California Environmental Quality Act Findings of Fact and Statement of Overriding Considerations Regarding the Final Environmental Impact Report for the Renewable Placer: Waste Action Plan

State Clearinghouse Number 2019039087

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Western Placer Waste Management Authority

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Acronyms and Abbreviations

µin/sec	microinch(es) per second
AB	Assembly Bill
ADC	alternative daily cover
AERMOD	American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model
AMSL	above mean sea level
APE	Area of Potential Effects
ASP	aerated static pile
ASTM	American Society for Testing Materials
BACT	Best Available Control Technology
BMP	best management practice
Board	Western Placer Waste Management Authority Board of Directors
C&D	construction and demolition
CAAQS	California Ambient Air Quality Standards
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CalFire	California Department of Forestry and Fire
CALGreen	California Green Building Standards
Cal OES	California Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CARP	Western Placer County Aquatic Resources Program
CAP	Corrective Action Program
CAPCOA	California Air Pollution Control Officers Association
CASP	covered aerated static pile
CBC	*California Building Standards Code*
CCR	*California Code of Regulations*
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFD	Community Facilities District
CFR	*Code of Federal Regulations*
CGS	California Geological Survey

CGP	Construction General Permit
CH_4	methane
cm/sec	centimeter(s) per second
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Placer
CRHR	California Register of Historical Resources
CVRWQCB	Central Valley Regional Water Quality Control Board
CWA	Clean Water Act
dB	decibel(s)
dBA	A-weighted decibel(s)
Draft EIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	environmental site assessment
Final EIR	Final Environmental Impact Report
FESA	Federal Endangered Species Act
FGC	*Fish and Game Code*
FHWA	Federal Highway Administration
GHG	greenhouse gas
GHG Rx	Greenhouse Gas Reduction Exchange Program
H:V	horizontal to vertical
HCP	Habitat Conservation Plan
HHW	household hazardous waste
HHWF	household hazardous waste facility
HI	hazard indices
HIA	acute hazard index
HIC	chronic hazard index
HRA	health risk assessment
IGP	Industrial General Permit
ILF Program	In-Lieu Fee Program
Jacobs	Jacobs Engineering Group Inc.
lb/day	pound(s) per day

LFG	landfill gas
LFGTE	landfill gas to energy
LHMP	Local Hazard Mitigation Plan
LID	low-impact development
LOS	Level of Service
MBI	Michael Baker International
MBTA	Migratory Bird Treaty Act
MEIR	maximally exposed individual at a residential location
MEIW	maximally exposed individual at a workplace location
mgd	million gallons per day
mgy	million gallons per year
MLD	Most Likely Descendant
MMP	Mitigation and Monitoring Plan
MOU	memorandum of understanding
MPE	maximum probable earthquake
MRF	materials recovery facility
msl	mean sea level
MSW	municipal solid waste
MT	metric ton(s)
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
NPDES	National Pollutant Discharge Elimination System
NOP	Notice of Preparation
NOx	oxides of nitrogen
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OIMP	Odor Impact Minimization Plan
OFMSW	organic fraction of municipal solid waste
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Program

PCWA	Placer County Water Agency
PG&E	Pacific Gas & Electric Company
PM2.5	particulate matter with diameter 2.5 micrometers and smaller
PM10	particulate matter with diameter 10 micrometers and smaller
PMI	point of maximum impacts
ppmv	parts per million by volume
PPV	peak particle velocity
PRC	*(California) Public Resources Code*
Project	Renewable Placer: Waste Action Plan
PRSP	Placer Ranch Specific Plan
REL	reference exposure level
RMS	root mean square
ROG	reactive organic gases
SACOG	Sacramento Area Council of Governments
SAP	Sunset Area Plan
SB	Senate Bill
scfm	standard cubic feet per minute
sf	square feet
SHPO	State Historic Preservation Officer
SR	State Route
State CEQA Guidelines	California Code of Regulations, Title 14, Section 15091
SVAB	Sacramento Valley Air Basin
SWOP	Site-Wide Odor Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
UAIC	United Auburn Indian Community of the Auburn Rancheria
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VDECS	Verified Diesel Emission Control Strategy
VEE	Visible Emissions Evaluation
VMT	vehicle miles traveled
WDR	Waste Discharge Requirement

WPWMA	Western Placer Waste Management Authority
Waste Action Plan	*Renewable Placer: Waste Action Plan*
WRSL	Western Regional Sanitary Landfill
WSA	Water Supply Assessment
WWTP	wastewater treatment plant

1. Introductory Findings

Pursuant to California Public Resources Code (PRC) Section 21081 and California Code of Regulations, Title 14, Section 15091 (State CEQA Guidelines), no public agency shall approve or carry out a project for which an Environmental Impact Report (EIR) has been certified, which identifies one or more significant impacts on the environment that would occur if the project is approved or carried out, unless the public agency makes one or more findings for each of those significant impacts, accompanied by a brief explanation of the rationale of each finding. The possible findings, which must be supported by substantial evidence in the record, are:

1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant impact on the environment (hereinafter Finding 1).

2) Changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency (hereinafter Finding 2).

3) Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR (hereinafter Finding 3).

For those significant impacts that cannot be mitigated to below a level of significance to approve the project, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant impacts on the environment.

The Western Placer Waste Management Authority (WPWMA) Board of Directors (Board) hereby approves the Renewable Placer: Waste Action Plan (Project) and certifies the Project Final EIR (Final EIR), State Clearinghouse Number 2019039087, consisting of the Draft EIR, Responses to Comments, and other supporting documents. The Board finds that the Final EIR reflects the independent judgment and analysis of the WPWMA and has been completed in compliance with CEQA (PRC Section 21000-21177), and the Board has received, reviewed, and considered the information contained in the Final EIR, all testimony at public hearings, and submissions from public agencies, local landowners, residents and others, and all other information in the record prior to its approval of the Project.

Having received, reviewed, and considered the foregoing information, as well as any and all other information in the record, the Board hereby makes findings pursuant to, and in accordance with, Section 21081 of the Public Resources Code.

This document consists of the following sections:

- Section 2 of these findings discusses those potential environmental impacts of the Project that were reviewed during the scoping process prior to preparation of the Draft EIR, but were found to be less than significant.

- Section 3 discusses those potential environmental impacts of the Project that were evaluated in the Draft EIR and are not significant.

- Section 4 discusses those potential environmental impacts that have been mitigated to a level of insignificance.

- Section 5 discusses those unavoidable environmental impacts that cannot be mitigated to a level of insignificance.

- Section 6 discusses the potential growth-inducing impacts of the Project.

- Section 7 discusses the alternatives to the Project as discussed in the Final EIR.
- Section 8 contains findings regarding the Mitigation Monitoring and Reporting Program.
- Section 9 contains findings regarding the location and custodian of the record of proceedings.
- Section 10 contains findings regarding the independent judgment of the WPWMA.
- Section 11 contains findings regarding the nature of the findings.
- Section 12 contains findings regarding the reliance on the record.
- Section 13 contains the Statement of Overriding Considerations. The findings set forth in each section are supported by substantial evidence in the record of the approval of the Project.

In accordance with the provisions of CEQA and the State CEQA Guidelines, the Board adopts these findings as part of its certification of the Final EIR for the Project.

1.1 Project Selection

The Draft EIR evaluated two concepts (Plan Concepts 1 and 2) at an equal level of detail for implementing the Renewable Placer: Waste Action Plan and identified Plan Concept 1 as the preferred Project. However, based on the information contained in the Final EIR, all testimony at public hearings, information submitted during the public review process, and all other information in the record, the WPWMA identified Plan Concept 2 for approval as the Project. This section details the rationale behind the WPWMA's selection of Plan Concept 2 as the Project referenced in these Findings.

The WPWMA developed Plan Concepts 1 and 2 based on operational performance related to space utilization and material diversion rates at the time. While both Plan Concepts would meet the WPWMA's Project objectives, the Draft EIR identified Plan Concept 1 as the Preferred Project predominantly due to economic factors. Since then, due in part to the implementation of Senate Bill (SB) 1383 and award of MRF and Landfill operations to FCC Environmental Services (FCC) effective July 1, 2022, the factors influencing specific elements of Plan Concepts 1 and 2 have evolved from the Draft EIR's designation of the Preferred Project.

In particular, based on FCC's proposed facility design modifications and contractual diversion requirements, sufficient space has been identified to accommodate aerated static pile (ASP) composting and a new construction and demolition (C&D) debris processing area without the need to immediately develop a new organics area or excavate portions of the existing closed, pre-Subtitle D-lined, landfill to site these facility elements.

As a result, Plan Concept 2 no longer requires immediate excavation and relocation of waste from closed, pre-Subtitle D-lined, Modules 1, 2, 10 and 11 to realize the economic and operational benefits presented by that concept. The cost estimate prepared by Jacobs Engineering Group Inc (Jacobs) is between approximately $80 million and $100 million to excavate and relocate waste from the closed, pre-Subtitle D-lined, modules; avoiding or delaying this cost while realizing the project benefits serves to lessen the economic burden on the WPWMA's current and future customers. In contrast, to fully realize the project benefits of Plan Concept 1 – particularly to maximize future landfill capacity, the excavation and relocation of waste must occur.

As originally conceptualized, it was believed that waste excavation under Plan Concept 2 would need to occur within the first several years of project implementation whereas waste excavation under Plan Concept 1 could be conducted further in the future. Initial analysis focused on the relative cost of each project over the first 10 years of implementation when considering which project was more economically sound, and Plan

Concept 1 was identified as economically superior and therefore selected as the Preferred Project. As noted previously, since an immediate operational need to excavate and relocate waste no longer exists and the full benefits of Plan Concept 2 can be realized without excavation, the WPWMA determined that Plan Concept 2 is superior and has been selected as the Project, referenced herein. The following summarizes additional findings by the WPWMA supporting the selection of Plan Concept 2 as the Project.

1.1.1 Landfill Capacity

As noted in Chapter 3 of the Draft EIR, Plan Concept 2 could provide approximately 5 million cubic yards of additional airspace compared to Plan Concept 1, assuming waste excavation and relocation occurs under both plan concepts. The estimates provided in the Draft EIR suggest this additional landfill airspace could extend the life of the Western Regional Sanitary Landfill (WRSL) under Plan Concept 2 by up to 9 years compared to Plan Concept 1. The estimated landfill closure date identified in the Draft EIR under Plan Concept 1 would be 2101 and under Plan Concept 2 would be 2110.

Subsequent analysis by the WPWMA suggests that if waste excavation and relocation operations do not occur, Plan Concept 2 could provide approximately 31.6 million cubic yards of additional airspace compared to Plan Concept 1. This is a result of a net decrease in the overall landfill capacity associated with Plan Concept 1 by not realizing the additional capacity within the footprint of closed, pre-Subtitle D-lined, modules on the center property and the ability to fill between the northeastern portion of the Plan Concept 1 landfill expansion and the closed, pre-Subtitle D-lined, modules on the center property. At an average disposal rate of 500,000 cubic yards per year, which represents current trends, this subsequent analysis suggests that the operational life of the WRSL under Plan Concept 2 could be approximately 63 years longer than that of Plan Concept 1.

1.1.2 Avoidance of Biological Disturbances

Siting future landfill on the western property under Plan Concept 2 has the potential to impact fewer wetland and vernal pool areas compared to siting the landfill on the eastern property under Plan Concept 1. Utilizing the eastern property for compatible manufacturing could also allow for more opportunities to minimize impacts to biological resources compared to developing the entire area as a landfill.

1.1.3 Compatibility with Planned and Existing Neighboring Land Uses

Development is anticipated to occur on all properties bordering the WPWMA's, other than the preserve immediately north of the WPWMA's center and eastern properties. The Placer One development project broke ground on Friday, October 21, 2022, indicating that development along the WPWMA's eastern and southern boundaries is more imminent than future developments considered to the north and west.

Considering the potential receptor proximity resulting from these anticipated developments to solid waste operations, particularly landfilling, Plan Concept 2 is expected to provide a greater distance between landfill operations and sensitive receptors for a longer period of time compared to Plan Concept 1.

1.1.4 Design and Operational Flexibility

Greater developable acreage of the western property (459 acres) versus the eastern property (155 acres), provides increased opportunity for design and operational flexibility in developing the western property for landfilling under Plan Concept 2 than the eastern property under Plan Concept 1. This additional flexibility also provides more options when considering landfill setbacks from property lines, locations of supporting elements, and locations of operational or physical buffers.

1.1.5 Landfill Design and Construction Challenges

Developing future landfill on the eastern property under Plan Concept 1 would require a tie-in to the existing liner systems on the center property, extension and modification of module sump risers and pumping systems along the eastern edge of the center property, and installation of a separation liner system between Class II and Class III modules. While engineering solutions could be identified to address these challenges, they would result in increased design and operational costs. Development of a physically separated landfill on the western property under Plan Concept 2 would avoid these design and operational costs.

For these reasons, Plan Concept 2 as described in the Draft EIR constitutes the Project referenced in this document.

1.2 Project Description

The Project (Plan Concept 2) includes the following elements: solid waste project elements, complementary/programmatic elements, and supporting elements. The following paragraphs describe how these elements are proposed to be located on the project site.

Expanded Landfill Capacity—The expanded landfill area would be located entirely on the western property, separated from the existing landfill by Fiddyment Road. Within the center property, the landfill's peak elevation would not exceed 295 feet above mean sea level, the current permitted elevation, which is 99 feet greater than the landfill's existing height of 196 feet (as of aerial mapping dated Jan 2, 2019). The proposed height of the landfill expansion area on the western property would be 325 feet above mean sea level.

Existing Solid Waste Excavation—The northern closed, pre-Subtitle D-lined, portions of the existing landfill are proposed to be excavated and relocated to a Subtitle D-compliant lined module. The relocation would facilitate expansion of processing and recycling operations in the northern portion of the center property.

Expanded and Redesigned Compost Operations—Composting operations and other organics management would be located in the northern portion of the center property. The composting operations would be sized to accommodate anticipated material growth rates. The relocation of waste from the northern portion of the existing landfill would provide the additional space needed to accommodate these operations.

Expanded and Redesigned Construction and Demolition Waste Operations—Expanded C&D would be located within the northern portion of the center property near the redesigned composting and public waste drop-off areas.

Expanded and Redesigned Public Waste Drop-Off Area Operations—The expanded public waste drop-off area would be located within the northern portion of the center property near the redesigned composting and C&D areas. These operations would be designed to ensure separation from the other waste management operations to ensure the safety and convenience of public customers.

Complementary/Programmatic Elements—The complementary/programmatic elements include compatible manufacturing, pilot study areas, university research areas, and a landfill gas to renewable fuels area. For the compatible manufacturing uses, areas have been designated in the southern portions of the western property and on the entire eastern property. The same area in the southern portion of the western property would also be designated for university research uses. Areas for pilot studies and a landfill gas to renewable fuels facility are designated in the northeastern portion of the center property. Although space has been initially reserved for these elements primarily within the southern portions of the western property and on the eastern property, opportunities may arise that would support locating some of these complementary/programmatic elements in closer proximity to the solid waste project elements or within areas not yet developed with solid waste project elements. Therefore, this plan concept assumes these complementary/programmatic elements could be located throughout the project site.

