at the time of development of the Draft EIR. The WPWMA would comply with updated regulations at the time of project implementation; no further response is required.
O-15	The commenter states that Mitigation Measure 7.2 should be reviewed by state and federal wildlife agencies regarding protection of western spadefoot by proxy under the PCCP and that a separate action under Section 7 or Section 10 of the ESA and CESA is required. Western spadefoot is designated as a California Species of Special Concern and is not listed under the ESA or CESA; thus, no ESA/CESA consultations would be required for this species. The commenter does not provide technical information to explain why protection of western spadefoot by proxy is not adequate to offset potential impacts; therefore, no further response is required.

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
O-16	<p>The commenter states that the application process for Participating Special Entities in HCP/NCCP Section 8.9.4.1 requires the submittal and approval of a participation package.</p> <p>As indicated in Chapter 3 of this Final EIR, the following text is hereby added to Appendix D, Section D11: "As required in HCP/NCCP Section 8.9.4.1, the WPWMA will submit to the PCA a plan participation package for the proposed project (refer to Section 6.2.4, HCP/NCCP Participation Package), along with any environmental analysis that has been prepared to comply with CEQA or NEPA."</p>
O-17	<p>The commenter states that a portion of the Western Property is located within the City of Lincoln's sphere of influence. As the WPWMA is a JPA composed of the County of Placer and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill, the WPWMA considers local regulations and consults with local agencies. However, County and city land use regulations are not applicable to the WPWMA, as the County and cities do not have land use jurisdiction over the proposed project.</p>
O-18	<p>The commenter states that, in Section 1.8.3, Local Approvals, grading, drainage, and building permits are issued under the Placer County Community Development Resource Agency. As indicated in Chapter 3 of this Final EIR, the following text is hereby added as a subheading to Section 1.8.3 on page 1-43 of the Draft EIR to reflect the that grading, drainage, and building permits are issued by the Placer County Community Development Resource Agency: "Placer County Community Development Resource Agency"</p>
O-19	<p>The commenter states that the Draft EIR is tiering from the SAP/PRSP EIR and incorporating by reference the information included in the SAP/PRSP EIR; therefore, the project should meet or exceed the stormwater peak flow and volume detention and retention mitigation measures included in the SAP/PRSP EIR. The Draft EIR incorporates the information included in the SAP/PRSP EIR. However, the SAP/PRSP EIR was prepared at a programmatic level whereas the Draft EIR was prepared at a project level. By conducting a project-level analysis, the Draft EIR preparers were able to specifically determine the stormwater impacts that would be expected with site development and to describe the BMPs that would be implemented.</p> <p>As described on page 12-35 of the Draft EIR, the existing Storm Water Pollution Prevention Plan (SWPPP) would be modified and implemented with project implementation. The SWPPP would include BMPs designed to prevent construction pollutants from contacting stormwater and to keep products of erosion from moving offsite into receiving waters throughout construction and the life of the project. The BMPs also would address source control and, if necessary, pollutant control. In addition, as described on page 12-41 of the Draft EIR, the project is not located in a 100-year floodplain or designated flood hazard zone. Although the project would result in increased area of impervious surfaces, runoff would be minimized by the incorporation of the <i>Low-Impact Development (LID) Manual</i> measures (discussed in Section 12.2.3 of the Draft EIR); therefore, the project would not result in a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite.</p> <p>Because the stormwater control BMPs identified in the Draft EIR are designed specifically to address the stormwater impacts associated with the development proposed at the project site, the incorporation of more general programmatic mitigation measures from the SAP/PRSP EIR would not be necessary.</p>
O-20	<p>The commenter provides a list of SAP policies it considers relevant to the analysis of aesthetics and a list of specific standards from the <i>Corridor Design Standards and Guidelines</i> that it believes informs the environmental analysis. Please refer to the response to Comment O-7.</p> <p>The commenter also states that Impact 5-1 of the Draft EIR does not provide feasible mitigation, including planting of tall trees that could reduce the level of impact. For a discussion of the tree</p>

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
	planting that would be required following project approval around the perimeter of the landfill, the commenter is referred to Mitigation Measure 6-6 on page 6-65 of the Draft EIR. Mitigation Measure 7-7 requires the WPWMA to implement actions consistent with SAP Mitigation Measure 4.4-7a requiring avoidance or compensation for loss of protected trees and Mitigation Measure 5-3 is intended to reduce the impacts of offsite litter through implementation of a tarping policy that requires incoming loads to use tarps, thus minimizing the potential for offsite litter generation.
O-21	The commenter states the Draft EIR should include a statement that the WPWMA will comply with the County's grading and erosion requirements for the project. Please refer to the response to Comment O-7. The commenter also is referred to the list of local approvals required for project implementation included on page 1-43 of the Draft EIR, which includes grading, drainage, and building permits as well as offsite encroachment permits from the Placer County DPW. As the WPWMA is a JPA composed of the County of Placer and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill, the WPWMA considers local regulations and consults with local agencies. While County and city land use regulations are not applicable to the WPWMA, as the County and cities do not have land use jurisdiction over the proposed project, project mitigation measures will be structured to include the voluntary action to seek local approvals as though the WPWMA were subject to such.
O-22	<p>The commenter states that, on November 16, 2021, the County approved an update to its Health and Safety Element and the Draft EIR should be updated to reflect the updates and whether the proposed project adheres to them.</p> <p>The regulatory descriptions included in the Draft EIR reflect the regulatory conditions at the time the Notice of Preparation was released. The WPWMA is committed to complying with regulations applicable to the project site operations. However, as described in the Draft EIR, the WPWMA is a Joint Powers Authority (JPA) composed of Placer County and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill. As a JPA, the WPWMA considers local regulations and consults with local agencies; County General Plan policies are not applicable, because the County does not have jurisdiction over the proposed project.</p> <p>The commenter states that page 11-19 of the Draft EIR identifies the potential for construction activities to expose the public or the environment to hazardous materials as a significant impact and proposes two mitigation measures. According to the commenter, the SAP/PRSP EIR also proposed a mitigation measure (4.8-1b) to adhere to American Petroleum Institute and Transportation Research Board recommendations regarding setbacks from pipelines. The commenter recommends inclusion of this mitigation measure in the Draft EIR unless infeasible. The Draft EIR did not identify any significant impacts related to the project's proximity to pipelines, thus a mitigation measure in the Draft EIR is not necessary and has not been added.</p> <p>The commenter further states that the landfill and proposed project are located within the area served by Placer County Fire Department. Placer County contracts with the California Department of Forestry and Fire Protection (CAL FIRE) for fire protection services in the unincorporated areas of the County, which includes the SAP area. The WPWMA helps to fund fire services through its voluntary participation in the Payment Agreement Relating to Provision of Fire and Emergency Services between the Western Placer Waste Management Authority and County of Placer.</p>
O-23	The commenter states that Section 14 of the WPWMA Joint Exercise of Powers Agreement requires improvements or structures on the landfill to comply with County regulations and states the Draft EIR should include a statement that WPWMA will comply with County onsite drainage and water quality requirements for the project. Please refer to the responses to Comments O-7 and O-21.

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
Comment:	Response:
O-24	<p>The commenter states that the Draft EIR should demonstrate how the project follows the Sunset Area Plan's requirements for stormwater detention and retention since the Draft EIR is tiering off of the Sunset Area Plan EIR.</p> <p>As discussed under Impact 12-6 on page 12-41 of the Draft EIR, the proposed project's stormwater collection system would be designed to capture and retain project-related increases in peak stormwater discharge on the project site. The project would minimize runoff through the incorporation of low-impact development (LID) strategies that focus on preserving key elements of a project site's pre-development hydrologic function. LID is a design strategy where stormwater runoff is treated as a valuable resource that can recharge groundwater supplies, protect and enhance natural habitat and biodiversity, and add value to new development or redevelopment projects. Rather than discharging stormwater runoff as a waste product, projects are designed to include a diverse set of post-construction stormwater controls or BMPs that infiltrate, evapotranspire, or biotreat stormwater runoff. By retaining stormwater runoff onsite, downstream receiving waters are provided with protection from increased pollutant loads and alterations of hydrologic functions otherwise affected by increased impervious surfaces and human activities.</p> <p>Furthermore, the Sunset Area Plan storm drain system would be designed to accommodate buildout stormwater conveyance, so that new development within the SAP area would not generate runoff that exceeds the capacity of the system's ability to handle it. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>
O-25	<p>The commenter states that Placer County DPW has jurisdiction over the project and related improvements within the existing or required highway easements on Athens Avenue, Fiddymment Road, Sunset Boulevard West, and East Catlett Road, and any roadway maintenance impacts associated with those roadways, and that the project must obtain approval from DPW for any changes to or within the highway easement/right-of-way via an Encroachment Permit/Improvement Plans or revision to maintenance funding mechanisms. The commenter further states that the Draft EIR should be revised to reflect the County's jurisdiction over project elements within the highway easement/right-of-way. The commenter is referred to the list of local approvals required for project implementation included on page 1-43 of the Draft EIR, which includes grading, drainage, and building permits as well as offsite encroachment permits from the Placer County DPW.</p>
O-26	<p>The commenter states that Impact 15-1 acknowledges the project is expected to increase demand for fire protection services, and that the Draft EIR should include a mitigation measure to revisit the funding mechanism/agreement to address the increase in fire protection services and demand on fire facilities from the project. The Draft EIR evaluated impacts regarding whether the project requires new or expanded fire protection facilities, in Impact 15-1, and concluded the WPWMA would continue to pay its fair share of its contribution toward fire protection services, which is consistent with the current agreement; there would be no impact.</p>
O-27	<p>The commenter states that Impact 15-4 acknowledges the potential need to modify the funding agreement to include Fiddymment Road, and that the Draft EIR should include a mitigation measure to revisit the funding mechanism/agreement to address increases in roadway maintenance caused by the project. The Draft EIR evaluated impacts related to new or expanded roadway maintenance and concluded that impacts are less than significant because the WPWMA has a mechanism in place with Placer County to provide funding for road maintenance and improvements on Athens Avenue. Discussion in Impact 15-1 states that it could be reasonably expected that the agreement may need to be modified to include Fiddymment Road should traffic levels on Fiddymment Road substantially increase as a result of the project. The WPWMA would</p>

<p style="text-align: center;">Placer County Todd Leopold, County Executive Officer January 11, 2022</p>	
<i>Comment:</i>	<i>Response:</i>
	comply with the existing agreement and consider a modification at the time of project implementation.
O-28	The commenter states the Draft EIR should be revised to reflect that the County has jurisdiction over project elements within the highway easement/right-of-way. Please refer to the response to Comment O-25.
O-29	The commenter states the Draft EIR should discuss the proposed overcrossing or undercrossing of Fiddymment Road as well as the proposed new encroachment at the existing Athens Avenue intersection with Fiddymment Road. The commenter also states the proposed features have the potential to increase vehicle hazards if not designed to standards that meet the satisfaction of the Placer County DPW. The commenter notes that Impact 16-3 should indicate the project is subject to obtaining an Encroachment Permit from the DPW for work within the County highway easement/right-of-way and for any improvements that the DPW determines necessary to ensure that there is no increase in vehicle hazards. Please refer to the response to Comment O-25.
O-30	The commenter states that the Draft EIR should be revised to reflect that the County has jurisdiction over project elements within the highway easement/right-of-way. Please refer to the response to Comment O-25.
O-31	The commenter states that the Draft EIR should reflect requirements and concerns related to construction or relocation of utility facilities. Please refer to the response to Comment O-25.

2.2.16 Letter P

JEN CA PLACER LLC

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January 12, 2022

Ms. Stephanie Ulmer
Western Placer Waste Management Authority
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Roseville, CA 95747
EIRComments@RenewablePlacer.com

**RE: Comments on WPWMA Draft EIR dated October 2021/
Request that Plan Concept 2 Be Implemented**

Dear Ms. Ulmer:

Thank you for the opportunity to comment on the Western Placer Waste Management Authority's (Authority) Draft EIR dated October 28, 2021, for its proposed expansion of the Regional Landfill.

JEN CA Placer LLC purchased the entirety of the Placer Ranch Specific Plan area in August of last year. Taylor Builders LLC is a Roseville-based land development firm which is the regional operating partner for JEN. We intend to develop and sell Placer Ranch in the phases identified in the Specific Plan adopted by the County on December 19, 2019. Thus, we have a significant vested interest in how the Landfill expansion is constructed.

We understand that the Authority has considered two separate and distinct Plan Concepts (Plan Concept 1 and Plan Concept 2) and that the Authority Staff has identified Plan Concept 1 as the "preferred plan." We have serious concerns about Plan Concept 1 regarding environmental, functional, and fiscal issues, which are discussed below. Before addressing our concerns, we outline our understanding of the proposed project.

PROJECT DESCRIPTION

Plan Concept 1 would keep the Material Recovery Facility (MRF), Construction and Demolition Materials Processing Operation (C&D operations), the Pilot Study Area, and the administrative buildings in generally the same location as currently exist, but would expand the landfill waste footprint to cover not only a major portion of the center property, but all of the eastern property. Plan Concept 2 would leave a majority of the existing activities, as well as the Organics Operation, on the center property and expand the waste footprint away from the center of the Sunset Area Plan onto the western property – preserving a large portion of the extensive vernal pools and wetlands on the eastern property. Perhaps most importantly, Plan

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 2 of 11

Concept 2 would locate compatible technologies on the eastern property, adjacent to surrounding innovation uses, allowing for better transition between uses.

Both Plan Concepts would include construction of a recovered materials storage building to protect recovered MRF materials from weather exposure to reduce odors and stormwater pollution, and both would include landscaping and fencing along the perimeter of the site.

Plan Concept 1 would also locate half of the complementary/programmatic elements such as compatible technologies and the University research areas on the further location north and west – on the western parcel. Plan Concept 2 would locate these uses directly adjacent and north to the University site, and a future innovation center to the immediate east.

Most importantly, Plan Concept 1 would increase the permitted capacity of the Landfill to 45.1 million cubic yards (mcy) and increase the life of the landfill by an additional 43 years, whereas Plan Concept 2 would increase the permitted capacity to 50.2 mcy and increase the life of the landfill by 52 years – almost a decade longer.

ENVIRONMENTAL CONCERNS

In reading the Draft EIR it is noticeable that Plan Concept 2 appears to be an afterthought and not nearly well explained as Plan Concept 1. In this letter, we identify a number of CEQA deficiencies and then, the overwhelming benefits of Plan Concept 2, which may not be obvious to a general reader.

} P-1

General Comments

Regulatory Setting

In each of the impact chapters, there is a section on federal, state, and local regulations. It is called, “Regulatory Setting.” In each of these impact chapters¹, the section on local regulatory setting states as follows:

} P-2

The WPWMA is a Joint Powers Authority (JPA) composed of Placer County and the cities of Lincoln, Rocklin, and Roseville to own and

¹ See Draft EIR pages 5-3, 6-26, 7-30, 8-12, 9-23, 10-13, 11-16, 12-28, 13-2, 14-11, 15-6, 16-5, and 17-7.

Stephanie Ulmer
 Western Placer Waste Management Authority
 Re: Comments on Draft EIR Dated October 2021
 January 12, 2022
 Page 3 of 11

operate a regional recycling facility and sanitary landfill. As a JPA, the WPWMA considers local regulations and consults with local agencies, but County and city regulations are not applicable, as the County and cities do not have jurisdiction over the proposed project." [Emphasis added.]

The second (italicized) statement above is incorrect. The JPA **is** subject to local regulations. The Authority JPA Agreement dated October 3, 1978 (as amended) provides in pertinent part as follows:

Section 14. Authority to Approve Improvements and Structures.

From and after the date of this Agreement, the Authority shall approve any capital improvements to, structures placed or erected on, or lease of sanitary landfill property, **provided, however, that such improvements and structures shall comply with the applicable laws, ordinances, resolutions, or regulations of the County or any City in which such improvements or structures are located.** [Emphasis added.]

