3. Corrections and Revisions to the Draft EIR

This chapter contains changes to the text of the Draft EIR that were made based on comments received during the public comment period and responded to in Chapter 2 of this Final EIR. The changes are presented in the order in which they appear in the Draft EIR and are identified by the Draft EIR page number, section number, or other heading to identify the location of the change. Text deletions are shown in strikeout (~~strikeout~~) and corrections, revisions, and text additions are shown in bold underline (**bold underline**).

Section 1.6.3 on page 1-27 under subheading "Other Wastes Requiring Special Handling," the following bullet is hereby added to the end of the subsection:

- ***Fire Debris*** **- The WPWMA may temporarily accept and discharge into the WRSL waste derived from cleanup of local emergency/disaster-impacted areas.**

The following text is hereby added as a subheading to Section 1.8.3 on page 1-43 of the Draft EIR and the bullet listing grading, drainage, and building permits has been moved under this subheading:

1.8.3 Local Approvals

Local agency permits and approvals that may be applicable to the proposed project include the following:

WPWMA

- Certification of the Final EIR, approval of the Waste Action Plan, and selection of a Plan Concept for implementation

Placer County

- SWFP (issued by the LEA with concurrence from CalRecycle)
- Authority to Construct and Permit to Operate issued by the PCAPCD

Placer County Department of Public Works

- ~~Grading, Drainage, and Building Permits~~
- Offsite Encroachment Permits

Placer County Community Development Resource Agency

- **Grading, Drainage, and Building Permits**

The "projected annual tons disposed" values in Table 2-1, on page 2-6 of the Draft EIR, under the Waste Disposal heading are hereby revised as follows:

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
Waste Disposal			
Increased Waste Disposal	Annual tons disposed – 288,838	Projected annual tons disposed – 52~~1~~**5**,100	Projected annual tons disposed – 52~~1~~**5**,100

Mitigation Measure 6-2(b) on pages 2-16 and 6-44 of the Draft EIR is hereby revised to show the "Mitigation Measure 6-2(b)" in bold text to reflect additions to the first bullet and addition of a fourth bullet:

Mitigation Measure 6-2(b): Project contractor(s) shall implement BMPs prior to or during all construction activities, including onsite construction-related grading.

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:

- 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. **The designated monitoring personnel shall obtain the certificate of Visible Emissions Evaluation (VEE) from the California Air Resources Board (CARB) field training program, or equivalent.**
- Post signage at property boundaries with name(s) and contact information for designated person(s) for reporting of dust complaints.
- 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.
- **The PCAPCD shall be contacted regarding permitting requirements if any portable equipment is to be used for construction of the project elements.**

The following text for the description of Mitigation Measure 6-6 on page 2-24 and the title and description on page 6-65 is hereby revised as follows:

Mitigation Measure ~~6-4~~6-6: Implement Odor Reduction Measures.

The following additional 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:

- ~~Conduct Annual Odor Emissions Testing and Implement Response Actions~~ **Compile and Evaluate Weekly Odor Emissions Monitoring** (Tier 1, Composting Operations). **Weekly odor emissions monitoring from various points on and offsite, conducted pursuant to the SWOP, will be compiled annually to evaluate odor emission trends and the strength and character of odors generated at different phases and sources in the composting process. Response actions will be implemented as indicated in site operational documents such as the SWOP and OIMP.**
- Increase Screening of LFG and Implement Response Actions (Tier 1, Landfill Operations). Quarterly screening for fugitive LFG shall be conducted to identify "hot spots" of LFG emissions through interim and final landfill covers. Such screening reduces the time between identification and repair of surface hot spot emissions, and thus odor. **A "hot spot" is defined as any area where surface methane standards established by the CARB are exceeded for at least two quarters in any consecutive four quarter period. CARB requires that, "any area where solid waste has been buried; the landfill methane surface concentration must not exceed the 500 parts per million by volume (ppmv) instantaneous or 25 ppmv (averaged) integrated surface methane emission standards, excluding the working face." (CARB 2022) For instances where the integrated surface methane emission standard of 25 ppmv (averaged) of a monitoring grid is exceeded, the grid area will be monitored again at 15-foot centers (instead of the routine 25-foot centers) to further identify the area(s) of highest emissions. The noted areas of exceedance will be monitored again and corrective actions from the site operations and maintenance manual will be implemented as necessary to reduce emissions below the allowable level. For instances where the instantaneous surface methane emission standard of 500 ppmv is exceeded, the area will be monitored weekly for up to 3 weeks or until emissions are reduced enough to no longer constitute an exceedance. Corrective actions from the site operations and maintenance manual will be implemented as necessary to reduce emissions below the allowable level.**