Supporting Elements—The supporting elements for the Project are primarily located in the northern portion of the center property where the majority of supporting activities currently occur. These elements include recovered materials storage areas, administration buildings, facility parking, and existing Materials Recovery Facility (MRF), Household Hazardous Waste Facility (HHWF) and landfill gas-to-energy (LFGTE) plant. Within this area, the existing waste delivery entrance on Athens Avenue is proposed to be realigned to better accommodate customers. In addition, a new site entrance is proposed to be installed near the southwest corner of Athens Avenue and Fiddyment Road to provide vehicle access to the western property. A new road crossing near the south end of the MRF would consist of a tunnel, bridge, or conveyor system to connect the waste operations on the center property to those proposed on the western property. Stormwater ponds are proposed to be located in two locations to capture stormwater runoff from site operations, including at the northern end of the western property and at the southwestern end of the center property. A maintenance area is proposed to be located in the northern portion of the western property to support landfill-related operations.

1.3 Project Objectives

Placer County, the majority of which is included in the WPWMA's service area, was the second-fastest growing county in California in 2018, according to the California Department of Finance, State Population Projections (May 2020). Based on land use projections included in the general plans of the Participating Agencies, the population served by the WPWMA is expected to nearly double over the next 30 years. In addition to projected population increases, the Participating Agencies are seeking ways to respond to simultaneous restrictions in global recycling markets and increasingly stringent state-mandated limitations on materials that can be disposed in California's landfills.

In anticipation of this projected growth, the WPWMA initiated a master planning effort in 2015 identified as the *Renewable Placer: Waste Action Plan*. The purpose of the Waste Action Plan is to identify the physical and operational changes needed at the WPWMA facility to support future Waste Recovery and Waste Disposal needs for the rapidly growing communities it serves while complying with an increasingly complex regulatory environment and fluctuating global recyclables markets. The Waste Action Plan was also developed to maintain a stable cost structure for the Participating Agencies, improve operational efficiencies and customer safety, and continue to enhance compatibility between ongoing operations and current and future adjacent land uses.

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

- Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.
- Expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded organics management, improved recovery of C&D materials, recycling, and public buy-back activities.
- Increase the WRSL's permitted footprint and height to optimize the efficient use of land for Waste Disposal and so that sufficient Waste Disposal capacity is available to accommodate anticipated long-term growth in the Participating Agencies' waste streams.
- Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.
- Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and verify that operations associated with Waste Action Plan implementation are conducted in the most environmentally responsible manner possible.

- Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.
  - Compatible technologies could include both proven and innovative recycling strategies intended to capitalize on an evolving local recyclable materials market and potentially reduce dependence on foreign markets.
  - Developing compatible technologies could promote state-mandated waste diversion goals, offset costs associated with ongoing solid waste operations, and generate innovative and creative economic opportunities within the County consistent with the Sunset Area Plan (SAP) objectives (Placer County 2019).
- Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area's anticipated transition to a more urban environment.
- Encourage implementation of the Placer County Conservation Program and the integration of environmentally conscious practices into the facility operations.
- Develop WPWMA properties consistent with the goals, policies, and implementation programs identified in the SAP (Placer County 2019).
- Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy[1] in Placer County.

1.4 Background

The WPWMA issued a Notice of Preparation (NOP) on March 15, 2019 with a review period from March 15, 2019 to April 15, 2019, and a scoping meeting was held on April 1, 2019. The WPWMA circulated the Draft EIR for public review and comment from October 29, 2021 to January 12, 2022, and held two public meetings on December 7, 2021 (morning and evening sessions).

The Draft EIR for the Project was prepared in accordance with CEQA and the State CEQA Guidelines. The WPWMA has analyzed, reviewed and edited the Draft EIR circulated for public review and subsequently circulated the responses to comments received on the Draft EIR on October 26, 2022. The Draft EIR and the Final EIR reflect the Board's independent judgment.

[1] A circular economy aims to redefine growth, focusing on positive societywide benefits. It entails gradually decoupling economic activity from the consumption of finite resources, and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: design out waste and pollution, keep products and materials in use, regenerate natural systems. (https://www.ellenmacarthurfoundation.org/circular-economy/concept)

2. Potential Environmental Impacts Determined to be Less Than Significant During the Scoping Process

Upon completion of the scoping process, the WPWMA determined that the Project would have no significant impact on agricultural resources, mineral resources, population and housing, and recreation and that no further analysis was needed. Impacts on agricultural resources and recreation associated with project implementation were found not to be significant. Although the project site currently includes areas of grazing land on the eastern property and parts of the western property, the project site does not include any designated prime farmland, unique farmland, or farmland of statewide importance. Additionally, the land use and zoning designations established by Placer County for these lands supports solid waste and industrial uses. No lands within the project site are designated for agricultural uses, and the Project would not conflict with existing zoning for agriculture use or with a Williamson Act contract. The Project does not include uses that would disturb or disrupt existing recreational uses and would not be expected to substantially increase the demand on existing recreational resources. Although the Project would increase employment within the region, this increase in employment would not be expected to result in the substantial physical deterioration of recreational facilities. The project site does not contain any known mineral resource and there are no known mines on or near the project site. Therefore, no further analysis of these topics was included in the Draft EIR.

The Project would provide for ongoing waste disposal and recovery operations and could increase local employment to accommodate these operations. However, workers would be expected to come from the existing workforce within the surrounding communities. The implementation of the complementary and programmatic elements would further expand the demand for workers. Depending upon how quickly the complementary and programmatic elements are developed, the increased demand for workers could increase the demands on the local housing supply. However, the Project is consistent with the land use and zoning designation in the SAP, and by extension, the employment, public facility development, and housing assumptions evaluated in the SAP EIR. Implementation of the Project would be expected to generate employment opportunities for current and future residents consistent with the SAP's goals and policies. Therefore, the Project would not be expected to induce substantial unplanned population growth or housing demand in the County and would not be expected to be growth inducing.

3. Potential Environmental Impacts that are Not Significant (No Mitigation Required)

The Final EIR evaluated impacts in thirteen major environmental categories and concluded that certain impacts in each of the following issue areas would be less than significant without imposition of mitigation.

3.1 Aesthetics—Light or Glare

Please refer to Draft EIR Chapter 5 for an analysis of impacts to aesthetics, including potential impacts from light or glare (Impact 5-2).

3.1.1 Potential Effects and Rationale Supporting Finding

The Project will reconfigure the existing WPWMA facility layout, including the construction of several new facilities, and as such, will result in new sources of light and glare during project construction and operation. All temporary construction lighting and permanent facility lighting will be consistent with related local regulations, which are generally intended to control and reduce impacts associated with light and glare on neighboring properties.

Impacts of new light and glare sources associated with construction are limited by their nature because they are temporary. Construction of new facilities associated with the Project will occur in phases over a period of years, after which these sources of light and glare will be removed. To the extent feasible, project construction will be limited to daytime hours, further reducing the impacts of temporary lighting, which will be less than significant.

With the construction of several new facilities, there will be a net increase in the amount of permanent lighting required. However, the WPWMA facility is in close proximity to several cities, each a considerable source of existing light. New facility lighting will not be out of scale with surrounding development and will represent an incremental increase in the total amount of lighting used in the vicinity. Impacts to day and nighttime views from light or glare would be less than significant.

3.1.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on aesthetics resulting from light or glare.

3.2 Aesthetics—Cumulative (Glare)

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on aesthetics.

3.2.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The Project will not create new cumulatively considerable aesthetic resource impacts that were not considered in the SAP EIR. The development of the SAP and other cumulative projects were estimated to create less-than-significant cumulative glare impacts, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted. Cumulative impacts from new light sources are discussed in Section 5.

3.2.2 Finding

For the foregoing reasons, the Project will have a less-than-significant cumulative impact on aesthetics from glare.

3.3 Air Quality—Mobile-Source Concentrations of Carbon Monoxide

Please refer to Draft EIR Chapter 6 for an analysis of impacts to air quality, including impacts from mobile-source concentrations of carbon monoxide (CO) (Impact 6-4).

3.3.1 Potential Effects and Rationale Supporting Finding

Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, speed, and delay. Transport of CO from offsite locations is extremely limited because, under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain meteorological conditions, CO concentrations near roadways and intersections may reach unhealthy levels at nearby sensitive land uses, such as residential units, hospitals, schools, and childcare facilities. As a result, it was recommended that CO be analyzed at the local level instead of at the regional level (Placer County 2018).

Placer County Air Pollution Control District's (PCAPCD) screening criterion for CO dispersion modeling indicate that projects emitting less than 550 pounds per day (lb/day) of CO from vehicle operation are not anticipated to exceed the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for CO (PCAPCD 2017a). Although the maximum daily CO emissions from vehicle trips on offsite roads associated with construction and operation of the Project are not anticipated to occur contemporaneously, they were conservatively summed for comparison to the PCAPCD screening criterion. Refer to the Draft EIR Table 6-13, which shows that the estimated offsite mobile-source emissions of CO for the Project will not exceed PCAPCD's screening criterion; as summed, they are far less than the threshold of significance. Therefore, CO dispersion modeling is not recommended, and the Project is not anticipated to cause a localized CO impact. This impact would be less than significant.

MRF Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented under the Project and would potentially result in changes in quantities, timing, and release locations of estimated air emissions associated with project-related construction and operations. The proposed changes would involve accelerated and expanded diversion of organic material, including the organic fraction of municipal solid waste (OFMSW), for composting in covered aerated static pile (CASP) composting systems and increased recovery and diversion of recyclables.

This accelerated diversion rate may result in a nominal increase in traffic in the near term as materials diverted from the waste stream are recovered and taken offsite. However, this increase in near-term traffic would be less than the net increase in vehicle trips associated with full buildout of the Waste Action Plan and evaluated as part of the Project. Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this air quality impact analysis, and the conclusions of the project-level analysis related to mobile-source concentrations of CO would not change.

3.3.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on air quality resulting from mobile-source concentrations of carbon monoxide.

3.4 Air Quality—Exposure of Sensitive Receptors to Toxic Air Contaminants

Please refer to Draft EIR Chapter 6 for an analysis of impacts to air quality, including impacts from exposure of sensitive receptors to toxic air contaminants (TAC) (Impact 6-5).

3.4.1 Potential Effects and Rationale Supporting Finding

Construction and operation of the Project will result in TAC emissions from the MRF, landfill, composting facility, landfill gas (LFG)-to-energy facility and flares, and fuel combustion in on- and off-road vehicles and equipment. A health risk assessment (HRA) was conducted to evaluate potential human health risks associated with exposure to pollutant concentrations resulting from net increases of project-related TAC emissions for the Project. The HRA was developed using air dispersion modeling of the project-related emissions and characterization of the resultant exposures and health risks using approved risk assessment methodology from the California Office of Environmental Health Hazard Assessment (OEHHA) (OEHHA 2015), California Air Resources Board (CARB) risk management guidance (CARB 2015), and CEQA guidelines (PCAPCD 2017a).

By plotting the risk results on the receptor grid for the Project, cancer, chronic, and acute health risks were estimated for the locations of the hypothetical maximally exposed individual at a residential location (MEIR), the maximally exposed individual at a workplace location (MEIW), and at sensitive receptors within 10 kilometers of the project site. Health risk results at the modeled point of maximum impacts (PMI) were also estimated. Risk results predicted at the MEIR, MEIW, and sensitive receptor locations for the Project are presented in Chapter 6 of the Draft EIR. Results have been compared to the PCAPCD's recommended thresholds of significance summarized as follows (PCAPCD 2017a):

- Incremental increase in cancer risk of 10 in 1 million individuals
- HIC of 1.0
- HIA of 1.0

Using the OEHHA guidance, the incremental increase in lifetime cancer risk associated with exposure to construction and operation emissions from implementation of the Project at the location of the MEIR (also the existing sensitive receptor, located approximately 2 kilometers from the facility's southeastern boundary) is predicted to be 4.7 in 1 million. The maximum incremental increase in cancer risk predicted for worker exposures at the location of the MEIW (located near the intersection of Athens Avenue and Foothills Blvd) is predicted to be 6.8 in 1 million. For specific assumptions, modeling inputs, figures, and risk results, refer to Appendix C.5 of the Draft EIR.

The HIC and HIA values estimated for the locations of maximum impact for noncancer chronic and acute exposures are all less than the PCAPCD threshold of 1.0.

No cancer, chronic, or acute thresholds have been exceeded, indicating health risk impacts for TAC emissions associated with the Project will be less than significant.

MRF Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented under the Project and would potentially result in changes in quantities, timing, and release locations of estimated project-related air emissions from construction and operations. The proposed changes would involve accelerated and expanded diversion of organic material, including OFMSW, for composting in CASP composting systems and increased recovery and diversion of recyclables. Changes may also involve addition of an enclosed building for organics receipt and processing. This accelerated diversion rate may result in a nominal increase in traffic in the near term as materials diverted from the waste stream are recovered and taken offsite. Diversion of more OFMSW from

the landfill within a faster timeframe would correspond to a near-term (next 10 years) reduction in LFG production, and reduced emissions of fugitive LFG and the associated TACs.

The PCAPCD has issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system that may require permitting by the PCAPCD as a stationary source. As the permitting process is undertaken, the WPWMA facility would continue to comply with applicable regulatory and permitting requirements. Under PCAPCD Rule 513 ("Toxics New Source Review"), all stationary sources that have the potential to emit TACs are required to obtain permits from PCAPCD. PCAPCD may grant permits to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures.

A project-level HRA was conducted to assess the potential for project-related TAC emissions to expose receptors to substantial health risks. The analysis found less-than-significant impacts for the Project without the MRF operations design changes. To evaluate the MRF operations design changes, TAC emissions for stationary sources that would change to meet the accelerated and expanded demand for OFMSW processing and CASP composting may need to be evaluated at the time of air permitting. If the facility changes would emit TACs in excess of PCAPCD's standard of significance for TACs, the sources would have to implement Best Available Control Technology (BACT) to reduce the TAC emissions.

3.4.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on air quality resulting from exposure of sensitive receptors to TACs.

3.5 Air Quality—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on air quality.

3.5.1 Potential Effects and Rationale Supporting Finding

The Project will not create new cumulatively considerable CO impacts that were not considered in the SAP EIR. Therefore, cumulative air quality impacts for mobile-source concentrations of CO 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.

3.5.2 Finding

For the foregoing reasons, the cumulative generation of mobile-source CO emission concentrations are less than significant.

3.6 Biological Resources—Interference with Wildlife Movement Corridors

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including from interference with wildlife movement corridors (Impact 7-6).

3.6.1 Potential Effects and Rationale Supporting Finding

Wildlife movement corridors are features that provide connections between two or more areas of habitat that will otherwise be isolated. Often drainages, creeks, or riparian areas are used by wildlife as movement corridors, as these features can provide cover and access across a landscape. Movement corridors can include dispersal corridors between populations that allow genetic exchange within a metapopulation; corridors

used for daily movements between areas that provide different habitat functions (for example, between areas that provide thermal cover and hiding cover and areas used for foraging and obtaining water); and migratory routes used for seasonal migrations between summer and winter ranges. There are no established migratory routes and no riparian corridors through the proposed project area that are vital for the movement of any resident or migratory fish or wildlife species or population. Implementation of the Project will not substantially interfere with the seasonal migration of any species. Therefore, this impact will be less than significant.

3.6.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on biological resources resulting from interference with wildlife movement corridors.

3.7 Biological Resources—Conflicts with an Adopted HCP, NCCP, or Other Approved Local, Regional, or State Habitat Conservation Plan

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including conflicts with an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan (Impact 7-8).

3.7.1 Potential Effects and Rationale Supporting Finding

The project site is within the boundaries of the approved Placer County Conservation Program (PCCP) HCP and NCCP, and the WPWMA proposes to implement the Project as a Covered Activity, consistent with the PCCP. There are no other adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plans. Therefore, there will be no impact.