The WPWMA JPA Agreement does not provide any counter direction pertaining to local regulations. As such, the statement made in the sections cited above is incorrect. Each regulatory setting section referencing local rules in the Draft EIR needs to be revised to acknowledge that the Authority must comply with all applicable local laws and regulations, and that the various general plan and municipal ordinances of the County apply to the project.

Mitigation Measures

Mitigation measures must be described in detail in the Draft EIR. For a mitigation measure to be adequate under CEQA, an agency must commit itself to the mitigation, adopt specific performance standards, and identify the types of potential actions that would feasibly achieve the performance standards set forth. (CEQA Guidelines, § 15126.4, subd. (a)(1)(B)). Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. (*Ibid.*, § 15126.4, subd. (a)(2).)

Many of the mitigation measures in the Draft EIR use the verb "will." This term is not sufficient direction. The word "will" should be replaced with "shall" in each instance; otherwise, the mitigation measure does not adequately mandate the action to be taken and are inadequate under CEQA.

P-2

P-3

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 4 of 11

Aesthetics

Both Plan Concepts 1 and 2 would allow the Landfill to reach 325 feet in height; however, Plan Concept 1 would continue the waste footprint on the center property and further, expand the waste footprint onto the eastern property (historically intended as a bufferland) – immediately adjacent to neighboring innovation uses and businesses within the Sunset Area. This would have significant and unavoidable negative repercussions on the overall aesthetics of the Sunset Area Plan, and certainly the views of neighboring property owners, which have not been sufficiently presented in the Draft EIR.

Specifically, this Chapter of the Draft EIR is flawed as the analysis is completely devoid of any discussion of visual impacts on the Placer Ranch project or the Sunset Industrial Area. Instead, the Key Observation Points (KOPs) include locations such as Fiddymont Ranch (in Roseville, over 3 miles away and south of Placer Ranch), Lincoln Hills (in Lincoln, and over 3 miles away), and Amoruso Ranch (in the County, west of Placer Ranch). No viewpoints are shown from the Placer Ranch Specific Plan Area, or the adjacent Sunset Industrial Area in the Draft EIR. The application for the Sunset Area Plan/Placer Ranch Specific Plan (and the related EIR) was only a month away from County consideration when the other KOPs were identified and thus, clearly a pending and foreseeable project under CEQA. Indeed, other parts of the Draft EIR acknowledge the approval of the Placer Ranch Specific Plan and Sunset Area Plan in December of 2019. Given this draft was circulated almost two years later, there is little rationale for why such KOPs as Placer Ranch and the Sunset Industrial Area were not analyzed. As such, the Aesthetic impacts analysis in this section is woefully inadequate.

While adding these KOPs to the Draft EIR will not alter the significant and unavoidable outcome, the Authority has a duty under CEQA to clearly and fully identify, and disclose ALL potentially foreseeably aesthetic impacts – especially in this circumstance where despite a similar legal conclusion, the practical effect of the different concept plans is extraordinary. Such disclosure has not been provided about the extensive impacts on the Sunset Area Plan, and most specifically, the Placer Ranch Specific Plan.

Additionally, it is confounding why Mitigation Measure 3-1[sic] (it should read MM 5-1) indicates that “mitigation measures intended to visually screen the landfill from local and distant viewpoints would be ineffective. Therefore, no mitigation measures are available to reduce this impact to a less-than-significant level.” (DEIR, pp. 5-59.) First and foremost, **Mitigation Measure 6-6** related to objectionable odors requires the Authority to establish a tree-lined perimeter of the Landfill. It’s unclear why this mitigation measure was not simply referenced or included in Mitigation Measure 5-1, but it should be because although the entire

P-4

P-5

Stephanie Ulmer
 Western Placer Waste Management Authority
 Re: Comments on Draft EIR Dated October 2021
 January 12, 2022
 Page 5 of 11

visual impact of the expansion will not be addressed, the views of those receptors immediately surrounding the Landfill in Placer Ranch and the surrounding SAP would benefit from at least partial obscuring of the base of the landfill with trees and shrubs. As a result, **we recommend the following mitigation measure be added to the Draft EIR for Impact 5-1:**

Establish a tree-lined perimeter of evergreen trees such a redwoods or pines around the Landfill in Tier 1 to visually screen the landfill from surrounding areas.

P-5

Notably, we do not endorse the use of eucalyptus trees as visual screens. They are messy and have shallow root systems that are often problematic in large storm events (causing downed trees and/or limbs).

While we acknowledge waste piles may need to reach this height, Plan Concept 2 allows for a waste footprint expansion on the western property – on the western boundary of the Sunset Area Plan, as opposed to in the center of it. The placement of the waste piles on the western property under Plan Concept 2 would be far less impactful on surrounding uses, and seemingly more beneficial for other reasons as discussed further in this letter.

P-6

Onsite litter was also not addressed in the Draft EIR. **Impact 5-3** addresses impacts of “offsite” litter only. There are no impacts that address litter generally or litter generated from onsite (as opposed to just from offsite sources). While much of the litter may come from offsite sources, it seems axiomatic that some trash (i.e., papers, plastic bags, etc.) might get loose at the Landfill, especially on windy days. Further, there is no doubt an onsite litter plan in place, but the public does not automatically know that and the Draft EIR should address the potential impact of *both* onsite *and* offsite litter.

P-7

In a related vein, **Mitigation Measure 5-3** indicates the Authority “would implement a tarping policy that requires incoming loads to use tarps, thus minimizing the potential for offsite litter generation.” The proposed constitutes deferred mitigation under CEQA because it does not clearly state when or how the tarping policy would be implemented. It is also not clear how the policy would be enforced. Would the Authority reject the loads, thereby creating a worse issue? Would the Authority fine offenders? Or would the Sheriff be tasked with this enforcement? CEQA requires that deferred mitigation measures have performance standards included in them. MM 5-3 should be rewritten to include details about the implementation of the tarping policy.

P-8

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 6 of 11

Air Quality/Odor

Yet another example of the distinction between Plan Concept 1 and 2 that should be highlighted is the impacts of air quality on the surrounding environment. As the Draft EIR details in **Impact 6-3** (Operational Emissions of Criteria Air Pollutants and Ozone Precursors), Plan Concept 2 will have significantly lower NO_x and PM₁₀ emissions² than Plan Concept 1. While a significant and unavoidable conclusion results under either plan concept, selection of Plan Concept 2 would not only result in fewer NO_x and PM₁₀ emissions, but mitigation costs would be significantly less. For instance, a mitigation fee program for PM₁₀ emissions would result in a savings of \$76,200 under Plan Concept 2. Thus, Plan Concept 2 would be far more beneficial for surrounding users and the environment when compared to Plan Concept 1 when it comes to criteria air pollutants.

P-9

Similarly, Plan Concept 2 would be preferable when it comes to odor impacts. According to the Draft EIR, there are four facilities or operations at the Landfill with the greatest potential to produce odors, including the MRF building, composting operation, active landfill areas and the landfill gas collection system. Of these, the composting operations are the most problematic.

P-10

Impact 6-6 (Create Objectionable Odors Affecting a Substantial Number of People) identifies that "[i]mplementation of the solid waste elements, complementary and programmatic elements, and supporting elements under the proposed project [has] the potential to create objectionable odors affecting a substantial number of people. The proposed project would implement numerous facility improvements, including more efficient waste management operations and odor abatement strategies. However, the nature and effectiveness of these strategies are unknown, there are no quantifiable thresholds of significance for odor impacts and there is no existing fee program or other mechanism by which to fund odor mitigation." Then, again, the Draft EIR concludes a significant and unavoidable impact.

P-11

We acknowledge there are no quantifiable thresholds of significance for odor impacts, but there are numerous known odor policies and measures which have been implemented by the many urban landfills throughout California. Further, the Authority itself has conducted pilot studies that reduce odors from the composting. Additionally, it is incorrect that the Authority has no means by which to fund odor mitigation. Each of these points is discussed below.

P-12

² Plan Concept 2 will result in 0.5 tons less emissions per year of NO_x emissions (or 21.5 tons fewer emissions over the life of the Landfill), and a \$10,000 savings in mitigation fees as compared to Plan Concept 1. Additionally, Plan Concept 2 will result in 12.9 fewer tons PM₁₀ emissions than under Plan Concept 1, and \$76,200 savings in mitigation costs.

Stephanie Ulmer
 Western Placer Waste Management Authority
 Re: Comments on Draft EIR Dated October 2021
 January 12, 2022
 Page 7 of 11

First, Authority Staff insists the Authority wants to be progressive in addressing the odor issues arising at the landfill. However, the Authority has had over a decade to implement effective odor-reducing measures but has – to date- failed to do that. Policies such as not turning composting piles when winds are high would in and of themselves help to significantly reduce odor impacts, yet they have not been formalized or consistently practiced.

Second, and just as importantly, the Placer Ranch Development Agreement (DA), adopted by Placer County in December 2019, specifically requires the developer of Placer Ranch to pay a landfill and composting fee of \$340 per residential unit, as well as \$0.25 per square foot for non-residential development (i.e., office, retail, and industrial construction). The DA calls for 5,636 residential units, which alone would generate \$1,916,240 in landfill fees payable to the Authority through the County. Furthermore, the Campus Park area of Placer Ranch permits 4.5 million square feet of non-residential construction, generating another \$1,125,000 of landfill/composting fees, and the Town Center allows for 600,00 square feet – so \$150,000 towards landfill/composting fees. Thus, the Placer Ranch development alone would generate over \$3,000,000 in composting fees, which could easily be used to finance better and more effective odor-reducing measures, including fully enclosing the composting area.

We have serious concerns that adoption of Plan Concept 1, which moves the composting facilities to the northwestern parcel, will allow the Authority to rationalize delaying any upgrades in compost processing and thus, odor impacts, on the grounds they have moved the processing facilities further away. We would far prefer Plan Concept 2, which allows the composting activities to remain on the center parcel as there are known feasible mitigation measures that can address odors. There is no mitigation that will adequately address a 325-foot-high pile of dirt filled with trash.

P-12

Biological Resources

The Draft EIR seems to demonstrate that Plan Concept 1 would have far more extensive impacts on biological resources, including wetlands and vernal pools, than Plan Concept 2. (See **Figure 7-2**, which illustrates the extent of waters on the eastern property versus the western property.) In particular, the Draft EIR acknowledges that much of the western property is developed and/or disturbed. In contrast, it is noted that the “eastern property is undeveloped land characterized by a mosaic of seasonal wetlands (including vernal pools) and swales.” (DEIR, p. 7-8.) Moreover, while it is true that mitigation can and would occur through the Placer County Conservation Program (PCCP) for either plan concept, the PCCP is not a pass or waiver which allows for filling any or all wetlands within the identified development area. Rather, the PCCP is a mechanism by which to ease permitting requirements where waters

P-13

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 8 of 11

of the US fall under a certain threshold. But the filling of waters is still subject to US Army Corps authorization and it's extremely important to note that mitigating impacts to Plan Concept 1 will be far more costly given the extensive waters on the eastern property. This is because the land conversion fee under the PCCP is a minimum of \$25,000 per acre, in addition to site-specific resource conversion fees (upwards of \$250,000 for certain vernal pool impacts) depending on the resources at issue. Locating and expanding the landfill on western property under Plan Concept 2 would be *far less impactful* on waters of the US.

P-13

In the same vein, **Impact 7-1** discusses impacts to Special Status Plant Species and concludes impacts for both concept plans would be significant. But **Figure 7-4** illustrates otherwise. Specifically, the figure shows plant species on the central and eastern properties, but NOT on the western property. Thus, once again, Plan Concept 1 would have more practical significant impacts than Plan Concept 2 would because the development of compatible technologies on the eastern property could potentially avoid the special status plants located there, but use of the western property for the landfill expansion would not avoid those plants. This should be explained in the Draft EIR. Instead, the Draft EIR provides an unsubstantiated statement that "Similar to Plan Concept 1, Plan Concept 2 would result in significant impacts on special-status plants." (Draft EIR, p. 7-36.)

P-14

Geology and Soils

Impact 9-2 discusses the potential impacts of soil loss or erosion. While many aspects of the plan concepts would be similar, and best management practices through a SWPPP would be employed for either plan concept, common sense dictates that far more extensive BMPs would be required on the eastern parcel should Plan Concept 1 be implemented because of the exposed landfilling process. In contrast, Plan Concept 2 would provide that the entire eastern parcel be developed with complementary programmatic elements and technologies that would require more significant and permanent drainage infrastructure to protect water quality, reducing long term costs of BMPs. As such, Plan Concept 2 would be preferable for purposes of protecting water quality.

P-15

Hazards and Hazardous Materials

Impact 11-3 highlights the potential for landfill gas to accumulate near structures within 1,000 feet of the landfill. Here again, this impact highlights the need to place the main landfill further away from urban development, including the office and industrial spaces proposed on the eastern and southern borders of the Landfill, as well as residences further south, in the Placer Ranch development. While Mitigation Measure 11-3 would be required regardless of the plan

P-16

Stephanie Ulmer
 Western Placer Waste Management Authority
 Re: Comments on Draft EIR Dated October 2021
 January 12, 2022
 Page 9 of 11

concept selected, Plan Concept 2 would be preferable to Plan Concept 1 to reduce public safety risks related to landfill gas intrusion to the greatest extent feasible.

} P-16

Risk of vectors is also increased under Plan Concept 1. **Impact 11-7** identifies that the stormwater ponds have an increased risk of exposing the public to vector-borne diseases. The analysis states that while the location of the stormwater ponds would be different under each concept plan, the impacts remain the same. But that's not what the figures of the different plan concepts illustrate. While it is true that under either concept plan a stormwater pond would be located at the southwest corner of the center parcel (where it is currently located), the discussion fails to explain that under Plan Concept 1, the second stormwater pond would be located in the center of the western parcel but under Plan Concept 2, the second stormwater pond would be located in the furthest distance from "the public" – at the northernmost end of the western parcel, adjacent to the new landfill area. Once again, these facts highlight that Plan Concept 2 would be preferable in reducing hazard impacts.

} P-17

Hydrology and Water Quality

The Draft EIR identifies **Impact 12-3** – the potential for waste excavation and relocation to degrade surface water and/or groundwater quality. As with the previous impacts discussed, Plan Concept 2 would be preferable to Plan Concept 1 as the benefit to groundwater from removing waste from the soil-lined landfill would occur sooner under Plan Concept 2 because the waste would be removed on a shorter timeline than under Plan Concept 1.

} P-18

Land Use and Planning

This chapter of the Draft EIR should address how the Landfill plans to adapt from a rural landfill to an *urban* landfill given it is located at the center of the Sunset Area Community Plan and just north of the Placer Ranch Specific Plan area, which has been approved for 5,636 residential units (with a range of densities), 8,440,513 square feet of employment and commercial uses, including the 300-acre Sacramento State University satellite campus, parks, open space, schools, and corresponding infrastructure (i.e., roads, utilities, etc.).

} P-19

Oddly, while the Draft EIR emphasizes that the Landfill is proposed to be surrounded by industrial and commercial uses, including research and development and the University campus proposed in the Placer Ranch Specific Plan, it generally ignores the fact that over 5,000 new homes have been approved to be located south of the Landfill as part of the Specific Plan, mentioning only briefly that the buffer area between residences and the Landfill was reduced from one mile to 2,000 feet.

} P-20

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 10 of 11

Perhaps more concerning, the regulatory setting regarding land use authority is also inaccurate. As discussed above, the JPA is indisputably subject to the County's land use authority and the Landfill project must be constructed and operated consistent with the County's General Plan policies, as well as Zoning Code. Section 13.3.3 must be revised to clearly state that the Authority is, in fact, subject to the County's land use regulations and policies. Why else would the Authority be required to obtain conditional use permits from the County?