Mitigation Measure 7-1: Impacts on Special-Status Plant Species on pages 2-25 and 7-36 of the Draft EIR is hereby revised as follows:

Mitigation Measure 7-1: Impacts on Special-Status Plant Species.

The WPWMA will implement the proposed project as a Covered Activity under the PCCP and CARP to compensate for any loss of special-status plants. **In the absence of avoidance, minimization, and mitigation measures established by the PCCP for rare plants, WPWMA will implement the Placer County Sunset Area Plan (SAP) Policy NR-2.1: Special-Status Plant Species Protection, and SAP Program NR-5: Special-Status Plant Species Protection Guidelines, to mitigate for the loss of special-status plant species. The WPWMA will retain qualified botanists to conduct protocol-level botanical surveys. The Guidelines, at a minimum, will require the following:**

- **All plant species encountered on the project site will be identified to the taxonomic level necessary to determine species status.**

- **The surveys will be conducted no more than 5 years prior and no later than the blooming period immediately preceding the approval of a grading or improvement plan or any ground-disturbing activities, including grubbing or clearing.**

- **If special-status plants are identified on the project site, the project applicants will be required to implement the following measures to mitigate the potential loss of special-status plant species:**

    - **Avoid special-status plant occurrences through project design to the extent technically feasible and appropriate. Avoidance will be deemed technically feasible and appropriate if the habitat occupied by special-status plants may be preserved onsite while still obtaining the project purpose and objectives and if the preserved habitat features could reasonably be expected to continue to function as suitable habitat for special-status plants following project implementation.**

    - **If, after examining all feasible means to avoid impacts to potential special-status plant species habitat through project site planning and design, adverse effects cannot be avoided, then impacts will be mitigated in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species.**

    - **Notify CDFW, as required by the California Native Plant Protection Act, if any special-status plants are found on the project site. Notify the USFWS if any plant species listed under the Endangered Species Act are found.**

    - **Develop a mitigation and monitoring plan (MMP) to compensate for the loss of special-status plant species found during preconstruction surveys, if any. The MMP will be submitted to CDFW and/or USFWS, as appropriate depending on species status, for review and comment. WPWMA will consult with these entities, as appropriate, depending on species status. Mitigation measures may include preserving and enhancing existing onsite populations, creation of offsite populations on project mitigation sites through seed collection or transplantation and preserving occupied habitat offsite in sufficient quantities to offset loss of occupied habitat or individuals.**

    - **If transplantation is part of the mitigation plan, the plan will include a description and map of mitigation sites, details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements, and sources of funding to purchase, manage, and preserve the sites. The following performance standards will be applied:**

        - **The extent of occupied area and the flower density in compensatory re-established populations will be equal to or greater than the affected occupied habitat and will be self-producing. Re-established populations will be considered self-producing when:**

- **Plants re-establish annually for a minimum of 5 years with no human intervention, such as supplemental seeding.**
- **Re-established habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types.**

- **If offsite mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, and other details, as appropriate to target the preservation of long-term viable populations.**

The "projected annual tons disposed" values in Tables 3-1, on page 3-5 of the Draft EIR, under the Waste Disposal heading are hereby revised as follows:

Table 3-1. 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
Waste Disposal			
Increased Waste Disposal	Annual tons disposed – 288,838	Projected annual tons disposed – 52~~1~~**5**,100 by 2050	Projected annual tons disposed – 52~~1~~**5**,100 by 2050

