

## 2. Executive Summary

The Renewable Placer: Waste Action Plan (project) is a proposal by the Western Placer Waste Management Authority (WPWMA) to implement the Waste Action Plan within the properties owned by the WPWMA in western Placer County. The WPWMA has identified two separate plan concepts for implementing the Waste Action Plan, which are evaluated at an equal level of detail in this Draft Environmental Impact Report (DEIR). These two plan concepts were developed through a detailed planning process that included convening an Advisory Committee composed of key staff from each of WPWMA's Member Agencies; organizing a Stakeholder Working Group consisting of nearby commercial entities, developers, environmental groups, and residential neighborhood representatives; and preparing detailed technical evaluations.

This DEIR addresses the potential environmental impacts that are anticipated to result from implementation of the proposed project. The DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA). The WPWMA is the lead agency for the CEQA process and has independently evaluated, directed, and supervised the preparation of this document. The Executive Summary identifies the purpose of the DEIR, provides an overview of the proposed project and alternatives, summarizes the major findings and conclusions of the DEIR, identifies the potential impacts of the proposed project, and summarizes the recommended mitigation measures.

### 2.1 Purpose of this Document

An EIR is a public informational document used for planning and decision-making purposes. The WPWMA will consider the information in the EIR, including the public comments and staff response to those comments, during the public hearing process. As a legislative act, the final decision is made by the WPWMA Board of Directors, who may approve, conditionally approve, or deny the project. The purpose of an EIR is to identify the following:

- Significant potential impacts of the proposed project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated
- Any unavoidable adverse impacts that cannot be mitigated
- Reasonable and feasible alternatives to the project that would eliminate any significant adverse environmental impacts or reduce the impacts to a less-than-significant level

An EIR also discloses growth-inducing impacts; impacts found not to be significant; and significant cumulative impacts of past, present, and reasonably anticipated future projects. CEQA requires an EIR be prepared that reflects the independent judgment of the lead agency regarding the impacts, the level of significance of the impacts both before and after mitigation, and mitigation measures proposed to reduce the impacts.

### 2.2 Overview of the Proposed Project

The Waste Action Plan includes solid waste elements, complementary and programmatic elements, and supporting elements that are incorporated in both Plan Concept 1 and Plan Concept 2. The plan concepts contain these similar elements, but the locations and characteristics of the elements vary between the two concepts. Solid waste (Waste Recovery and Waste Disposal) project elements and supporting elements include those directly under the WPWMA's control. Complementary and programmatic elements include those that may involve third parties.

**Solid waste project elements** are the Waste Recovery and Waste Disposal project elements that are needed to continue providing solid waste management services to the WPWMA's Participating Agencies in the near and long term. These project elements are summarized as follows:

### 2.2.1 Waste Recovery

- Expanded Operation of Materials Recovery Building – The proposed project includes continued and expanded operation of the Materials Recovery Facility (MRF) Building to accommodate growth in the waste stream.
- Expanded and Redesigned Organics Management Operation – The organics management operation would include an expanded and redesigned organics processing operation to increase capacity to accommodate growth in the organics waste stream and increased organic diversion required by new state-mandated organics diversion regulations (Senate Bill 1383) to accept additional compostable material streams (e.g., food waste, other organics), and to improve odor control.
- Expanded and Redesigned Construction and Demolition Materials Processing Operation – The construction and demolition (C&D) materials processing operation is proposed to be redesigned to increase capacity to accommodate growth in the waste stream and respond to increased state-mandated diversion requirements (e.g., CALGreen Building Standards) and the needs of Participating Agencies.
- Expanded and Redesigned Public Waste Drop-off Area Operations – The public waste drop-off area operations are proposed to include a new public waste tipping area, material buy-back center, household hazardous waste (HHW) facilities, reuse store, and a new entrance kiosk with vehicle queuing lanes. The expanded and redesigned public waste drop-off area operations are proposed to accommodate population growth and associated facility use, support customer safety and convenience, and provide opportunities for increased material diversion (e.g., operation of a reuse store).

### 2.2.2 Waste Disposal

- Expanded Landfill Disposal Capacity – The Western Regional Sanitary Landfill's (WRSL's) disposal capacity is proposed to be expanded to accommodate current and future Participating Agency solid Waste Disposal demands. This element addresses landfill expansion, tonnage and vehicle limit changes, and landfill environmental monitoring and control systems.
- Excavation of Existing Solid Waste – Closed and pre-Subtitle D sections of the WRSL are proposed to be excavated and relocated to a Subtitle D-compliant module on the site. Subtitle D of the Resource Conservation and Recovery Act (Part 258 of the *Code of Federal Regulations* [CFR]) regulates the design, operation, and monitoring of municipal solid waste landfills.

**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 the 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.

**Supporting Elements** are the project elements required to support the solid waste management and complementary and programmatic elements. Some of these elements already exist at the site and would be modified with project implementation, and some would be new additions. The elements include recovered materials storage areas, stormwater ponds, road crossings, maintenance areas, administrative buildings, facility parking, entrance facilities, wastewater and water supply infrastructure, LFG-to-energy plant, and site perimeter infrastructure.

### 2.2.3 Potential Facility Operating Contract Amendments

The WPWMA is currently undergoing a competitive procurement process for the future near-term (approximately 10-year) waste recovery and waste disposal contract operations. As part of that process, the WPWMA received proposals for waste recovery operations (termed MRF operations for the Request For Proposal [RFP]) and for waste disposal operations (termed landfill operations for the RFP). The WPWMA's procurement process is ongoing as of the preparation of this EIR and conceptual designs associated with the proposals for MRF operations are preliminary and do not contain enough detail to alter the details of Plan Concept 1 or Plan Concept 2.

### 2.2.4 Baseline Condition and Plan Concept Comparison

For purposes of analysis in this DEIR, the baseline conditions are those that existed on the three WPWMA-owned properties when the Notice of Preparation was released on March 15, 2019. For solid waste operations that fluctuate on a daily basis, the baseline is based on averages from calendar year 2018, unless otherwise specified. A full calendar year was used to capture the full range of operations that typically occur at the site over four seasons.

The Waste Action Plan includes solid waste, complementary and programmatic, and supporting elements that are incorporated in both Plan Concept 1 and Plan Concept 2. The plan concepts contain these similar elements, but the locations and characteristics of the elements vary between the two plan concepts.

Tables 2-1, 2-2, and 2-3 summarize the environmental baseline and the changes associated with both plan concepts for solid waste project elements, complementary and programmatic elements, and supporting elements, respectively.

### 2.2.5 Preferred Plan Concept

The proposed project is implementation of the Waste Action Plan, and Plan Concepts 1 and 2 have been identified as two options for implementing the Waste Action Plan. Accordingly, Plan Concepts 1 and 2 have been evaluated at an equal level of detail in this EIR.

While the WPWMA believes that identification and evaluation of two plan concepts to implement the Waste Action Plan provides the public and decision makers with robust review and disclosure regarding the potential environmental impacts associated with implementation of the Waste Action Plan, and although both Plan Concepts would achieve the Waste Action Plan objectives and would meet WPWMA's long-term operational needs, the WPWMA identified Plan Concept 1 as the preferred plan concept, as described in detail in Section 4.2.

Renewable Placer: Draft Environmental Impact Report  
Chapter 2 – Executive Summary

**Table 2-1. Summary of Environmental Baseline and Change Associated with Solid Waste Elements**

| Waste Action Plan Project Element                     | Environmental Baseline   | Plan Concept 1 Change   | Plan Concept 2 Change  |
|---|--|---|--|
| <b>Sitewide Operations</b>                            |  |   |  |
| Material Tonnage Permit Limits                        | Waste Recovery operations limited to 1,750 tpd; Waste Disposal operations limited to 1,900 tpd                         | Sitewide solid waste management activities limited to a rolling 7-day average of 4,000 tpd        | Sitewide solid waste management activities limited to a rolling 7-day average of 4,000 tpd   |
| Vehicle Permit Limits                                 | Waste Recovery operations limited to 1,014 vehicles per day; Waste Disposal operations limited to 624 vehicles per day | The permitted vehicle limits for Waste Recovery and Waste Disposal operations would be eliminated | The permitted vehicle limits for Waste Recovery and Waste Disposal operations would be eliminated  |
| Material Tons   | The WPWMA facility received 483,968 tons of solid waste material in 2018   | The WPWMA facility would receive up to 912,200 tons of solid waste material by 2050               | The WPWMA facility would receive up to 912,200 tons of solid waste material by 2050  |
| Material Recovery                                     | Approximately 39% of material received at the site was recovered from the waste stream in 2018                         | The WPWMA facility would have a material recovery rate of 50% or greater by 2050                  | The WPWMA facility would have a material recovery rate of 50% or greater by 2050   |
| Odor Management                                       | Odors are managed by facility (in particular, MRF building, composting operation, WRSL)                                | Odors would be managed sitewide through implementation of a SWOP                                  | Odors would be managed sitewide through implementation of a SWOP   |
| <b>Waste Recovery</b>                                 |  |   |  |
| MRF Operation   | The MRF building processed 240,068 tons in 2018  | The MRF building would process up to 416,600 tons per year  | The MRF building would process up to 416,600 tons per year   |
| Expanded and Redesigned Organics Management Operation | Organics management operation located in the northern part of the center property                                      | Expanded organics management relocated to the central part of the western property                | Expanded organics management operation within the northern part of the center property. Requires relocation of waste in modules 1, 2, 10, and 11 |
|   | Organics management operation, using composting  | Designed to accommodate composting but could also accommodate other organics management methods   | Designed to accommodate composting but could also accommodate other organics management methods  |
|   | The composting operation processed 60,606 tons in 2018, with minimal food waste  | The composting operation would process up to 157,900 tons by 2050; food waste added               | The composting operation would process up to 157,900 tons by 2050; food waste added  |

**Table 2-1. Summary of Environmental Baseline and Change Associated with Solid Waste Elements**

| Waste Action Plan Project Element                             | Environmental Baseline   | Plan Concept 1 Change  | Plan Concept 2 Change   |
|---|--|--|---|
|   | Two compost leachate collection ponds on center property   | 50% increase in overall pond capacity and removal of pond on center property   | 50% increase in overall pond capacity and removal of pond on center property  |
|   | Processing via windrow piles   | Processing transitions from windrows to ASP technology   | Processing transitions from windrows to ASP technology  |
|   | Compostable materials received outside   | Potential construction of a food waste receiving building  | Potential construction of a food waste receiving building   |
|   | Odor control consists of implementation and maintenance of good operating practices consistent with the OIMP                   | Odor control consists of implementing a SWOP, which incorporates the OIMP; odor control improved by change in composting technology and use of biofilter layer on the compost piles  | Odor control consists of implementing a SWOP, which includes the OIMP; odor control improved by change in composting technology and use of biofilter layer on the compost piles   |
| Expanded and Redesigned C&D Materials Processing Operation    | C&D materials processing located in the northern part of the center property   | C&D materials processing operation increased in size by 2 to 3 times on the center property  | C&D materials processing operation increased in size by 2 to 3 times on the center property and integrated with expanded composting operation and redesigned public waste drop-off; requires relocation of waste in modules 1, 2, 10, and 11              |
|   | The C&D materials processing operation, including inerts area, processed 87,404 tons in 2018                                   | The C&D materials processing operation would process up to 174,600 tons per year of C&D plus 55,200 tons per year inerts by 2050   | The C&D materials processing operation would process up to 174,600 tons per year of C&D plus 55,200 tons per year inerts by 2050  |
| Expanded and Redesigned Public Waste Drop-Off Area Operations | Public waste drop-off area operations (tipping area, buy-back center, HHW) located in the northern part of the center property | Public waste drop-off area operations expanded and redesigned and relocated to the western property; new facilities include a public tipping area, material buy-back center, HHW waste drop-off area, reuse store, and entrance kiosk with vehicle queuing | Expanded and redesigned public waste drop-off operations on the center property; new facilities include public tipping area, material buy-back center, HHW waste drop-off area, and reuse store; requires relocation of waste in modules 1, 2, 10, and 11 |
|   | Public waste drop-off area operations received 44,194 tons in 2019   | Public waste drop-off area operations would receive up to 83,300 tons by 2050  | Public waste drop-off area operations would receive up to 83,300 tons by 2050   |