P-21

We respectfully disagree with the discussion in **Impact 13-2** relating to the consistency with applicable land use plans and policies. Specifically, we disagree that the Plan Concept 1 would have no impact. As outlined in this letter, there are a myriad of examples of how Plan Concept 2 is far preferable to surrounding uses in comparison to Plan Concept 1. Certainly, the idea of locating the Compatible Technologies, Pilot Study Area, and University Area in the furthest western corner – away from the new University campus and the eastern Sunset Industrial Area is confounding, let alone impractical and costly (since there is currently no infrastructure by which to support buildings on the western parcel). Thus, by definition, there is a major distinction between the two plan concepts, which this Draft EIR completely overlooks. Plan Concept 2 is far more compatible with surrounding land uses, and thus, must be selected to reduce impacts to the extent possible – even if the CEQA conclusion technically remains the same.

P-22

Noise

As illustrated in **Figure 3-1** (Plan Concept 1) and **Figure 3-7** (Plan Concept 2), the key difference in uses is that the landfilling is proposed to be moved *closer* to neighboring uses. Having the boundary uses proposed under Plan Concept 2 – including the compatible technologies and University research areas closer to neighboring uses would be far more beneficial not only from a land use compatibility standpoint, but from a noise perspective, as these uses will be enclosed and be able to buffer against some of the sounds at the Landfill. This is a particularly poignant point when one realizes that the Landfill-related construction can extend to 8:30 in the evening seven days a week. The Draft EIR completely fails to identify this major distinction in operations under the two concept plans.

P-23

FISCAL CONCERNS

Authority Staff has advised that Plan Concept 1 is preferred based on an economic analysis conducted by its consultant team. As the Draft EIR notes, however, the consulting team only

P-24

Stephanie Ulmer
Western Placer Waste Management Authority
Re: Comments on Draft EIR Dated October 2021
January 12, 2022
Page 11 of 11

developed the Initial Capital Costs (ICCs) for each plan concept, and these costs do not include key factors such as construction timing, replacement costs, and time value of money as considered with present day value. For instance, while Plan Concept 1 ICCs were estimated at \$521,233,000, such a cost fails to consider that Plan Concept 2 will result in fewer mitigation fees, fewer aesthetic impacts, better air and water quality, and provide an additional 10 years of life and five tons of capacity to the Landfill.

P-24

CONCLUSION

In conclusion, Plan Concept 2 is the preferable concept plan – for the benefit of all surrounding users, the taxpayers of Placer County, and even the Authority. The environmental impacts and mitigation costs under Plan Concept 1 far exceed those that would result under Plan Concept 2. In the end, the odor issues from composting on the eastern parcel (leaving it where it is) would have far fewer significant impacts than a 325-foot-high pile of dirt/trash. Mitigation fees for the biological and air impacts would be hundreds of thousands of dollars less under Plan Concept 2. And, implementation of Plan Concept 2 would reduce the Authority's overall costs, ultimately reducing costs for citizens of Placer County.

P-25

We respectfully request that Staff update the Draft EIR as discussed above and recommend Plan Concept 2 to the Authority Board.

Thank you for your consideration. Please do not hesitate to contact Kate Hart or me with any questions.

Very truly yours,



Clifton Taylor
Vice President

cc: Bill Hallidin, WPWMA Board Chair
Bonnie Gore, WPWMA Board Member
Dan Karleskint, WPWMA Board Member
Pauline Roccucci, WPWMA Board Member
Ken Grehm, WPWMA Executive Director
Kevin Bell, WPWMA Deputy Executive Director
Eric Oddo, WPWMA Program Manager

Letter P Comment Responses

JEN CA Placer LLC Clifton Taylor January 12, 2022	
Comment:	Response:
P-1	The commenter states that Plan Concept 2 appears to be an afterthought and not evaluated at the same level as Plan Concept 1. Plan Concepts 1 and 2 include two different approaches to implementing the Renewable Placer: Waste Action Plan. However, because both plan concepts are intended to achieve the same project objectives, many of the project components are similar. In many cases, the differences are limited to the component locations and/or the timing of their implementation. As a result, similar impacts typically were identified for both plan concepts. To improve readability and reduce redundancy, when impacts for Plan Concept 2 were identified as being the same as for Plan Concept 1, the impact discussion for Plan Concept 2 was limited to any differences in impacts or mitigation measures between the two plan concepts.
P-2	<p>The commenter refers to the statement in the Regulatory Setting section of the Draft EIR that references WPWMA as a Joint Powers Authority: "As a JPA, the WPWMA considers local regulations and consults with local agencies, but County and city regulations are not applicable, as the County and cities do not have jurisdiction over the proposed project." The commenter says this statement is incorrect and that the Regulatory Setting section referencing local rules should be revised.</p> <p>Please refer to the responses to Comments O-7 and O-21. The text regarding the Regulatory Setting is correct and no changes are necessary. Section 14 of the WPWMA JPA Agreement states that the WPWMA will comply with "applicable" (quotation marks added) laws, ordinances, resolutions or regulations of the County or cities (collectively "local regulations"). As a JPA, the WPWMA considers local regulations and consults with local agencies. However, local regulations are not applicable to the proposed project, because the County and cities created the JPA and the JPA is not presumptively subject to those regulations given the common powers of its members. The WPWMA Board of Directors has not made local regulations applicable to the proposed project. For reference, see, <i>Zack v. Marin Emergency Radio Authority</i> (2004) 118 Cal.App.4th 617.</p>
P-3	The commenter states that the use of the word "will" in mitigation measures does not provide sufficient direction and that it should be replaced with the word "shall." However, as used in the mitigation measures, the word "will" represents a command and as such, dictates that the mitigation measures are required to be implemented. Replacing the word "will" with the word "shall" would not alter WPWMA's obligation to implement the identified mitigation measures. Therefore, no change in the language of the mitigation measures has been made.
P-4	The commenter states that the visual impacts of Plan Concept 1 on the properties to the east have not been sufficiently presented in the Draft EIR. For a detailed representation of the visual impacts associated with Plan Concept 1 as experienced by viewers to the east, the commenter is referred to the Key Observation Point (KOP) 3 simulation of visual changes anticipated by 2050 and at full buildout included on page 5-39 of the Draft EIR. The commenter also is referred to the discussion of visual impacts from KOP 3 associated with Plan Concept 1 included on page 5-45 and the discussion under Impact 5-1 on page 5-59. The commenter also is referred to the KOP 4 simulation of visual changes anticipated by 2050 and at full buildout included on page 5-40 of the Draft EIR and to the discussion of visual impacts from KOP 4 associated with Plan Concept 1 included on page 5-46 and the discussion under Impact 5-1 on page 5-59.
P-5	<p>The commenter identifies an incorrect number reference to the mitigation measure on page 5-59 of the Draft EIR. As indicated in Chapter 3 of this Final EIR, the reference to Mitigation Measure 3-1 on page 5-59 of the Draft EIR is hereby revised to Mitigation Measure 5-1.</p> <p>The commenter recommends a new mitigation measure to address visual impacts as follows: "Establish a tree-lined perimeter of evergreen trees such as redwoods or pines around the Landfill in Tier 1 to visually screen the landfill from surrounding areas." However, as the commenter</p>

JEN CA Placer LLC Clifton Taylor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	correctly notes, Mitigation Measure 6-6 included in Chapter 6, Air Quality, already requires the planting of trees around the landfill perimeter to visually screen the landfill from surrounding areas. Therefore, an additional mitigation measure is not necessary. The selection of the trees to be planted is expected to be based on the effectiveness of the individual tree species to minimize both odor and visual impacts, and their long-term maintenance requirements.
P-6	The commenter notes that placement of waste on the Western Property under Plan Concept 2 would be less impactful on surrounding uses. Please refer to the response to Comment P-1.
P-7	The commenter states that the Draft EIR should address the potential impact of onsite and offsite litter. The commenter is referred to the litter control discussion in Chapter 1, Introduction, of the Draft EIR in Section 1.6.2, Waste Recovery Operations.
P-8	The commenter states that Mitigation Measure 5-3 should be rewritten to include details about implementation of the tarping policy. The Draft EIR includes implementation of a tarping policy in Mitigation Measure 5-3 that would require incoming loads to use tarps, thus minimizing the potential for offsite litter. Even with implementation of a tarping policy, the Draft EIR concluded that offsite litter impacts would remain significant and unavoidable, and additional detail would not impact this conclusion.
P-9	The commenter states that Plan Concept 1 would have more extensive impacts on air quality, including emissions of the criteria air pollutants NO _x (oxides of nitrogen) and PM ₁₀ and related mitigation costs, than Plan Concept 2. As described in Chapter 6, Air Quality, despite subtle differences in the emission estimates for the two plan concepts, the mitigation measures and impact significance conclusions were the same. Therefore, no substantive differences in the air quality impacts for the two plan concepts were identified in the Draft EIR.
P-10	<p>The commenter states that Plan Concept 1 would have more extensive impacts on air quality, including odor impacts, than Plan Concept 2. The odor impacts associated with implementation of the two plan concepts were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned development identified in the Sunset Area Plan did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not yet been constructed, it was not considered when describing the impacts of the two plan concepts on the existing environment.</p> <p>For a discussion of the cumulative odor impacts that would be expected with buildout of the Sunset Area Plan, the commenter is referred to the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR.</p> <p>Regarding future development uses in the project vicinity, in addition to the Sacramento State – Placer Center proposed to be located south of the Center and Eastern Properties, the Placer Ranch Specific Plan includes commercial and residential uses south of the Western Property. Also, the Sunset Area Plan includes proposed Innovation Center uses to the east and west of the WPMWA property. Because all of the properties surrounding the project site, with the exception of those to the north, are expected to be developed with implementation of the Sunset Area Plan and Placer Ranch Specific Plan, the Draft EIR concluded that the cumulative impacts of the two plan concepts in relation to future adjacent land uses would not substantially differ.</p> <p>Please refer to the response to Comment P-9.</p>
P-11	The commenter notes the conclusions of the Draft EIR identify a significant and unavoidable impact related to odors. The comment is acknowledged.
P-12	The commenter makes a general statement regarding odor mitigation policies and measures implemented at other urban landfills in California. The WPMWA SWOP, provided as Appendix C.6

JEN CA Placer LLC Clifton Taylor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	<p>of the Draft EIR, describes both the odor control measures that are currently being implemented and those that would be fully implemented as part of the proposed project.</p> <p>The commenter describes the requirements of the Placer Ranch Development Agreement for developer fees payable to the Authority to fund odor mitigation. The odor mitigation funding amounts listed by the commenter would not be generated until the Placer Ranch project development fees are paid. Therefore, the statement in Impact 6-6 that “there is no existing fee program or other mechanism by which to fund odor mitigation” is accurate since funding has not started as of the release of this Final EIR. It is acknowledged that future developer fees required as part of the Placer Ranch Development Agreement will fund a portion of the WPWMA’s odor mitigation measures.</p> <p>The commenter states concern that Plan Concept 1 would have greater odor impacts related to the location of the composting facilities than Plan Concept 2. Please refer to the response to Comment P-10.</p>
P-13	The commenter states that Plan Concept 1 would have greater impacts on biological resources, including wetlands and vernal pools, than Plan Concept 2. The commenter also states that locating and expanding the landfill on the Western Property under Plan Concept 2 would be less impactful on waters of the U.S. Please refer to the response to Comment G-4.
P-14	The commenter states that Plan Concept 1 would have greater biological impacts than Plan Concept 2 because the development of compatible technologies on the Eastern Property could potentially avoid special-status plants; however, use of the Western Property for the landfill expansion would not avoid those plants. Please refer to the response to Comment G-4.
P-15	<p>The commenter states that more extensive BMPs would be required on the Eastern Property should Plan Concept 1 be implemented because of the exposed landfilling process. In contrast, Plan Concept 2 would allow the entire Eastern Property to be developed with complementary/programmatic elements and technologies that would require more significant and permanent drainage infrastructure to protect water quality, reducing long-term costs of BMPs. As such, Plan Concept 2 would provide greater water quality protection.</p> <p>Because of the relatively flat topography of the project site and limited onsite drainages, the Draft EIR concluded in the discussion of Impact 9-2 in Chapter 9, Geology, Soils, and Paleontology, and Impacts 12-1, 12-3, and 12-4 in Chapter 12, Hydrology and Water Quality, that the two plan concepts would have similar water quality impacts requiring similar BMPs. Both plan concepts include similar solid waste and complementary/programmatic elements. The primary difference between the plan concepts is where the different elements would be located. Both plan concepts include an operating landfill that would receive municipal solid waste daily.</p>
P-16	<p>The commenter states that Impact 11-3 highlights the potential for landfill gas to accumulate near structures within 1,000 feet of the landfill and the need to place the main landfill farther away from urban development and concludes that Plan Concept 2 would be preferable in reducing public safety risks related to landfill gas intrusion.</p> <p>No offsite structures are currently located within 1,000 feet of the proposed landfill expansion areas identified in either Plan Concept 1 or Plan Concept 2. Therefore, neither plan concept would be expected to have any effect on offsite structures associated with potential landfill gas migration risks.</p> <p>The Sunset Area Plan proposes development to the east, south, and west of the project site. For Plan Concept 1, the proposed expanded landfill would be closer to the development proposed to the south and east, whereas for Plan Concept 2, the proposed new landfill would be closer to the</p>

JEN CA Placer LLC Clifton Taylor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	<p>development proposed to the west. Therefore, the plan concepts would not differ substantially in relation to the proximity of future development to the proposed landfill uses.</p> <p>For future residential development, the Sunset Area Plan includes a 2,000-foot setback requirement between the WPWMA property, and any new residential uses and the land use designations included in the Placer Ranch Specific Plan reflect this setback requirement and a 1,000-foot setback between the WPWMA property and any new commercial properties. Therefore, no residential or commercial land uses are expected to be located within 1,000 feet of the landfill uses associated with either plan concept.</p>
P-17	<p>The commenter states that according to Impact 11-7 in the Draft EIR, the risk of vectors is increased under Plan Concept 1 and the discussion fails to explain that the stormwater pond would be located in the center of the Western Property but under Plan Concept 2, the stormwater pond would be located farthest from the public. The commenter states that Plan Concept 2 would be preferable in reducing hazard impacts.</p> <p>For information regarding the proposed locations of stormwater ponds, the commenter is referred to Figure 3-1 for Plan Concept 1 and Figure 3-7 for Plan Concept 2 in Chapter 3, Project Description, of the Draft EIR.</p> <p>Impact 11-7 identifies on page 11-29 of the Draft EIR that the proposed project expansion would require the WPWMA to implement a broader vector program that covers the Western and Eastern Properties, in addition to the expanded activities on the Center Property. The Western and Eastern Properties provide a greater potential for vectors (specifically, mosquitoes) to occur because of the presence of aquatic resources that may be disturbed during construction and operation (as discussed in Chapter 3, Biological Resources). The disturbance of these aquatic resources could increase areas of standing water, which would increase breeding areas for mosquitoes.</p> <p>The discussion referenced by the commenter in Impact 11-7 does not state that the existing or proposed stormwater ponds would contribute to this impact. The existing stormwater ponds are managed to control mosquito populations and future ponds would be similarly managed. For any areas of increased standing water associated with either Plan Concept 1 or 2, Mitigation Measure 11-7 would be required to be implemented, which includes limiting areas of standing water during project construction and granting site access to the Placer Mosquito and Vector Control District to perform vector control during construction and operation of the proposed project. Because both the Western and Eastern Properties contain aquatic resources, the Draft EIR concluded that both have the potential to increase mosquito populations.</p>
P-18	<p>The commenter states that Plan Concept 2 is preferred as the benefit to groundwater from removing waste from the soil-lined landfill would occur sooner. This comment is acknowledged; since it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.</p>
P-19	<p>The commenter states that the Land Use and Planning chapter of the Draft EIR should address how the landfill plans to adapt from a rural landfill to an urban landfill given its location at the center of the Sunset Area Plan. As described in Section 1.4 of Chapter 1, Introduction, in the Draft EIR, the WPWMA developed the Renewable Placer: Waste Action Plan to articulate a long-term vision for optimizing ongoing waste recovery and disposal services provided to the Participating Agencies while responding to a nearly doubling of the population served by the WPWMA over the next 30 years. The objectives of the Waste Action Plan that would help achieve this vision are articulated on page 1-7 of the Draft EIR, including developing WPWMA properties consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan. By doing so, the Renewable Placer: Waste Action Plan Project is expected to be developed consistent with the other planned land uses within the Sunset Area Plan.</p>