The following text is hereby added to Section 3.5.2 on page 3-20 of the Draft EIR:

Differences Between MRF Operations RFP Proposals and Plan Concepts – Vendor proposals received in the MRF Operations procurement process include some variations in the types of materials processed at the organics processing area as well as some differences in how that material is processed (MSW organics composting). Generally, the vendor-proposed organics management operation is being designed to accommodate a total tonnage of 157,550 tons per year of organics: 92,450 tons per year of food waste and the organics fraction of MSW (OFMSW) and 65,100 tons per year of yard waste. This is capacity is comparable to the buildout capacity as the Organics Management Operation in Plan Concept 1 and Plan Concept 2. The inclusion of the OFMSW in the proposed feedstocks is one area that the proposals differ from the plan concepts. It is assumed that this material would be recovered during the sorting process inside the MRF building. Recovering this material would also result in higher diversion rates and less material going to the landfill (as either average daily cover or disposed material). Additional features of the Organics Management Operation represented in the proposals is summarized as follows:

- **Location** – The proposals show the Organics Management Operation located on the center ~~property~~ **portion of the Western Property** (which is consistent with Plan Concept 1).

The "projected annual disposed tons" value and the "projected increase in annual tons" value in Table 3-10, on page 3-25 of the Draft EIR, are hereby revised as follows:

Table 3-10. Summary of Tonnage and Vehicle Limit Changes Under Plan Concept 1

Environmental Baseline	Plan Concept 1	Change
Baseline annual disposed tons = 288,838	Projected annual disposed tons = ~~533,654~~ **525,100**	Projected increase in annual tons = ~~244,816~~ **236,262**

The values for "projected annual disposed tons" and "projected increase in annual tons" and the heading for the second column in Table 3-22, on page 3-63 of the Draft EIR, are hereby revised as follows:

Table 3-22. Summary of Tonnage and Vehicle Limit Changes Under Plan Concept 2

Environmental Baseline	Plan Concept ~~1~~2	Change
Current annual disposed tons – 288,838	Projected annual disposed tons – ~~533,654~~ **525,100**	Projected increase in annual tons – ~~244,816~~ **236,262**

The reference to Mitigation Measure 3-1 on page 5-59 of the Draft EIR is hereby revised as follows:

Mitigation Measure ~~3~~5-1: Impacts to Visual Character and Quality

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.

The following bullet is hereby added to page 6-5 of the Draft EIR, Table 6-1, Current Emission Reduction Measures and Best Management Practices Incorporated as Project Design Measures, Current Odor Management Practices section:

- **Comply with the applicable requirements of 40 Code of Federal Regulations (CFR) Part 60 Subpart Cf and 40 CFR Part 63 Subpart AAAA.**

Chapter 11, on page 11-6, first paragraph of the Draft EIR, is hereby revised as follows:

There are approximately 17 LFG monitoring points around the perimeter of the site. Additional monitoring probes may be added as the landfill continues to fill with waste over time. Prior to the placement of waste in a new module, perimeter gas monitoring probes are installed in accordance with Title 27 Section 20925, which requires nested probes at a minimum of 1 per 1,000 feet around the perimeter of the landfill (as a whole, not by individual landfill module). Each LFG monitoring point includes one intermediate and one deep monitoring probe, with the deep one equal to the lowest waste elevation. In accordance with Title 27 Section 20921 requirements for the closed part of the landfill and Section ~~29025~~ **20925** for the active parts, these probes are monitored on a monthly basis. Reports of the monthly monitoring are presented to the LEA.

Appendix D. Project-Applicable Conditions on Covered Activities from the PCCP, is hereby revised as follows, including section heading numbering as applicable:

D.11 Application Process for Participating Special Entities

As required in HCP/NCCP Section 8.9.4.1, the WPWMA will submit to the PCA a plan participation package for the proposed project (refer to Section 6.2.4, HCP/NCCP Participation Package), along with any environmental analysis that has been prepared to comply with CEQA or NEPA.

D.12 References

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