3.7.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on biological resources resulting from conflicts with an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

3.8 Biological Resources—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on biological resources.

3.8.1 Potential Effects and Rationale Supporting Finding

Less-than-significant cumulative biological resource impacts identified in the SAP EIR included loss of special-status plant and fish species, loss of elderberry longhorn beetle, loss or degradation of riparian habitat, interference with wildlife movement, loss of wildlife nursery sites, conflicts with local policies protecting biological resources, and conflicts with an adopted Habitat Conservation Plan. The Project will 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 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.

3.8.2 Finding

For the foregoing reasons, the Project will have less-than-significant cumulative biological resource impacts.

3.9 Cultural Resources—Disturbance of Historic Resources

Please refer to Draft EIR Chapter 8 for an analysis of impacts to cultural and tribal cultural resources, including from disturbance of historic resources (Impact 8-1).

3.9.1 Potential Effects and Rationale Supporting Finding

The records search and pedestrian survey revealed two historical resources in the Area of Potential Effects (APE): a segment of Fiddyment Road (P-31-001422) and a segment of the Pacific Gas & Electric Company (PG&E) Rio Oso-Hurley/Rio Oso-Tesla Transmission Line (P-31-005857). These sites do not appear to meet the criteria for the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) and are therefore not considered to be significant for the purposes of CEQA. In addition, the pedestrian survey did not reveal any additional historical sites. Therefore, the APE does not contain any historical resources that will be considered significant for the purposes of CEQA. The Project will have no impact to historical resources.

3.9.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on cultural and tribal cultural resources resulting from disturbance of historic resources.

3.10 Cultural and Tribal Resources—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on cultural and tribal resources.

3.10.1 Potential Effects and Rationale Supporting Finding

The SAP EIR concluded that because no specific Tribal Cultural Resources (TCRs) have been identified within the SAP area, and mitigation measures were identified in the EIR that will minimize impacts to any discovered TCRs, the development of the SAP and other cumulative projects will result in less-than-significant impacts on TCRs. The SAP EIR further concluded that with implementation of SAP Policies CR-1.1, 1.5, 1.6, and 1.7, and Mitigation Measure 4.5-1b, as well as compliance with *Health and Safety Code* Sections 7050.5 and 7052, and PRC Section 5097, adverse effects on known archaeological resources, potentially newly discovered archaeological resources, and human remains will be less than significant.

The Project will not create new cumulatively considerable cultural resource impacts that were not considered in the SAP EIR. No significant cultural, archaeological, or historical resources or TCRs were identified on the project site during cultural resource surveys. Therefore, cumulative cultural 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.

3.10.2 Finding

For the foregoing reasons, the Project will have less-than-significant cumulative cultural and tribal cultural resource impacts.

3.11 Geology, Soils, and Paleontological Resources—Seismic Activity

Please refer to Draft EIR Chapter 9 for an analysis of impacts to geology, soils, and paleontological resources, including impacts from seismic activity (Impact 9-1).

3.11.1 Potential Effects and Rationale Supporting Finding

Sitewide

The Project is not located within an Alquist-Priolo earthquake fault zone (California Geological Survey [CGS] 2018), and there are no known active faults located within the project site (Idriss 2001, as referenced in Golder 2017a). The nearest active faults are the Spenceville fault and Mysterious Ridge segment, which are located 13 miles east and 27 miles west, respectively. These two faults represent the primary sources of potential seismic shaking at the site. A major seismic event on either of these faults is not expected to result in significant ground motion (less than 0.15 g, corresponding to strong perceived shaking and light potential damage) (Idriss 2001, as referenced in Golder 2017a). Furthermore, the western and central parts of Placer County generally experience low seismicity (Placer County 1994). The Project will be required to be designed and constructed in accordance with the current *California Building Standards Code* (CBC), which contains specifications to minimize adverse effects on structures caused by ground shaking from earthquakes and to minimize secondary seismic hazards (such as ground lurching and liquefaction).

The Project is not expected to experience a ground rupture or strong seismic ground shaking because of a known earthquake fault. Because the solid waste management project facilities, including complementary and programmatic elements, will be designed in conformance with CBC building requirements, if the site did experience a large seismic event, impacts will result in minimal adverse impacts. Thus, implementation of the proposed project will not directly or indirectly expose people or structures to substantial adverse effects related to seismic hazards, including the risk of loss, injury, or death involving these events. This impact will be less than significant.

The sandy clay and silty sand deposits at the project site are generally classified as nonliquefiable, based on site-specific geotechnical laboratory testing. The site-specific geotechnical testing also indicated liquefaction potential of sand deposits at the project site is negligible (Golder 2017a). No areas indicating liquefaction potential have been delineated at the project site (Figure 9-4, of the Draft EIR). Therefore, the project site is not expected to experience liquefaction, and the proposed project will not directly or indirectly expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving a liquefaction event. Therefore, this impact will be less than significant.

Landfill Expansion

Because of the project site's relatively flat terrain, landslides are not a concern for most of the solid waste elements and for all of the complementary and programmatic elements. However, the operation of a landfill includes the establishment of artificial slopes that can become unstable if not properly designed. This instability can occur along cut slopes, interim refuse fill slopes, soil stockpile slopes, and final cover slopes.

During the design of individual landfill modules, the interim refuse fill slopes are evaluated for stability. This includes the submittal of an engineering design report to the regulatory agencies for review and approval. The engineering design report presents a maximum interim refuse fill plan with supporting slope stability calculations that consider static and dynamic loading conditions. A similar slope stability analysis is conducted for proposed soil stockpiles to prevent the slopes of the stockpiles from failing.

Implementation of the Project will include the construction of a new Class II or III landfill on the western property that will create artificial slopes similar to those evaluated at the WRSL. The Project will be required to conform to design requirements in Title 27, Section 20250, for Class II landfills or Title 27, Section 20370, Seismic Design for Class III landfills, which requires that Class II landfills be designed to withstand the maximum probable earthquake (MPE) without damage to the foundation or to the structures that control leachate, surface drainage, erosion, or landfill gas. In addition, Title 27 requires the preparation of a stability analysis prior to landfill module construction activities. This stability analysis will include the preparation of an engineering design report that will evaluate slope stability and identify appropriate slope angles for the

cut slopes, interim refuse fill slopes, soil stockpile slopes, and final cover slopes. Because the slopes associated with the new landfill will be required by Title 27 to be designed to be stable, the new landfill will not be expected directly or indirectly to cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic activity. This impact will be less than significant.

3.11.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on geology, soils, and paleontological resources resulting from with seismic activity.

3.12 Geology, Soils, and Paleontological Resources—Soil Loss or Erosion

Please refer to Draft EIR Chapter 9 for an analysis of impacts to geology, soils, and paleontological resources, including impacts from the potential for soil loss or erosion (Impact 9-2).

3.12.1 Potential Effects and Rationale Supporting Finding

Landfill Expansion

The existing Stormwater Pollution Prevention Plan (SWPPP) identifies best management practices (BMPs) that are required to be implemented at the WRSL (MBI 2015). Most areas of the project site are relatively flat with natural slopes ranging up to 9 percent with limited erosion potential. However constructed slopes associated with the engineered landfill part of the site are significantly greater, ranging up to 35 percent for the final cover, as indicated by the topographic map on Figure 9-1 of the Draft EIR. As described by Golder (2017a), erosion and soil loss at the landfill are controlled through a system of engineered controls and practices. These practices will be required to be implemented at the Project's expanded landfill.

The erosion potential associated with existing landfill operations was also considered when developing the site's storm water management system and BMPs described in the SWPPP. The components of the SWPPP are described in further detail in Chapter 12, Hydrology and Water Quality, of the Draft EIR. The SWPPP will be required to be updated to include specific measures and stormwater system designs applicable to the expanded landfill on the western property associated with the Project. Because erosion associated with the landfill expansion element will be temporary and controlled through the use of BMPs, impacts will be less than significant.

In-Place Waste Excavation

The Project includes the excavation of existing buried waste previously placed in non-Subtitle D lined Modules 1, 2, 10, and 11 and relocating the waste to an onsite Subtitle D-compliant module. The erosion of soil and exposed, previously buried waste during excavation and relocation activities will be controlled under separate, project-specific SWPPPs (or modification to an existing SWPPP) that will include BMPs to control soil and exposed waste erosion. Implementation of the BMPs will be expected to protect workers, the public, and local surface water drainages from exposure to contaminants. Construction will be temporary, and the potential for offsite soil erosion will be controlled by using the identified BMPs. Therefore, soil erosion associated with the excavation and reburial of existing waste will be considered a less-than-significant impact.

Complementary and Programmatic Elements

In addition to solid waste elements, complementary and programmatic elements may be developed on WPWMA properties. Construction activities associated with the project-level complementary elements include excavating for utilities and building foundations and grading for internal roadways and parking lots. These construction activities have the potential to cause soil erosion or result in loss of topsoil. The proposed

complementary elements included in this Project will require a project-specific SWPPP that will include BMPs to control soil erosion. Construction activities associated with the buildout of project-level complementary elements will be temporary, and the potential for offsite soil erosion will be controlled by using the previously described BMPs. Therefore, construction of the project-level complementary elements will have a less-than-significant impact on soil erosion.

Buildout of the programmatic elements involve the same construction activities identified for the project level. Construction of the additional programmatic elements (1.6 million square feet) will also require separate, project-specific SWPPPs for each project. Therefore, construction of the program level of complementary and programmatic elements will have a less-than-significant impact on soil erosion.

3.12.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on geology, soils, and paleontological resources resulting from the potential for soil loss or erosion.

3.13 Geology, Soils, and Paleontological Resources—Unstable Soils

Please refer to Draft EIR Chapter 9 for an analysis of impacts to geology, soils, and paleontological resources, including those from unstable soils (Impact 9-3).

3.13.1 Potential Effects and Rationale Supporting Finding

Sitewide

The project site is not located on a geologic unit or soil that is unstable. The project elements will not be exposed to hazards such as onsite or offsite landslides, surface ruptures, ground failures, liquefaction, or collapse that will contribute to unstable conditions. Factors affecting soil stability include soil saturation and slope. Given the depth to groundwater of approximately 90 feet below ground surface at the site, soil saturation from rising groundwater is not expected to adversely affect soil stability. Given the relatively flat slopes of the native surface soils and the requirement that the project elements be constructed consistent with the CBC and any applicable building permit requirements, the solid waste and complementary and programmatic elements, excluding the landfill discussed in the following section, will not be expected to be affected by unstable soils.

Landfill Expansion

Implementation of the Project will include the construction of a new landfill on the western property that will create artificial slopes similar to those evaluated at the WRSL. Title 27 requires the preparation of a stability analysis prior to landfill module construction activities. This stability analysis will include the preparation of an engineering design report for the new western landfill that will evaluate slope stability and identify appropriate slope angles for the cut slopes, interim refuse fill slopes, soil stockpile slopes, and final cover slopes. Because the slopes associated with the new landfill will be required by Title 27 to be designed to be stable, the new landfill is not expected to result in unstable soil conditions, and this impact will be less than significant.

3.13.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on geology and soils resulting from unstable soils.

3.14 Geology, Soils, and Paleontological Resources—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on geology, soils, and paleontological resources.

3.14.1 Potential Effects and Rationale Supporting Finding

Project impacts related to geology, soils, seismicity, and groundwater are site-specific and will not generally combine with related impacts of other projects to create cumulatively considerable impacts. The SAP EIR acknowledged that the cumulative development area is characterized by limited topographic relief and variation. All projects within the SAP larger than 1 acre, including the Project, will be required to comply with the National Pollution Discharge Elimination System Construction General Permit. Additionally, projects will be required to comply with standard engineering practices and applicable regulations regarding building within areas containing expansive soils. The SAP EIR concluded that cumulative development will not change the availability of mineral resources or contribute to a regional cumulative loss of paleontological resources. The SAP EIR concluded that development of the SAP and other cumulative projects will result in less-than-significant cumulative impacts on geology, soils, and paleontological resources.

The Project will not create new cumulatively considerable geology, soils, and paleontological resource impacts that were not considered in the SAP EIR. The 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.

3.14.2 Finding

For the foregoing reasons, the Project will have less-than-significant cumulative impacts on geology, soils, and paleontological resources.

3.15 Greenhouse Gas Emissions and Climate Change—Consistency with Applicable Plans, Policies, or Regulations Adopted to Reduce Greenhouse Gas Emissions

Please refer to Draft EIR Chapter 10 for an analysis of impacts to greenhouse gas emissions and climate change, including impacts from consistency with applicable plans, policies, or regulations adopted to reduce greenhouse gas (GHG) emissions (Impact 10-2).

3.15.1 Potential Effects and Rationale Supporting Finding

Federal and state laws and regulations have resulted in plans and policies to reduce GHG emissions from the waste management sector. The Project will integrate and support the goals and directives of federal and state plans and policies, including the following:

- Increasing diversion of organics and other recyclable commodities from landfills
- Increasing use of alternative technologies, such as ASP composting
- Reducing volumes of waste landfilled
- Expanding the current waste management infrastructure to accommodate the increases in recycling and remanufacturing of waste materials to meet goals, including co-location of new waste treatment facilities at existing waste sites to minimize permitting issues and environmental impacts

- Implementing BMPs at landfills, including specific requirements for LFG collection system design and construction, landfill unit and cell design and construction, waste placement methods, daily and intermediate cover materials and practices, use of compost or other biologically active materials in cover soils, and organic materials management

Accordingly, the following discussion regarding project consistency with local goals and policies from the Placer County Sustainability Plan and the Placer County General Plan is provided for informational purposes only.

Construction and operation of the Project will be consistent with the Placer County General Plan, which was originally adopted in 1994 and last updated in 2013. The General Plan includes several policies related to addressing GHG emissions and climate change in Placer County, including implementation of building and operational energy efficiency programs, traffic demand management, and water-efficient landscaping (Placer County 2013). Project proponents are encouraged to consult with the County early in the planning process regarding Countywide indirect and areawide source programs and transportation control measure programs. The Project includes measures to reduce GHG emissions and promote energy efficiency and is therefore consistent with this General Plan policy.

The Placer County Sustainability Plan, adopted in January 2020, includes voluntary goals that include working with WPWMA to find funding, provide public education, support compliance with state laws and regulations, and evaluate feasible approaches to meet aspirational goals for methane capture and transition to vehicles and haul trucks that will use low-carbon fuels and electricity. The Placer County Sustainability Plan forecasts Countywide GHG emissions from solid waste at 190,910 metric tons (MT) carbon dioxide equivalent (CO_2e) per year (Placer County 2020a). Estimates of project-related GHG missions for the Project are higher than the Countywide solid waste GHG estimates in the sustainability plan, but it is not accurate to compare the two GHG emission inventories, because of differences in assumptions and calculation methods. Therefore, the Project will result in less-than-significant impacts.

Material Recovery Facility Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented and would potentially result in changes in quantities, timing, and release locations of estimated project-related GHG emissions from construction and operations. The proposed changes would involve facility improvements to accommodate accelerated and expanded diversion of organic material, including OFMSW, for composting in CASP composting systems and increased recovery and diversion of recyclables. Changes may also involve the addition of an enclosed building for organics receipt and processing.

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of the analysis of project consistency with applicable plans, policies, and regulations for GHG reductions, and the conclusions of the project-level analysis related to GHG emissions would not change.

3.15.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on greenhouse gas emissions and climate change resulting from consistency with applicable plans, policies, or regulations adopted to reduce GHG emissions.

3.16 Hazards, Hazardous Materials, and Wildfire—Potential for Solid Waste Operating Activities to Release Hazardous Materials into the Environment

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire,

including impacts from the potential for solid waste operating activities to release hazardous materials into the environment (Impact 11-2).