JEN CA Placer LLC Clifton Taylor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
P-20	<p>The commenter states that the Draft EIR only briefly mentions that more than 5,000 new homes have been approved to be located south of the landfill as part of the Placer Ranch Specific Plan and that the buffer area between residences and the landfill was reduced from 1 mile to 2,000 feet.</p> <p>For more information regarding the change in General Plan Policy 4.G.11, the commenter is referred to the discussion included in Chapter 6, Air Quality; Chapter 11, Hazards, Hazardous Materials, and Wildfire; Chapter 13, Land Use and Planning; and Chapter 19, Cumulative Impacts (pages 6-31, 6-32, 6-63, 11-6, 13-11, 13-13, and 19-4). The commenter also is referred to the discussion of the Sunset Area Plan, which is included throughout the resource chapters of the Draft EIR. In addition, the cumulative impacts associated with implementing the Sunset Area Plan, which includes development of the WPWMA properties, are described in detail in Chapter 19, Cumulative Impacts, of the Draft EIR.</p>
P-21	<p>The commenter states that the WPWMA is subject to the County's land use authority and the project must be constructed and operated consistent with the County General Plan policies and zoning code. The WPWMA is a JPA composed of Placer County and the cities of Lincoln, Rocklin, and Roseville to own and operate a regional recycling facility and sanitary landfill. As a JPA, the WPWMA considers local regulations and consults with local agencies, but the County and city regulations are not applicable, because the County and cities do not have jurisdiction over the proposed project. Although the WPWMA voluntarily secured a conditional use permit from the County for operations at the site in 2001, the WPWMA is not required to secure a new conditional use permit or a modification of the current permit for the Renewable Placer: Waste Action Plan.</p>
P-22	<p>The commenter disagrees with the discussion in Impact 13-2 and states that Plan Concept 2 is preferable. As described in Impact 13-2, the project is consistent with the site's land use and zoning designations, as identified in the Sunset Area Plan.</p>
P-23	<p>The commenter states that the key difference in uses (between plan concepts) is that the landfill is proposed closer to neighboring uses and that siting compatible technologies and university research areas closer to neighboring uses would be more beneficial from a noise perspective. The noise impacts associated with implementation of the two plan concepts were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned Sunset Area Plan developments did not exist when the Notice of Preparation was released, nor do they exist as of the release of this Final EIR, they were not considered when describing the noise impacts of the two plan concepts on the existing environment. For a discussion of the cumulative noise impacts that would be expected with buildout of the Sunset Area Plan, the commenter is referred to the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR.</p>
P-24	<p>The commenter discusses the cost differences between the two plan concepts. The costs associated with the two plan concepts is outside of the scope of the EIR; therefore, no further response is required.</p>
P-25	<p>The commenter summarizes a preference for Plan Concept 2 and requests that staff recommend Plan Concept 2 to the WPWMA Board of Directors. These comments are acknowledged.</p>

2.2.17 Letter Q



California State University, Sacramento
6000 J Street
Sacramento, CA 95819



Sierra College
5100 Sierra College Boulevard
Rocklin, CA 95677

January 11, 2022

Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, CA 95747
Attention: Stephanie Ulmer
EIRcomments@RenewablePlacer.com

**Re: Western Placer Waste Management Authority's Waste Action Plan Draft
Environmental Impact Report**

Dear Ms. Ulmer,

This letter is provided in response to the Waste Action Plan Draft Environmental Impact Report (the "DEIR") that the Western Placer Waste Management Authority ("WPWMA") released for public comment on October 28, 2021. The Board of Trustees of the California State University, by and through California State University, Sacramento (together, the "CSU") and Sierra College respectfully request that WPWMA proceed with "Plan Concept 2," as described in the DEIR, in light of the future development of the Sacramento State – Placer Center, a 300-acre academic center, which will be located directly southeast of WPWMA's facility.

As WPWMA is aware, the Board of Trustees of the California State University accepted a philanthropic donation from Placer Ranch, Inc. ("Placer Ranch") that involved the transfer of a 301-acre site within the Placer Ranch Specific Plan ("PRSP") area to enable development of the Sacramento State – Placer Center. The Sacramento State – Placer Center will be the centerpiece of the 2,200-acre master-planned Placer Ranch development, which, as depicted on Enclosure 1, is located directly southeast of WPWMA's existing facility and future expansion site, on the south side of WPWMA's Project Boundary and on east side of Fiddymont Road. CSU is collaborating with Sierra College on a dual-enrollment venture and partnership of the institutions at the Sacramento State – Placer Center.

The Sacramento State – Placer Center could accommodate up to 1,500 full-time students initially and may support upwards of 25,000 students in the long term. The Sacramento State – Placer Center and adjacent development within the Placer Ranch Specific Plan area are envisioned as a full-service community with academic, office, research and development, light industrial, commercial, and residential uses.

The DEIR presents two concepts to implement the waste recovery and waste disposal changes associated with the Waste Action Plan: Plan Concept 1 and Plan Concept 2. The main difference

Q-1

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between Plan Concept 1 and Plan Concept 2, insofar as the CSU and Sierra College are concerned, is the location of expanded landfill disposal and complementary and programmatic elements such as the Compatible Technologies and University Research Area. Specifically, in Plan Concept 1, expanded landfill disposal is located on the easternmost edge of the Project Boundary, whereas in Plan Concept 2 the expanded landfill disposal is located on the northwest side of the Project Boundary with the Compatible Technologies located on the easternmost edge. The Sacramento State – Placer Center and Campus Park area of the PRSP will be developed and located directly south of the easternmost edge of WPWMA’s Project Boundary. In light of the immediate proximity of the planned educational, commercial, and residential uses on the Placer Center campus to the eastern edge of the Project Boundary, Plan Concept 2 is not only the logical option but also the environmentally superior option, as it places future landfill disposal activities farther from development and related conflicting land uses. The location of future landfill disposal area is particularly important as the Sunset Area Plan and PRSP development will have a reduced residential buffer zone of 2,000 feet, compared with the original 1-mile buffer implemented to limit odor and other sanitary landfill impacts.

As discussed in the Air Quality chapter of the DEIR, the odor impacts associated with the Waste Action Plan will be significant and there is no existing fee program or other mechanism to fund odor mitigation. Odors, as well as noise and various other impacts, dissipate with distance. As a result, locating the landfill disposal area on the northwest side of the Project Boundary, rather than the easternmost edge that borders the future Campus Park area and is in immediate proximity to the Sacramento State – Placer Center, will result in reduced impacts to the students, faculty, residents, workers, and guests who will occupy the University site.

Plan Concept 2 is superior not only for odor impacts, but also in regard to land use and planning, noise, transportation, and cumulative impacts from WPWMA’s facility. Locating the landfill disposal area further from the Sacramento State – Placer Center will minimize significant adverse environmental impacts, including noise and traffic congestion from landfill vehicles, that will result from WPWMA’s expansion. As such, the CSU and Sierra College strongly recommend that, should WPWMA proceed with the Waste Action Plan, WPWMA implement Plan Concept 2 as opposed to Plan Concept 1.

Additionally, CSU has prepared specific comments on select sections of the DEIR, set forth below as Enclosure 2. CSU greatly appreciates WPWMA’s consideration of and responses to these comments.

The CSU and Sierra College would welcome a meeting with WPWMA to discuss the recommendation in support of Plan Concept 2, or any of the comments provided herein. You may contact Jonathan Bowman at bowman@csus.edu, (916) 278-7462, or counsel for CSU at the email address provided below, to coordinate a time to meet. Thank you for your attention to this important matter.

[signatures on next page]

Q-1

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Regards,



Robert S. Nelsen
President
California State University, Sacramento



William H. Duncan, IV (Jan 10, 2022 19:06 PST)

William Duncan
President
Sierra College



Jonathan Bowman (Jan 10, 2022 17:31 PST)

Jonathan Bowman
Vice President, Administration & Chief Financial Officer
California State University, Sacramento

cc (via email): Sasha Danna, Esq., CSU University Counsel, sdanna@calstate.edu;
Anne Collins-Doehne, CSU Principal Environmental Planner, acollins-doehne@calstate.edu;
Tania Nunez, CSU, Sacramento Project Manager, tania.nunez@csus.edu.

Enclosures: 1 – Land Use Plan for PRSP, Figure 4-1 of PRSP;
2 – CSU's Comments on WPWMA's DEIR.

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ENCLOSURE 1

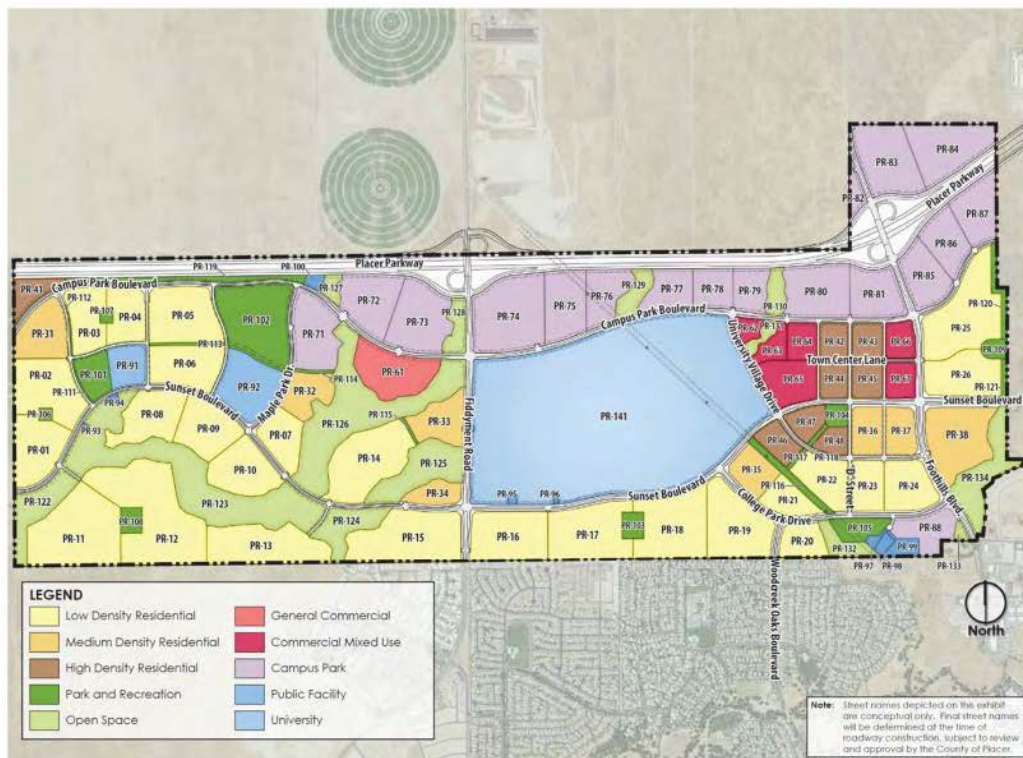


FIGURE 4-1: LAND USE PLAN

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land use

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ENCLOSURE 2

Comments of California State University and California State University, Sacramento Regarding Renewable Placer: Waste Action Plan Draft Environmental Impact Report, Western Placer Waste Management Authority (Project No. P2683386), Released on October 29, 2021

CHAPTER 1 - INTRODUCTION

- Section 1.1, WPWMA (pg. 1-1) indicates, “The WPWMA also provides solid waste services to the cities of Auburn and Colfax and the Town of Loomis; these entities and the Member Agencies are collectively referred to as Participating Agencies.”
 - Comment: CSU expects to join the list of Participating Agencies upon opening of the Sacramento State – Placer Center and suggests that the EIR reflect this fact.
- Section 1.2 Project Location (pg. 1-4) “Solid waste uses on this property have already been subject to environmental review, and a conditional use permit to operate a landfill was previously granted by the Placer County Planning Commission; however, the property has not been fully permitted for solid waste related operations.”
 - Comment: Because substantial environmental review and permitting has already been completed with regard to landfill uses on the western property, in addition to the reasons provided below, the western property is most suited for solid waste disposal.
- Section 1.4, Project Objectives (pgs. 1-6 to 1-7) indicates:

“The WPWMA developed the Waste Action Plan to articulate a long-term vision for optimizing the ongoing Waste Recovery and Waste Disposal services provided to the Participating Agencies. The objectives of the Waste Action Plan that would help achieve this vision are described as follows:

 - Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.
 - Compatible technologies could include both proven and innovative recycling strategies intended to capitalize on an evolving local recyclable materials market and potentially reduce dependence on foreign markets.
 - Developing compatible technologies could promote state-mandated waste diversion goals, offset costs associated with ongoing solid waste operations, and generate innovative and creative economic opportunities within the County consistent with the Sunset Area Plan’s objectives (Placer County 2019).”

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- Comment: The DEIR should include specific references to the Sacramento State – Placer Center which will serve as a regional academic and technology hub, and in conjunction with implementation of Plan Concept 2 will help fulfill the above-referenced Waste Action Plan benefits of proximate siting to the WPWMA operations.
- “Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area’s anticipated transition to a more urban environment.”
 - Comment: This compatibility reference should expressly discuss the land use and environmental compatibility and benefits of the Plan Concept 2 to the proximately located proposed Sacramento State – Placer Center campus environment.
- “Develop WPWMA properties consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).”
 - Comment: The PRSP, approved in conjunction with the Sunset Area Plan, includes goals, policies, and implementation programs that recognize and promote the Sacramento State – Placer Center.
- “Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.”
 - Comment: The Sacramento State – Placer Center will similarly serve as a regional hub of innovation, and should be acknowledged as such in discussions of the Waste Action Plan, including the environmental benefits of proximate location.
- Section 1.6.1, Eastern Property/Western Property (pg. 1-9)
 - Comment: The DEIR should expand upon the heightened environmental impact of developing, particularly for solid waste disposal uses, the unpermitted eastern property, currently leased for cattle grazing, versus the western property, currently permitted for solid waste-related operations.

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CHAPTER 3 – PROJECT DESCRIPTION

- Section 3.3, Waste Disposal (pg. 3-2)
 - Comment: Please confirm that the reference to “future Participating Agencies” includes CSU.
- Section 3.2, Complimentary and Programmatic Elements (pg. 3-2)

Q-9

“Complementary and Programmatic Elements are the project elements that are not specifically required to provide continued solid waste management services to the Participating Agencies but are important in achieving other project objectives (e.g., create opportunities for innovation and economic growth, enhance opportunities to increase recycling and landfill waste diversion, and enhance ability to comply with regulations). These project elements include the following:

- Compatible Technologies – Space would be reserved for third-party commercial or full-scale compatible technologies and manufacturing operations that would take materials and products primarily from the WPWMA’s facility to produce beneficial products, including renewable energy, fuels, and marketable commodities.
- Pilot Study Area – Space would be reserved for third parties to conduct pilot studies, using materials and products primarily from WPWMA’s facility and processing them in new ways or producing beneficial products, including renewable energy, fuels, and marketable commodities.
- University Research Area – Space would be reserved for university-led research, using materials and products primarily from the WPWMA’s facility and processing them in new ways or producing beneficial products, including renewable energy and marketable commodities. This could also include more general solid waste-related research to, for example, improve facility diversion, increase efficiencies, and lower environmental impacts...”
- Comments:
 1. Each of these project elements is particularly compatible with the Sacramento State – Placer Center campus, and thereby supports the locational and environmental benefits of Plan Concept 2.
 2. The EIR should detail the land use and environmental benefits of the relationship between the proposed University Research Area and the Sacramento State – Placer Center, and conversely the increased environmental effects (including, but not limited to increased traffic and air quality impacts) of physically distancing these uses as would occur under Plan Concept 1.