**Table 2-1. Summary of Environmental Baseline and Change Associated with Solid Waste Elements**

| <b>Waste Action Plan Project Element</b>                     | <b>Environmental Baseline</b>   | <b>Plan Concept 1 Change</b>  | <b>Plan Concept 2 Change</b>  |
|--|---|---|---|
| Environmental control measures for Waste Recovery operations | Environmental control measures are implemented in a manner consistent with regulations to protect public health and the environment | Existing environmental control measures would continue and expand with the expanded Waste Recovery operations       | Existing environmental control measures would continue and expand with the expanded Waste Recovery operations       |
| <b>Waste Disposal</b>  |   |   |   |
| Increased Waste Disposal                                     | Annual tons disposed – 288,838  | Projected annual tons disposed – 521,100  | Projected annual tons disposed – 521,100  |
| Expanded Landfill Disposal Capacity                          | Waste footprint located on center property in one contiguous landfill footprint   | Waste footprint expanded to eastern property in one contiguous landfill footprint                                   | Waste footprint expanded to western property with distinct landfill footprints on the center and western properties |
|  | Elevation – 196 feet AMSL and permitted peak elevation – 295 feet AMSL  | Height increase above current conditions – 129 feet; height increase above currently permitted conditions – 30 feet | Height increase above current conditions – 129 feet; height increase above currently permitted conditions – 30 feet |
|  | Permitted waste footprint – 231 acres   | Waste footprint expands by 89 acres to 320 acres  | Waste footprint expands by 131 acres to 362 acres   |
|  | Permitted capacity – 36.3 million cy  | Landfill disposal capacity increases by approximately 45.1 million cy   | Landfill disposal capacity increases by approximately 50.2 million cy   |
|  | Waste capacity exhausted by approximately 2058  | Estimated landfill site life increases by approximately 43 years  | Estimated landfill site life increases by approximately 52 years  |
|  | Eventual relocation of Waste Recovery operations on currently permitted Module 9 to allow for future landfill disposal              | Elimination of currently permitted Module 9 for future Waste Disposal   | Elimination of currently permitted Modules 8 and 9 for future Waste Disposal  |

**Table 2-1. Summary of Environmental Baseline and Change Associated with Solid Waste Elements**

| Waste Action Plan Project Element                     | Environmental Baseline   | Plan Concept 1 Change  | Plan Concept 2 Change   |
|---|--|--|---|
| Excavation of Existing Solid Waste                    | Waste in non-Subtitle D lined modules (modules 1, 2, 10, 11)   | Module 1, 2, 10, and 11 contents would be excavated and relocated to an onsite Subtitle D-compliant module; excavated modules would be lined and reused for future Waste Disposal when needed; remaining excavated module areas would be backfilled with clean soil (starting in year 2045) within 5 years to accommodate expansion of solid waste activities on the center property | Module 1, 2, 10, and 11 contents would be excavated and relocated to an onsite Subtitle D-compliant module; a portion of Module 11 would be lined and reused for future Waste Disposal; remaining excavated module areas would be backfilled with clean soil within 3 years (starting in year 2024) to accommodate expansion of solid waste activities on the center property |
|   | Peak elevations of Modules 1, 2, 10, and 11 do not exceed approximately 170 feet AMSL                                  | The peak elevation of Modules 1, 2, 10, and 11 would be approximately 325 feet AMSL  | A portion of Module 11 would be relined and incorporated into the remaining waste cells, which would be approximately 325 feet AMSL. Modules 1, 2, 10, and part of 11 would be filled with clean soil to match the surrounding ground elevation   |
| Landfill Environmental Monitoring and Control Systems | Double-composite landfill liners are installed in modules constructed within the existing permitted landfill footprint | No changes in the liner systems; future modules would include double-composite liners  | No changes in the liner systems; future modules would include double-composite liners   |
|   | Leachate, surface water, LFG management systems  | The leachate, surface water, and LFG management systems would be expanded to accommodate the expanded landfill footprint and height  | The leachate, surface water, and LFG management systems would be expanded to accommodate the expanded landfill footprint and height, and duplicated for the landfill expansion on the western property  |

Notes:

AMSL = above mean sea level  
 ASP = aerated static pile  
 C&D = construction and demolition  
 cy = cubic yard(s)

OIMP = Odor Impact Minimization Plan  
 SWOP = Site-Wide Odor Plan  
 tpd = ton(s) per day

**Table 2-2. Summary of Environmental Baseline and Change Associated with Complementary and Programmatic Elements**

| Waste Action Plan Project Element       | Environmental Baseline  | Plan Concept 1 Change   | Plan Concept 2 Change   |
|---|---|---|---|
| Complementary and Programmatic Elements | Grazing operations on the eastern property, solid waste operations on the center property, and irrigation and model airplane operations on the western property | <p>Project Level – Development of up to 300,000 square feet of buildings plus exterior infrastructure for industrial uses that are complementary to the solid waste management elements. Industrial uses may include compatible technologies, pilot study areas, university research areas, and an LFG to compressed natural gas area</p> <p>Program Level – Up to 1.6 million square feet of industrial uses that are complementary to the solid waste management elements</p> | <p>Project Level – Development of up to 300,000 square feet of buildings plus exterior infrastructure for industrial uses that are complementary to the solid waste management elements. Industrial uses may include compatible technologies, pilot study areas, university research areas, and an LFG to compressed natural gas area</p> <p>Program Level – Up to 1.6 million square feet of industrial uses that are complementary to the solid waste management elements</p> |
|   |   | <p>Project Level – Located on the northern part of the western property</p> <p>Program Level – Primarily in the northern and southern parts of the western 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</p>   | <p>Project Level – Located on the northern part of the eastern property</p> <p>Program Level – Primarily on the eastern property, plus locations on the center property and southern part of the western 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</p>  |



**Table 2-3. Summary of Environmental Baseline and Change Associated with Supporting Elements**

| Waste Action Plan Project Element                              | Environmental Baseline   | Plan Concept 1 Change   | Plan Concept 2 Change  |
|--|--|---|--|
| <b>Waste Recovery and Waste Disposal – Supporting Elements</b> | Materials recovered from the MRF operations are stored either within or outside of the MRF building, depending on materials type and space constraints | Construction of a new recovered materials storage building and increased ability to store recovered materials inside  | Construction of a new recovered materials storage building and increased ability to store recovered materials inside   |
|  | Stormwater ponds on center property  | New and expanded stormwater ponds on western, center, and eastern properties  | New and expanded stormwater ponds on western and center properties   |
|  | Road crossings between center and western property limited to public roads   | Separated facility-only crossing of Fiddymment Road that would connect center and western properties  | Separated facility-only crossing of Fiddymment Road that would connect center and western properties   |
|  | Maintenance facility on the center property  | Center property maintenance facility would be upgraded and a new satellite maintenance facility would be constructed on the western property (for compost and public waste drop-off operations) | Center property maintenance facility would be upgraded and a new satellite maintenance facility would be constructed on the western property (for landfill operations) |
|  | Administration building on the center property   | Expansion or addition of administration building with an education center and parking   | Expansion or addition of administration building with education center and parking   |
|  | Entrance facilities on Athens Avenue   | Upgraded Athens Avenue entrance facilities, including site access and scale house infrastructure when needed  | Upgraded Athens Avenue entrance facilities, including site access and scale house infrastructure when needed   |
|  | Restricted dirt road access to western property at Fiddymment Road and Athens Avenue intersection  | New paved site entrance to western property at Fiddymment Road and Athens Avenue intersection to accommodate public access to the western property  | New paved site entrance to western property at Fiddymment Road and Athens Avenue intersection to accommodate expanded landfill operation                               |

**Table 2-3. Summary of Environmental Baseline and Change Associated with Supporting Elements**

| Waste Action Plan Project Element | Environmental Baseline  | Plan Concept 1 Change   | Plan Concept 2 Change  |
|-----------------------------------|---|---|--|
|                                   | Wastewater and fire protection water line used for the existing Public Waste Drop-Off Area operations | A new wastewater and new fire protection water line extending to the western property would be necessary to service the relocated public waste drop-off area operations | A new wastewater and fire protection water line extending to the western property would be necessary to service the expanded landfill operations             |
|                                   | LFG-to-energy plant operations on center property   | No change to continued LFG-to-energy plant operations on the center property  | No change (beyond LFG management systems on the western property, mentioned in Table 3-1) to continued LFG-to-energy plant operations on the center property |
|                                   | Landscaping and fencing located along sections of the center property                                 | Expanded perimeter landscaping and fencing to surround entire project site  | Expanded perimeter landscaping and fencing to surround entire project site   |

## 2.3 Project Alternatives

Section 15126.6(c) of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which could feasibly attain most of the basic project objectives while also avoiding or substantially lessening any of the significant environmental effects of the proposed project.

**Alternatives considered by the WPWMA but eliminated** from detailed discussion in this EIR include the following:

- Alternative Location in Placer County
- Landfill Closure and Transfer to Out-of-County Landfill

**Alternatives considered by WPWMA and evaluated** in this EIR include the following:

- No Project (Alternative A)
- Prioritize Waste Recovery Alternative (Alternative B)
- No Organics Processing Alternative (Alternative C)
- Three-Bin Clean MRF Alternative (Alternative D)

A comparative summary of the significance of potential environmental impacts associated with the project alternatives compared with the preferred plan concept is provided in Table 18-5.

### 2.3.1 Alternatives Considered but Eliminated

#### Alternative Location in Placer County

Under the Alternative Location in Placer County Alternative, the WPWMA would relocate all solid waste management activities to a new facility located within Placer County where it could continue to provide the solid waste management needs of Placer County and the cities of Lincoln, Rocklin, and Roseville, although the exact location of such a facility is unknown and speculative. This alternative has been eliminated from consideration in this EIR.

#### Landfill Closure and Transfer to Out-of-County Landfill

Under this alternative, the WPWMA's role in solid waste management at the site would be limited to sorting municipal solid waste only and sending other materials offsite for processing (e.g., organics, C&D debris) or for disposal at an out-of-county landfill. Under this alternative, each jurisdiction would eventually (within approximately 3 years) need to arrange for organic waste management and C&D processing through their own facilities, contracts, and collections. This alternative has been eliminated from consideration in this EIR.

### 2.3.2 Evaluation of Project Alternatives

#### Alternative A: No Project Alternative

Under Alternative A, the No Project Alternative, the WPWMA would continue providing solid waste management services at the current location. Activities allowed under existing permits would continue until the WRS� reaches capacity, at which time, the landfill portion of the facility would close. Solid waste management services would be limited to the center property and existing permit limits. Under Alternative A, there would be no change in how waste is collected and delivered to the site (single-stream mixed waste), and municipal solid waste would continue to be delivered to the site and processed through the MRF building accordingly.

### **Alternative B: Prioritize Waste Recovery**

The Prioritize Waste Recovery Alternative (Alternative B) is similar to Plan Concept 2 of the proposed project, in that it concentrates waste recovery activities on the center property. However, Alternative B eliminates expansion of the WRS� onto the eastern or western properties and adds complementary and programmatic elements on the western property only. No activity would occur on the eastern property or the northern portion of the western property.

### **Alternative C: No Organics Processing**

The No Organics Processing Alternative (Alternative C) is similar to Plan Concept 1 of the proposed project but excludes processing of organic waste. Like Plan Concept 1, Alternative C uses all of the WPWMA's properties. The WRS� would be expanded onto the eastern property, creating a single landfill mound with disposal capacity until approximately 2101. The public waste drop-off area would be relocated to the western property, with a new entrance to the western property at the intersection of Athens Avenue and Fiddyment Road. On the center property, the waste relocation and excavation would be expected to occur, the C&D facility would be expanded, and other facilities would be expanded or redesigned similar to the proposed project. Under this alternative, each jurisdiction would need to arrange for organic waste management through their own facilities, contracts, and collections.