3.16.1 Potential Effects and Rationale Supporting Finding

The Project will continue to operate in conformance with the facility's permit conditions and will implement additional practices to minimize the potential for hazardous wastes to commingle with solid waste loads through the placement of signage and through a load-checking program. Project personnel will continue to implement visual inspections at the scale house for obvious items that may be hazardous and that are not accepted at the site or should be directed to the household hazardous waste (HHW) facility. The Project will continue to implement the load-checking program at the MRF and WRSL. Self-haul vehicles going to the MRF, public waste drop-off area, organics management area, or construction and demolition (C&D) processing area will be screened at one of the scale house areas. The load-checking program is intended to identify and remove hazardous and otherwise prohibited wastes from the waste stream prior to disposal. Because the Project will continue to operate in compliance with solid waste permitting requirements, Title 22 State regulations, and will also continue to implement practices such as the load-checking program, impacts from the proposed project are less than significant.

3.16.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hazards, hazardous materials, and wildfire resulting from the potential for solid waste operating activities to release hazardous materials into the environment.

3.17 Hazards, Hazardous Materials, and Wildfire—Risk of Wildfire

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including impacts from the risk of wildfires (Impact 11-6).

3.17.1 Potential Effects and Rationale Supporting Finding

Sitewide

Areas at risk for wildfires are designated by California Department of Forestry and Fire (CalFire) and include lands with characteristics of dense vegetation where severe burning potential is present. There are no lands in the vicinity of the Project that are categorized by Placer County or CalFire as either (1) wildland areas that may contain substantial forest fire risks and hazards (wildland areas or SRA), or (2) very-high-fire-hazard severity zones. As described in the Placer County Local Hazard Mitigation Plan (LHMP) Update, parts of the site are located within a moderate fire hazard zone, and the project area is at risk to smaller grassfires, especially during the dry, hot summers. To minimize hazards associated with potential grassfires, the WPWMA implements practices of vegetation clearing, storage of water nearby vegetated areas, and stockpiling soil that can be used to extinguish small grass fires. In addition, fire safety practices onsite will be implemented in accordance with California Division of Occupational Safety and Health (Cal/OSHA) standards as discussed in Section 11.2.2 of the Draft EIR. Cal/OSHA requires mandatory site safety plans that may include emergency response and fire prevention plan preparation.

Because the Project will comply with Cal/OSHA fire standards and will implement the WPWMA's Emergency Response and Contingency Plan, including practices that minimize wildfire hazards, people or structures will not be subject to the risk of loss, injury, or death involving wildland fires, and impacts will be less than significant.

The Project includes the construction or expansion of structures and infrastructure at the site. Solid waste material contains combustible components and the operation of solid waste facilities can result in fire risks.

The introduction of new or expanded structures and the expansion of solid waste operations at the site could increase this risk.

However, operating procedures and design features at the facility greatly reduce the potential for fire to be started at the site and to spread onto adjacent grasslands. These operating procedures include the application of daily and interim cover at the landfill; implementation of a hazardous waste screening program; implementation of an equipment maintenance program; and implementation of design, safety, training, and reporting measures specified in the facility's hazardous materials management plan. In addition, the potential for onsite fire to spread to adjacent grasslands is reduced by the availability of stored water, stockpiled soil, an engineered fire suppression system in the MRF building, and equipment on the site that can be used to extinguish or contain small fires, as well as the maintenance of firebreaks. For these reasons, the expanded solid waste facilities are not expected to exacerbate wildfire risk or result in temporary or ongoing impacts to the environment.

Additionally, the Project will not expose people or structures to significant risks resulting from downslope or downstream flooding or landslides from runoff, post-fire slope instability, or drainage changes. The Project will implement project-specific SWPPPs that will include BMPs to prevent runoff or flooding that could alter or otherwise affect existing drainage patterns. The potential for post-fire instability resulting in downslope runoff and flooding will be low. Therefore, implementation of the Project's solid waste elements will have a less-than-significant impact on wildfire risk.

Complementary and Programmatic Elements

In addition to solid waste elements, complementary and programmatic elements may be developed on the WPWMA's properties. Development of the complementary and programmatic elements will be subject to the CCR Fire Code. The Fire Code contains regulations relating to construction, maintenance, and use of buildings and provides guidance on emergency access, access gates, sprinkler systems, fire alarms within buildings, and construction of access roads to accommodate fire responders. Compliance with these regulations will substantially reduce the potential that the complementary elements will contribute to wildland fire risks. For these reasons, and the fact that the project site is not located within a wildland area that may contain substantial wildfire risks and hazards or a very-high-fire-hazard severity zone, the risk of wildfires associated with the complementary elements will be less than significant.

3.17.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hazards, hazardous materials, and wildfire resulting from the risk of wildfires.

3.18 Hazards, Hazardous Materials, and Wildfire—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on hazards, hazardous materials, and wildfire.

3.18.1 Potential Effects and Rationale Supporting Finding

The SAP EIR concluded that hazards associated with development of the SAP and other cumulative projects will be local and will have no potential to contribute to cumulative hazardous conditions. Future development in the region will be subject to contemporary safety and hazardous materials controls, as set forth in the numerous regulations that control the use of potentially hazardous materials. The development of the SAP and other cumulative projects was estimated to create less-than-significant cumulative hazard and hazardous materials impacts.

The Project will not create new cumulatively considerable hazards impacts that were not considered in the SAP EIR. The 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 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 Project will result in no cumulative impacts on wildfire.

3.18.2 Finding

For the foregoing reasons, the Project will have a less-than significant cumulative impacts on hazards, hazardous materials, and wildfire.

3.19 Hydrology and Water Quality—Potential for Solid Waste Project Elements to Violate Water Quality Standards or Substantially Degrade Surface Water Quality

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including impacts from the potential for solid waste project elements to violate water quality standards or substantially degrade surface water quality (Impact 12-1).

3.19.1 Potential Effects and Rationale Supporting Finding

Surface Water Quality

Implementation of the Project will involve construction activities, including clearing, grading, stockpiling, and excavation. These activities have the potential to increase runoff because of temporary changes to surface contours. Sediment transport from construction work areas to adjacent water resources could contribute to water quality degradation. The erosion potential ranges from low to high: where work will occur in areas with flat to gentle sloping terrain, the erosion potential is low, but where work will occur on sloping terrain, including the landfill, the erosion potential is high. Therefore, the Project will expand coverage for construction and operational activities under the existing Industrial General Permit (IGP) SWPPP to control impacts associated with stormwater runoff.

The surface water flows at the WPWMA facility are actively managed and monitored under the existing SWPPP (MBI 2015) issued for the WRSL and MRF in accordance with the State Water Resources Control Board's (SWRCB) General Permit for Storm Water Discharges Associated with Industrial Activities, IGP Order No. 2014-0057-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000001 adopted by SWRCB.

Under the Project, the existing SWPPP will be modified and implemented for each site covered by the permit, including the WRSL, MRF, composting, and other facilities. The SWPPP will include BMPs designed to prevent construction pollutants from contacting stormwater and to keep products of erosion from moving offsite into receiving waters throughout construction and the life of the Project. The BMPs will also address source control and, if necessary, pollutant control. The Project could potentially entail a diversion of OFMSW to aerated static pile composting. However, impacts associated with any changes in the increased diversion and processing of OFMSW would be negligible, because the volume of water discharged from the site would not increase, and changes would be covered in an amended IGP SWPPP.

In addition to SWPPP implementation at the landfill, Title 27 includes requirements for Water Monitoring in Subchapter 3 and in Section 20365, Precipitation and Drainage Controls, which require landfill units and their

respective containment structures be designed and constructed to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping. The Project will be required to continue to conform with Title 27 requirements. Therefore, with implementation of the applicable Title 27 regulations and project SWPPP, project impacts on surface water quality will be less than significant.

3.19.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential for solid waste project elements to violate water quality standards or substantially degrade surface water quality.

3.20 Hydrology and Water Quality—Potential for Solid Waste Project Elements to Violate Waste Discharge Requirements or Substantially Degrade Ground Water Quality

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including impacts from the potential for solid waste project elements to violate waste discharge requirements or substantially degrade ground water quality (Impact 12-2).

3.20.1 Potential Effects and Rationale Supporting Finding

Groundwater Quality

The WPWMA currently operates under Waste Discharge Requirement (WDR) Order No. R5-2007-0047 and Title 27 requirements for groundwater monitoring and will continue to operate in a manner consistent with these requirements under an amended WDR for the proposed expansion of solid waste project elements. Title 27 requires groundwater monitoring for Waste Disposal operations. WDR Order No. R5-2007-0047 requires that groundwater monitoring at the WPWMA facility be performed on a quarterly basis at the WRSL in accordance with the Monitoring and Reporting Program, including implementing the established groundwater detection monitoring and corrective action programs to identify, evaluate, and mitigate changes and groundwater quality. The existing groundwater monitoring program has detected volatile organic compounds that may be associated with LFG or migrating leachate, or both. The Project involves removing waste in the closed, pre-Subtitle D-lined, landfill and putting it in a lined cell, eliminating the potential for LFG migration for that section of the landfill. The Project provides potential improvement in groundwater quality by removing an ongoing source of contamination. Therefore, project impacts are less than significant.

3.20.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential for solid waste project elements to violate waste discharge requirements or substantially degrade ground water quality.

3.21 Hydrology and Water Quality—Potential for Programmatic Elements to Degrade Water Quality

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including from the potential for programmatic elements to degrade water quality (Impact 12-4).

3.21.1 Potential Effects and Rationale Supporting Finding

In addition to solid waste elements, complementary and programmatic elements may be developed on the WPWMA's properties. Construction activities associated with the project level of complementary elements include clearing, grading, stockpiling, and excavation. These activities have the potential to increase runoff because of temporary changes to surface contours. The complementary elements included in the Project will obtain coverage for construction and operational activities under the Construction General Permit (CGP) and implement an SWPPP (or site-specific SWPPPs) to control impacts associated with stormwater runoff. Therefore, construction of the project level of complementary elements will have a less-than-significant impact on water quality.

Buildout of the programmatic elements involve the same construction activities identified for the project level. Construction of the additional programmatic elements will also require separate, project-specific SWPPPs for each project. The site-specific SWPPPs will include BMPs designed to prevent construction pollutants from contacting stormwater and to keep products of erosion from moving offsite into receiving waters throughout construction and the life of the Project. The BMPs will also address source control and, if necessary, pollutant control. Therefore, the impact associated with the potential to violate water quality standards or WDRs or otherwise substantially degrade surface water or groundwater quality for the complementary and programmatic elements of the proposed project will be less than significant**.**

3.21.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential for programmatic elements to degrade water quality.

3.22 Hydrology and Water Quality—Potential to Decrease Groundwater Supplies or Interfere with Groundwater Recharge

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including from the potential to decrease groundwater supplies or interfere with groundwater recharge (Impact 12-5).

3.22.1 Potential Effects and Rationale Supporting Finding

The use of water on the Project will increase during construction activities for dust control; however, the WPWMA does not intend to use groundwater for this activity. The WPWMA also does not anticipate increasing groundwater use over the long-term, except as noted in Section 12.1.3 of the Draft EIR regarding a possible seasonal groundwater pump-and-treat system, to support expansion of the landfill and associated operations, such as soil and waste compaction and vegetative landfill cover watering. The WPWMA plans to supplement the current groundwater supply with alternative sources of water; for example, the WPWMA intends to use recycled water currently available from the City of Lincoln's Wastewater Treatment Plant and piped to the intersection of Athens Avenue and Fiddyment Road, where it is used for agricultural purposes. The WPWMA will continue to use groundwater at operational levels to support its operations. With implementation of an expanded groundwater monitoring program, including wells located at the project perimeter, the WPWMA will monitor their use and impact on groundwater levels in the surrounding area.

There is potential for groundwater recharge to be reduced because of an increase in area of impervious surfaces associated with expansion of the organics management operation, construction and demolition materials processing operation, and public waste drop-off area operations. Expansion of the landfill disposal capacity development and development of the complementary and programmatic elements over areas currently covered with native soil will also reduce the area available for infiltration of surface water to recharge groundwater. The site is underlain by mostly fine-grained silts and clays that do not facilitate percolation of large quantities of water for groundwater recharge and, thus, the project site is not considered

a significant groundwater recharge area compared with the recharge that occurs via surface water drainages in the area. Groundwater recharge is not anticipated to significantly decrease such that sustainable groundwater management will be impeded.

Although the Project components, including complementary and programmatic elements, may result in increased impervious surfaces, the potential impact on groundwater recharge resulting from the increase in the extent of impervious surfaces would be minimized by the incorporation of the Low-Impact Development (LID) Manual measures that allow infiltration of stormwater onsite in conformance with SAP Policy LU/ED-3.12: Impervious Surfaces/Low-Impact Development. Under this policy, the County requires that all new discretionary development be designed in accordance with the LID Manual to incorporate site design measures and LID features to infiltrate runoff from impervious surfaces.

Because the Project is not anticipated to interfere with groundwater supply or recharge, impacts associated with implementation of the Project are less than significant.

3.22.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential to decrease groundwater supplies or interfere with groundwater recharge.

3.23 Hydrology and Water Quality—Potential to Increase Runoff and Localized or Downstream Flooding

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including from the potential to increase runoff and localized or downstream flooding (Impact 12-6).

3.23.1 Potential Effects and Rationale Supporting Finding

The surface water flows at the WPWMA facility are actively managed by using an engineered stormwater management system, including engineered paved areas and landscaped areas to prevent erosion; unlined and lined swales, pipes, and other drainage conveyance features; and sedimentation basins, water detention ponds, and other stormwater collection features. Stormwater monitoring is conducted at the WRSL and MRF under the SWPPP (MBI 2015) in accordance with the SWRCB's General Permit for Storm Water Discharges Associated with Industrial Activities, IGP Order No. 2014-0057-DWQ, NPDES General Permit No. CAS000001 adopted by SWRCB.

The Project will obtain coverage for construction activities by amending the existing IGP SWPPP or obtaining coverage under the CGP and implementing a SWPPP (or site-specific SWPPPs) to control impacts associated with stormwater runoff. In addition to the project SWPPPs, Title 27 regulations require that landfill units and their respective containment structures be designed and constructed to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping. With implementation of the applicable laws and regulations, the Project will not result in substantial erosion or siltation onsite or offsite.

The Project is not located in a 100-year floodplain or designated flood hazard zone. In addition to implementation of the SWPPP and Title 27 measures described earlier, although the Project will result in increased area of impervious surfaces, runoff will be minimized by the incorporation of the LID Manual measures; therefore, the Project will not result in a substantial increase in the rate or amount of surface runoff in a manner that will result in flooding onsite or offsite.

Furthermore, the SAP storm drain system will be designed to accommodate buildout stormwater conveyance, so that new development within the SAP area will not generate runoff that exceeds the capacity of the

system's ability to handle. Therefore, the Project will not create or contribute runoff water that will exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Because the Project is not located within a 100-year floodplain or designated flood hazard zone, the Project will not impede or redirect flood flows, as measures from the SWPPP, Title 27 measures, and incorporation of LID measures will minimize runoff from the site.

Thus, implementation of all applicable laws and regulations will mean that impacts are less than significant.

3.23.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential to increase runoff and localized or downstream flooding.

3.24 Hydrology and Water Quality—Potential Conflicts with Applicable Water Quality Control Plan

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including impacts from potential conflicts with an applicable water quality control plan (Impact 12-7).