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- Table 3-1 (pg.3-5), Summary of Environmental Baseline and Change Associated with Solid Waste Elements
 - Comment: The DEIR indicates under Increased Waste Disposal for Plan Concept 1: “Projected annual tons disposed – 521,100 by 2050”. This figure differs from the projected Plan Concept 1 annual disposed tonnage of 533,654 in Table 3-10 (pg. 3-25). It appears that the figure in Table 3-1 is in error and should be 533,654. (See also comment below re Table 3-22 (pg. 3-63).)
- Section 3.5.1, Sitewide Material Quantities, Diversion Rate, and Permitted Tonnage (pg. 3-12)
 - Comment: Please confirm that the statement, “[t]he sitewide 7-day rolling average also takes into account the anticipated increase in materials through 2050 and the relationship between average tons received per day and peak tons received per day over the past several years”, assumes materials to be generated by the Sacramento State – Placer Center.
- Table 3-10, Summary of Tonnage and Vehicle Limit Changes Under Plan Concept 1 (pg.3-25)
 - Comment: Re Plan Concept 1, projected annual disposed tons, see comment above re Table 3-1.
- Table 3-Summary of the Proposed WRSL Capacity Increase Under Plan Concept 1 11 (pg.3-26)
 - Comment: The “Change” column indicates the primary change in landfill location under Plan Concept 1 would be “Waste footprint expanded to eastern property” instead of remaining centrally located on the property as at present. However, the DEIR does not appear to consider the environmental impacts of this expansion upon the unique land uses and activities that will occur contemporaneously at the Sacramento State – Placer Center.
- Section 3.5.3 Waste Disposal Operations (pg. 3-26), “Expanded Landfill Disposal Capacity” sets forth: “Plan Concept 1 includes expanding the WRSL footprint onto the eastern property to create a total contiguous landfill footprint of approximately 320 acres. Plan Concept 1 also includes increasing the permitted height of the WRSL to 325 feet AMSL, or approximately 30 feet above the currently permitted peak elevation of 295 feet AMSL and 129 feet above the WRSL’s existing height of 196 feet AMSL (as of aerial mapping dated January 2, 2019).”
 - Comment: The DEIR does not appear to assess the visibility/aesthetic impacts of Plan Concept 1’s increased WRSL height upon the unique land uses and campus activities that will occur contemporaneously at the Sacramento State – Placer Center.

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- Section 3.5.3, Waste Disposal Operations (pg. 3-27), “Expanded Landfill Disposal Capacity” sets forth: “With the implementation of Plan Concept 1, the additional Waste Disposal capacity provided by an eastern expansion would be available following project approval and the issuance of all applicable permits but would only be developed as needed. Figure 3-3 identifies the anticipated sequence in which existing and future landfill modules would be filled. Based on this anticipated fill sequence, Figure 3-4 identifies the estimated elevation and contours of the existing and expanded WRSL in the year 2050. Figure 3-5 identifies the final elevation and contours of the WRSL once it reaches full capacity, which is estimated to occur in the year 2101.”
 - Comment: The referenced Figure 3-3 identifies the potential landfill modules on the eastern property by letter designations A through G, running south to north. Please confirm that if Plan Concept 1 is implanted that the fill sequencing will proceed in order from A through G. There does not appear to be any detail provided either in the DEIR text or Figure 3-3. The CSU requests that the Draft EIR provide further detail about module phasing and potential for environmental impacts on contemporaneous Sacramento State – Placer Center campus development. Specifically, analysis should clarify the order in which modules A-G would be constructed and filled, the rationale for the proposed phasing, any potential for north-south phasing flexibility, and the timeline for module construction, active operations, and duration, particularly for the southeasternmost modules A, B and C closest to the campus.
- Figure 3-3, Plan Concept 1 WRSL Anticipated Fill Sequence (pg. 3-29)
 - Comment: See above comment re Section 3.5.3 (pg. 3-27).
- Section 3.5.3, Excavation of Existing Solid Waste (pg. 3-40)
 - Comment: The DEIR states that: Excavated areas to be developed with a Subtitle D composite liner system would be graded at roughly 1.5 to 3.5 percent to flow to the eastern central edge of the excavation. Please explain where the flow is anticipated to go from the eastern property line.
- Section 3.5.4, Complimentary and Programmatic Elements (pg. 3-43), “Although space has been reserved for these elements primarily within the western property, opportunities may arise that would support locating some of these complementary and programmatic elements in closer proximity to the solid waste project elements or within areas not yet developed with solid waste project elements.”
 - Comment: Please explain whether this is intended to leave the door open for certain complementary elements, for example, university research areas, on the eastern property.
- Section 3.5.4, Sunset Area Plan (pgs. 3-43 to 3-44), sets forth the following SAP goal and policies applicable to the EI land use designation:

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- Goal LU/ED-6: Eco-Industrial. To support WPWMA’s efforts to diversify and expand its operations while protecting the viability of its facilities. Renewable Placer: Draft Environmental Impact Report Chapter 3 – Project Description 3-44 FES0708210729BAO
 - Policy LU/ED-6.1: Innovation/Research and Development. The County will support WPWMA initiatives to establish industrial and manufacturing uses focused on alternative waste-to-energy technologies, recovery and reuse of materials, solid waste-related research and development, and related advanced manufacturing. This includes efforts to collaborate with nearby universities to advance state-of-the-art approaches to these activities.
 - Policy LU/ED-6.2: Land Use Changes near WPWMA facilities. When considering land use changes near the WRSI and the WPWMA MRF operation, the County will consider the regional value of these solid waste facilities and operations. To protect these facilities and operations from incompatible encroachment, as well as to protect new uses from nuisances generated by the landfill and MRF, new development will be reviewed and approved on a project-by-project basis, considering proximity to the active operation of these facilities and predicated on the new development’s ability to comply with the standards specified in Table 1-3 of this Plan.
 - Policy LU/ED-6.3: WPWMA Land Use Compatibility. The County will encourage businesses that are compatible with WPWMA land uses, such as businesses focused on the collection and conversion of waste, including biomass and production of organics for composting and mulching to be located in the Eco-Industrial District.
- Q-20
- Comment: The DEIR should indicate that each of these goals and policies support Plan Concept 2 and proximity to the Sacramento State – Placer Center, along with the reduced environmental effects of doing so, including traffic.
- Table 3-22, Summary of Tonnage and Vehicle Limit Changes Under Plan Concept 2 (pg. 3-63)
- Q-21
- Comment: The table’s middle column appears to be mistakenly identified and should appear as Plan Concept 2 which is the subject of the table.
- Section 3.6.4, Complimentary/Programmatic Elements and Table 3-26, (pg. 3-81)
- Q-22
- Comment: Both Table 3-26 and the Detailed Description text highlight the Project Level land use and environmental compatibility between Plan Concept 2 and the Sacramento State – Placer Center, including, but not limited to:
- “Project Level – Development of up to 300,000 square feet of building plus exterior infrastructure for complementary solid waste management elements; Industrial uses may include compatible technologies, pilot study areas, university research areas, and an LFG to compressed natural gas, hydrogen, or other renewable fuels area”, and “[t]he complementary and

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programmatic elements include the development of compatible technologies, pilot study areas, university research areas, and an LFG to compressed natural gas, hydrogen or other renewable fuel-production and vehicle-filling area. On the project level, these are assumed to be located on the northern part of the eastern property and may include compatible technologies or pilot studies.”

The DEIR should expressly identify and analyze the compatibility benefits and any resulting impact reductions.

- Comment: Both Table 3-26 and the Detailed Description text also highlight the Program Level land use and environmental compatibility that will exist between Plan Concept 2 and the Sacramento State – Placer Center, including, but not limited to:

“Program Level – Primarily on the eastern property, plus locations on the center property, although some uses may be developed in closer proximity to the solid waste project elements or within areas not yet developed with solid waste project elements”, and “[o]n a program level, areas have been designated on the remainder of the eastern property.”

The DEIR should expressly identify and analyze the compatibility benefits and any resulting impact reductions.

Q-22

- Section 3.6.4, Potential Compatible Technology Development (pg. 3-82)
 - Comment: In addition to discussing “companies interested in developing compatible technologies at the site”, this section of the DEIR should discuss the compatibility of both the complimentary and programmatic elements, and the compatibility of any interested businesses in locating under Plan Concept 2 in close proximity to the Sacramento State – Placer Center, along with the resulting environmental benefits and impact reductions.
- Section 3.6.4, Achievement of Project Objectives (pg. 3-83), “Facilitating the siting and development of compatible technologies that would benefit from proximity to WPWMA”.
 - Comment: This bullet item should be revised to expressly identify the additional benefits of locating in proximity to the Sacramento State – Placer Center.

Q-23

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CHAPTER 6 – AIR QUALITY

- IMPACT 6-6 Create Objectionable Odors Affecting a Substantial Number of People. Implementation of the solid waste elements, complementary and programmatic elements, and supporting elements under the proposed project has the potential to create objectionable odors affecting a substantial number of people. The proposed project would implement numerous facility improvements, including more efficient waste management operations and odor-abatement strategies. However, the nature and effectiveness of these strategies are unknown, there are no quantifiable thresholds of significance for odor impacts, and there is no existing fee program or other mechanism by which to fund odor mitigation. Impacts related to odors would be significant. (pg. 6-63)

 - Comment: The WMPWMA DEIR concludes odor impacts will be significant and that the proposed project has the potential to create objectionable odors affecting a substantial number of people. The DEIR's analysis related to odor impacts is conclusory and fails to specifically address odor impacts to the future Sacramento State – Placer Center. The Sacramento State – Placer Center will be located directly southeast of the WPMMA facility as depicted by [Figure 4-1 of the Placer Ranch Specific Plan](#). The Sacramento State – Placer Center will add, in addition to commercial, employment, and university related-non-residential uses, over 5,600 anticipated residential dwelling units and 13,000 residents. Please explain how the mitigation measures and best management practices outlined in Chapter 6 will reduce the odor impacts to the thousands of people who will be working, residing, and attending the campus area directly southeast of the WPMMA site.
- With approval of the SAP/PRSP, the residential buffer zone surrounding the proposed project site was reduced from 1 mile to 2,000 feet. This does not meet the PCAPCD-recommended odor screening distances of 1 mile for sanitary landfills and 2 miles for composting facilities. Section 6.2.4 describes the existing setting for odors, including odor sources, odor controls already in place, odor notification reports received for the existing site, and other potential odor sources in the proposed project area. Odors from the site are part of the existing environment in the proposed project area, and it is not feasible to differentiate between existing odors that would continue in the future and future proposed project-related odors. (pg. 6-63)

 - Comment: The DEIR concludes that it will not be feasible to differentiate between existing odors and future proposed project-related odors. While the type of odors may be the same in future, this conclusion fails to address the acknowledged increased intensity and duration of odors that will result from the project as the result of the expansion of active landfill area, and the fact that this increase in odors will be perceptible and differentiated from the existing odor levels, particularly for the land uses located in close proximity to active portions of WPMMA's facility.
- Construction of solid waste elements, complementary and programmatic elements, and supporting elements under Plan Concept 1 could result in odorous emissions from activities such as use of heavy-duty diesel equipment and the laying of fresh asphalt.

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However, these emissions would be intermittent and temporary and would dissipate with an increase in distance from the construction location(s). Construction under Plan Concept 1 would be implemented over approximately 30 years, but construction-related odors would not be limited to a single location or occur within proximity to offsite receptors for an extended period. (pg. 6-64)

- Comment: The DEIR recognizes that odorous emissions will dissipate with an increase in distance from the construction location(s). Did WPWMA consider the immediate proximity of the Sacramento State – Placer Center, which is planned to be constructed around the same timeframe as WPWMA’s project? (*See generally* Placer Ranch Specific Plan Environmental Impact Report, released by Placer County on October 31, 2019, available at: <https://www.placer.ca.gov/2702/Sunset-Area-Plan---Placer-Ranch-Specific>).
- Plan Concept 2. As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on the WPWMA’s property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. As such, impacts related to odors for implementation of Plan Concept 2 would be the same as described for Plan Concept 1. (pg. 6-65)
 - Comment: The DEIR concludes that odor impacts will be the same under Plan Concept 1 and Plan Concept 2; however, this conclusion directly conflicts with the fact that various facilities are located in different places for Plan Concepts 1 and 2. In Chapter 6, the DEIR notes that the Sitewide Odor Program (SWOP) identifies four facilities or operations with the greatest potential to produce odors: (1) the MRF building; (2) composting operation; (3) WRSL active landfill areas; and (4) LFG collection and control system. These four facilities are identified as numbers 1, 2, 5/7, and 11 on the indices for Figures 3-1 and 3.7 [depictions of Plan Concept 1 and Plan Concept 2, respectively]. The major difference between Plan Concept 1 and Plan Concept 2 is where the landfill expansion area will be – it is located in the eastern most edge in Plan Concept 1 and the northwest corner in Plan Concept 2. The landfill expansion area is one of the four operations with the greatest potential to produce odors. Considering the landfill expansion area is located in extremely close proximity to the Sacramento State – Placer Center in Plan Concept 2, odor impacts will be greater under Plan Concept 2. The fact this was not analyzed in the DEIR is an omission that needs to be corrected. Plan Concept 2 is the environmentally superior option in a number of ways, including because it will reduce odor impacts to a substantial number of people, which the DEIR concluded will be a substantial impact.

Q-26

Q-27

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CHAPTER 13 – LAND USE AND PLANNING

- Parcels south of the project site are designated as Campus Park under the Placer Ranch Specific Plan and are intended to be used for nonresidential mixed uses, including “professional office, research and development, commercial, and light industrial space” (Placer County 2019b). These land-use designations are shown on Figure 13-2. (pg. 13-2)
 - Comment: Please note that the Sacramento State – Placer Center will be located immediately south of the area designated as the “Campus Park,” as designated in Figure 13-2. The University site is planned for development with both residential and nonresidential uses.
- Policy 1.F.3: The County shall require public facilities, such as wells, pumps, tanks, and yards, to be located and designed so that noise, light, odors, and appearance do not adversely affect nearby land uses. (pg. 13-9)
 - Comment: This policy highlights the need for WPWMA’s expansion to be designed and located in a way that the impacts do not adversely affect nearby land uses, including Sacramento State – Placer Center. To ensure WPWMA’s expansion is consistent with Policy 1.F.3, it is essential that WPWMA consider the future Sacramento State – Placer Center in its environmental review. Plan Concept 2 is aligned with Policy 1.F.3, as it locates the landfill expansion area further from future commercial, educational, and residential land uses.
- Policy LU/ED-3.1: High-Quality Design. The County shall require high-quality design in both the public and private realm to ensure an attractive setting for investment in planned uses in the Sunset Area, especially along key transportation corridors (e.g., Placer Parkway, Highway 65, Sunset Boulevard, Foothills Boulevard North, Athens Avenue, Fiddymen Road). (pg. 13-9)
- Policy LU/ED-6.2: Land Use Changes near WPWMA Facilities. When considering land use changes near the Western Regional Sanitary Landfill (WRSL) and the WPWMA material recovery facility (MRF) operation, the County shall consider the regional value of these solid waste facilities and operations. To protect these facilities and operations from incompatible encroachment, as well as to protect new uses from nuisances generated by the landfill and MRF, new development shall be reviewed and approved on a project-by-project basis, considering proximity to the active operation of these facilities and predicated on the new development’s ability to comply with the standards specified in Table 1-3 of this Plan. (pg. 13-10)
 - Comment: It is very important that WPWMA design its expansion in a consistent manner with Policy LU/ED-3.1 and Policy LU/ED-6.2 in light of the development envisioned and approved in the Placer Ranch Specific Plan including, but not limited to, the Sacramento State – Placer Center. The PRSP represents Placer County’s most recent near-term land use and development vision for locations proximate to the WRSL.

Q-28

Q-29

Q-30

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- Plan Concept 2. Impacts related to consistency with existing land-use plans, policies, and regulations as a result of implementation of Plan Concept 2 would be the same as described for Plan Concept 1. (pg. 13-13)

- Comment: As noted above, the impacts related to the consistency with land-use plans differs significantly between Plan Concept 1 and Plan Concept 2 due to the planned development southeast of WPWMA's facility. Locating expanded landfill operations further from the approved PRSP development and development of the Sacramento State – Placer Center, as depicted in Plan Concept 2, will result in fewer impacts to the surrounding communities.