### **Alternative D: Three-Bin Clean MRF**

The Three-Bin Clean MRF Alternative (Alternative D) is similar to Alternative A (No Project), in that solid waste management activities would occur only on the center property. However, the Clean MRF Alternative makes several distinct changes regarding solid waste management. For the Clean MRF Alternative, the current single-stream mixed-waste system for waste collection would convert to a three-bin system that would require each Participating Agency and their designated waste haulers to comply accordingly. Correspondingly, 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 and not commingled recyclables, 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 directly to the WRS� for disposal. Consequently, once black bin waste material is received onsite, there would be no opportunity for removing potential recyclables or organics from that part of the waste stream.

### **Environmentally Superior Alternative**

Among the alternatives evaluated, CEQA requires that a DEIR identify the environmentally superior alternative. Based on the discussion of the various alternatives, the alternative that would result in the fewest onsite or local environmental impacts is Alternative A, the No Project Alternative, although it would not achieve the project objectives.

According to Section 15126.6(e)(2) of the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, "the EIR shall also identify an environmentally superior alternative among the other alternatives." As such, the WPWMA has determined that Alternative C (No Organics Processing) is the environmentally superior alternative, although it would not achieve the project objectives.

## **2.4 Summary of Project Impacts and Mitigation**

A summary of the significance of potential environmental impacts associated with the plan concepts is provided in Table 2-4.

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <b>Chapter 5 Aesthetics</b>   |   |                                |                               |                                |                               |
| <p><b>Impact 5-1: Impacts to Visual Character and Quality</b></p> <p>The proposed project would expand Waste Recovery and Waste Disposal activities onto currently vacant portions of the project site, and an expanded and taller landfill would reduce the visual quality of the site and its surroundings.</p> | <p><b>Mitigation Measure 5-1: Impacts to Visual Character and Quality</b></p> <p>Because both plan concepts would expand the landfill’s final elevation substantially above the surrounding area, 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.</p>  | Significant Impact             | Significant Impact            | Significant Impact             | Significant Impact            |
| <p><b>Impact 5-2: Impacts from Light or Glare</b></p> <p>New sources of light and glare would be consistent with local regulations intended to control and reduce lighting impacts. Additionally, proposed project lighting would not be out of scale in rapidly developing western Placer County.</p>            | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 5-3: Impacts from Offsite Litter Generation</b></p> <p>Litter is generated offsite by vehicles accessing the MRF and the WRSL.</p>   | <p><b>Mitigation 5-3: Impacts from Offsite Litter Generation</b></p> <p>Although an extensive offsite litter control program is in place at the facility and would continue in the future with implementation of the proposed project, the impact of increased litter through the extended life of the WRSL would be considered significant and unavoidable. Therefore, WPWMA would implement a tarping policy that requires incoming loads to use tarps, thus minimizing the potential for offsite litter generation. However, even with implementation of a tarping policy, this impact would remain significant.</p> | Significant Impact             | Significant Impact            | Significant Impact             | Significant Impact            |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <b>Chapter 6 Air Quality</b>   |  |                                |                               |                                |                               |
| <p><b>Impact 6-1: Consistency with Applicable Air Quality Plans.</b></p> <p>PCAPCD and other air districts in the SVAB develop and implement air quality plans to enable the region to achieve attainment of the federal and state standards (that is, NAAQS and CAAQS) for ozone, PM<sub>2.5</sub>, and PM<sub>10</sub>, and maintain compliance with standards. These air quality plans are based on an inventory of existing emission sources as well as projections about future development in Placer County and the SVAB. The SAP DEIR/FEIR concluded that the levels of growth associated with the SAP project, including development of WPWMA solid waste elements, supporting elements, and land use changes similar to those proposed as complementary and programmatic elements under the proposed project, were accounted for in the projections of emissions-generating activity used in the air quality planning documents. However, the emissions estimates prepared to support this analysis of the proposed project indicate that the construction and operation of the solid waste elements, complementary and</p> | <p><b>Mitigation Measure 6-1: Consistency with applicable air quality plans</b></p> <p>Through the air permitting process and implementation of BMPs and project design measures in Table 6-1, the WPWMA shall work with the PCAPCD to provide information on the construction and operation of the solid waste elements, complementary and programmatic elements, and supporting elements under the proposed project. The emissions estimates prepared to support this CEQA air quality impact analysis are based on many conservative assumptions (as described in the sections to follow and in Appendix C.2) to allow flexibility as the project elements move forward through planning, design, funding, and implementation. The methodology for this air quality and environmental assessment is consistent with the CEQA Handbook that PCAPCD prepared for evaluation and mitigation of projects in Placer County (PCAPCD 2017a). Current results and conclusions are based on criteria used by PCAPCD to evaluate potential air quality impacts, using PCAPCD-recommended emissions calculation methods, significance thresholds, and mitigation strategies. All projects in Placer County are subject to PCAPCD’s adopted rules and regulations. Specific local air quality rules applicable to implementation of the proposed project have been evaluated for applicability to the project elements, and results show that the proposed project elements (solid waste elements, complementary and programmatic elements, and supporting elements) would comply with applicable regulatory and permitting requirements.</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>programmatic elements, and supporting elements under the proposed project would have the potential to exceed PCAPCD's numerical thresholds of significance for emissions of the ozone precursor NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. These emissions increases could contribute to the existing nonattainment status of Placer County and the SVAB region with respect to the NAAQS for ozone and PM<sub>2.5</sub>, and the CAAQS for ozone and PM<sub>10</sub>, and could impede air quality planning efforts to bring the air basin into attainment of the health-protective NAAQS and CAAQS. For these reasons, the project would potentially conflict with implementation of the applicable air quality plans.</p> |   |                                |                               |                                |                               |
| <p><b>Impact 6-2: Construction Emissions of Criteria Air Pollutants and Ozone Precursors.</b><br/>Total maximum daily construction emissions estimated for the development of solid waste elements, complementary elements, and supporting elements under the proposed project would exceed PCAPCD's recommended construction significance threshold of 82 lb/day for</p>   | <p><b>Mitigation Measure 6-2(a): Construction emissions of criteria air pollutants (PM<sub>10</sub> and PM<sub>2.5</sub>) and ozone precursors.</b><br/>Construction contractor(s) shall document their capability and commitment to implement PCAPCD's recommended construction mitigation measures and the project design measures identified in Table 6-1 as part of their grading and improvement plan submittals. Prior to any construction activity, the contractor(s) shall submit a Construction Emission and Dust Control Plan to PCAPCD a minimum of 21 days before construction activity is scheduled to commence. To further mitigate the significant air quality impact identified for construction PM<sub>10</sub> emissions, the following additional mitigation</p> | Significant Impact             | Significant and Unavoidable   | Significant Impact             | Significant and Unavoidable   |

Renewable Placer: Draft Environmental Impact Report  
Chapter 2 – Executive Summary

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>PM<sub>10</sub>. Exceedance of the threshold indicates that air quality impacts associated with project-related construction emissions would be significant for PM<sub>10</sub>. Because PM<sub>2.5</sub> is a subset of PM<sub>10</sub>, the significance finding for PM<sub>10</sub> is conservatively used to indicate potentially significant impacts related to PM<sub>2.5</sub>.</p> <p>Prediction of the specific health consequences associated with the criteria pollutant emissions from an individual project is not feasible at this time. More generally, by exceeding PCAPCD's numerical thresholds, construction-generated emissions of PM<sub>10</sub> could contribute to the existing nonattainment status of Placer County and the SVAB region with respect to the CAAQS and the NAAQS for PM<sub>10</sub> and PM<sub>2.5</sub>, respectively. The NAAQS and CAAQS represent concentrations of criteria air pollutants that provide public health protection, including protecting the health of sensitive populations. Because estimated maximum daily construction emissions would exceed the PCAPCD significance threshold, it is</p> | <p>measures, expanding on those identified in Table 6-1 as BMPs and project design measures,<sup>8</sup> shall be implemented to address exhaust PM<sub>10</sub> and PM<sub>2.5</sub> emissions and provide dust control.</p> <p>Mitigation Measure 6-2(b): Project contractor(s) shall implement BMPs prior to or during all construction activities, including onsite construction-related grading.</p> <p>The WPWMA shall require all construction contracts and plans to include the applicable construction BMPs and project design measures from Table 6-1, as well as the following:</p> <ul style="list-style-type: none"> <li>▪ Designation of 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 percent opacity, and prevent transport of dust offsite. Duties shall include holidays and weekend periods when work may not be in progress.</li> <li>▪ Post signage at property boundaries with name(s) and contact information for designated person(s) for reporting of dust complaints.</li> <li>▪ All roadways, driveways, sidewalks, parking lots intended for pavement as part of an applicable construction project shall be paved as soon as possible. In addition, building pads shall be laid immediately after grading unless seeding or soil binders are used.</li> </ul> <p><b>Mitigation Measure 6-2(c):</b> The WPWMA shall implement a recordkeeping program to oversee and enforce compliance with the BMP requirement for diesel-fueled equipment to use engines that</p> |                                |                               |                                |                               |

<sup>8</sup> Note: Applicable measures from PCAPCD's recommended construction mitigation measures (PCAPCD 2017a) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 6-1.