3.24.1 Potential Effects and Rationale Supporting Finding

The Central Valley Regional Water Quality Control Board (CVRWQCB_ adopted the Water Quality Control Plan for the Sacramento and San Joaquin Basin (Basin Plan) of 2018. According to the Basin Plan, the project area is within municipal and domestic water supply beneficial use designations for surface water by CVRWQCB. The Basin Plan requires that these uses be protected by implementing water discharge requirements and permits, including NPDES permits.

The Project will result in a less-than-significant impact on water quality because of implementation of project SWPPPs, compliance with Title 27 regulations, and expanded environmental monitoring systems. Thus, implementation of all applicable laws and regulations described earlier will mean that the project-level solid waste management and complementary and programmatic elements of the Project will not conflict with or obstruct implementation of the Basin Plan.

3.24.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from potential conflicts with an applicable water quality control plan.

3.25 Hydrology and Water Quality—Potential for Waste Excavation and Relocation to Conflict with or Obstruct Implementation of a Water Quality Control Plan

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including from the potential for waste excavation and relocation to conflict with or obstruct implementation of a water quality control plan (Impact 12-8).

3.25.1 Potential Effects and Rationale Supporting Finding

The surface water flows at the WPWMA facility are actively managed by using an engineered stormwater management system, including engineered paved areas and landscaped areas to prevent erosion; unlined and

lined swales, pipes, and other drainage conveyance features; and sedimentation basins, water detention ponds, and other stormwater collection features. Stormwater monitoring is conducted at the WRSL and MRF under the SWPPP (MBI 2015) in accordance with the SWRCB's General Permit for Storm Water Discharges Associated with Industrial Activities, IGP Order No. 2014-0057-DWQ, NPDES General Permit No. CAS000001 adopted by SWRCB. Leachate, unsaturated zone, and groundwater monitoring are implemented regularly at the WRSL under the WDRs, which include a groundwater detection monitoring program and groundwater Corrective Action Program (CAP).

The Project includes excavation and relocation of existing solid waste. Implementation of the Project will substantially alter existing drainage patterns, temporarily increase areas of exposed waste, and alter groundwater recharge patterns and locations associated with the waste excavation and relocation component of the proposed project. Exposure of waste to precipitation and surface water runoff during waste excavation and relocation has the potential to affect surface water quality directly and groundwater quality indirectly through infiltration of surface water affected by exposure to waste. Therefore, the Project will maintain and expand coverage under the existing IGP SWPPP for the waste excavation and relocation activities. With implementation of measures in a SWPPP for waste excavation and relocation activities, impacts will be less than significant.

3.25.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on hydrology and water quality resulting from the potential for waste excavation and relocation to conflict with or obstruct implementation of a water quality control plan.

3.26 Hydrology and Water Quality—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on hydrology and water quality.

3.26.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. Cumulative development will increase regional stormwater runoff and the potential for downstream flooding. However, projects will be required to comply with the CVRWQCB, Placer County, and municipal stormwater regulations and ordinances. Therefore, these impacts will not be cumulatively considerable. Because most new developments, including those within the SAP and other cumulative projects, will be served primarily by surface water, development will not cumulatively contribute to groundwater depletion or recharge. Similar to stormwater runoff impacts, the cumulative water quality impacts associated with both construction and post-construction operations will be minimized through the implementation of regulatory water quality protection measures. Therefore, development of the SAP and other cumulative projects will not contribute considerably to a significant cumulative impact related to water quality. Cumulative development projects will be required to meet existing mitigation standards to prevent an increase in 100-year flood flows and will be subject to federal and County floodplain protection regulations.

The Project will not create new cumulatively considerable hydrology or water quality impacts that were not considered in the SAP EIR. The 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.

3.26.2 Finding

For the foregoing reasons, the Project will have a less-than significant impact on cumulative hydrology and water quality.

3.27 Land Use and Planning—Physically Divide an Established Community

Please refer to Draft EIR Chapter 13 for an analysis of impacts to land use and planning, including impacts to the physical division of an established community (Impact 13-1).

3.27.1 Potential Effects and Rationale Supporting Finding

The Project is located in a rural, undeveloped area of unincorporated Placer County. An established community, the Lincoln Crossing subdivision is located approximately 2 miles northeast of the eastern property's northern boundary. The nearest established community, the Blue Oaks subdivision, is located one mile south of the eastern property's southern boundary. Although the Project will be situated between these two communities, they are located in different cities: Lincoln Crossing in the City of Lincoln and Blue Oaks in the City of Roseville. In addition, the existing and proposed uses at the site will be consistent with the site's Eco-Industrial land use and zoning designations. Therefore, the Project will not physically divide these established communities. Additionally, the SAP assumes the project site will be developed with the types of uses specifically identified in the Project. Therefore, there will be no impact.

3.27.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on land use and planning resulting from the physical division of an established community.

3.28 Land Use and Planning—Consistency with Land-Use Plans and Policies

Please refer to Draft EIR Chapter 13 for an analysis of impacts to land use and planning, including consistency with land-use plans and policies (Impact 13-2).

3.28.1 Potential Effects and Rationale Supporting Finding

The SAP is the primary plan governing land use for the project area. The Project will be located on lands both designated and zoned for Eco-Industrial use, which explicitly includes solid waste management and related practices and processes, as well as specific industrial and manufacturing uses. The SAP also includes numerous goals and policies adopted with the intention of avoiding or mitigating adverse environmental impacts, including effects to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Energy. These goals and policies are discussed within the regulatory sections of the Draft EIR in Chapters 6, 7, 8, 9, 12, 14, and 17, respectively. The Project will not conflict with these environmental protection policies and will further employ design, construction, and operations best practices consistent with these policies. The project design will be informed by Policies LU/ED-3.1, LU/ED3.2, LU/ED-3.4, and LU/ED-3.8 related to High-Quality Design, Environmentally Responsive Design, Land Alteration, and Landscaping, respectively, Also, because the Project will not include the development of new residential uses and will not expand beyond the site's long-established boundary, it will not contribute to the significant and unavoidable land-use compatibility impact identified in the SAP EIR associated with reducing the 1-mile buffer requirement for residential uses included in Placer County General Plan Policy 4.G.11. As such, the Project will 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, and there will be no impact.

3.28.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on land use and planning resulting from inconsistency with land-use plans and policies.

3.29 Land Use and Planning—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on land use and planning.

3.29.1 Potential Effects and Rationale Supporting Finding

The SAP EIR stated that development of the SAP and other cumulative projects will result in no cumulative land use impacts. The SAP will be consistent and compatible with existing and planned development, will not cause the physical division of an established community, and will not cause economic or social changes that will result in physical environmental changes. The Project will not create new cumulatively considerable land use impacts that were not considered in the SAP EIR. The 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.

3.29.2 Finding

For the foregoing reasons, the Project will have no cumulative land use and planning impacts.

3.30 Noise—Construction Activity Noise Impacts

Please refer to Draft EIR Chapter 14 for an analysis of impacts from noise, including impacts from construction activity (Impact 14-1).

3.30.1 Potential Effects and Rationale Supporting Finding

Construction activities associated with the Project will result in temporary increases in ambient noise levels within the project vicinity. Construction for buildings and the majority of the solid waste management and support facilities will include grading, clearing, and excavation associated with the site preparation phase; demolition of existing concrete pads; pouring foundations and paving; building erection; infrastructure construction; and the application of architectural coatings, in addition to other miscellaneous activities. For the landfill modules and closure activities, construction will include excavating native soil, stockpiling excavated soil, installing a composite liner, installing a leachate collection and removal system prior to the modules use for waste disposal, and eventually placing final soil cover. The *Placer County Noise Ordinance* exempts construction activities from the specified noise ordinance standards during the hours of 6:00 a.m. to 8:00 p.m., Monday through Friday, and 8:00 a.m. to 8:00 p.m., Saturday and Sunday (Section 9.36.030). Generally, if a construction project adheres to the construction times identified in the Noise Ordinance, construction noise is exempt. Because construction activities will not be expected to occur outside of these hours, construction noise associated with implementation of the Project on adjacent land uses will be considered less than significant.

The additional programmatic elements (1.6 million square feet) will use similar construction equipment and construction is similarly not expected to occur outside of the previously noted hours; thus, construction noise associated with the additional programmatic elements on adjacent land uses will be considered less than significant.

3.30.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on noise resulting from construction activity.

3.31 Noise—Exposure of Sensitive Uses to Vibrations

Please refer to Draft EIR Chapter 14 for an analysis of impacts from noise, including from exposure of sensitive users to vibrations (Impact 14-3).

3.31.1 Potential Effects and Rationale Supporting Finding

Construction activities and landfill operations have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific equipment used and operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

At the nearest sensitive receptor, the predicted vibration levels will be below the established threshold.

Therefore, construction and operation of the solid waste facilities and waste management operations will not be expected to expose offsite sensitive receptors to excessive vibration levels.

Construction vibration levels generated from the complementary and programmatic project elements will be similar to those associated with the construction of solid waste facilities at the site. Given the distance from the nearest residence, the anticipated industrial uses within the complementary and programmatic project elements are not expected to generate vibration levels that will exceed the established vibration threshold. As a result, this impact is considered less than significant.

3.31.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on noise resulting from exposure of sensitive users to vibrations.

3.32 Noise—Traffic-Generated Permanent Increases in Ambient Noise Levels

Please refer to Draft EIR Chapter 14 for an analysis of impacts from noise, including from traffic-generated permanent increases in ambient noise levels (Impact 14-4).

3.32.1 Potential Effects and Rationale Supporting Finding

The Project will increase traffic noise along local roadways used by project traffic. However, no sensitive land uses are located along Athens Avenue, Industrial Avenue, or Sunset Boulevard. Therefore, increases in traffic noise associated with implementing the proposed project on these roadways will not affect sensitive land uses, and this impact will be less than significant. Also, because of the high traffic volumes on State Route 65, the Project's contribution of additional vehicles to this roadway will be relatively negligible. Therefore, the Project will not noticeably increase traffic noise along this State highway.

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

The Project is projected to increase the current average daily vehicle trips on Fiddyment Road by approximately 8 percent, from approximately 7,920 to a total of 8,530 average daily vehicle trips. A doubling of the number of daily vehicle trips is typically required to increase noise levels by 3 dBA (Caltrans 2015). Because the Project will not be expected to double the traffic volumes on Fiddyment Road and because existing masonry sound walls are in place adjacent to the existing residences, the increase in traffic volumes associated with the Project is not expected to substantially increase traffic noise levels experienced by residences adjacent to Fiddyment Road south of the project site. Therefore, traffic noise impacts will be considered less than significant.

3.32.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on noise resulting from traffic-generated permanent increases in ambient noise levels.

3.33 Noise—Cumulative (Vibration)

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on vibration noise.

3.33.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The Project will not create new cumulatively considerable vibration noise impacts that were not considered in the SAP EIR. The Project will generate vibration noise levels consistent with the solid waste and industrial uses anticipated for the site in the SAP. Therefore, cumulative vibration noise impacts have been adequately addressed in the SAP EIR.

3.33.2 Finding

For the foregoing reasons, cumulative vibration noise impacts will be less than significant.

3.34 Public Services—Require New or Expanded Fire Protection Facilities

Please refer to Draft EIR Chapter 15 for an analysis of impacts to public services, including from the requirement for new or expanded fire protection facilities (Impact 15-1).

3.34.1 Potential Effects and Rationale Supporting Finding

Solid waste management activities at the WPWMA facility will continue and expand under the Project, resulting in the ongoing potential for fire hazards from those activities and the potential for an incremental increase in the need for fire protection as a result of expanded operation. The WPWMA's solid waste management activities assume the potential for fires to occur, and procedures are in place to reduce fire potential and fight fires onsite. However, because the WPWMA regularly uses the emergency response services of Placer County Fire Station 77, the WPWMA pays its fair share for these services. Annual payments to Placer County for fire protection services are adjusted according to changes in the California Consumer Price Index, the same methodology identified in Community Facilities District (CFD) 2012-1.

Because a mechanism is in place that provides funding for fire protection services commensurate with demand, consistent with Placer County Policy PFS-8.1, implementation of the Project will not be expected to reduce fire protection service ratios or response times. Proposed solid waste operations will not differ substantially from current operations in regard to fire protection demands. Although solid waste operations will be expanded, it could be anticipated that the partial transition from the current windrow composting process to ASP technology may result in a reduced risk of fire as a result of the reduction in pile size to less

than 12 feet (BioCycle 2004), which could offset the nominal increase from the expansion of other operations. Overall, the Project will not be expected to require the provision of new or physically altered fire protection facilities, and the WPWMA will continue to pay its fair share for fire protection services. Therefore, the expanded solid waste management activities will result in no impact on the need for new or physically altered fire protection facilities.

In addition to solid waste management activities, complementary and programmatic elements may be developed on the WPWMA's properties. The development of the project-level complementary elements will result in an increased need for fire protection at the project site. The SAP EIR determined that development within the SAP will increase the demand for fire personnel at Station 77 to maintain County service levels; however, it concluded that this new facility will not result in "unmitigable, adverse effects on the environment" (Placer County 2018). Therefore, although the Project's complementary elements may result in the need for new or physically altered governmental facilities, this new or expanded facility has already been evaluated and will not result in substantial adverse physical impacts or significant environmental impacts. The project-level complementary elements will, therefore, result in no impact.

Buildout of the programmatic elements involves the same increased need for fire protection identified for the project level. Development of the additional programmatic elements (1.6 million square feet) may also result in the need for new or physically altered governmental facilities, which has already been evaluated in the SAP EIR. Therefore, development of the program level of complementary and programmatic elements will result in no impact. The SAP EIR also concluded that future development within the SAP boundaries will serve as an ongoing revenue source to maintain fire protection and emergency response services and that SAP Policy PFS-8.1 will require new discretionary development to construct facilities or to sufficiently fund fire protection personnel, operations, and maintenance to maintain County fire protection standards (Placer County 2018). It is therefore assumed that the WPWMA will need to continue to pay its fair share for the proposed complementary and programmatic elements and their contribution to the need for expansion of Station 77 or a new fire station. This is consistent with the current agreement and will therefore result in no impact.

3.34.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on public services resulting from the requirement for new or expanded fire protection facilities.

3.35 Public Services—Require New or Expanded Law Enforcement Facilities

Please refer to Draft EIR Chapter 15 for an analysis of impacts to public services, including from the requirement of new or expanded law enforcement facilities (Impact 15-2).

3.35.1 Potential Effects and Rationale Supporting Finding

Site security is provided by the WPWMA, including controlled access and security lighting. The Project will not interfere with existing or planned emergency response plans nor diminish the ability of police service personnel to respond to emergencies, because the facility will be serviced and maintained by existing staff.

Law enforcement at the Project continue to be provided by the Placer County Sheriff's Office South Placer Substation, located in the Town of Loomis, approximately 8 miles east of the project site. Under normal traffic conditions, law enforcement take approximately 17 minutes to drive from the substation to the project site, which is 2 minutes over the Placer County General Plan established average response time in rural areas of 15 minutes. However, because of the infrequent nature of emergencies requiring law enforcement support that have occurred historically at the project site and are expected to occur in the future Project, the demand for such public service is not anticipated to increase to such an extent that the County Sheriff's average response time throughout the year would fail to meet the response time standard. An additional Placer

County Sheriff's Office would not be required to provide law enforcement services to the project site for the expanded solid waste management activities, resulting in no impact.

The development of the project-level complementary elements are anticipated to result in an increased need for law enforcement protection at the project site, and the SAP EIR indicated that additional officers will be needed to meet an increase in demand for law enforcement services associated with nonresidential uses proposed in the SAP area. However, the SAP EIR also concluded that a new substation to service the project area has been planned under the Placer Vineyards Specific Plan, the first phase of which was approved in 2017 (Placer County 2021). This substation will be designed to accommodate the additional officers required for full buildout of the SAP EIR. Therefore, it can be assumed that the project-level complementary elements will not require the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, resulting in no impact.