Q-31

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CHAPTER 14 – NOISE

- 14.1.2 Local and Regional Noise Setting. The closest existing offsite residence is located over 5,000 feet northwest of the existing Material Recovery Facility (MRF) and 1,300 feet west of the western property (as shown on Figure 14-3). Additional isolated residences (shown on Figure 14-3) are located farther to the west on lands designated in the Sunset Area Plan (SAP) as Urban Reserve. Existing residential neighborhoods are located 1.5 miles and 1 mile to the west and south, respectively, of the project site. No other sensitive noise receptors are located within 1 mile of the project site. The Thunder Valley Casino Resort is located approximately 2 miles to the east of the project site, and the nearest airport, the Lincoln Regional Airport, is located approximately 4.5 miles to the north. (pg. 14-7)

Q-32

 - Comment: While section 14.1.2 addresses existing residences, it fails to address planned residences, including campus residences, and other sensitive noise receptors, some of which will be located 2,000 feet from the proposed project site. Assessment of noise impacts on these locations is needed.
- Policy 1.E.1. The County shall only approve new industrial development that has the following characteristics: ♣ Sufficient buffering from residential areas to avoid impacts associated with noise, odors and the potential release of hazardous materials ♣ Minimal significant adverse environmental impacts. (pg. 14-12)

Q-33

 - Comment: Plan Concept 2 aligns with Policy 1.E.1, whereas Plan Concept 1 does not, as Plan Concept 2 provides substantially greater buffering between the expanded landfill area and residential areas and minimizes adverse environmental impacts. Plan Concept 1 would exacerbate environmental impacts by locating landfill operations directly north of the planned Campus Park and Sacramento State – Placer Center.
- 9.A.2. Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 9-1 [reproduced in this document as Table 14-5] as measured immediately within the property line of lands designated for noise-sensitive uses, provided, however, the noise created by occasional events occurring within a stadium on land zoned for university purposes may temporarily exceed these standards as provided in an approved Specific Plan. (pg. 14-12)

Q-34

 - Comment: Plan Concept 2 better aligns with Goal 9.A.2, as noise impacts will be reduced by locating the landfill expansion area further from the planned development of the Campus Park and Sacramento State – Placer Center.
- Assuming a worst-case doubling of operating equipment and vehicle activity from existing operations at the site, the existing ambient noise levels would be expected to increase by approximately 3 dB. The noise levels associated with site operations experienced at existing residences in the project vicinity would increase from current conditions; however, the offsite noise levels associated with onsite operational activities would not increase greater than 3 dB. Because this increase would be less than the 5-dB

Q-35

113599120.3 0075368-00001

increase in ambient noise levels established as the permanent noise level threshold, the solid waste management activities associated with Plan Concept 1 would result in a less-than-significant permanent noise impact. (pg. 14-23)

- Comment: It is important to note that existing ambient noise levels will increase, likely more than 3 dB, in the Campus Park and Sacramento State – Placer Center area, which are located closer than current residences.

Q-35

- Plan Concept 2. As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on the WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. (pg. 14-24)

Q-36

- Comment: Noise impacts dissipate with distance. Plan Concept 1 would have greater noise impacts than Plan Concept 2 due to the expanded landfill operations being located closer to development and future residential areas.

- Plan Concept 1 would increase traffic noise along local roadways used by project traffic. However, no sensitive land uses are located along Athens Avenue, Industrial Avenue, or Sunset Boulevard. Therefore, increases in traffic noise associated with implementing the proposed project on these roadways would not affect sensitive land uses, and this impact would be less than significant. (pg. 14-28)

Q-37

- Comment: This conclusion fails to recognize the sensitive land uses that are approved and planned for the area directly southeast of Sunset Area Boulevard West in the Placer Ranch Specific Plan. The DEIR further should not assume that traffic noise impacts will be limited to the existing roadways, when there are also known, proposed roadways for the area directly south of Sunset Area Boulevard West.

- As identified in Table 14-11, for the segment of Fiddymont Road between Athens Avenue and the future alignment of Placer Parkway, existing noise levels were estimated to be between 60 and 65 dBA at distances between 54 and 117 feet from the roadway centerline. Similar noise levels would be expected for the segment of Fiddymont Road extending south from the future alignment of Placer Parkway through the Blue Oaks residential area. For this segment of Fiddymont Road, existing residences are located within 80 feet of the roadway centerline. However, masonry sound walls are currently in place parallel to Fiddymont Road that substantially attenuate traffic noise levels. Sound walls that block the line of site between the source and receiver would be expected to result in a minimum reduction of 5 dB (Caltrans 2015). (pg. 14-28)

Q-38

- Comment: The existing residences and masonry sound walls are located farther from the project site than the land uses that were approved for the area directly south of Sunset Area Boulevard West in the Placer Ranch Specific Plan. Noise impacts will likely be greater than the EIR projects for these areas.

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- Plan Concept 2. As described in Chapter 3, Project Description, the primary differences between Plan Concept 1 and Plan Concept 2 are related to where various facilities would be located on the WPWMA's property and when various facilities would be developed. These differences do not change the conclusions identified for Plan Concept 1. (pg. 14-28)
 - Comment: Noise impacts dissipate with distance. Plan Concept 1 would have greater noise impacts than Plan Concept 2 due to the expanded landfill operations being located closer to development and future residential areas, including Sacramento State – Placer Center residences.

Q-39

113599120.3 0075368-00001

CHAPTER 16 – TRANSPORTATION

- 16.1.5 Pedestrian and Bicycle Facilities and Public Transit No transit service, bicycle facilities, or pedestrian facilities are located within the study area. (pg. 16-2)
- No transit service, bicycle facilities, or pedestrian facilities are located within the study area, and the proposed project does not include any changes to the local roadway network. Therefore, project implementation would not be expected to adversely affect existing or planned bicycle, pedestrian, or transit system facilities within the project vicinity. (pg. 16-12)
 - Comment: It appears the above conclusions did not take into account the planned development within the Campus Park or Sacramento State – Placer Center area. Please clarify and ensure the EIR accounts for approved development, including the development and transportation changes approved in the PRSP.
- As such, impacts as a result of implement Plan Concept 2 would be the same as those described for Plan Concept 1. (pg. 16-13)
 - Comment: Transportation impacts would be worse under Plan Concept 1 than Plan Concept 2, as landfill vehicles would be transporting waste to and from the expanded landfill area on the road that separates the Campus Park and Sacramento State – Placer Center from the WPWMA’s facility.

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CHAPTER 18 – PROJECT ALTERNATIVES

- Section 18.4.2, Alternative B (Prioritize Waste Recovery) Summary (pg. 18-16 to 18-17), “Alternative B concentrates waste recovery operations on the center property, restricts landfill capacity, and adds complementary and programmatic elements on the southern portion of the western property.”
 - Comment: Amongst the alternatives, Alternative B, which will not include waste disposal activities on the eastern property, should be evaluated specifically to assess its reduced impacts relative to Plan Concept 1 on the Sacramento State – Placer Center. Relative to Plan Concept 2, however, Alternative B would reduce many of the compatibility benefits of locating complementary and programmatic elements on the eastern property in the vicinity of the Sacramento State – Placer Center. As stated above, CSU supports Plan Concept 2 and finds Plan Concept 2 adequately addresses its concerns related to the Sacramento State – Placer Center.
- Section 18.5, Comparison of Alternatives, “Alternative B (Prioritize Waste Recovery) concentrates waste recovery operations on the center property, restricts landfill capacity to the center property, and adds complementary and programmatic elements on the southern portion of the western property” (pg. 18-27).
 - Comment: See above comment re section 18.4.2.

CHAPTER 19 – CUMULATIVE IMPACTS

- State CEQA Guidelines Section 15130 states that the following elements are necessary for an adequate discussion of significant cumulative impacts: ♣ A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency (list approach), or a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. (pg. 19-1)
 - Comment: To adequately analyze cumulative impacts, and to allow the CSU to do likewise, the WPWMA needs to fully account for the future project of the Campus Park and Sacramento State – Placer Center site, as conceptually approved under the PRSP, and currently under master plan review by the CSU.
- Create objectionable odors affecting a substantial number of people. The SAP EIR predicted that cumulative development would make use of the WPWMA facilities for waste disposal, composting, and material recovery, which would result in a substantial increase in the incoming waste stream and associated odor emissions. The SAP EIR concluded that because the development of the SAP would result in the exposure of a substantial number of people to objectionable odors, the cumulative odor impacts would be significant and unavoidable. While odor abatement approaches and technologies would be implemented by the WPWMA as part of the Renewable Placer: Waste Action Plan, the nature and effectiveness of these measures are unknown at this time, and odor impacts would be cumulatively considerable. Therefore, the cumulative impact for odors would be significant and unavoidable. This finding is consistent with the findings of the SAP EIR, which determined that the impact of the project relative to odor impacts would be cumulatively considerable, and the cumulative impact would be significant and unavoidable. (pg. 19-5)
 - Comment: Considering the landfill expansion area is located in extremely close proximity to the Sacramento State – Placer Center in Plan Concept 1, cumulative odor impacts will be greater under Plan Concept 1. Plan Concept 2 is the environmentally superior option in a number of ways, including because it will reduce odor impacts to a substantial number of people, which the DEIR concluded is a substantial impact.

Q-44

Q-45

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Letter Q Comment Responses

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
Q-1	The commenter requests WPWMA proceed with Plan Concept 2 considering the future development of Sacramento State – Placer Center, which would be located southeast of WPWMA's project. The commenter states Plan Concept 2 is the environmentally superior option because it places future landfill disposal farther from development and what the commenter describes as related conflicting land uses. The commenter further states the location of the future landfill disposal area is important as the SAP and PRSP have a reduced residential buffer zone of 2,000 feet. The commenter states that odors, noise, and other impacts would dissipate with distance and thus locating the landfill disposal area on the northwest side of the Project boundary reduces impacts to students, faculty, residents, workers, and guests who occupy the University site. The commenter further states that Plan Concept 2 minimizes significant adverse environmental impacts. The WPWMA acknowledges the comments and notes that each of the resource areas referenced in this comment are discussed in the Draft EIR. Because the commenter does not reference a specific deficiency in the environmental analysis in the Draft EIR, no further response is required.
Q-2	The commenter states that CSU expects to join the list of Participating Agencies upon opening of the Sacramento State – Placer Center and suggests the EIR reflect this. This comment is acknowledged and the WPWMA looks forward to working with CSU to discuss the roles and responsibilities of participating agencies with CSU and discussing CSU's interest in becoming a Participating Agency following project consideration by the WPWMA Board of Directors.
Q-3	The commenter states that because substantial environmental review and permitting have already been completed with regard to landfill uses on the Western Property, this area is best suited for solid waste disposal. This comment is acknowledged and, since it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
Q-4	The commenter states that the Draft EIR should include specific references to the Sacramento State – Placer Center, citing Section 1.4, Project Objectives. The project objectives specifically reference the Sunset Area Plan, which includes the Sacramento State – Placer Center development as well as substantial other development within the Placer Ranch Specific Plan boundaries and the larger Sunset Area Plan. Therefore, a project-specific reference in the Project Objectives is not necessary.
Q-5	The commenter states that the compatibility reference located in Section 18.2, on page 18-4, should expressly discuss land use and environmental compatibility and the benefits of Plan Concept 2 to the proximately located proposed Sacramento State – Placer Center. Regarding future development uses in the project vicinity, in addition to the Sacramento State – Placer Center proposed to be located south of the Center and Eastern Properties, the Placer Ranch Specific Plan includes commercial and residential uses south of the Western Property. Also, the Sunset Area Plan includes proposed Innovation Center uses to the east and west of the WPMWA property. All of the properties surrounding the project site, with the exception of those to the north, are expected to be developed with implementation of the Sunset Area Plan and Placer Ranch Specific Plan. Because it would be speculative to do so, the Draft EIR did not determine how these developments would be phased. Also, because these are future developments, they were evaluated in the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR, rather than in the individual resource chapters. The commenter is referred to the cumulative land use discussion on page 19-8 of the Draft EIR for more information on this topic.

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
Q-6	The commenter states that the PRSP includes goals, policies, and implementation programs that recognize and promote the Sacramento State – Placer Center. The comment is acknowledged and, since it does not raise specific issues related to the adequacy of the environmental analysis included in the Draft EIR, no further response is required.
Q-7	The commenter states that Sacramento State – Placer Center will serve as a regional hub of innovation and should be acknowledged as such in discussions of the Waste Action Plan. The comment is acknowledged and, since it does not raise specific issues related to the adequacy of the environmental analysis included in the Draft EIR, no further response is required.
Q-8	The commenter states that the EIR should expand on the environmental impact of developing the unpermitted Eastern Property, currently leased for cattle grazing, versus the Western Property, currently permitted for solid waste-related operations. The Draft EIR addresses and evaluates environmental impacts for both Plan Concepts 1 and 2, which cover impacts to both the Eastern and Western Properties. Section 1.2 of the DEIR states, "Solid waste uses on this [the Western] property have already been subject to environmental review, and a conditional use permit to operate a landfill was previously granted by the Placer County Planning Commission; however, the property has not been fully permitted for solid waste related operations."
Q-9	The commenter states, "Please confirm that the reference to 'future Participating Agencies' includes CSU." This comment is acknowledged and the WPWMA looks forward to discussing the roles and responsibilities of participating agencies with CSU and discussing CSU's interest in becoming a Participating Agency following project consideration by the WPWMA Board of Directors.
Q-10	<p>The commenter states that the complementary and programmatic elements are compatible with the Sacramento State – Placer Center and supports Plan Concept 2. The commenter also states the EIR should detail the land use and environmental benefits of the relationship between the proposed University Research Area and the Sacramento State – Placer Center, and, conversely, the increased environmental impacts (including, but not limited to, increased traffic and air quality) of physically distancing these uses, as would occur under Plan Concept 1.</p> <p>Because the planned Sacramento State – Placer Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not been constructed, it was not considered when describing the environmental impacts of the proposed project on the existing environment. For a discussion of the cumulative environmental impacts that would be expected following buildout of the Sunset Area Plan, which includes buildout of the Sacramento State – Placer Center, the commenter is referred to the cumulative impact discussion in Chapter 19, Cumulative Impacts, of the Draft EIR.</p>
Q-11	The commenter states the figure identified in Table 3-1 differs from the projected Plan Concept 1 annual disposed tonnage of 533,654 in Table 3-10 (page 3-25) and that the figure in Table 3-1 should be 533,654. As indicated in Chapter 3 of this Final EIR, the "projected annual tons disposed" values are hereby revised to 525,100 tons in Tables 2-1, 3-1, 3-10, and 3-22. Additionally, the "projected increase in annual tons" values are hereby revised to 236,262 tons in Tables 3-10 and 3-22.
Q-12	The commenter requests confirmation that the statement "[t]he sitewide 7-day rolling average also takes into account the anticipated increase in materials through 2050 and the relationship between average tons received per day and peak tons received per day over the past several years," includes materials to be generated by the Sacramento State – Placer Center. The Renewable Placer: Waste Action Plan has been proposed to accommodate the nearly doubled