**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>reasonably foreseeable that construction-generated PM<sub>10</sub> emissions could result in increases in ambient air concentrations of PM<sub>10</sub> and PM<sub>2.5</sub>, and could contribute to higher levels of exposure and health effects for some sensitive receptors. However, it would be misleading and speculative to correlate the estimated PM<sub>10</sub> emissions to specific health outcomes.</p> <p>Construction of the proposed project could result in a net increase of criteria pollutants (PM<sub>10</sub> and PM<sub>2.5</sub>) for which the project region is nonattainment under an applicable and health-protective federal or state ambient air quality standard.</p> | <p>meet Tier 4 Final emission standards, as certified by CARB, or cleaner, prior to or during onsite grading and construction activities.</p> <p>This mitigation measure is intended for WPWMA oversight to ensure that all diesel-fueled construction equipment shall have engines that meet the Tier 4 Final emission standards, as certified by CARB, or cleaner, if feasible (City of Sacramento 2021). This requirement shall be verified through contractor submittal of an equipment inventory to the WPWMA for each construction project that includes the following information:</p> <ul style="list-style-type: none"> <li>A. Type of Equipment</li> <li>B. Engine Year and Age</li> <li>C. Number of Years Since Rebuild of Engine (if applicable)</li> <li>D. Type of Fuel Used</li> <li>E. Engine Horsepower</li> <li>F. Verified Diesel Emission Control Strategy (VDECS) information, if applicable, and other related equipment data</li> </ul> <p>If any new equipment is added after submission of the inventory, the contractor(s) shall contact the WPWMA regarding the new equipment being used.</p> <p>The project contractor(s) must also provide a signed Certification Statement for documentation of compliance and for future review by the WPWMA as needed. The Certification Statement shall state that the contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract.</p> <p>The WPWMA may waive the equipment requirement above only under the following unusual circumstances:</p> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--------|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|        |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|        | <ul style="list-style-type: none"> <li>▪ A particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available.</li> <li>▪ The equipment would not produce desired emissions reduction due to expected operating modes.</li> <li>▪ Installation of the equipment would create a safety hazard or impair visibility for the operator.</li> <li>▪ There is a compelling emergency need to use other alternate off-road equipment.</li> </ul> <p>If the WPWMA grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available, as detailed in Table 6-9. If seeking a waiver from this requirement it must be demonstrated, to the satisfaction of the WPWMA, that the emissions do not exceed significance thresholds. If the project implements the “step down” approach, using construction equipment with less than Tier 4 emissions standards and the resulting emissions exceed the PCAPCD threshold, a mitigation fee (per ton of emissions) shall be assessed to achieve the remaining mitigation.</p> <p>Table 6-9 describes the Off-Road Equipment Compliance Step Down approach:</p> <ul style="list-style-type: none"> <li>▪ If engines that comply with Tier 4 Final off-road emission standards are not commercially available, then the contractor shall meet Compliance Alternative 1.</li> <li>▪ If off-road equipment meeting Compliance Alternative 1 is not commercially available, then the project sponsor shall meet Compliance Alternative 2.</li> <li>▪ If off-road equipment meeting Compliance Alternative 2 is not commercially available, then the project sponsor shall meet Compliance Alternative 3.</li> </ul> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |                |                |   |        |                    |   |                      |                    |  |  |  |  |
|--|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|----------------|----------------|---|--------|--------------------|---|----------------------|--------------------|--|--|--|--|
|  |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |                |                |   |        |                    |   |                      |                    |  |  |  |  |
|  | <p>Table 6-9. Off-Road Equipment Compliance Step Down Approach</p> <table border="1"> <thead> <tr> <th>Compliance Alternative</th> <th>Engine Emissions Standard</th> <th>Emissions Control</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tier 4 Interim</td> <td>Tier 4 Interim</td> </tr> <tr> <td>2</td> <td>Tier 3</td> <td>CARB Level 3 VDECS</td> </tr> <tr> <td>3</td> <td>Tier 2 with retrofit</td> <td>CARB Level 3 VDECS</td> </tr> </tbody> </table> <p>For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (1) potential significant delays to critical-path timing of construction for the project and (2) geographic proximity to the project site of Tier 4 Final equipment.</p> <p>The project contractor(s) shall maintain records concerning relevant efforts to comply with this requirement and provide them to WPWMA on a weekly basis during active construction periods.</p> | Compliance Alternative         | Engine Emissions Standard     | Emissions Control              | 1                             | Tier 4 Interim | Tier 4 Interim | 2 | Tier 3 | CARB Level 3 VDECS | 3 | Tier 2 with retrofit | CARB Level 3 VDECS |  |  |  |  |
| Compliance Alternative   | Engine Emissions Standard  | Emissions Control              |                               |                                |                               |                |                |   |        |                    |   |                      |                    |  |  |  |  |
| 1  | Tier 4 Interim   | Tier 4 Interim                 |                               |                                |                               |                |                |   |        |                    |   |                      |                    |  |  |  |  |
| 2  | Tier 3   | CARB Level 3 VDECS             |                               |                                |                               |                |                |   |        |                    |   |                      |                    |  |  |  |  |
| 3  | Tier 2 with retrofit   | CARB Level 3 VDECS             |                               |                                |                               |                |                |   |        |                    |   |                      |                    |  |  |  |  |
| <p><b>Impact 6-3: Operational Emissions of Criteria Air Pollutants and Ozone Precursors.</b> Estimated net changes in total emissions associated with the future operation of solid waste elements, complementary elements, and supporting elements under the proposed project would exceed PCAPCD’s recommended operational</p> | <p><b>Mitigation Measure 6-3: Operational emissions of criteria air pollutants and ozone precursors.</b></p> <p>The WPWMA and their operation contractor(s) shall document their capability and commitment to implement the operational emission reduction BMPs and project design measures identified in Table 6-1 as part of their contracts and plan submittals. To further mitigate the significant air quality impacts identified for operational emissions of NOx and PM<sub>10</sub>, the following additional mitigation measures, which</p>   | Significant                    | Significant and Unavoidable   | Significant                    | Significant and Unavoidable   |                |                |   |        |                    |   |                      |                    |  |  |  |  |

Renewable Placer: Draft Environmental Impact Report  
Chapter 2 – Executive Summary

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>significance thresholds of 55 lb/day for NO<sub>x</sub> and 82 lb/day for PM<sub>10</sub>. Exceedance of the thresholds indicates that air quality impacts associated with project-related operational emissions would be significant for NO<sub>x</sub> and PM<sub>10</sub>. Because PM<sub>2.5</sub> is a subset of PM<sub>10</sub>, the significance finding for PM<sub>10</sub> is conservatively used to indicate potentially significant impacts related to PM<sub>2.5</sub>.</p> <p>Operational emissions from the proposed project could contribute to the existing nonattainment status of Placer County and the SVAB region with respect to the NAAQS for ozone and PM<sub>2.5</sub>, and the CAAQS for ozone and PM<sub>10</sub>. It is reasonably foreseeable that operational emissions could result in increases in ambient air concentrations of ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, and could contribute to higher levels of exposure and health effects for some sensitive receptors. Prediction of the specific health consequences associated with the criteria pollutant emissions and ozone precursors from operation of an</p> | <p>expand on those identified in Table 6-1 as BMPs and project design measures,<sup>9</sup> shall be implemented.</p> <p><b>Mitigation Measure 6-3(a): Fund NO<sub>x</sub> emissions reductions through an Offsite Mitigation Fee Program.</b></p> <p>The operation of solid waste elements, complementary elements, and supporting elements under the proposed project would result in net emissions increases in operational emissions that would exceed PCAPCD’s recommended operational significance thresholds of 55 lb/day for NO<sub>x</sub>, even with implementation of the BMPs and project design measures listed in Table 6-1. The estimated total increase in NO<sub>x</sub> emissions estimated in excess of the significance threshold for this project under Plan Concept 1 is approximately 102.5 lb/day, equivalent to 9.4 tons per ozone season,<sup>10</sup> and under Plan Concept 2 is approximately 97.2 lb/day, equivalent to 8.9 tons per ozone season. To mitigate the net project-related increases in operational NO<sub>x</sub> emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs:</p> <ul style="list-style-type: none"> <li>Establish and fund an offsite mitigation project to result in a NO<sub>x</sub> emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single season. Developing an offsite mitigation program in western Placer County shall be coordinated with PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD. Examples of NO<sub>x</sub> emission reduction mitigation projects include, retrofitting, repowering, or replacing heavy-</li> </ul> |                                |                               |                                |                               |

<sup>9</sup> Note: Applicable measures from PCAPCD’s recommended operational emission mitigation measures (PCAPCD 2017a) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 6-1.

<sup>10</sup> The summer season is estimated at 184 days per year and applies to estimation of mitigation requirements for ozone precursors like NO<sub>x</sub>; the winter season is estimated at 181 days and applies for PM<sub>10</sub> (PCAPCD 2017a).

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>individual project is not feasible at this time.</p> <p>Operation of the proposed project elements would result in a net increase of criteria pollutants (NOx as an ozone precursor, PM<sub>10</sub>, and PM<sub>2.5</sub>) for which the project region is nonattainment under the applicable and health-protective federal or state ambient air quality standards.</p> | <p>duty engines from mobile sources (for example, buses, construction equipment, on-road haulers), provision of electrical charging stations to support vehicle electrification, or other programs to reduce regional NOx emissions.</p> <ul style="list-style-type: none"> <li>▪ Participate in the District’s Offsite Mitigation Fee Program by paying the equivalent amount of money to mitigate the net project contribution of NOx that exceeds the 55 lb/day threshold over a single season. As indicated previously, the estimated NOx emissions offset requirement is approximately 9.4 tons/year for Plan Concept 1 and 8.9 tons/year for Plan Concept 2. The estimated mitigation fees for the NOx emissions increase associated with project operations is approximately \$177,000 for Plan Concept 1 and \$167,000 for Plan Concept 2, based upon PCAPCD’s adopted cost-effectiveness rate of \$18,790 per ton for ozone precursors like NOx and the current California CPI rate (PCAPCD 2017b, 2021b). The actual amount to be paid shall be determined based on the selected program and applicable cost-effectiveness rate agreed to by the WPWMA and PCAPCD and shall be paid by the WPWMA or other responsible parties.</li> <li>▪ Any combination of the above or other measures, as determined feasible by WPWMA and PCAPCD.</li> </ul> <p><b>Mitigation Measure 6-3(b): Fund PM<sub>10</sub> emissions reductions through an Off-Site Mitigation Fee Program.</b></p> <p>The operation of solid waste elements, complementary elements, and supporting elements under the proposed project would result in net emissions increases in operational emissions that would exceed PCAPCD’s recommended operational significance thresholds of 82 lb/day for PM<sub>10</sub>, even with implementation of the BMPs and project design measures listed in Table 6-1. The estimated total</p> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--------|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|        |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|        | <p>increase in PM<sub>10</sub> emissions estimated in excess of the significance threshold for this project under Plan Concept 1 is approximately 403.0 lb/day, equivalent to 36.5 tons per winter season, and for Plan Concept 2 is approximately 263.7 lb/day, equivalent to 23.9 tons per winter season. To mitigate the net project-related increases in operational PM<sub>10</sub> emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs:</p> <ul style="list-style-type: none"> <li>▪ Establish and fund an offsite mitigation project to result in a PM<sub>10</sub> emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single season. Developing an offsite mitigation program in western Placer County shall be coordinated with PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD. Examples of PM<sub>10</sub> emission reduction mitigation projects include, among other, retrofitting, repowering, or replacing heavy-duty engines from mobile sources (for example, buses, construction equipment, on-road haulers), replacing woodstoves, road paving, or other programs to reduce PM<sub>10</sub> emissions.</li> <li>▪ Participate in the District's Offsite Mitigation Fee Program by paying the equivalent amount of money, to mitigate the net project contribution of PM<sub>10</sub> that exceeds the 82 lb/day threshold over a single season. As indicated previously, the estimated PM<sub>10</sub> emissions offset requirement is approximately 36.5 tons/year for Plan Concept 1 and 23.9 tons/year for Plan Concept 2. The estimated mitigation fees for the PM<sub>10</sub> emissions increase associated with project operations is approximately \$220,800 for Plan Concept 1 and \$144,600 for Plan Concept 2, based upon an assumed cost-effectiveness rate</li> </ul> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|  | <p>of \$6,050 per ton used for PM<sub>10</sub> in the SAP DEIR (Placer County 2018). The actual amount to be paid shall be determined based on the selected program and applicable cost-effectiveness rate agreed to by the WPWMA and PCAPCD and shall be paid by the WPWMA or other responsible parties.</p> <ul style="list-style-type: none"> <li>Any combination of the above or other measures, as determined feasible by the WPWMA and PCAPCD.</li> </ul> |                                |                               |                                |                               |
| <p><b>Impact 6-4: Mobile-Source Concentrations of Carbon Monoxide.</b><br/>Though buildout of the proposed project would result in additional vehicle trips on the surrounding roadway network, mobile-source emissions of CO associated with the proposed project would not exceed the PCAPCD's screening criterion for CO dispersion modeling. Therefore, the proposed project is not anticipated to cause a localized exceedance of the NAAQS and CAAQS for CO.</p> | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 6-5: Exposure of Sensitive Receptors to TACs.</b><br/>Estimated net changes in TAC emissions associated with construction and operation of solid waste elements, complementary elements, and supporting elements under the proposed project would not result in the exposure of sensitive receptors to</p>  | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| substantial TAC concentrations. Based on the results of a HRA for project-related emissions, the evaluated exposure conditions at nearby residential, workplace, and sensitive receptor locations would not result in risk values that exceed PCAPCD thresholds of significance at any modeled receptors, including sensitive receptors. Modeled emissions and exposures would not result in an incremental increase in lifetime cancer risk of greater than 10 in 1 million, nor would they result in hazard indices for noncancer chronic (HIC) or acute exposures (HIA) greater than 1.0. |   |                                |                               |                                |                               |
| <p><b>Impact 6-6: Create Objectionable Odors Affecting a Substantial Number of People.</b></p> <p>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</p>  | <p><b>Mitigation Measure 6-6: Implement odor reduction measures</b></p> <p>The following odor reduction measures shall be implemented in addition to the BMPs and project design measures listed in Table 6-1 as mitigation measures for the proposed project:</p> <ul style="list-style-type: none"> <li>▪ <u>Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations).</u></li> <li>▪ <u>Increase Screening of LFG and Implement Response Actions (Tier 1, Landfill Operations).</u> 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.</li> <li>▪ <u>Enhance LFG Collection (Tier 1, Landfill Operations).</u> To reduce landfill-related odor emissions, the WPWMA shall establish stricter protocols for LFG collection. Because LFG must be used,</li> </ul> | Significant Impact             | Significant Impact            | Significant Impact             | Significant Impact            |



Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| 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.  | <p>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.</p> <ul style="list-style-type: none"> <li>▪ <u>Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations)</u>. To monitor odor emissions in areas around the WRS�, 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.</li> <li>▪ <u>Establish Tree-lined Perimeter of WRS� (Tier 1, Site-wide Technologies and Operations)</u>. Trees with aromatic foliage, such as pine or eucalyptus, shall be planted and maintained around the WRS� 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.</li> <li>▪ <u>Implement additional measures in accordance with the Odor Mitigation MOU (reference)</u>.</li> </ul> |                                |                               |                                |                               |
| <b>Chapter 7 Biological Resources</b>   |   |                                |                               |                                |                               |
| <p><b>Impact 7-1: Impacts on Special-Status Plant Species</b></p> <p>Implementation of the proposed project would result in direct removal and potential indirect disturbance of dwarf downingia, a species with a California Rare Plant Rank of 2B.2, and potential habitat for other special-status plant</p> | <p><b>Mitigation Measure 7-1: Impacts on Special-Status Plant Species</b></p> <p>The WPWMA shall implement the proposed project as a Covered Activity under the PCCP and CARP to compensate for any loss of special-status plants.</p>  | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| species. Other special-status plant species may be present adjacent to the project site and could be indirectly affected by habitat removal or modification on the site.   |   |                                |                               |                                |                               |
| <p><b>Impact 7-2: Impacts on Vernal Pool Branchiopods and Western Spadefoot</b></p> <p>Implementation of the proposed project would result in loss and degradation of habitat for special-status wildlife species that rely on vernal pool-type wetlands for at least a portion of their lifecycle. These species include federally listed vernal pool fairy shrimp and vernal pool tadpole shrimp, as well as western spadefoot, a California species of special concern.</p> | <p><b>Mitigation Measure 7-2: Impacts on Vernal Pool Branchiopods and Western Spadefoot</b></p> <p>The WPWMA shall implement the proposed project as a Covered Activity under the PCCP and CARP to compensate for loss of vernal pool fairy shrimp and vernal pool tadpole shrimp habitat. Although western spadefoot is not covered under the PCCP, implementation of the PCCP would reduce impacts on western spadefoot because the species requires the protection of vernal pool complex habitat for survival, and this habitat would be protected for vernal pool fairy shrimp and vernal pool tadpole shrimp. The protection of vernal pool complex habitat, and vernal pool branchiopods and western spadefoot by proxy, would be supported by the following conditions from the PCCP (Placer County 2020c) (Appendix D):</p> <ul style="list-style-type: none"> <li>▪ General Condition 1, Watershed Hydrology and Water Quality</li> <li>▪ General Condition 3, Land Conversion</li> <li>▪ General Condition 4, Temporary Effects</li> <li>▪ General Condition 5, Conduct Worker Training</li> <li>▪ Regional Public Projects Condition 3, Operations and Maintenance best management practices (BMPs)</li> <li>▪ Species Condition 10, Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp</li> </ul> <p>Covered Activities shall be assessed fees based on the parameters described in Chapter 9, Costs and Funding, and as summarized in Tables 9-6 and 9-7 of the PCCP HCP/NCCP (Placer County 2020a).</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|  | Special habitat fees (Table 9-7 of the PCCP HCP/NCCP) are variable depending on the special habitat type and would be paid in addition to land conversion fees. In the Central Valley, the fees shall be applied when projects affect natural, semi-natural, and other agricultural communities.  |                                |                               |                                |                               |
| <p><b>Impact 7-3: Impacts on Valley Elderberry Longhorn Beetle</b></p> <p>Implementation of the proposed project could result in loss of elderberry shrubs, the host plant for the federally listed as threatened valley elderberry longhorn beetle, and could result in take of this species.</p> | <p><b>Mitigation Measure 7-3: Impacts to Valley Elderberry Longhorn Beetle</b></p> <p>Valley elderberry longhorn beetle is a Covered Species under the PCCP. Potential impacts on this species shall be mitigated by implementing the PCCP conservation strategy. The PCCP conservation strategy includes survey and impact minimization and avoidance requirements for Covered Species, other conditions on Covered Activities to achieve conservation goals and objectives for Covered Species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system. The protection and restoration of valley elderberry longhorn beetle habitat within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D):</p> <ul style="list-style-type: none"> <li>▪ General Condition 4, Temporary Effects</li> <li>▪ General Condition 5, Conduct Worker Training</li> <li>▪ Regional Public Projects Condition 3, Operations and Maintenance BMPs</li> <li>▪ Species Condition 8, Valley Elderberry Longhorn Beetle</li> </ul> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |
| <p><b>Impact 7-4: Impacts on Special-Status Bird Species, Including Raptors</b></p> <p>Implementation of the proposed project would result in direct removal or disturbance of habitat with potential to</p>   | <p><b>Mitigation Measure 7-4: Impacts on Special-Status Bird Species, Including Raptors</b></p> <p>Burrowing owl, Swainson’s hawk, and tricolored blackbird are Covered Species under the PCCP. Potential impacts on these species shall be mitigated through implementation of the PCCP</p>  | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| support burrowing owl, Swainson’s hawk, northern harrier, white-tailed kite, tricolored blackbird, and grasshopper sparrow.   | <p>conservation strategy. The PCCP conservation strategy includes survey and impact minimization and avoidance requirements for Covered Species, other conditions on Covered Activities to achieve conservation goals and objectives for Covered Species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system. The protection and restoration of burrowing owl, Swainson’s hawk, and tricolored blackbird within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D):</p> <ul style="list-style-type: none"> <li>▪ General Condition 1, Watershed Hydrology and Water Quality</li> <li>▪ General Condition 4, Temporary Effects</li> <li>▪ General Condition 5, Conduct Worker Training</li> <li>▪ Regional Public Projects Condition 3, Operation and Maintenance BMPs</li> <li>▪ Species Condition 3, Western Burrowing Owl</li> <li>▪ Species Condition 4, Tricolored Blackbird</li> <li>▪ Species Condition 1, Swainson’s Hawk</li> </ul> |                                |                               |                                |                               |
| <p><b>Impact 7-5: Impacts on Wetlands or Other Sensitive Natural Communities</b></p> <p>Implementation of the proposed project would result in the loss of jurisdictional waters of the United States, including wetlands subject to USACE jurisdiction under the federal Clean Water Act (CWA). The proposed project also would result in the loss of a sensitive natural community.</p> | <p><b>Mitigation Measure 7-5: Impacts on Wetlands or Other Sensitive Natural Communities</b></p> <p>The anticipated permanent impacts to wetlands would be offset through a watershed-based approach as described in the CARP (Placer County, 2020c). Both the HCP/NCCP and CARP require compensatory mitigation for wetland impacts to be implemented at 1.5:1 through payment into an ILF Program or purchase of mitigation credits at an agency-approved mitigation bank, or through land dedications in lieu of fee payments. Most of this mitigation would be achieved through the enhancement</p>  | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--------|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|        |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|        | <p>(rehabilitation) of wetlands and waters, and creation (establishment) or restoration (re-establishment) of 2,715 acres of constituent habitats that would be considered protected wetlands and waters (Placer County 2020c). Overall, the proposed wetland mitigation in the CARP would maintain or improve the functions and services of wetlands, including special aquatic sites, within the larger PCCP area.</p> <p>The PCCP includes several objectives and conservation measures to prevent net loss of functions and services within the larger PCCP area. These objectives and measures would allow preserved, enhanced, and established and re-established wetlands and waters to maintain or improve the physical, chemical, and biological processes of wetlands in these landscapes, including nutrient cycling, vegetation structure, plant and animal diversity, habitat for rare or listed species, and habitat linkages and corridors. The services that these wetlands provide would include such benefits as flood control, groundwater recharge, and maintenance of water quality in receiving waters. The protection and restoration of protected wetlands and waters within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D):</p> <ul style="list-style-type: none"> <li>▪ General Condition 1, Watershed Hydrology and Water Quality</li> <li>▪ General Condition 3, Land Conversion</li> <li>▪ General Condition 4, Temporary Effects</li> <li>▪ Regional Public Project Condition 3, Operation and Maintenance BMPs</li> </ul> <p>The CARP provides additional specific avoidance and minimization measures, summarized in Table 4.2 of that document (Placer County 2020c).</p> |                                |                               |                                |                               |

**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--------|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|        |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|        | <p>The PCCP objectives, conservation measures, and conditions establish performance standards for measuring the effectiveness of proposed conservation actions. The acres of protection and restoration and the commitment to ratios established in the CARP satisfy the typical mitigation that would be applied to the proposed project impacts, as well as mitigating the effects of the other conservation measures. The proposed conditions further demonstrate the intent to avoid and minimize effects and to maintain or improve wetland and water functions and services over the life of the PCCP.</p> <p>Consistent with SAP Program NR-4, PCCP, and CARP, the WPWMA shall delineate all aquatic resources, implement all feasible avoidance and minimization measures described in the PCCP and CARP, calculate the extent of impacts, and provide compensatory mitigation according to the procedures described in the PCCP and CARP through payment of applicable mitigation fees to the ILF Program or purchase of mitigation credits at an agency-approved mitigation bank. The PCCP allows for consideration of land dedication in lieu of PCCP fees, subject to approval by the future Placer Conservation Authority and concurrence by the state and federal agencies. The fees collected through the ILF Program will be used to fund land acquisition; mitigation projects that protect, enhance, and restore aquatic resources; and long-term management and monitoring in the PCCP Reserve Acquisition Areas.</p> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p><b>Impact 7-6: Interference with Wildlife Movement Corridors</b></p> <p>Implementation of the proposed project would not significantly interfere with the movement of native resident wildlife species through the proposed project area.</p>   | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 7-7: Conflicts with Local Ordinances</b></p> <p>Implementation of the proposed project would result in development in areas containing trees protected under the County Tree Ordinance. Project implementation would result in the removal or degradation of these resources and could conflict with the County Tree Ordinance.</p> | <p><b>Mitigation Measure 7-7: Conflicts with Local Ordinances</b></p> <p>Actions consistent with the following measure from the SAP shall be implemented so that the proposed project does not conflict with the County Tree Ordinance:</p> <ul style="list-style-type: none"> <li>▪ <b>SAP Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees.</b> <ul style="list-style-type: none"> <li>– The County will require future projects, including for offsite improvements, to avoid tree removal or death if feasible and appropriate, through incorporation of these features into project design and planning.</li> <li>– All trees retained onsite will be protected from construction-related impacts by placing exclusion fencing 1 foot outside the drip line of retained trees, or 1 foot outside the outer edge of the riparian woodland habitat and maintaining said fencing through the duration of construction.</li> <li>– If any trees protected under the County ordinance cannot feasibly be avoided, they will be mitigated through the payment of PCCP land conversion fees and incorporation of its avoidance and minimization measures into the project.</li> </ul> </li> </ul> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p><b>Impact 7-8: Conflicts with an Adopted HCP, NCCP, or Other Approved Local, Regional, or State Habitat Conservation Plan</b></p> <p>The WPWMA will implement the proposed project as a Covered Activity under the approved PCCP, which is the only Habitat Conservation Plan or Natural Community Conservation Plan that has been adopted for the proposed project area. Therefore, the proposed project would not conflict with an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.</p> | None required.   | No Impact                      | No Impact                     | No Impact                      | No Impact                     |
| <b>Chapter 8 Cultural and Tribal Resources</b>  |  |                                |                               |                                |                               |
| <p><b>Impact 8-1: Disturbance of Historic Resources</b></p> <p>The Area of Potential Effects does not contain any historic resources that would be considered significant for the purposes of CEQA.</p>   | None required.   | No Impact                      | No Impact                     | No Impact                      | No Impact                     |
| <p><b>Impact 8-2: Disturbance of Tribal Cultural Resources Discovered during Construction</b></p> <p>Ground disturbance from project construction activities could disturb,</p>   | <p><b>Mitigation Measure 8-2: Disturbance of Tribal Cultural Resources Discovered during Construction</b></p> <p>If any suspected tribal cultural resources are discovered during ground-disturbing construction activities, work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from the</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |



Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| disrupt, or destroy unknown tribal cultural resources.   | <p>United Auburn Indian Community of the Auburn Rancheria (UAIC) shall be immediately notified to determine whether the find is a tribal cultural resource (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort shall be made to preserve the resources in place, including through project redesign. Culturally appropriate treatment may include processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. The UAIC does not consider curation of tribal cultural resources to be appropriate or respectful and requests that materials not be permanently curated unless approved by the tribe.</p> <p>The WPWMA’s contractors will implement any measures deemed by the WPWMA to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until the necessary investigation and evaluation of the discovery pursuant to CEQA and AB 52 has been satisfied.</p> |                                |                               |                                |                               |
| <p><b>Impact 8-3: Disturbance of Archaeological Resources Discovered during Construction</b></p> <p>Ground disturbance from project construction activities could disturb,</p> | <p><b>Mitigation Measure 8-3: Disturbance of Archaeological Resources Discovered during Construction</b></p> <p>If any prehistoric-era or historic-era archaeological resources are discovered during ground-disturbing activities, work within 100 feet of the resources shall be halted, and a qualified archaeologist will be consulted to assess the significance of the find according to CEQA</p>   | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| disrupt, or destroy unknown buried archaeological resources.  | Guidelines Section 15064.5. If any find is determined to be significant, the WPWMA and the archaeologist would determine the appropriate avoidance measures or other appropriate mitigation. If the archaeologist determines that the find is potentially a tribal cultural resource (for example, a prehistoric-era archaeological site), the archaeologist shall notify the WPWMA, and the procedures described in Mitigation Measure 8-2 shall be followed. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, curation (unless it is a tribal cultural resource), and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to archaeological resources, the WPWMA shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, proposed project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (for example, data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical or unique archaeological resources is being carried out. |                                |                               |                                |                               |
| <b>Impact 8-4: Disturbance of Human Remains</b><br>Construction and excavation activities associated with project implementation could unearth previously undiscovered human remains. | <b>Mitigation Measure 8-4: Disturbance of Human Remains</b><br>As required by the provisions of California's <i>Health and Safety Code</i> Section 7050.5, PRC Section 5097.98, and the <i>California Code of Regulations</i> Section 15064.5 (CEQA), if human remains are encountered at the site, work in the immediate vicinity of the discovery shall cease, and necessary steps to secure the integrity of the immediate area shall be taken. The Placer County Coroner shall be notified immediately. The coroner will then determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner will notify the Native   | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|  | 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. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the WPWMA shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the WPWMA does not accept the MLD's recommendations, the WPWMA or the MLD may request mediation by the NAHC. |                                |                               |                                |                               |
| <b>Chapter 9 Geology, Soils, and Paleontological Resources</b>   |  |                                |                               |                                |                               |
| <b>Impact 9-1: Risks Related to Seismic Activity</b><br>The proposed project is not expected to directly or indirectly cause potential substantial adverse effects associated with earthquake faults, strong seismic shaking, liquefaction, or landslides. | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Impact 9-2: Potential for Soil Loss or Erosion</b><br>The proposed project is not anticipated to cause substantial soil erosion or the loss of topsoil, because of the implementation of best management practices to control erosion.                  | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p><b>Impact 9-3: Potential for Unstable Soils</b></p> <p>The project site is not located on a geologic unit or soil that is unstable, and the project elements would not be expected to experience unstable soil conditions.</p>           | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 9-4: Presence of Expansive Soils</b></p> <p>The presence of expansive soils on the site could expose building foundations to damage caused by soil expansion and contraction, which can create risks to life and property.</p> | <p><b>Mitigation Measure 9-4: Presence of Expansive Soils</b></p> <p>Consistent with <i>California Building Standards Code</i> Section 1808.2 and Placer County General Plan Policy 8.A.1, the WPWMA shall conduct a geotechnical investigation prior to constructing any buildings or other structures designed for human occupancy that may be exposed to expansive soils. The geotechnical report shall be prepared by a qualified and licensed civil engineer, geotechnical engineer, or certified engineering geologist. During project construction, all recommendations outlined in the geotechnical report shall be implemented, subject to revision by the civil or geotechnical engineer or engineering geologist where needed, and verified by a construction quality assurance observer. Typical recommendations could include over-excavating the foundations, reinforcing the foundations, and using fill soil to minimize the exposure of the foundations to the effects of the expansive soils.</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |
| <p><b>Impact 9-5: Potential Destruction of Paleontological Resources</b></p> <p>Fossils are known to occur in the project vicinity, and ground disturbance from project construction activities could</p>                                   | <p><b>Mitigation Measure 9-5: Potential Destruction of Paleontological Resources</b></p> <p>If evidence of any paleontological features or deposits are discovered during construction-related earth-moving activities (for example, vertebrate, invertebrate, or plant fossils, traces, or trackways), the WPWMA shall halt ground-disturbing activity in the area of the discovery and retain a qualified paleontologist to assess</p>  | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| disturb or destroy paleontological resources.  | the significance of the find. If the paleontologist determines that the find does not constitute a significant or unique resource, construction may proceed. If the paleontologist determines that further information is needed to evaluate significance, a data recovery plan shall be prepared. If the find is determined to be significant by the qualified paleontologist, they shall work with the WPWMA to avoid disturbance to the resources. If complete avoidance is not feasible in light of project design, economics, logistics, or other factors, accepted professional standards for documentation of any find and recovery of important fossils shall be followed.  |                                |                               |                                |                               |
| <b>Chapter 10 Greenhouse Gas Emissions and Climate Change</b>  |   |                                |                               |                                |                               |
| <p><b>Impact 10-1: Construction and Operational GHG Emissions</b></p> <p>Annual greenhouse gas (GHG) emissions estimated for the development and implementation of solid waste elements, complementary elements, and supporting elements under the proposed project would exceed Placer County Air Pollution Control District's (PCAPCD's) recommended GHG significance thresholds, including the bright-line threshold of 10,000 metric tons (MT) of carbon dioxide equivalent per year</p> | <p><b>Mitigation Measure 10-1: Fund GHG Emissions Reductions through an Offsite Mitigation Fee Program</b></p> <p>WPWMA and their operation contractor(s) shall document their capability and commitment to implement the GHG BMPs and project design measures<sup>11</sup> identified in Table 10-1 as part of their contracts and plan submittals. To further mitigate the significant GHG impacts identified for the proposed project, WPWMA shall participate in one of the following voluntary offsite mitigation programs:</p> <ul style="list-style-type: none"> <li>Establish and fund an offsite mitigation project to result in a GHG emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single year. Developing an offsite mitigation program in western Placer County shall be coordinated with</li> </ul> | Significant Impact             | Significant and Unavoidable   | Significant Impact             | Significant and Unavoidable   |

<sup>11</sup> Note: Applicable measures from PCAPCD's recommended GHG emission mitigation measures (PCAPCD 2017) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 10-1, Current Emission Reduction Measures and Best Management Practices Incorporated as Project Design Measures.

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p>(CO<sub>2</sub>e/year) for the construction and operational phases of land-use projects. GHG emissions from construction alone would not exceed PCAPCD's recommended bright-line threshold of 10,000 MT CO<sub>2</sub>e/year, but estimated operational GHG emissions increases would exceed the threshold. Exceedance of the PCAPCD threshold of 10,000 MT CO<sub>2</sub>e/year indicates that GHG emissions associated with the proposed project would result in a cumulatively considerable contribution to global climate change.</p> | <p>PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD.</p> <ul style="list-style-type: none"> <li>▪ Participate in PCAPCD's Offsite Mitigation Fee Program by paying the equivalent amount of money to mitigate the net annual project contribution of GHG that exceeds the PCAPCD threshold. The actual amount to be paid shall be determined according to the selected program and applicable cost-effectiveness rate agreed to by WPWMA and PCAPCD. (Please note that there is currently no mitigation fee option for GHG offsite mitigation, because there is no fee rate or cost-effectiveness factor established by a statewide incentive program.)</li> <li>▪ Any combination of these or other measures, as determined feasible by WPWMA and PCAPCD.</li> </ul> <p>If an offsite mitigation measure is required for a land-use project, that mitigation measure shall explicitly identify the required GHG emissions reduction and the implementation method. PCAPCD's Board of Directors adopted the Review of Land Use Projects under CEQA Policy in 2016, which outlines the principles on how the GHG offsite mitigation measures should be implemented, by the selected mitigation scenarios, to offset the land-use project's related operational GHG emissions. The project applicant has two options to implement offsite mitigation measures for GHG emissions: (1) proposing their own offsite mitigation project or (2) purchasing carbon credits from recognized carbon credit registries.</p> <p>When offsite mitigation is an option used to mitigate the project's operational impacts, additional (surplus) emission reductions achieved from offsite sources should be equal to the emission reductions required to mitigate the land-use project's onsite</p> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--------|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|        |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|        | <p>impacts. This can provide the proper nexus for GHG emission mitigation under CEQA. For example, excessive GHG emissions from a land-use project's energy usage could be reduced by a project that would generate the same amount of surplus GHG emission reductions by renewable energy.</p> <p>Prior to implementation of an offsite mitigation project, the applicant shall consult with PCAPCD and demonstrate that the project meets all conditions required by a selected carbon credit protocol approved by California Air Pollution Control Officers Association (CAPCOA), CARB, or other similar entities determined acceptable by PCAPCD. If the applicant chooses to purchase carbon credits, the credits should be registered under the CAPCOA GHG Reduction Exchange Program, American Carbon Registry, Climate Action Reserve, or other similar carbon credit registry as determined acceptable by PCAPCD. This requirement means that the proposed mitigation project or carbon credit purchase can result in an equivalent GHG reduction required by the offsite mitigation measure. In addition, PCAPCD encourages the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism for implementing the GHG offsite mitigation measure, which helps direct the state toward achieving the GHG emission reduction goal.</p> <p>The following are well-recognized entities with approved carbon offset protocols or registered carbon credits that can be applied toward a land-use project's GHG emission reductions:</p> <ul style="list-style-type: none"> <li>▪ CAPCOA GHG Reduction Exchange Program (GHG Rx)</li> <li>▪ CARB Compliance Offset Protocols</li> <li>▪ Verified Carbon Standard (Verra)</li> <li>▪ American Carbon Registry</li> <li>▪ Climate Action Registry</li> </ul> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|   | PCAPCD notes that it will not be involved with any carbon credit purchase agreements; PCAPCD is only assisting the lead agency with verification of the carbon credits to confirm they are real, permanent, quantifiable, verifiable, enforceable, and additional.  |                                |                               |                                |                               |
| <b>Impact 10-2: Consistency with Applicable Plans, Policies, or Regulations Adopted to Reduce GHG Emissions</b><br><br>The construction and operation of the solid waste elements, complementary and programmatic elements, and supporting elements under the proposed project would implement and accommodate compliance with goals and directives in applicable plans, policies, and regulations to reduce GHG emissions. | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Chapter 11 Hazards, Hazardous Materials, and Wildfire</b>  |   |                                |                               |                                |                               |
| <b>Impact 11-1: Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials</b><br><br>Construction of the proposed project may involve routine transport, use, and disposal of hazardous materials including fuels and petroleum-based fluids. Additionally, construction activities may result in exposure to  | <b>Mitigation Measure 11-1: Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials</b><br><br>A Phase I ESA shall be prepared prior to the construction of any facilities on the western or eastern properties in general conformance with the ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and U.S. Environmental Protection Agency "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the WPWMA shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |



Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| contaminated soils during excavation activities. | <p>sampling to characterize the contamination and to identify any required remediation that shall be conducted. Any remediation recommendations shall be implemented before earth disturbance in the vicinity of the contamination.</p> <p>In addition, a construction hazardous materials management plan shall be prepared by the WPWMA or the WPWMA's construction-manager/contractor for all future development projects on the western and eastern properties and shall be incorporated into the construction and contract specifications for each project. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials and exposure to potentially contaminated soil during project construction. The management plan shall include provisions managing impacted materials, sampling and analytical requirements and disposal procedures. Specifically, the construction hazardous materials management plan shall:</p> <ul style="list-style-type: none"> <li>▪ Describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction.</li> <li>▪ Describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials.</li> <li>▪ Include measures to protect worker safety if signs of contamination are encountered.</li> <li>▪ Identify sampling and analysis protocols for various substances that might be encountered.</li> <li>▪ List required regulatory agency contacts if contamination is found.</li> </ul> |                                |                               |                                |                               |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
|   | <ul style="list-style-type: none"> <li>▪ Include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way.</li> <li>▪ Identify legal and regulatory processes and thresholds for cleanup of contamination.</li> <li>▪ Include provisions for delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels.</li> <li>▪ Require that the project contractor verify that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the <i>California Vehicle Code</i> and the requirements of the licensed receiving facility.</li> </ul> |                                |                               |                                |                               |
| <p><b>Impact 11-2: Potential for Solid Waste Operating Activities to Release Hazardous Materials into the Environment</b></p> <p>The proposed project involves the increased delivery of waste materials to the site and the potential for hazardous waste to be illegally or accidentally delivered to the site in loads of municipal solid waste. Growth in the HHW stream would also be expected to result in greater quantities of HHW being processed at and stored on the site. The proposed project would continue implementation of the existing load-checking program, waste acceptance procedures, and compliance with the solid waste permitting requirements.</p> | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <p><b>Impact 11-3: Potential for Landfill Gas to Accumulate in Occupied Structures</b></p> <p>The proposed project may result in migrating LFG intrusion within 1,000 feet of the landfill.</p> | <p><b>Mitigation Measure 11-3: Potential for Landfill Gas to Accumulate in Occupied Structures</b></p> <p>For any structure sited within 1,000 feet of the WRSL within the project's boundary, the following measures specified in <i>California Code of Regulations</i> (CCR) Title 27 Section 21190(g) shall be included:</p> <ul style="list-style-type: none"> <li>▪ A geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade.</li> <li>▪ A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab.</li> <li>▪ A geotextile filter shall be used to prevent the introduction of fines into the permeable layer.</li> <li>▪ Perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging.</li> <li>▪ The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system.</li> <li>▪ Automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected.</li> </ul> <p>In addition, the WPWMA shall use a qualified specialist to conduct periodic methane gas monitoring (pursuant to CCR Section 20920 et. seq.) inside all buildings and underground utilities.</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |
| <p><b>Impact 11-4: Potential for Waste Relocation Activities to Release Hazardous Materials into the Environment</b></p>  | <p><b>Mitigation Measure 11-4: Potential for Waste Relocation Activities to Release Hazardous Materials into the Environment</b></p> <p>Prior to commencing waste relocation activities, the WPWMA shall develop and implement a contingency plan in case hazardous</p>   | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact   | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| The waste excavation and relocation component of the proposed project has the potential to expose onsite personnel or the environment to hazardous materials.  | wastes are encountered during waste relocation. The contingency plan shall be based on guidelines issued by the State of California Governor’s Office of Emergency Services (CA OES 2001) for preparation of a Hazardous Material Incident Contingency Plan that describes emergency procedures and actions to be implemented to minimize hazards and release hazardous materials.   |                                |                               |                                |                               |
| <b>Impact 11-5: Potential Conflict with an Adopted Emergency Response Plan</b><br>The proposed project is not expected to conflict with implementation of an adopted emergency response plan. However, construction activities on local roadways may require temporary lane closures that could delay emergency evacuation.  | <b>Mitigation Measure 11-5: Potential Conflict with an Adopted Emergency Response Plan</b><br>Before construction activities commence, the WPWMA shall prepare a Construction Traffic Management Plan to minimize traffic impacts on all roadways at and near the work site affected by construction activities. The plan shall identify construction and public (if applicable) access points, procedures for notification of lane closures, a construction materials delivery plan, and a description of emergency personnel access routes during lane closures. This plan shall include measures that provide adequate access for emergency evacuation, including maintaining bypass lanes around any roadway construction sites. | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |
| <b>Impact 11-6: Risk of Wildfire</b><br>The proposed project is not located in an area of substantial wildfire risks or hazards and would not be expected to increase risks associated with wildfire. The expanded solid waste operations would include specific operational procedures that would minimize the potential for wildland fires to be started on the site. Also, the compatible/programmatic uses would | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| be subject to applicable regulations that would minimize wildfire risks.   |   |                                |                               |                                |                               |
| <p><b>Impact 11-7: Risk of Vectors</b></p> <p>The proposed project operations have the potential to attract vectors, particularly mosquitoes within areas of standing water, which can increase exposure of the public to vector-borne diseases.</p>   | <p><b>Mitigation Measure 11-7: Risk of Vectors</b></p> <p>During construction, all grading shall be performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. The Placer Mosquito and Vector Control District shall be granted access to perform vector control both during construction and operation of the proposed project. This includes ongoing access to all common areas including drainages. As part of the access agreement with Placer Mosquito and Vector Control District, the WPWMA shall require that the district use appropriate vector control methods in biologically sensitive areas to minimize any potential adverse effects to sensitive wildlife and plant species or their habitat.</p> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |
| <b>Chapter 12 Hydrology and Water Quality</b>  |   |                                |                               |                                |                               |
| <p><b>Impact 12-1: Potential for Solid Waste Project Elements to Violate Water Quality Standards or Substantially Degrade Surface Water Quality</b></p> <p>The project-level solid waste management operations have the potential to violate water quality standards or waste discharge requirements (WDRs) or otherwise substantially degrade surface water quality. This project will be required to comply with applicable laws and regulations, including amendment of</p> | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| the existing Stormwater Pollution Prevention Plan (SWPPP).   |   |                                |                               |                                |                               |
| <p><b>Impact 12-2: Potential for Solid Waste Project Elements to Violate Waste Discharge Requirements or Substantially Degrade Ground Water Quality</b></p> <p>The project-level solid waste management operations have the potential to violate water quality standards or WDRs or otherwise substantially degrade groundwater quality. However, the project is required to comply with applicable laws and regulations, including project WDRs, and the project involves removal of waste from unlined cells to lined cells.</p> | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 12-3: Potential for Waste Excavation and Relocation to Degrade Surface Water or Groundwater Quality</b></p> <p>The excavation and relocation of previously buried waste would eliminate a long-term source of groundwater contamination. However, during waste excavation and relocation activities, the excavated waste would be exposed to water and wind erosion, which could degrade surface water quality. In addition, the percolation of water</p>   | <p><b>Mitigation Measure 12-3: Potential for Waste Excavation and Relocation to Degrade Surface Water or Groundwater Quality</b></p> <ul style="list-style-type: none"> <li>▪ To implement the state and local regulatory policies intended to address the potential for violating water quality standards or WDRs, or otherwise substantially degrading surface or ground water quality, the WPWMA shall Amend the existing project SWPPP for the waste excavation and relocation component of the project. The SWPPP may include the following BMPs:                             <ul style="list-style-type: none"> <li>– Where excavation and removal occurs over a unlined area, the project will implement secondary containment in the direct path of hauling and removal.</li> </ul> </li> </ul> | Significant Impact             | Less than Significant         | Significant Impact             | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| through the exposed waste could degrade groundwater quality.  | <ul style="list-style-type: none"> <li>– The project shall avoid excavation and relocation of waste between October 15 and April 30 unless such activities are adequately mitigated to avoid impacts during the rainy season.</li> <li>– If excavation and relocation of waste activities cannot be avoided during this period, the WPWMA shall implement use of tarps or soil cover over the exposed face overnight and when the activity will not occur for more than 24 hours.</li> </ul> <p>The SWPPP shall be prepared and implemented prior to ground-disturbing activities commencing for the waste excavation and relocation component of the proposed project.</p> |                                |                               |                                |                               |
| <p><b>Impact 12-4: Potential for Programmatic Elements to Degrade Water Quality</b></p> <p>The complementary and programmatic elements have the potential to violate water quality standards or WDRs or otherwise substantially degrade surface or ground water quality. Site-specific SWPPPs would be prepared for these project elements.</p> | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 12-5: Potential to Decrease Groundwater Supplies or Interfere with Groundwater Recharge</b></p> <p>The project does not propose to increase the use of groundwater supplies for the waste management operations or the complementary and programmatic elements. Also, the project site is not located within a</p>                 | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| groundwater recharge area and would not be expected to substantially interfere with groundwater recharge.  |                    |                                |                               |                                |                               |
| <p><b>Impact 12-6: Potential to Increase Runoff and Localized or Downstream Flooding</b></p> <p>Implementation of the proposed project would result in an increase in impervious surfaces on the project site and altered drainage patterns, which would lead to an increase in stormwater runoff compared with existing conditions. The project site is not located within a 100-year floodplain or designated flood hazard zone. Also, 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.</p> | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 12-7: Potential Conflicts with Applicable Water Quality Control Plan</b></p> <p>The project would implement all applicable laws and regulations.</p>  | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 12-8: Potential for Waste Excavation and Relocation to Conflict with or Obstruct Implementation of a Water Quality Control Plan</b></p>   | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |



**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact   | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| The proposed project would maintain and expand coverage under the existing IGP SWPPP for the waste excavation and relocation activities.   |                    |                                |                               |                                |                               |
| <b>Chapter 13 Land Use and Planning</b>  |                    |                                |                               |                                |                               |
| <b>Impact 13-1: Physically Divide an Established Community</b><br>The proposed project is located on WPWMA-owned land designated for Public/Quasi-Public uses. The project site is located within a rural area and would not physically divide an established community.   | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |
| <b>Impact 13-2: Consistency with Land-Use Plans and Policies</b><br>The proposed project is consistent with the site's land use and zoning designations, as identified in the SAP. The proposed project would not conflict with the goals and policies included in the SAP that have been adopted for the purpose of avoiding or mitigating an environmental effect. | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure   | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |  | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <b>Chapter 14 Noise</b>   |  |                                |                               |                                |                               |
| <p><b>Impact 14-1: Construction Activity Noise Impacts</b></p> <p>Construction activities would result in temporary increases in ambient noise levels within the project vicinity. As specified in the Placer County Noise Ordinance, construction noise impacts that occur during acceptable hours are exempt from the Ordinance’s noise level limits.</p>                             | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 14-2: Increase in Operational Noise Levels</b></p> <p>The expansion of the waste management operations would not be expected to generate noise levels above the established noise threshold. However, the development of the complementary and programmatic elements could include manufacturing or industrial uses that would exceed the established noise threshold.</p> | <p><b>Mitigation Measure 14-2: Increase in Operational Noise Levels</b></p> <p>The WPWMA shall conduct an acoustical evaluation of any facility proposed as part of the complementary and programmatic elements prior to issuance of building permits. The acoustical evaluation shall document that either the proposed uses will not generate noise levels greater than 5 dB above the existing ambient noise level generated from industrial facilities at the site or will be redesigned such that this threshold is not exceeded at existing receiving property boundaries.</p> | Significant                    | Less than Significant         | Significant                    | Less than Significant         |
| <p><b>Impact 14-3: Exposure of Sensitive Uses to Vibrations</b></p> <p>The vibration levels generated by the construction and operation of the proposed solid waste management elements and the complementary and</p>   | None required.   | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact  | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| programmatic project elements would not expose residences within the project vicinity to excessive vibration levels.  |                    |                                |                               |                                |                               |
| <b>Impact 14-4: Traffic-Generated Permanent Increases in Ambient Noise Levels</b><br>The proposed project would not result in a noticeable increase in traffic noise levels at offsite sensitive receptors.   | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Chapter 15 Public Services</b>   |                    |                                |                               |                                |                               |
| <b>Impact 15-1: Require New or Expanded Fire Protection Facilities</b><br>The proposed project would be expected to increase demand for fire protection services. However, the WPWMA has a funding mechanism in place with Placer County to address additional fire protection services, and the SAP EIR includes the provision for new or expanded fire protection facilities. | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |
| <b>Impact 15-2: Require New or Expanded Law Enforcement Facilities</b><br>The proposed project would be expected to increase demands for law enforcement services. The incremental demand increase as a result of expanded solid waste management   | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |

**Table 2-4. Summary of Impacts and Mitigation Measures**

| Impact   | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| operations is not expected to result in the need for additional law enforcement facilities. The development of complementary and programmatic elements will contribute to the need for additional law enforcement facilities, which have been planned under the Placer Vineyards Specific Plan.  |                    |                                |                               |                                |                               |
| <b>Impact 15-3: Require New or Expanded Schools and Parks</b><br>The proposed project would not be expected to increase demands for schools and parks to such an extent that new or expanded schools and parks would be required beyond what has been accounted for in the SAP EIR.  | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Impact 15-4: Require New or Expanded Roadway Maintenance</b><br>Although the proposed project would not require new roadways, it would be expected to increase the need for maintenance of local roadways. The WPWMA has a mechanism in place with Placer County to provide funding for road maintenance and improvements on Athens Avenue that would remain in place for the proposed project. | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure  | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |   | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| <b>Chapter 16 Transportation</b>   |   |                                |                               |                                |                               |
| <p><b>Impact 16-1: Conflict with Traffic Circulation Plan or Program</b></p> <p>The proposed project would increase traffic volumes on study roadway segments in Placer County. However, this increase in traffic volumes would not exceed the capacities of the affected roadways. Also, the proposed project does not include any changes to the roadway network that would affect alternative modes of transportation. Therefore, the proposed project would not conflict with any program, plan, ordinance, or policy addressing the circulation system.</p> | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 16-2: Increase in Vehicle Miles Traveled</b></p> <p>The implementation of the proposed project would result in new daily vehicle travel, which would result in a net increase in vehicle miles traveled (VMT). This increase in VMT would exceed the identified significance threshold.</p>   | <p><b>Mitigation Measure 16-2: Increase in Vehicle Miles Traveled</b></p> <p>Prior to the initiation of project construction activities, the WPWMA shall prepare a Transportation Demand Management Plan to minimize the increase in VMT. The Transportation Demand Management Plan shall include specific measures intended to reduce employee vehicle trips, such as carpool and ride-share incentive strategies.</p> | Significant and Unavoidable    | Significant and Unavoidable   | Significant and Unavoidable    | Significant and Unavoidable   |
| <p><b>Impact 16-3: Increase in Vehicle Hazards</b></p> <p>The proposed project does not include roadway design changes and would not</p>   | None required.  | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| substantially increase hazards for vehicles as a result of a geometric design feature or incompatible uses. During the installation of utility upgrades within local roadways and site access improvements, temporary lane closures would be necessary to accommodate construction activities. However, these roadway construction activities would include the implementation of standard construction traffic management procedures that would minimize potential temporary traffic hazards. In addition, during site operations, the improvements to the site entrance would be expected to minimize potential vehicle conflicts associated with vehicles backing up on Athens Avenue. |                    |                                |                               |                                |                               |
| <b>Impact 16-4: Inadequate Emergency Vehicle Access</b><br>The proposed project would not result in inadequate emergency vehicle access to or around the project site. The project site can be accessed from multiple directions along local roadways. Also, the proposed project includes upgrading existing site access locations and installing new site access  | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| locations to accommodate the site improvements.   |                    |                                |                               |                                |                               |
| <b>Chapter 17 Utilities and Service Systems and Energy</b>  |                    |                                |                               |                                |                               |
| <p><b>Impact 17-1: Require the Construction or Relocation of Utility Facilities</b></p> <p>Project implementation would require a new fire protection water line and wastewater line extending to the western property. However, these new lines would be located within existing roadways and previously disturbed onsite areas that would be repaved or otherwise buried and returned to existing conditions after installation. No relocation of infrastructure for telecommunications or electricity would be required. Project implementation would also require the relocation of composting and public waste drop-off operations; however, the facilities would be relocated within the WPWMA property boundary.</p> | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <p><b>Impact 17-2: Have Sufficient Water Supplies</b></p> <p>The proposed project would result in increased potable and nonpotable water demand during both construction and operations. However, these increases were evaluated under the SAP</p>  | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |

Renewable Placer: Draft Environmental Impact Report  
 Chapter 2 – Executive Summary

Table 2-4. Summary of Impacts and Mitigation Measures

| Impact   | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|--|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|  |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| WSA and the Placer County Water Agency Urban Water Management Plan (UWMP), and both analyses concluded that Placer County Water Agency has sufficient water rights, contracts, and entitlements to supply the service area during normal, single dry, and multiple dry water years at full SAP buildout.   |                    |                                |                               |                                |                               |
| <b>Impact 17-3: Have Adequate Wastewater Treatment Capacity</b><br>Wastewater generated by the proposed project would be treated at Pleasant Grove Wastewater Treatment Plant (WWTP) where an expansion in treatment capacity from 9.5 million gallons per day (mgd) to 12 mgd is currently underway. The WWTP would have adequate capacity to treat the increase in wastewater. | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Impact 17-4: Generate Solid Waste in Excess of Standards or Infrastructure Capacity or Impair the Attainment of Solid Waste Reduction Goals</b><br>Waste generated during both construction and operations of the proposed project would be minimal and disposed of in compliance with state and local standards. Implementation of the proposed project would increase       | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |



Table 2-4. Summary of Impacts and Mitigation Measures

| Impact  | Mitigation Measure | Plan Concept 1                 |                               | Plan Concept 2                 |                               |
|---|--------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
|   |                    | Significance Before Mitigation | Significance After Mitigation | Significance Before Mitigation | Significance After Mitigation |
| local infrastructure and support the attainment of solid waste reduction goals.   |                    |                                |                               |                                |                               |
| <b>Impact 17-5: Comply with Solid Waste Reduction Statutes and Regulations</b><br>Implementation of the proposed project would both comply with and support solid waste reduction measures.   | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |
| <b>Impact 17-6: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</b><br>The proposed project will result in increased consumption of energy resources; however, increased energy use is necessary to provide expanded solid waste services to accommodate regional growth and changing regulatory climate. | None required.     | Less than Significant          | Less than Significant         | Less than Significant          | Less than Significant         |
| <b>Impact 17-7: Conflict with a State or Local Plan for Renewable Energy or Energy Efficiency</b><br>Implementation of the proposed project would support state and local plans regarding renewable energy and energy efficiency.   | None required.     | No Impact                      | No Impact                     | No Impact                      | No Impact                     |

## 2.5 Cumulative Impacts

This EIR uses the tiering concept and is hereby incorporating by reference the information included in the SAP EIR, in accordance with CEQA Guidelines Section 15150. An EIR may incorporate by reference all or portions parts of another document that is a matter of public record or is generally available to the public (CEQA Guidelines Section 15150). This EIR tiers off the analysis included in the SAP EIR for the cumulative impact analysis.

### 2.5.1 Aesthetics

The proposed project would not create new cumulatively considerable aesthetic resource impacts that were not considered in the SAP EIR. Therefore, cumulative aesthetic resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

### 2.5.2 Air Quality

**Construction Emissions of Criteria Air Pollutants and Ozone Precursors:** The proposed project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS would be cumulatively considerable. 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 EIR, which determined that project construction emissions would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

**Operational Emissions of Criteria Air Pollutants and Ozone Precursors:** The proposed project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS would be cumulatively considerable. Because no mitigation is available beyond that recommended for the project, the cumulative impact for project-specific operational emissions would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP EIR, which determined that the project's contribution of pollutants that exceed the CAAQS and NAAQS would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

**Mobile-Source Concentrations of Carbon Monoxide:** The proposed project would not create new cumulatively considerable carbon monoxide impacts that were not considered in the SAP EIR. Therefore, cumulative air quality impacts for mobile-source concentrations of carbon monoxide have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

**Exposure of Sensitive Receptors to Toxic Air Contaminants (TACs):** The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable exposure of sensitive receptors to TACs. While emission reduction 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 TAC-related impacts associated with the proposed project would be cumulatively considerable. Cumulative impacts related to exposure of sensitive receptors to TACs would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP EIR, which determined that the project's contribution to cumulative TACs would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

Create Objectionable Odors Affecting a Substantial Number of People: 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.

### **2.5.3 Biological Resources**

The proposed project would not create new cumulatively considerable biological resource impacts that were not considered in the SAP EIR. The SAP EIR assumed the same disturbance to site-specific biological resources as were assumed in this EIR. Therefore, cumulative biological resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

### **2.5.4 Cultural and Tribal Resources**

Cultural and Tribal resources were not considered in the SAP EIR. No significant cultural, archaeological, or historical resources or tribal cultural resources were identified on the project site during cultural resource surveys. Therefore, cumulative cultural resource impacts have been adequately addressed, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

### **2.5.5 Geology, Soils, and Paleontological Resources**

The proposed project would not create new cumulatively considerable geology, soils, and paleontological resource impacts that were not considered in the SAP EIR. The proposed project does not include any soil-disturbing activities that were not considered in the SAP EIR for the project site. Therefore, cumulative geology, soils, and paleontological resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

### **2.5.6 Greenhouse Gas Emissions**

The emissions estimates prepared to support this EIR indicate that the level of construction and operational emissions associated with implementation of the proposed project would exceed PCAPCD's bright line threshold of 10,000 MT CO<sub>2</sub>e per year, and therefore would be cumulatively considerable. Implementation of GHG reduction measures and mitigation measures, along with establishment of offsets or purchase of carbon credits, would not reduce GHG emissions below PCAPCD significance thresholds for the life of the project. Because the availability and affordability of GHG offset credits in the future is uncertain, the impact remains significant and unavoidable.

### **2.5.7 Hazards, Hazardous Materials, and Wildfire**

The proposed project would not create new cumulatively considerable hazards impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative hazards impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

While the SAP EIR did not evaluate impacts to wildfire, the proposed project and surrounding vicinity are not located in a wildland area with substantial forest fire risks and hazards nor in very high fire hazard severity zones. Therefore, the proposed project would result in no cumulative impacts on wildfire.

#### **2.5.8 Hydrology and Water Quality**

The proposed project would not create new cumulatively considerable hydrology or water quality impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative hydrology and water quality impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

#### **2.5.9 Land Use and Planning**

The proposed project would not create new cumulatively considerable land-use impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative land-use impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

#### **2.5.10 Noise**

The proposed project would not create new cumulatively considerable noise impacts that were not considered in the SAP EIR. The proposed project would generate noise levels consistent with the solid waste and industrial uses anticipated for the site in the SAP. Therefore, cumulative noise impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

#### **2.5.11 Public Services**

The proposed project would not create new cumulatively considerable public services impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative public services impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

#### **2.5.12 Transportation**

The proposed project would not create new cumulatively considerable transportation impacts that were not considered in the SAP EIR. The SAP EIR assumed the generation of substantially greater VMT from the project site than is anticipated in this EIR. Therefore, cumulative transportation impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

#### **2.5.13 Utilities and Energy**

The proposed project would not create new cumulatively considerable public utility or energy impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative public utility and energy impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.