Buildout of the programmatic elements involve the same increased need for law enforcement protection identified for the project level. Development of the additional programmatic elements (1.6 million square feet) may also result in the need for law enforcement protection, which has already been evaluated in the SAP EIR. Therefore, development of the program level of complementary and programmatic elements will result in no impact.

3.35.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on public services resulting from the requirement for new or expanded law enforcement facilities.

3.36 Public Services—Require New or Expanded Schools and Parks

Please refer to Draft EIR Chapter 15 for an analysis of impacts to public services, including from the requirement for new or expanded schools and parks (Impact 15-3).

3.36.1 Potential Effects and Rationale Supporting Finding

Solid waste management activities at the WPWMA facility will continue and expand under the Project; however, these operations will not result in the need for new schools or parks, because the Project does not involve residential uses or induce population growth. Additional staffing required as a result of the Project is anticipated to be accommodated by existing residents or population growth planned by the regional jurisdictions.

The complementary and programmatic elements will result in new employment opportunities in the project area, which will increase demand on local schools and parks. The SAP EIR concluded that full buildout of the SAP will result in 40,804 new jobs within the SAP area (Placer County 2019). Although the expected number of jobs per acre per land use type was not included in the evaluation, averaging the total number of jobs across all commercial land use types included in the SAP (in other words, excluding the reserve land use acreage), results in approximately 11.25 jobs per acre.

Using the average of 11.25 jobs per acre, the development of the project-level complementary elements could result in up to 78 new jobs. Assuming an average Placer County household size of 2.67, these 78 new jobs could result in up to 208 new residents in the project area. Although some of the people seeking these new employment opportunities may live outside the project area, for the purposes of this analysis, it is conservatively assumed all will reside within Placer County. Up to 46 of these new residents could be school-aged children, based on an average 22.1 percent of the population being under 18 years of age (Census 2019), who are among the demographic most likely to use public parks. In accordance with the General Plan, and as discussed in the SAP EIR, 5 acres of active parks, 5 acres of passive recreation and open space or paseos, and 1 mile of trails are required per each 1,000 residents. Using these requirements, the SAP EIR concluded that

there is sufficient space within the Sunset Area to accommodate new and expanded schools and parks for the full buildout of the SAP and Placer Ranch Specific Plan (PRSP), and that environmental impacts associated with the construction of these new and expanded facilities will be less than significant. Therefore, the impacts associated with the provision of new or physically altered schools and parks associated with the proposed project-level complementary elements will also be less than significant.

Buildout of the programmatic elements is assumed to involve the same increase in jobs per acre described for the project-level elements. Development of the additional programmatic elements (1.6 million square feet) may therefore result in up to 414 new jobs, which could result in an increase of up to 1,104 residents and 244 school-aged children in the area, using the same household size and percentage of the population under 18 noted previously (Census 2019). This population increase will exceed the 1,000-resident threshold requiring 5 acres of active parks, 5 acres of passive recreation and open space or paseos, and 1 mile of trails. However, the SAP EIR concluded that there is sufficient space within the Sunset Area to accommodate new and expanded schools and parks for full a buildout of the SAP and PRSP, and that environmental impacts associated with the construction of these new and expanded facilities will be less than significant. Therefore, the impacts associated with the provision of new or physically altered schools and parks associated with the programmatic elements will also be less than significant.

Overall, impacts related to schools and parks will be less than significant.

3.36.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on public services resulting from the requirement for new or expanded schools and parks.

3.37 Public Services—Require New or Expanded Roadway Maintenance

Please refer to Draft EIR Chapter 15 for an analysis of impacts to public services, including from the requirement for new or expanded roadway maintenance (Impact 15-4).

3.37.1 Potential Effects and Rationale Supporting Finding

Solid waste management activities at the WPWMA facility will continue and expand under the Project, which will result in an increased use of local roadways and a corresponding need for increased road maintenance. However, the WPWMA has a mechanism in place with the Placer County Department of Public Works to provide proper road maintenance and improvements on Athens Avenue. That mechanism will remain in place under the Project; however, it could be reasonably expected that the agreement may need to be modified to include Fiddyment Road should traffic levels on Fiddyment Road substantially increase.

In addition to solid waste management activities, complementary and programmatic elements may be developed on the WPWMA's properties. The development of these complementary project-level elements and buildout of the programmatic elements will be anticipated to result in increased use of Fiddyment Road and a corresponding need for roadway maintenance. The SAP EIR concluded that the increased use of County roads could result in an increase in the frequency of maintenance needed for these facilities and identifies Placer County General Plan Policies 4.B.1 and 4.B.2 and SAP Policies PFS-2.1 and PFS-2.2, all of which require new developments to pay a fair share of funding for maintenance of public roads. By continuing the existing funding mechanism the WPWMA has in place with the Placer County Department of Public Works to provide proper road maintenance on Athens Avenue, the Project will be consistent with these policies. This impact is less than significant.

3.37.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on public services resulting

from the requirement for new or expanded roadway maintenance.

3.38 Public Services—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on public services.

3.38.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The Project will not create new cumulatively considerable public services impacts that were not considered in the SAP EIR. The 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.

3.38.2 Finding

For the foregoing reasons, upgraded public service infrastructure will be constructed in a manner consistent with development of the SAP and other cumulative projects will not contribute considerably to a significant cumulative impact related to public services, and these impacts will be less than significant.

3.39 Transportation—Conflict with Traffic Circulation Plan or Program

Please refer to Draft EIR Chapter 16 for an analysis of impacts to transportation, including from conflict with traffic circulation plans or programs (Impact 16-1).

3.39.1 Potential Effects and Rationale Supporting Finding

Operation

Although policies in the Placer County General Plan identify Level of Service (LOS) criteria for roadway segments, according to SB-743 and subsequent CEQA Guidelines (Section 15064.3(b)), these policies are no longer considered in making CEQA significance determinations. However, to determine whether the Project would result in any conflicts with roadway improvements identified in Placer County's Circulation Plan and program or the SAP development, the Project's projected ADT volumes were compared with the identified roadway capacities.

The number of vehicles per day from the WPWMA facility consists of vehicles associated with waste recovery, waste disposal, and supporting elements and vehicles associated with the complementary and programmatic elements. The proposed expansion of the solid waste operations with 300,000 square feet of building space for the complementary elements is anticipated to generate 3,619 vehicle trips per day during a weekday and 2,713 during a weekend. When the 1.9 million square feet of building space associated with the complementary and programmatic elements is combined with the expanded solid waste operations, a total of 9,870 vehicle trips per day during the weekday and 5,289 vehicle trips per day during the weekend will be expected.

Table 16-4 of the Draft EIR summarizes the project access roadways, along with the existing number of lanes, existing roadway capacity, and weekday existing year 2018 ADT with and without the Project. Since Project vehicle traffic is higher during the weekday compared with the weekend, the analysis was conducted for weekday only to represent a worse-case scenario. Project trips were added to the project access roadways based on WPWMA service location data. With the additional Project trips, the volumes on the project access roadways are within existing roadway capacities.

No transit service, bicycle facilities, or pedestrian facilities are located within the study area, and the Project does not include any changes to the local roadway network. Therefore, project implementation Is not expected to adversely affect existing or planned bicycle, pedestrian, or transit system facilities within the project vicinity.

The Project includes a crossing of Fiddyment Road to connect the center and western properties. This crossing will be constructed either under or over Fiddyment Road and will not connect to the local project access roadways. This project feature is not anticipated to conflict or interfere with any existing or planned improvements identified in Placer County's Circulation Plan or the SAP development for Fiddyment Road.

The Project will not change the existing or planned circulation system in the project vicinity. Therefore, the Project will not conflict or interfere with any program, plan, ordinance, or policy addressing the circulation system, specifically Placer County's Circulation Plan (per goal 3.A. and policy 3.A.1) and proposed improvements and goal TM-1 for the entire SAP development. Therefore, Project operational impacts will be less than significant.

Construction

During construction, there will be a short-term, temporary increase in traffic on the project access roadways as a result of the construction of utilities underneath the roadway and the crossing connecting the center and western properties over Fiddyment Road. The increase in traffic caused by construction is expected to be minimal. Furthermore, the WPWMA will prepare a Construction Transportation Management Plan under Mitigation Measure 11-3, and as discussed in Chapter 11 Hazards, Hazardous Materials, and Wildfire, of the Draft EIR, a Construction Traffic Management Plan will be implemented under Mitigation Measure 11-5, both of which could further reduce impacts from project construction on traffic. Since the transportation effects during construction are short term and temporary, construction impacts on the local circulation system and potential conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, will be less than significant.

3.39.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on transportation resulting from conflicts with traffic circulation plans or programs.

3.40 Transportation—Increase in Vehicle Hazards

Please refer to Draft EIR Chapter 16 for an analysis of impacts to transportation, including from an increase in vehicle hazards (Impact 16-3).

3.40.1 Potential Effects and Rationale Supporting Finding

Operations

The increase in vehicle trips associated with project operations is expected to increase the number of vehicles entering the central property from Athens Avenue and queuing on the site prior to dumping materials. This increase in vehicles could result in backups on Athens Avenue during peak conditions if additional queuing capacity is not provided on the site. However, the Project includes entrance improvements that are intended to increase vehicle capacity and throughput for solid waste operations on the central property. In addition, some of the solid waste traffic associated with the existing facility will be diverted to the western property, which will reduce the potential for vehicle backups on Athens Avenue at the central property entrance. By limiting the potential for backups on Athens Avenue associated with solid waste operations, the Project is not expected to increase the potential for traffic conflicts that could result in vehicle stacking hazards on this roadway during site operations. Therefore, this impact will be less than significant.

Construction

Project implementation will require some existing utility infrastructure buried within local roadways to be upgraded. Also, the existing entrance on Athens Avenue that provides access to the central property will be upgraded to accommodate the expanded solid waste operations on this property. The entrance improvements will increase the number of vehicles that can enter the site without resulting in vehicle backups on Athens Avenue.

The unimproved segment of Athens Avenue that extends west of the Fiddyment Road and Athens Avenue intersection is proposed to be improved to accommodate access to proposed solid waste uses on the western property. In addition, to accommodate the movement of vehicles and materials between the central and western properties, the installation of a crossing over or under Fiddyment Road is proposed. Finally, the construction of complementary and programmatic elements on the western property will require the construction of new access locations on Fiddyment Road.

The proposed utility upgrades and new or expanded entrance facilities may require temporary lane closures to accommodate construction activities. The construction of any facilities that could affect local vehicle circulation will be required to comply with applicable construction traffic management requirements that have been established to maintain safety and reduce traffic hazards. This includes the use of appropriately trained personnel to direct traffic, the placement of temporary signage, and the use of other traffic safety equipment. Standard engineering practice for roadway construction projects includes complying with the Manual for Uniform Traffic Control Devices (Federal Highway Administration [FHWA] 2012) so that appropriate signage, pavement delineations, and traffic control devices are being used. These types of roadway construction projects and associated traffic management activities are common in the area and are not expected to cause unique roadway hazards. Therefore, project construction is not expected to substantially increase vehicle hazards, and this impact will be less than significant.

3.40.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on transportation resulting from an increase in vehicle hazards.

3.41 Transportation—Inadequate Emergency Vehicle Access

Please refer to Draft EIR Chapter 16 for an analysis of impacts to transportation, including from inadequate emergency vehicle access (Impact 16-4).

3.41.1 Potential Effects and Rationale Supporting Finding

Construction

During construction activities that affect local roadways, necessary temporary lane closures could delay emergency vehicle access to the site or through the area. However, the construction of any facilities that could affect local vehicle circulation will be required to comply with standard construction traffic management requirements that have been established to maintain safety and reduce traffic hazards. These traffic management requirements include verifying that access is maintained for emergency vehicles throughout the construction period. Furthermore, the WPWMA will be required to prepare a Construction Transportation Management Plan, which will need to identify strategies for providing adequate emergency vehicle access at the site throughout construction periods. Therefore, the construction activities will not interfere or substantially delay emergency vehicle access to the project site or within the local area, and this impact will be less than significant.

Operation

The project site can be accessed from the south and north via Fiddyment Road, and from the east via Athens Avenue. For the project site's center and eastern properties, emergency vehicle access is available at the main entrance along Athens Avenue. In addition, three existing access locations are located along Fiddyment Road. Although these access locations are gated and rarely used, they will provide alternative access options in the event of an emergency at the central or eastern property.

For the western property, emergency vehicle access will be provided by the extension of Athens Avenue onto the western property from the Fiddyment Road and Athens Avenue intersection. This new entrance onto the western property will be required to be constructed to accommodate the anticipated vehicle traffic associated with the site uses as well as to accommodate emergency vehicle access. With the construction of complementary and programmatic elements, construction of additional access locations will be required to accommodate site circulation. Construction of these new access locations will improve emergency vehicle access at the site. Therefore, emergency vehicle access impacts are considered to be less than significant.

3.41.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on transportation resulting from inadequate emergency vehicle access.

3.42 Transportation—Cumulative (Local Roadways and Freeway Interchanges)

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts related to transportation, local roadways and freeway interchanges.

3.42.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The SAP EIR identified significant and unavoidable cumulative level-of-service impacts on local roadways and freeway interchanges. However, with adoption of SB 743 by the California legislature in 2013 and the addition of Section 15064.3 into the State CEQA Guidelines, traffic level-of-service impacts are no longer considered significant. The Project will not create new cumulatively considerable transportation impacts that were not considered in the SAP EIR. Therefore, cumulative transportation impacts have been adequately addressed in the SAP EIR.

3.42.2 Finding

For the foregoing reasons, the Project will have less-than-significant cumulative level-of-service impacts on local roadways and freeway interchanges due to the adoption of SB 743 by the California legislature in 2013 and the addition of Section 15064.3 into the State CEQA Guidelines.

3.43 Utilities and Service Systems and Energy—Require the Construction or Relocation of Utility Facilities

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including from construction or relocation of utility facilities (Impact 17-1).

3.43.1 Potential Effects and Rationale Supporting Finding

Water Supply

The Project includes the extension of a new fire protection water supply line to the western property to supply new fire hydrants. The new water supply line will extend approximately 1 mile south along Fiddyment Road from the roadway's intersection with Athens Avenue to the intersection with Sunset Boulevard.

The installation of the new pipeline will require a trench to be excavated within Fiddyment Road. This excavation may require the closure of one lane during the construction period, which will result in minor vehicle delays. The excavation will expose soils to erosion during the construction period, though the trench will be refilled following pipeline installation, and construction will be limited to a single construction season. Further, best management practices (BMPs) intended to address the potential for violating water quality standards or waste discharge requirements, or otherwise substantially degrading surface or ground water quality similar to the BMPs identified in Chapter 12, Hydrology and Water Quality, of the Draft EIR will be implemented for excavation activities associated with expanding existing water infrastructure. Therefore, expansion of the existing water supply infrastructure as a result of the Project's solid waste management activities will result in a less-than-significant impact.

The potable water demand associated with the complementary and programmatic elements is expected to increase as a result of the Project when compared with current demand. The project-level complementary elements will be expected to increase potable water demand to 0.02 mgd, and the programmatic elements will increase demand to 0.12 mgd. Sufficient water supplies are available to meet this demand, and the Foothill and Sunset water treatment plants have capacity to treat 2.5 mgd of additional water to support buildout of the SAP and PRSP (Placer County 2018). Therefore, additional supplies and treatment capacity will not be required for the complementary and programmatic elements, resulting in a less-than-significant impact.