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	population size served by the WPWMA over the next 30 years, including the land uses within the Sunset Area Plan such as the Sacramento State – Placer Center.
Q-13	The commenter indicates that projected annual tons disposed differs from the annual disposed tonnage and that Table 3-1 is in error. Please refer to the response to comment Q-11.
Q-14	The commenter states that the description in the Draft EIR in Table 3-11 of the change anticipated with Plan Concept 1 on the Eastern Property does not appear to consider the environmental impacts of the eastern expansion of the landfill on the land uses and activities that will occur at the Sacramento State – Placer Center. Please refer to the response to Comment Q-10.
Q-15	The commenter states that the Draft EIR does not appear to assess the visibility/aesthetic impacts of Plan Concept 1's increased landfill height upon the land uses that will occur at the Sacramento State – Placer Center. The visual impacts associated with implementation of Plan Concept 1 are compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Please refer to the response to Comment Q-10.
Q-16	<p>The commenter requests that the Draft EIR provide further detail about module phasing and potential for environmental impacts on Sacramento State – Placer Center campus development, clarifying the order in which the modules would be constructed and filled, the rationale for the proposed phasing, the potential for north-south phasing flexibility, and the timeline for module construction, active operations, and duration.</p> <p>For Plan Concept 1, the commenter is referred to the fill sequencing plan included as Figure 3-3 in the Project Description chapter of the Draft EIR. As identified in this figure, the modules are expected to be constructed and filled in a south-to-north sequence. Based on this anticipated fill sequence, Figure 3-4 identifies the estimated elevation and contours of the existing and expanded landfill in the year 2050. As represented in this figure, the southern portion of the landfill would be filled first, including filling on top of the existing southern modules on the Center Property before moving to the northern portion. Figure 3-5 identifies the final elevation and contours of the landfill when it reaches full capacity, which is estimated to occur in the year 2101.</p> <p>For Plan Concept 2, Figure 3-8 identifies the sequence in which existing and future landfill modules are estimated to be filled. Similar to Plan Concept 1, the modules are proposed to be filled in a south-to-north sequence. Based on this anticipated fill sequence, Figure 3-9 identifies the estimated elevation and contours of the existing landfill and the western landfill in the year 2050. Figure 3-10 identifies the final elevation and contours of the existing and western landfills when they reach full capacity, which is estimated to occur in the year 2110.</p> <p>The impacts of landfill expansion on either the Eastern Property or the Western Property are discussed throughout the Draft EIR, including the impacts on adjacent properties. For a discussion of the cumulative impacts that would be anticipated with development of the Placer Ranch Specific Plan and the larger Sunset Area Plan, the commenter is referred to Chapter 19, Cumulative Impacts, of the Draft EIR.</p> <p>The module filling is proposed to progress from south to north for both plan concepts to allow excavation of the contents of Modules 1, 2, 10, and 11 in the northern portion of the Center Property. Because Modules 1, 2, 10, and 11 have been closed, they have reached their peak elevation and no additional waste can be placed on top of those modules. However, with the removal of the waste from these modules and their ultimate reuse, the peak elevation of these modules would increase to match the elevations of the other landfill modules. As a result of reusing these modules, the landfill's total disposal capacity would increase because the peak</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	<p>elevation of these modules would be substantially higher when refilled (that is, up to 325 feet versus 170 feet above mean sea level). The contents of these modules would be relocated to the Subtitle D-compliant lined module within the southern portion of the site and the filling would progress accordingly from south to north. Because of this excavation component, it would be difficult for landfill filling to progress from north to south regardless of the plan concept selected.</p> <p>Although the excavation of these modules would not need to occur immediately under Plan Concept 1 and could be delayed until the additional landfill capacity is needed, the Draft EIR assumes these activities would occur from 2045 to 2050. WPWMA may proceed sooner with the excavation, based on economic, technical, or environmental factors.</p> <p>Plan Concept 2 includes reusing the excavated modules for the expanded composting, construction, and demolition material processing, public waste dropoff, recovered materials storage, and alternative technologies pilot study uses. To accommodate these uses, within 3 years following project approval, the excavated area would be filled to surrounding elevations with available onsite soil to provide a flat working surface.</p>
Q-17	The commenter refers to the previous comment (Q-16) regarding Figure 3-3 in Section 3.5.3. Please refer to the response to Comment Q-16.
Q-18	The commenter references Chapter 3, Section 3.5.3, and requests an explanation about where the flow is anticipated to go from the Eastern Property line. Stormwater flow from the Eastern Property line would be managed as part of a stormwater management program and would be directed to an onsite stormwater retention basin.
Q-19	The commenter references Section 3.5.4, noting the location of complimentary and programmatic elements, and requests an explanation whether this is intended to leave the door open for certain complementary elements, for example, university research areas, on the Eastern Property. Please refer to the response to Comment O-6.
Q-20	The commenter states that the Draft EIR should indicate that each of the SAP goals and policies stated on pages 3-43 to 3-44 support Plan Concept 2 and proximity to the Sacramento State – Placer Center, along with the reduced environmental effects of doing so, including traffic. This comment is acknowledged and the WPWMA Board will consider SAP goals and policies as the project is being evaluated.
Q-21	The commenter states that, in Table 3-22, the middle column appears to be mistakenly identified and should appear as Plan Concept 2. As indicated in Chapter 3 of this Final EIR, the text in the middle column of Table 3-22 is revised to reflect Plan Concept 2.
Q-22	The commenter references Draft EIR Section 3.6.4 and states that this section of the Draft EIR should discuss compatibility of complimentary and programmatic elements, compatibility of interested businesses in locating under Plan Concept 2 close to the Sacramento State – Placer Center, and the resulting environmental benefits and impact reductions. Please refer to the responses to Comments O-6 and Q-10.
Q-23	The commenter states Section 3.6.4 should be revised to identify the additional benefits of locating in proximity to the Sacramento State – Placer Center. Please refer to the response to Comment Q-10.
Q-24	The commenter states that the Draft EIR concludes odor impacts would be significant and that the proposed project has the potential to create objectionable odors affecting a substantial number of people. The commenter states that the Draft EIR's analysis related to odor impacts is conclusory and fails to specifically address odor impacts to the future Sacramento State – Placer

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	<p>Center. The commenter asks for an explanation of how the mitigation measures and BMPs outlined in Chapter 6 will reduce the odor impacts to people in the campus area southeast of the WPWMA site.</p> <p>The commenter is referred to Table 6-1 on page 6-3 of the Draft EIR for a detailed description of the current emission reduction measures and BMPs incorporated as project design measures. These include specific odor management practices that would continue to be implemented during construction and operation of the proposed project. These measures specifically reduce emissions generated from site operations, including odor emissions. The commenter is further referred to the detailed discussion of odor issues associated with the existing operations and the proposed project included in Chapter 6 of the Draft EIR. In addition, the odor reduction mitigation measures included on page 6-65 of the Draft EIR would further reduce odor emissions and odors in the project vicinity.</p> <p>Although the proposed project would implement numerous facility improvements, including more efficient waste management operations and odor-abatement strategies, the Draft EIR concludes on page 6-65 that the nature and effectiveness of these strategies are unknown. Because there are no quantifiable thresholds of significance for odor impacts and there is no existing fee program or other mechanism by which to fund odor mitigation, the Draft EIR concluded that this impact would remain significant and unavoidable after mitigation. Please refer to the response to Comment P-12.</p> <p>For a discussion of the proposed project's odor impacts associated with cumulative development in the region, the commenter is referred to Chapter 19, Cumulative Impacts, of the Draft EIR. The SAP/PRSP EIR concluded that the development and buildout of the Sunset Area Plan, which would include projects such as the future Sacramento State – Placer Center, would result in the exposure of a substantial number of people to objectionable odors, a significant and unavoidable cumulative odor impact. While odor abatement approaches and technologies would be implemented by the WPWMA as part of the Renewable Placer: Waste Action Plan, the nature and effectiveness of these measures are unknown at this time, and odor impacts would be cumulatively considerable. Therefore, the cumulative impact for odors from the proposed project would be significant and unavoidable. This finding is consistent with the findings of the SAP/PRSP EIR.</p>
Q-25	<p>The commenter states that the Draft EIR concludes that it will not be feasible to differentiate between existing and future proposed project-related odors and that this conclusion fails to address the acknowledged increased intensity and duration of odors that will result from the project.</p> <p>The Draft EIR acknowledges on page 6-65 that although the proposed project would implement numerous facility improvements, including more efficient waste management operations and odor-abatement strategies, the nature and effectiveness of these strategies are unknown. Because there are no quantifiable thresholds of significance for odor impacts and there is no existing fee program or other mechanism by which to fund odor mitigation, the Draft EIR concluded that this impact would remain significant and unavoidable after mitigation. Please refer to the response to Comment P-12. For a discussion of the proposed project's odor impacts associated with cumulative development in the region, including development of land uses in proximity to the WPWMA facilities under the Sunset Area Plan, the commenter is referred to Chapter 19, Cumulative Impacts, of the Draft EIR.</p>
Q-26	<p>The commenter acknowledges that the Draft EIR describes how construction-related odorous emissions will dissipate with an increase in distance from the construction location(s) and asks if the WPWMA considered the immediate proximity of the Sacramento State – Placer Center.</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	<p>The construction-related impacts associated with implementation of the proposed project were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned Sacramento State – Placer Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not yet been constructed, it was not specifically considered when describing the impacts of the proposed project on the existing environment.</p> <p>For a discussion of the cumulative impacts that would be expected with development of the Sunset Area Plan, which would include buildout of the future Sacramento State – Placer Center, the commenter is referred to the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR. Construction activities related to the proposed project, in combination with the reasonably foreseeable regional urban development described in the SAP Draft EIR, would add emissions of the criteria pollutants for which the project region is in nonattainment under applicable health-protective federal and state ambient air quality standards, including emissions of the ozone precursors reactive organic gases and oxides of nitrogen, and of particulate matter (PM₁₀ and PM_{2.5}). Some of these emissions may be odorous. Development projects, while required to mitigate adverse air quality impacts from construction, would contribute to regional emissions that may conflict with area air quality plans and attainment efforts. Because no mitigation is available beyond that recommended for the project, the cumulative impact for project-specific construction emissions would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP/PRSP EIR, which determined that project construction emissions would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.</p>
Q-27	<p>The commenter states that the Draft EIR conclusion that odor impacts will be the same under Plan Concept 1 and Plan Concept 2 conflicts with the fact that various facilities are located in different places for Plan Concepts 1 and 2. The commenter states that the major difference between the plan concepts is where the landfill expansion area will be located and believes that the close proximity of the landfill to the Sacramento State – Placer Center in Plan Concept 2 will result in greater odor impacts. The commenter requests that this be analyzed in the Draft EIR. The commenter concludes that Plan Concept 2 is the environmentally superior option, including because it will reduce odor impacts to a substantial number of people, which the Draft EIR concluded will be a substantial impact.</p> <p>The odor impacts associated with implementation of the two plan concepts were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned Sacramento State – Placer Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not been constructed, it was not considered when describing the impacts of the two plan concepts on the existing environment.</p> <p>For a discussion of the cumulative impacts that would be expected with buildout of the Sunset Area Plan, which would include buildout of the future Sacramento State – Placer Center, the commenter is referred to the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR.</p> <p>Regarding future development uses in the project vicinity, in addition to the Sacramento State – Placer Center proposed to be located south of the Center and Eastern Properties, the Placer Ranch Specific Plan includes commercial and residential uses south of the Western Property. Also, the Sunset Area Plan includes proposed Innovation Center uses to the east and west of the WPMWA property. Because all of the properties surrounding the project site, with the exception of those to the north, are expected to be developed with implementation of the Sunset Area Plan</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	and Placer Ranch Specific Plan, the Draft EIR concluded that the cumulative impacts of the two plan concepts in relation to future adjacent land uses would not differ substantially.
Q-28	The commenter notes that the Sacramento State – Placer Center will be located immediately south of the area designated as the “Campus Park,” as designated in Figure 13-2 and that the University site is planned for development with both residential and nonresidential uses. These comments are acknowledged. For future residential development, the Sunset Area Plan includes a 2,000-foot setback requirement between the WPWMA property and any new residential uses. The land use designations included in the Placer Ranch Specific Plan reflect this setback requirement. The location of residential uses within the Sacramento State – Placer Center project are assumed to comply with this setback requirement. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
Q-29	The commenter states that Placer County Policy 1.F.3 highlights the need for WPWMA’s expansion to be designed and located in a way that does not adversely affect nearby land uses, including Sacramento State – Placer Center and that the WPWMA consider the future University in its environmental review. The commenter states that Plan Concept 2 is aligned with Policy 1.F.3, as it locates the landfill expansion area farther from future commercial, educational, and residential land uses. As described in Chapter 13, Land Use and Planning, and as discussed in Impact 13-1 and 13-2, neither plan concept would have an impact on land use plans and policies, including the Sunset Area Plan. Please refer to the response to Comment Q-27.
Q-30	The commenter states that the WPWMA design its expansion in a consistent manner with Placer County Policy LU/ED-3.1 and Policy LU/ED-6.2 in light of the development envisioned and approved in the Placer Ranch Specific Plan, including the Sacramento State – Placer Center and that PRSP represents Placer County’s most recent near-term land use and development vision for locations proximate to the landfill. This comment is acknowledged; because it does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
Q-31	The commenter states that the impacts related to the consistency with land use plans differs significantly between Plan Concept 1 and Plan Concept 2 because of the planned development southeast of WPWMA’s facility and states that locating expanded landfill operations farther from the approved PRSP development and development of the Sacramento State – Placer Center, as depicted in Plan Concept 2, will result in fewer impacts to the surrounding communities. Please refer to the response to Comment Q-27.
Q-32	<p>The commenter states that Section 14.1.2 of the Draft EIR fails to address the noise impacts on planned residences, including campus residences, and other sensitive noise receptors and that assessment of noise impacts on these locations is needed.</p> <p>The noise impacts associated with implementation of the two plan concepts were compared to the baseline existing conditions, which are those that existed when the Notice of Preparation was released on March 15, 2019. Because the planned Sacramento State – Placer Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, has not yet been constructed, it was not considered when describing the noise impacts of the two plan concepts on the existing environment.</p> <p>For a discussion of the cumulative noise impacts that would be expected with buildout of the Sunset Area Plan, which would include buildout of the future Sacramento State – Placer Center,</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	the commenter is referred to the cumulative impact discussion included in Chapter 19, Cumulative Impacts, of the Draft EIR.
Q-33	The commenter states that Plan Concept 2 aligns with Placer County Policy 1.E.1 and Plan Concept 1 does not, as Plan Concept 2 provides substantially greater buffering between the expanded landfill area and residential areas and minimizes adverse environmental impacts. The commenter further states that Plan Concept 1 would exacerbate environmental impacts by locating landfill operations directly north of the planned Campus Park and Sacramento State – Placer Center. Please refer to the response to Comment Q-27.
Q-34	The commenter states that Plan Concept 2 better aligns with Goal 9.A.2, as noise impacts will be reduced by locating the landfill expansion area farther from the planned development of the Campus Park and Sacramento State – Placer Center. Please refer to the response to Comment Q-27.
Q-35	The commenter states that existing ambient noise levels will increase, likely by more than 3 decibels, in the Campus Park and Sacramento State – Placer Center area, which will be located closer than current residences. Please refer to the responses to Comments Q-27 and Q-32.
Q-36	The commenter states that Plan Concept 1 would have greater noise impacts than Plan Concept 2 because the expanded landfill operations would be closer to development and future residential areas. Regarding future development uses in the project vicinity, the Placer Ranch Specific Plan includes proposed commercial and residential development to the south of the Eastern, Center, and Western Properties. In addition, the Sunset Area Plan includes proposed Innovation Center uses to the east and west of the WPMWA property. Based on the proximity of proposed future development to both the Eastern and Western Properties, the Draft EIR concluded that future noise impacts associated with the two plan concepts would not differ substantially. Please refer to the response to Comment Q-28.
Q-37	<p>The commenter states that the traffic noise analysis fails to recognize the sensitive land uses that are approved and planned for the area directly southeast of Sunset Area Boulevard West in the Placer Ranch Specific Plan. The commenter states that the Draft EIR should not assume that traffic noise impacts will be limited to the existing roadways, when there are also known, proposed roadways for the area directly south of Sunset Area Boulevard West.</p> <p>For the anticipated traffic noise impacts expected to be experienced by future residences within the Placer Ranch Specific Plan, the commenter is referred to the EIR that was prepared for the Placer Ranch Specific Plan and Sunset Area Plan. That EIR anticipated development of the project site, development of the residential uses within the Specific Plan, and buildout of the regional transportation infrastructure when evaluating traffic noise impacts on future residential uses. The buildout of the Sunset Area Plan would be expected to generate greater traffic noise impacts along local roadways than would be anticipated with implementation of the proposed project because of the substantially larger development footprint.</p>
Q-38	<p>The commenter states that the existing residences and masonry sound walls are located farther from the project site than the land uses that were approved for the area directly south of Sunset Area Boulevard West in the Placer Ranch Specific Plan and that noise impacts will likely be greater than the EIR projects for these areas. Please refer to the response to Comment Q-37.</p> <p>For the anticipated traffic noise impacts expected to be experienced by future residences within the Placer Ranch Specific Plan, the commenter is referred to the EIR that was prepared for the Placer Ranch Specific Plan and Sunset Area Plan. That EIR anticipated development of the project site, development of the residential uses within the Specific Plan, and buildout of the regional</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
Comment:	Response:
	transportation infrastructure when evaluating traffic noise impacts on future residential uses. The buildout of the Sunset Area Plan would be expected to generate greater traffic noise impacts along local roadways than would be anticipated with implementation of the proposed project because of the substantially larger development footprint.
Q-39	The commenter states that Plan Concept 1 would have greater noise impacts than Plan Concept 2 because the expanded landfill operations would be closer to the development and future residential areas, including Sacramento State – Placer Center area. Please refer to the response to Comment Q-37.
Q-40	The commenter states that conclusions related to bicycle, pedestrian, and public transit facilities did not account for the planned development within the Campus Park or Sacramento State – Placer Center area. Please refer to the response to Comment Q-27.
Q-41	The commenter states that transportation impacts would be worse under Plan Concept 1 than Plan Concept 2, as landfill vehicles would be transporting waste to and from the expanded landfill area on the road that separates the Campus Park and Sacramento State – Placer Center from the WPWMA's facility. The delivery of waste to the project site would not differ between Plan Concept 1 and Plan Concept 2. Both plan concepts would include the delivery of materials to the entrance facilities near the intersection of Athens Avenue and Fiddymont Road.
Q-42	The commenter states Alternative B referenced in Section 18.4.2, which does not include waste disposal activities on the Eastern Property, should be evaluated specifically to assess its reduced impacts relative to Plan Concept 1 on the Sacramento State – Placer Center. The commenter also states relative to Plan Concept 2, Alternative B would reduce many of the compatibility benefits of locating complementary and programmatic elements on the Eastern Property in the vicinity of the Sacramento State – Placer Center. The commenter supports Plan Concept 2 and finds Plan Concept 2 adequately addresses its concerns related to the Sacramento State – Placer Center. Because the planned Sacramento State – Placer Center did not exist when the Notice of Preparation was released and, as of the release of this Final EIR, it has not yet been constructed, it was not considered when describing the impacts of the two plan concepts or alternatives on the existing environment.
Q-43	The commenter states Alternative B, referenced in Section 18.5, should be evaluated specifically to assess its reduced impacts relative to Plan Concept 1 on the Sacramento State – Placer Center. The commenter also states relative to Plan Concept 2, Alternative B would reduce many of the compatibility benefits of locating complementary and programmatic elements on the Eastern Property in the vicinity of the Sacramento State – Placer Center. Please refer to the response to Comment Q-42.
Q-44	<p>The commenter states that to adequately analyze cumulative impacts and to allow CSU to do likewise, the WPWMA needs to fully account for the future project of the Campus Park and Sacramento State – Placer Center site, as conceptually approved under the Placer Ranch Specific Plan and currently under master plan review by CSU.</p> <p>Pursuant to state CEQA Guidelines Section 15130(d), previously approved land use documents may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in a previously certified EIR may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master, or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project</p>