Wastewater

Expansion of the composting and public waste drop-off operations in the center property will require installation of a new wastewater line extending from Athens Avenue to Sunset Boulevard within Fiddyment Road.

The new wastewater pipeline will be installed parallel to the required fire protection water line. The installation of the new pipeline will require a trench to be excavated within Fiddyment Road. This excavation will likely require the closure of one lane during the construction period, which will result in minor vehicle delays. The excavation will also expose soils to erosion during the construction period, though the trench will be refilled following pipeline installation, and construction will be limited to a single construction season. Further, BMPs intended to address the potential for violating water quality standards or waste discharge requirements, or otherwise substantially degrading surface or ground water quality similar to the BMPs identified in Chapter 12 of the Draft EIR, Hydrology and Water Quality, will be implemented for excavation activities associated with expanding existing water infrastructure. Therefore, expansion of the existing wastewater infrastructure as a result of the Project's solid waste management activities will result in a less-than- significant impact.

The wastewater generated by the complementary and programmatic elements is expected to increase as a result of the proposed project when compared with current generation. When combining expanded operations with the project-level and programmatic building space, the Project will be expected to result in a total generation of nearly 0.08 mgd. However, there is sufficient treatment capacity to accommodate this increase at Pleasant Grove WWTP, and new treatment infrastructure will not be required (Placer County 2018). Therefore, this will also be considered a less-than-significant impact.

Reclaimed Water

There is an existing recycled water line, or purple pipe, from the City of Lincoln's wastewater treatment plant (WWTP) that currently conveys recycled water from the WWTP to the agricultural operations on the WPWMA's western property. This line does not currently provide recycled water to the center property or any onsite solid waste management facilities. However, under the Project, it is anticipated that reclaimed water may be periodically used in the composting process and as landscape irrigation and dust control in lieu of other onsite non-potable water supplies, as needed and permitted. This is expected to require the installation of a new connection to the existing purple pipe, as well as an elevated secondary tank on the center property near the existing southern compost pond. The excavation for the trench will likely require the closure of one lane during the construction period, which will result in minor vehicle delays. The excavation for the trench and any grading required for the elevated tank will also expose soils to erosion during the construction period, though the trench will be refilled following pipeline installation, and construction for both facilities will be limited to a single construction season. Further, BMPs intended to address the potential for violating water quality standards or waste discharge requirements, or otherwise substantially degrading surface or ground water quality similar to the BMPs identified in Chapter 12 of the Draft EIR, Hydrology and Water Quality, will be implemented for excavation activities associated with expanding existing water infrastructure. Therefore, expansion of the existing reclaimed water infrastructure as a result of the Project's solid waste management activities will result in a less-than-significant impact.

The recycled water demand associated with the complementary and programmatic elements is expected to increase as a result of the proposed project when compared with current demand. However, the expected supply of reclaimed water from the City of Lincoln's WWTP is expected to exceed demand through 2045 (City of Lincoln 2021), so only the new infrastructure required for solid waste management operations will be required to convey the reclaimed water to its point of use. Therefore, additional supplies and treatment capacity will not be required for the complementary and programmatic elements, resulting in a less-than-significant impact.

Electricity and Natural Gas

The Project will increase the demand for electricity and possibly establish a need for natural gas; there are existing and planned facilities nearby, such as the Athens substation and Placer Ranch substation. Natural gas needs, if any, are expected to be met with existing or planned infrastructure. Wiring and tie-ins to existing and future lines may be warranted; however, because the project location has access to electricity, ground disturbance is not expected to be significant. Additionally, the SAP EIR concludes that there is sufficient capacity in existing and future infrastructure to meet the demands of the SAP (Placer County 2019). As such, impacts associated with implementation of the Project related to the construction or relocation of electricity infrastructure will result in a less-than-significant impact.

Telecommunications

There are numerous existing fiber-optic telecommunications lines in the project area, including Sprint and AT&T lines, which run directly through the project site along Fiddyment Road. The Project does not include any proposed uses that will conflict with these existing telecommunication lines. Therefore, the relocation of telecommunication lines will not be required or expected with implementation of the Project. The extension of these lines may be necessary to accommodate specific uses on the project site, such as the proposed complementary and programmatic elements. However, these extensions are expected to occur alongside construction of those new uses and will not in and of themselves be expected to cause significant physical disturbance or unique environmental impacts. As such, impacts associated with implementation of the Project related to the construction or relocation of telecommunications infrastructure will result in a less-than-significant impact.

3.43.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from construction or relocation of utility facilities.

3.44 Utilities and Service Systems and Energy—Have Sufficient Water Supplies

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including having sufficient water supplies (Impact 17-2).

3.44.1 Potential Effects and Rationale Supporting Finding

In compliance with SB 610, Placer County Water Agency (PCWA) conducted a water supply assessment (WSA) of available surface water supplies and expected demand of the full buildout of the SAP, which includes the proposed project. The PCWA WSA for the SAP, which reflects the conclusion of the 2015 PCWA Urban Water Management Plan (UWMP) and is consistent with the analysis and conclusions of the subsequent 2020 UWMP, concluded that PCWA has sufficient existing water supply to meet existing and planned future demand of development at buildout of the Sunset Area during normal, single dry, and multiple dry water years (PCWA 2016; PCWA 2017). Therefore, although increases in potable and reclaimed water demand will be expected as a result of Project implementation, including solid waste management operations and the complementary and programmatic elements, no additional water rights, contracts, or entitlements will be required for the Project, resulting in a less-than-significant impact.

3.44.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from having sufficient water supplies.

3.45 Utilities and Service Systems and Energy—Have Adequate Wastewater Treatment Capacity

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including impacts from having adequate wastewater treatment capacity (Impact 17-3).

3.45.1 Potential Effects and Rationale Supporting Finding

Operation of the Project is expected to result in the generation of approximately 0.08 mgd of wastewater per day by 2050, including solid waste management operations and the complementary and programmatic elements. This wastewater will be treated at Pleasant Grove WWTP in the City of Roseville. The Pleasant Grove WWTP currently has the capacity to treat 9.5 mgd but is permitted to treat up to 12 mgd. An expansion of the existing facilities to reach the permitted limit is currently underway (City of Roseville 2020). These improvements are being implemented largely in anticipation of buildout of both the SAP and PRSP, which are expected to generate a combined total of nearly 5.8 mgd of wastewater at full buildout, which would exceed the plant's current capacity (Placer County 2019). This expansion is intended to accommodate full buildout, including the Project, which accounts for 0.08 percent and 0.5 percent of the anticipated increases in wastewater generation for the solid waste management operations and complementary and programmatic elements, respectively. As a result, the Project will have a less-than-significant impact.

3.45.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from having adequate wastewater treatment capacity.

3.46 Utilities and Service Systems and Energy—Generate Solid Waste in Excess of Standards or Infrastructure Capacity or Impair the Attainment of Solid Waste Reduction Goals

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including impacts from generating solid waste in excess of standards or infrastructure capacity or impairing the attainment of solid waste reduction goals (Impact 17-4)**.**

3.46.1 Potential Effects and Rationale Supporting Finding

Construction-related wastes will be expected during project construction; however, construction contractors will be required to dispose of construction waste in accordance with federal, state, and local regulations as a requirement of project construction contract specifications. Solid waste generated at the project location during project operations will be consistent with current generation patterns, which are primarily limited to food and sanitary waste from employees onsite. These activities will not generate solid waste in excess of standards or infrastructure capacity. The impacts will therefore be less than significant.

The Project is expected to extend the operational life of the current WPWMA facility; expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions; and increase the WRSL's permitted capacity to accommodate anticipated long-term growth before the permitted landfill capacity is exhausted in 2058 (California Department of Resources Recycling and Recovery [CalRecycle] 2021). Further, the Project is intended to support the attainment of solid waste-related goals and standards. As a result, implementation of the Project will not impair the attainment of solid waste reduction goals and this impact will be less than significant.

3.46.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from generating solid waste in excess of standards or infrastructure capacity or impairing the attainment of solid waste reduction goals.

3.47 Utilities and Service Systems and Energy—Comply with Solid Waste Reduction Statutes and Regulations

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including compliance with solid waste reduction statutes and regulations (Impact 17-5)**.**

3.47.1 Potential Effects and Rationale Supporting Finding

The Project is intended to both comply with and support the attainment of solid waste-related goals and standards, including solid waste reduction measures. As a result, implementation of the Project will result in no impact.

3.47.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy**,** including compliance with solid waste reduction statutes and regulations.

3.48 Utilities and Service Systems and Energy—Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including from wasteful, inefficient, or unnecessary consumption of energy resources (Impact 17-6).

3.48.1 Potential Effects and Rationale Supporting Finding

The Project will result in increased consumption of energy resources as detailed in Table 17-4 of the Draft EIR. Although an increase in energy consumption is anticipated, use of energy is necessary to provide expanded solid waste services to the region as population rises. Additionally, the Project is expected to implement efficient energy technologies and building concepts as the Project is designed and constructed.

Because the increased energy use is necessary to accommodate solid waste services for regional growth and the changing regulatory climate, and the Project provides opportunities for renewable energy production from LFG, implementation of the Project will have a less-than-significant impact.

3.48.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from wasteful, inefficient, or unnecessary consumption of energy resources.

3.49 Utilities and Service Systems and Energy—Conflict with a State or Local Plan for Renewable Energy or Energy Efficiency

Please refer to Draft EIR Chapter 17 for an analysis of impacts to utilities and service systems and energy, including from conflict with a state or local plan for renewable energy or energy efficiency (Impact 17-7).

3.49.1 Potential Effects and Rationale Supporting Finding

Implementation of the Project will result in an increase in energy consumption because of the need for expanded solid waste services to accommodate regional growth and regulatory climate change. The Project will include use of energy-efficient and renewable energy technology within the planned solid waste project elements as well as the planned complementary and programmatic elements. The WPWMA facility currently includes an LFG-to-energy plant on the premises; the Project will result in increased LFG generation, providing additional opportunities to produce more electricity from LFG or to implement new renewable energy technologies to convert LFG to compressed natural gas or other renewable energy products. Furthermore, there is the potential for the WPWMA to use the renewable energy produced at the facility to power site operations.

The Project will also comply with California Green Building Standards (CALGreen) building standards for nonresidential buildings, with plans to manage environmental impacts of site development and implement energy-efficient building concepts. The existing facility and the Project comply with many green building standards, such as material conservation and resource efficiency with the collocation of the MRF building, C&D area, and other Waste Recovery facilities onsite.

The Project is being implemented to further the objectives of the Waste Action Plan (WPWMA 2020). Compliance with plans for renewable energy and energy efficiency is expected; therefore, implementation of the Project will result in no impact.

3.49.2 Finding

For the foregoing reasons, the Project will have a less-than-significant impact on utilities and service systems and energy resulting from conflict with a state or local plan for renewable energy or energy efficiency.

3.50 Utilities and Energy—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on utilities and energy.

3.50.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The Project will not create new cumulatively considerable public utility or energy impacts that were not considered in the SAP EIR. The 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.

3.50.2 Finding

For the foregoing reasons, the Project will have a less-than-significant cumulative impact on utilities and energy.

4. Potential Environmental Impacts that have Been Mitigated to a Level of Insignificance

4.1 Air Quality—Consistency with Applicable Air Quality Plans

Please refer to Draft EIR Chapter 6 for an analysis of impacts to air quality, including potential impacts from consistency with applicable air quality plans (Impact 6-1).

4.1.1 Potential Effect and Rationale Supporting Finding

The construction and operation of the solid waste elements, complementary and programmatic elements, and supporting elements under the Project will have the potential to exceed PCAPCD's numerical thresholds of significance for emissions of the ozone precursor nitric oxide and nitrogen dioxide (NOx), particulate matter with diameter of 10 micrometers or less (PM10), and particulate matter with diameter of 2.5 micrometers or less (PM2.5). These emissions increases could contribute to the existing nonattainment status of Placer County and the Sacramento Air Valley Basin (SVAB) region with respect to CAAQS and NAAQS for ozone, the CAAQS for PM10, and the NAAQS for PM2.5, and could impede air quality planning efforts to bring the air basin into attainment of the health-protective NAAQS and CAAQS.

The results of this analysis indicate that the Project will potentially conflict with implementation of the applicable air quality plans.

4.1.2 Required Mitigation Measures

The following required mitigation measure will reduce impacts associated with the Project to less-than-significant levels:

Mitigation Measure 6-1: Consistency with applicable air quality plans

Through the air permitting process and implementation of BMPs and project design measures in Table 6-1 of the Draft EIR, 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 of the Draft EIR) 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 were 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) will comply with applicable regulatory and permitting requirements.

MRF Operations Design Concept Evaluation

As described in Chapter 3 of the Draft EIR, Project Description, and Chapter 4 of the Draft EIR, Approach, proposed changes to MRF operations could be implemented under the Project and would potentially result in changes in project-related air emissions and the potential for odor generation, primarily due to accelerated and expanded diversion of organic material, including the OFMSW processed in the MRF, for composting in

CASP composting systems and increased recovery and diversion of recyclables. Changes may also involve addition of an enclosed building for organics receipt and processing. This would reduce the amount and organic content of waste residuals sent to the landfill. Diversion of more OFMSW from the landfill within a faster timeframe would correspond to a near-term (next 10 years) reduction in LFG production, including reduced emissions of fugitive LFG and associated odors.

Mitigation Measure 6-1 requires the WPWMA to work with the PCAPCD to provide information on the construction and operation of the Project through the air permitting process and implementation of BMPs and project design measures in Table 6-1 of the Draft EIR. The emissions estimates prepared to support this CEQA air quality impact analysis are based on many conservative assumptions to allow flexibility as the project elements move forward through planning, design, funding, and implementation.

The PCAPCD recently issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system that may require permitting by the PCAPCD as a stationary source. As the permitting process is undertaken, the WPWMA facility would continue to comply with applicable regulatory and permitting requirements.

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this air quality impact analysis, and the conclusions of the project-level analysis related to consistency with applicable air quality plans would not change.

4.1.3 Finding

Ongoing evaluation of construction and operation of the solid waste elements, complementary and programmatic elements, and supporting elements under the Project shall be conducted to confirm compliance with BMPs, project design measures, and applicable PCAPCD rules and regulations, as project elements are designed, permitted, and implemented. This impact will be less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

4.2 Biological Resources—Impacts on Special-Status Plant Species

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including impacts to special-status plant species (Impact 7-1).

4.2.1 Potential Effect and Rationale Supporting Finding

Two special-status plant species, dwarf downingia and legenere, have been documented within 5 miles of the Project. One of these, dwarf downingia, was determined to be present within the project area. During the May 2017 floristic surveys, a population of dwarf downingia was observed in a large vernal pool located at the western edge of the eastern property. Several hundred plants were observed (Figure 7-4 of the Draft EIR).

Implementation of the Project will result in direct permanent impacts on dwarf downingia and its habitat as a result of ground disturbance, vegetation clearing, and development of the eastern property. Populations of dwarf downingia or other special-status plant species that are adjacent to or hydrologically connected to the project area could be indirectly affected. Direct and indirect impacts on special-status plant species will be significant.

4.2.2 Required Mitigation Measures

The following required mitigation measure will reduce impacts associated with the Project to less-than-significant levels:

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

The WPWMA proposes to implement the Project as a Covered Activity under the PCCP and Western Placer County Aquatic Resources Program (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 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 the California Department of Fish and Wildlife (CDFW), as required by the California Native Plant Protection Act, if any special-status plants are found on the project site. Notify the Unites States Fish and Wildlife Service (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.