California State University, Sacramento & Sierra College Robert S. Nelsen, President, CSUS; William Duncan, President, Sierra College; Jonathan Bowman, Vice President & Chief Financial Officer, CSUS January 11, 2022	
<i>Comment:</i>	<i>Response:</i>
	<p>have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.</p> <p>Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for an area plan) with later EIRs on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR solely on the issues specific to the later project (state CEQA Guidelines Section 15152(a)). Agencies are encouraged to tier the environmental analyses they prepare for separate but related projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR on the actual issues ripe for decision.</p> <p>As discussed in state CEQA Guidelines Section 15152(f)(1) and (2), where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR, that effect is not treated as significant for purposes of the later EIR and need not be discussed in detail. When assessing whether there is a new significant cumulative effect, the lead agency will consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects.</p> <p>The project site is located entirely within the boundaries of the SAP, an area that encompasses 8,497 acres in unincorporated west Placer County. In addition, the Sacramento State – Placer Center project is located entirely within the SAP. The SAP is a policy document intended to guide growth in the SAP area during a 20-year planning horizon; buildout of the SAP area is expected to occur during a period of 80 years or more. An EIR was prepared to evaluate the physical environmental effects of the proposed SAP pursuant to CEQA (Public Resources Code [PRC] Section 21000, et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 1500, et seq.).</p> <p>The SAP/PRSP EIR (Placer County 2019) programmatically evaluated the environmental impacts that would be anticipated with the expansion of solid waste elements and development of industrial uses on the WPWMA properties in a manner consistent with the site's land use and zoning designations. Both plan concepts include the development of the WPWMA's properties in a manner consistent with the land use and zoning designations identified in the SAP. The development of the Sacramento State – Placer Center project also was evaluated in the SAP/PRSP EIR. Therefore, the SAP/PRSP EIR fully evaluated the cumulative impacts associated with buildout of the WPWMA properties and the Sacramento State – Placer Center project. The commenter is referred to the cumulative impact analysis included in the SAP/PRSP EIR and the summary of this analysis included in Chapter 19, Cumulative Impacts, of the Draft EIR.</p>
Q-45	<p>The commenter states that considering the landfill expansion area is extremely close to the Sacramento State – Placer Center in Plan Concept 1, cumulative odor impacts would be greater in Plan Concept 1, making Plan Concept 2 the environmentally superior option. Please refer to the response to Comment Q-27.</p>

2.2.18 Letter R



T R A I N O R F A I R B R O O K
A T T O R N E Y S A T L A W

Charles W. Trainor
ctrainor@trainorfairbrook.com

January 12, 2022

Ms. Stephanie Ulmer
Western Placer Waste Management Authority
3013 Fiddymont Road
Roseville, California 95747
sulmer@placer.ca.gov
EIRcomments@RenewablePlacer.com

Re: Comments on the Draft Environmental Impact Report
for the Renewable Placer: Waste Action Plan

Dear Ms. Ulmer:

This law firm represents the United Auburn Indian Community ("UAIC"), the owner of the Thunder Valley Casino Resort ("Thunder Valley"), and other properties within two miles of the Western Regional Sanitary Landfill and Materials Recovery Facility. UAIC appreciates the effort that WPWMA has put into the analysis of the environmental impacts that the landfill expansion will have on surrounding properties and the environment, especially its willingness to fully vet two different concepts for expansion of the facility. UAIC hereby submits the following comments in relation thereto.

General Preference.

After reviewing the Draft EIR and the two concepts set forth therein, UAIC has determined that it supports for Plan Concept 2, as shown on Figure 3-7 of the Draft EIR. It is UAIC's opinion that Plan Concept 2 will have the least environmental impacts on Thunder Valley and on UAIC's surrounding lands as they are built out. Pursuant to the Sunset Area Plan adopted by the County, the zoning for the lands south of Thunder Valley (and east of the landfill) is an entertainment district, which will presumably result in large numbers of visitors to those properties in the future. Plan Concept 2 moves the landfill expansion area away from that area, improving the aesthetics and decreasing the likelihood of unpleasant odors from the prevailing westerly winds. Also, Plan Concept 2 presumably benefits the future residents of Placer Ranch who could be most negatively impacted by the eastern landfill expansion in Plan Concept 1 if that were to be adopted.

R-1

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Ms. Stephanie Ulmer

Re: Comments on the Notice of Preparation of a Draft Environmental
Impact Report for the Renewable Placer: Waste Action Plan

January 12, 2022

Page 2

Specific Comments.

- UAIC requests WPWMA to include a description of the project-level review process for future complementary and programmatic elements. How will surrounding property owners and the general public be notified of proposals or projects as they are further defined? These future projects may have odor or aesthetic impacts which need to be individually evaluated and disclosed, depending upon the proposed uses. } R-2
- In reference to the MRF Operations proposals, Page 3-20 states “The proposals show the Organics Management Operation located on the center property (which is consistent with Plan Concept 1).” We believe this statement is incorrect as Figure 3-1 shows Organics Management Operation under Plan Concept 1 on the western property. } R-3
- The EIR should consider simulating representative complementary and programmatic elements from Key Observation Points. For example, Plan Concept 2 at Full Buildout would allow for compatible technologies on the eastern property; however, simulations on Figure 5-26 show the eastern property without any notable development. } R-4

Cultural and Tribal Resources.

- We ask that the Tribal Cultural Resources chapter in the EIR and mitigation measures be separate and distinct from the Cultural Resources chapter. This is because tribal values are used to identify, evaluate and treat tribal cultural resources, while archaeological values are used for cultural resources. Separating the chapters also allows the opportunity to discuss Tribes in a contemporary context, especially when consulting under AB 52. If this cannot be done at this stage of the EIR, we understand, but are requesting this for all future CEQA documents. } R-5
- Page 8-19: Mitigation Measure 8-2: Disturbance of Tribal Cultural Resources Discovered during Construction. Thank you for incorporating UAIC’s Unanticipated Discoveries measure as they were provided. } R-6
- Page 8-21 and 22: Mitigation Measure 8-4: Disturbance of Human Remains. If the MLD is not UAIC or is unresponsive or provides recommendations in the given 48-hour timeframe, UAIC requests to be contacted to reinter the remains with the appropriate dignity in an area of the property secure from further disturbance, instead of the WPWMA. } R-7

Ms. Stephanie Ulmer

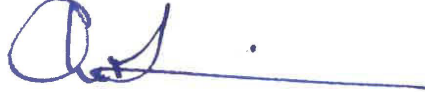
Re: Comments on the Notice of Preparation of a Draft Environmental
Impact Report for the Renewable Placer: Waste Action Plan

January 12, 2022

Page 3

Our client looks forward to continuing discussions with WPWMA on this project of regional importance as the Final EIR is adopted and expansion commences.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Charles W. Trainor', with a long horizontal line extending to the right.

Charles W. Trainor

CWT:skc

cc: Jennifer Wade Robertson

3671.058.2427382.1

Letter R Comment Responses

Trainor Fairbrook, On behalf of the United Auburn Indian Community Charles W. Trainor January 12, 2022	
Comment:	Response:
R-1	The commenter states its support for Plan Concept 2 because it would have the fewest environmental impacts on the Thunder Valley and UAIC's surrounding lands. WPWMA acknowledges this comment and that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
R-2	<p>The commenter requests that WPWMA include a description of the project-level review process for future complementary and programmatic elements and asks how surrounding property owners and the general public will be notified of proposals or projects as they are further defined. The commenter states that these future projects may have odor or aesthetic impacts that need to be individually evaluated and disclosed, depending on the proposed uses.</p> <p>Assuming the WPWMA Board of Directors approves a plan concept, WPWMA would subsequently review any project components that are being considered for implementation for their consistency with the project description included in the EIR. If those components are consistent with the project description evaluated in the EIR, WPWMA staff will bring any necessary contracts for the proposed improvements to the Board of Directors for their approval prior to implementing the improvements. If the project components are determined to not be consistent with the project description, subsequent environmental review consistent with CEQA may be necessary. In such cases, public notice will be provided consistent with the public noticing requirements of CEQA, and any necessary CEQA documentation will be completed prior to entering into any contracts to construct the improvements.</p>
R-3	<p>The commenter states that page 3-20 notes "The proposals show the Organics Management Operation located on the center property (which is consistent with Plan Concept 1)." We believe this statement is incorrect as Figure 3-1 shows the Organics Management Operation under Plan Concept 1 on the western property."</p> <p>As indicated in Chapter 3 of this Final EIR, the following text is hereby added to Section 3.5.2 on page 3-20 of the Draft EIR: "The proposals show the Organics Management Operation located on the center property <u>portion of the Western Property</u> (which is consistent with Plan Concept 1)."</p>
R-4	The commenter states the EIR should consider simulating representative complementary and programmatic elements from Key Observation Points (KOPs). In Chapter 5, Aesthetics, Section 5.3.3, the EIR analyzes locations within the 4-mile visual study area that could be the most sensitive to the proposed project's potential visual impacts. Additionally, visual simulations focused on showing the complementary and programmatic elements at the KOPs would not change the EIR's determination that the project results in significant and unavoidable impacts on visual character and quality. Because the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft EIR, no further response is required.
R-5	The commenter requests that the Tribal Cultural Resources chapter be presented separately and distinctly from the Cultural Resources chapter. The WPWMA appreciates and acknowledges this comment. However, because splitting a single chapter into two separate chapters would add complexity to the Draft EIR and may cause some confusion for readers, the WPWMA proposes not to make this change to the Final EIR but will consider preparing a separate and distinct Tribal Cultural Resources chapter in future CEQA documents.
R-6	The commenter acknowledges incorporation of UAIC's Unanticipated Discoveries measure as provided in Mitigation Measure 8-2. This comment is acknowledged.
R-7	The commenter requests that the UAIC be contacted to reinter Native American remains that may be discovered during project work rather than the WPWMA performing this task. As described in

Trainor Fairbrook, On behalf of the United Auburn Indian Community Charles W. Trainor January 12, 2022	
<i>Comment:</i>	<i>Response:</i>
	<p>Mitigation Measure 8-4, if human remains are encountered at the site, work in the immediate vicinity of the discovery will cease, and necessary steps to secure the integrity of the immediate area will be taken. The Placer County Coroner will be notified immediately and will determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner will notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendant (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. Because the UAIC is historically affiliated with the project site, WPWMA assumes that the MLD would be associated with the UAIC and that the NAHC would recommend notifying the UAIC. Therefore, the WPWMA assumes that any reinterment of remains would be conducted with the appropriate dignity in an area of the property secure from further disturbance by UAIC or in close coordination with UAIC.</p>

2.2.19 Letter S



Central Valley Regional Water Quality Control Board

12 January 2022

Stephanie Ulmer
 Western Placer Waste Management Authority
 3013 Fiddymont Road
 Roseville, CA 95747
SUlmer@placer.ca.gov

**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL
 IMPACT REPORT, RENEWABLE PLACER WASTE ACTION PLAN,
 SCH#2019039087, PLACER COUNTY**

Pursuant to the State Clearinghouse's 28 October 2021 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Renewable Placer Waste Action Plan, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

S-1

DENISE KADARA, ACTING CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

S-1

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

S-2

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

S-3

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

S-3

Renewable Placer Waste Action Plan - 5 -
Placer County

12 January 2022

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

S-3

If you have questions regarding these comments, please contact me at (916) 464-4709 or Greg.Hendricks@waterboards.ca.gov.



Greg Hendricks
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

Letter S Comment Responses

<p style="text-align: center;">Central Valley Regional Water Quality Control Board Greg Hendricks, Environmental Scientist January 12, 2022</p>	
<i>Comment:</i>	<i>Response:</i>
S-1	The commenter provides an overview of the Central Valley Water Board Basin Plan. This comment is acknowledged.
S-2	The commenter states that the EIR should evaluate potential impacts to both surface and groundwater quality. The Draft EIR analyzes potential impacts to surface and groundwater quality in Chapter 12, Hydrology and Water Quality, Section 12.3.2, Impacts and Mitigation Measures; specifically, Impacts 12-1 through 12-4 address impacts to water quality.
S-3	The commenter identifies a variety of permitting requirements, including the Construction Stormwater General Permit, Phase I and II Municipal Separate Storm Sewer System (MS4) Permits, Industrial Stormwater General Permit, Waste Discharge Requirements, Dewatering Permit, Limited Threat General National Pollutant Discharge Elimination System (NPDES) Permit, and NPDES Permit. The WPWMA acknowledges these permitting requirements and will work to secure applicable permits for the project as appropriate and necessary for the individual project components.