4.2.3 Finding

The protection and restoration guided by the PCCP's goals, objectives, conservation measures, and conditions will compensate for the loss of special-status plant species, and preserved habitat will be managed in perpetuity, thereby reducing these effects to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.3 Biological Resources—Impacts on Vernal Pool Branchiopods and Western Spadefoot

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including impacts on vernal pool branchiopods and western spadefoot (Impact 7-2).

4.3.1 Potential Effect and Rationale Supporting Finding

Vernal pool complexes containing vernal pools, vernal pool-type wetlands, and the vernal pool immediate watershed provide habitat for vernal pool fairy shrimp, vernal pool tadpole shrimp, and western spadefoot. The loss of vernal pool complex habitat could result in potential take of vernal pool fairy shrimp, vernal pool tadpole shrimp, or western spadefoot, and loss of habitat for these species.

The direct and indirect impacts on vernal pool fairy shrimp, vernal pool tadpole shrimp, and western spadefoot will be significant.

4.3.2 Required Mitigation Measures

The following required mitigation measure will reduce impacts associated with the Project to less-than-significant levels:

Mitigation Measure 7-2: Impacts on Vernal Pool Branchiopods and Western Spadefoot

The WPWMA proposes to implement the 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 will reduce impacts on western spadefoot because the species requires the protection of vernal pool complex habitat for survival, and this habitat will 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, will be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D of the Draft EIR):

- General Condition 1, Watershed Hydrology and Water Quality
- General Condition 3, Land Conversion
- General Condition 4, Temporary Effects
- General Condition 5, Conduct Worker Training

- Regional Public Projects Condition 3, Operations and Maintenance best management practices (BMPs)
- Species Condition 10, Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp

Covered Activities will 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 2020c). Special habitat fees (Table 9-7 of the PCCP HCP/NCCP) are variable depending on the special habitat type and will be paid in addition to land conversion fees. In the Central Valley, the fees will be applied when projects affect natural, seminatural, and other agricultural communities.

4.3.3 Finding

The Project will be implemented as a Covered Activity under the PCCP and CARP, and the project's special-status vernal pool branchiopods and western spadefoot impacts will be fully mitigated. Implementation of the PCCP is expected to reduce biological resource impacts to a much greater degree than will occur with project-by-project mitigation by developing a large, managed, and monitored reserve area that will provide vernal pool and associated habitat restoration, and open space and agricultural conservation in perpetuity, rather than smaller, more fragmented and isolated reserves surrounded by urban development. Additionally, its avoidance, minimization, and mitigation requirements also will support the reduction of potential indirect significant effects. The PCCP is specifically designed to support species recovery in addition to mitigating for direct and indirect species impacts. For these reasons, the project's impacts on special-status vernal pool branchiopods and western spadefoot will be reduced to less than significant with implementation of the PCCP and CARP. For the foregoing reasons, the Board adopts Finding 1.

4.4 Biological Resources—Impacts on Valley Elderberry Longhorn Beetle

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including impacts on Valley Elderberry Longhorn Beetle (Impact 7-3).

4.4.1 Potential Effect and Rationale Supporting Finding

Scattered elderberry shrubs occur in the southwestern corner of the center property. Implementation of the Project could result in the removal of elderberry shrubs that could potentially provide habitat for valley elderberry longhorn beetle and take of individual valley elderberry longhorn beetles could occur. Indirect impacts from ground-disturbing activities or use of herbicides near shrubs also could result in decline of elderberry shrubs. Direct removal of elderberry shrubs or disturbance that affects shrubs' health or survival will be considered a significant impact because of the effects on valley elderberry longhorn beetles.

4.4.2 Required Mitigation Measures

The following required mitigation measure will reduce impacts associated with the Project to less-than-significant levels:

Mitigation Measure 7-3: Impacts on Valley Elderberry Longhorn Beetle

Valley elderberry longhorn beetle is a Covered Species under the PCCP. Potential impacts on this species will 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 project area will be supported by the following conditions from the PCCP (Placer County 2020d) (Appendix D of the Draft EIR):

- General Condition 4, Temporary Effects
- General Condition 5, Conduct Worker Training
- Regional Public Projects Condition 3, Operations and Maintenance BMPs
- Species Condition 8, Valley Elderberry Longhorn Beetle

4.4.3 Finding

Implementation of the PCCP conservation strategy for valley elderberry longhorn beetle will reduce impacts on valley elderberry longhorn beetle to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.5 Biological Resources—Impacts on Special-Status Bird Species, Including Raptors

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including impacts on special-status bird species and raptors (Impact 7-4).

4.5.1 Potential Effect and Rationale Supporting Finding

Construction activities, such as ground disturbance and vegetation removal, and the conversion of suitable habitat to developed uses could result in the disturbance or loss of special-status bird species (including burrowing owl, Swainson's hawk, Northern harrier, White-tailed kite, Tricolored blackbird, Grasshopper sparrow, and bird species protected by the Migratory Bird Treaty Act) and reduced breeding productivity of these species. Special-status bird species are protected under the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), Fish and Game Code (FGC), CEQA, the Migratory Bird Treaty Act (MBTA), or other regulations. This will be a significant impact.

4.5.2 Required Mitigation Measures

Mitigation Measure 7-4: Impacts on Special-Status Bird Species, Including Raptors

Burrowing owl, Swainson's hawk, and tricolored blackbird are classified as Covered Species under the PCCP. Potential impacts on these species will be mitigated through implementation of 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 burrowing owl, Swainson's hawk, and tricolored blackbird within the project area will be supported by the following conditions from the PCCP (Placer County 2020d) (Appendix D of the Draft EIR):

- General Condition 1, Watershed Hydrology and Water Quality
- General Condition 4, Temporary Effects
- General Condition 5, Conduct Worker Training
- Regional Public Projects Condition 3, Operation and Maintenance BMPs
- Species Condition 3, Western Burrowing Owl
- Species Condition 4, Tricolored Blackbird
- Species Condition 1, Swainson's Hawk

4.5.3 Finding

Implementation of the PCCP conservation strategy will mitigate the loss of individuals and nests of special-status bird species, including raptors. With implementation of the PCCP, the Project will not substantially affect the distribution, breeding productivity, viability, or regional population of these species. Therefore, potential impacts will be reduced to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.6 Biological Resources—Impacts on Wetlands or Other Sensitive Natural Communities

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including impacts on wetlands or other sensitive natural communities (Impact 7-5).

4.6.1 Potential Effect and Rationale Supporting Finding

Implementation of the Project will result in the direct loss of jurisdictional waters of the United States, including wetlands that may be subject to United States Army Corps of Engineers (USACE) jurisdiction under the federal Clean Water Act (CWA). This impact will be significant.

4.6.2 Required Mitigation Measures

The following required mitigation measure will reduce impacts associated with the Project to less-than-significant levels:

Mitigation Measure 7-5: Impacts on Wetlands or Other Sensitive Natural Communities

The anticipated permanent impacts to wetlands will 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 In-Lieu Fee (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 will be achieved through the enhancement (rehabilitation) of wetlands and waters, and creation (establishment) or restoration (re-establishment) of 2,715 acres of constituent habitats that will be considered protected wetlands and waters (Placer County 2020b). Overall, the proposed wetland mitigation in the CARP will maintain or improve the functions and services of wetlands, including special aquatic sites, within the larger PCCP area.

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 will 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 will 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 project area will be supported by the following conditions from the PCCP (Placer County 2020d) (Appendix D of Draft EIR):

- General Condition 1, Watershed Hydrology and Water Quality
- General Condition 3, Land Conversion
- General Condition 4, Temporary Effects
- Regional Public Project Condition 3, Operation and Maintenance BMPs

The CARP provides additional specific avoidance and minimization measures, summarized in Table 4.2 of that document (Placer County 2020b).

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 will be applied to the 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.

Consistent with SAP Program NR-4, PCCP, and CARP, the Project will 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 may allow 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.

4.6.3 Finding

Implementation of the PCCP conservation strategy will reduce impacts on wetlands and other sensitive natural communities. With implementation of the PCCP, the natural community creation, enhancement, restoration, and protection activities in the PCCP and mitigation commitments under the CARP, which includes a commitment to mitigate at a 1.5:1 for wetlands, are more than sufficient to support the conclusion that the impacts on wetlands will be reduced to less than significant. The permitting requirements of the USACE through the CWA will also require natural community creation, enhancement, restoration, and protection activities sufficient to prevent net loss of wetland resources. For the foregoing reasons, the Board adopts Finding 1.

4.7 Biological Resources— Conflicts with Local Ordinances

Please refer to Draft EIR Chapter 7 for an analysis of impacts to biological resources, including from conflicts with local ordinances (Impact 7-7).

4.7.1 Potential Effect and Rationale Supporting Finding

The project site has limited areas with landscape or non-native trees, including within the center property and near the residence on the western property. Tree damage or removal associated with project implementation could conflict with the County Tree Ordinance. This impact will be significant.

4.7.2 Required Mitigation Measures

Mitigation Measure 7-7: Conflicts with Local Ordinances

Actions consistent with the following measure from the SAP will be implemented so that the Project does not conflict with the County Tree Ordinance:

SAP Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees.

- 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.
- 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.
- 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.

4.7.3 Finding

Implementation of actions consistent with SAP Mitigation Measure 4.4-7a will reduce significant impacts related to conflicts with County ordinances and policies protecting biological resources to a less-than-significant level because it will require the Project to avoid protected trees, if feasible, and will require compensation for unavoidable loss of protected trees consistent with the PCCP. For the foregoing reasons, the Board adopts Finding 1.

4.8 Cultural and Tribal Cultural Resources—Disturbance of Tribal Cultural Resources Discovered during Construction

Please refer to Draft EIR Chapter 8 for an analysis of impacts to cultural and tribal cultural resources, from disturbance of tribal cultural resources discovered during construction (Impact 8-2).

4.8.1 Potential Effect and Rationale Supporting Finding

No known tribal cultural resources are located in the project APE. However, there is a low to moderate potential for encountering isolated Native American artifacts or buried archaeological deposits, associated human remains, and tribal cultural resources during project-related ground disturbance. Ground-disturbing activities associated with the solid waste project elements and complementary and programmatic elements could result in the disturbance, disruption, or destruction of tribal cultural resources as defined in PRC Section 21074. This impact will be considered significant.

4.8.2 Required Mitigation Measures

Mitigation Measure 8-2: Disturbance of Tribal Cultural Resources Discovered during Construction

If any suspected tribal cultural resources are discovered during ground-disturbing construction activities, work will 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 United Auburn Indian Community of the Auburn Rancheria (UAIC) will be immediately notified and will determine whether the find is a tribal cultural resource (PRC Section 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 must 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. 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.

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 Assembly Bill (AB) 52 has been satisfied.

4.8.3 Finding

Implementation of Mitigation Measure 8-2 establishes the required procedures to be followed if tribal cultural resources are discovered during construction activities, including immediately stopping work within 100 feet of the discovery and coordinating with a Tribal Representative from a California Native American tribe that is traditionally and culturally affiliated with the geographic area. Because this mitigation will result in the avoidance of tribal cultural resources if they are discovered, or other appropriate measures (for example, reburial of cultural objects) will be implemented if avoidance is not possible, the impact will be reduced to less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

4.9 Cultural and Tribal Cultural Resources—Disturbance of Archaeological Resources Discovered during Construction

Please refer to Draft EIR Chapter 8 for an analysis of impacts to cultural and tribal cultural resources, including from disturbance of archaeological resources discovered during construction (Impact 8-3).

4.9.1 Potential Effect and Rationale Supporting Finding

Archival research indicated that there are no archaeological sites or ethnographic village sites in the project APE. However, there is a low to moderate potential for encountering isolated Native American artifacts or buried archaeological deposits, associated human remains, and tribal cultural resources during project-related ground disturbance. Based on this potential for prior Native American activity within the project area, ground-disturbing activities associated with the solid waste project elements and complementary and programmatic elements could result in the disturbance, disruption, or destruction of previously undiscovered archaeological resources as defined in State CEQA Guidelines 15064.5. This impact will be considered significant.

4.9.2 Required Mitigation Measures

Mitigation Measure 8-3: Disturbance of Archaeological Resources Discovered during Construction

If any prehistoric-era or historic-era archaeological resources are discovered during ground-disturbing activities, work within 100 feet of the resources will be halted, and a qualified archaeologist will be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the WPWMA and the archaeologist will 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 will notify representatives from the WPWMA, and the procedures described in Mitigation Measure 8-2 will be followed. All significant cultural materials recovered will 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 will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (for

example, data recovery) will be instituted. Work may proceed on other parts of the project site while mitigation for historical or unique archaeological resources is being carried out.

4.9.3 Finding

Implementation of Mitigation Measure 8-3 establishes the required procedures to be followed if archaeological resources are discovered during construction activities, including immediately stopping work within 100 feet of the discovery and retaining a qualified archaeologist to evaluate the find and recommend appropriate treatment. Because this mitigation will result in the avoidance of archaeological resources if they are discovered, or other appropriate measures (such as data recovery) if avoidance is not possible, the impact will be reduced to less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

4.10 Cultural and Tribal Cultural Resources—Disturbance of Human Remains

Please refer to Draft EIR Chapter 8 for an analysis of impacts to cultural and tribal cultural resources, including from disturbance of human remains (Impact 8-4).

4.10.1 Potential Effect and Rationale Supporting Finding

Ground-disturbing construction activities associated with the solid waste project elements and complementary and programmatic elements of the Project could uncover previously unknown human remains. The disturbance of previously unknown human remains will be considered a significant impact.

4.10.2 Required Mitigation Measures

Mitigation Measure 8-4: Disturbance of Human Remains

As required by the provisions of California's Health and Safety Code Section 7050.5, PRC Section 5097.98, and the California Code of Regulations Section 15064.5 (CEQA), if human remains are encountered at the site, work in the immediate vicinity of the discovery will cease, and necessary steps to secure the integrity of the immediate area will be taken. The Placer County Coroner will be notified immediately to determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner will notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendant (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. 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 will, 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.

4.10.3 Finding

Implementation of Mitigation Measure 8-4 establishes the required procedures to be followed if human remains are discovered during construction activities. Because this mitigation requires notifying the NAHC if human remains are discovered and coordinating with the MLD, if applicable, for proper disposition of the remains, the impact will be reduced to less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

4.11 Geology, Soils, and Paleontological Resources—Presence of Expansive Soils

Please refer to Draft EIR Chapter 9 for an analysis of impacts to geology, soils, and paleontological resources, including from the presence of expansive soils (Impact 9-4).

4.11.1 Potential Effects and Rationale Supporting Finding

There is a potential for buildings and other structures associated with the solid waste management and complementary and programmatic elements of the Project to be located on expansive soil, which, through the action of expansion or contraction, can lead to cracking, lifting, subsidence, and structural damage to utilities, building foundations, and occupied overlying structures. Damage to the Project's buildings and facilities could create risks to life or property if a failure were to occur. The potential for expansive soils to create risks to life or property with implementation of the Project will be a significant impact.

4.11.2 Required Mitigation Measures

Mitigation Measure 9-4: Presence of Expansive Soils

Consistent with CBC Section 1808.2 and Placer County General Plan Policy 8.A.1, the WPWMA will 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 will 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 will 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.

4.11.3 Finding

Implementation of Mitigation Measure 9-4 requires the WPWMA to conduct a geotechnical investigation prior to constructing any buildings or other structures designed for human occupancy in conformance with CBC Section 1808.2. Under CBC Section 1808.2, foundations placed on or within expansive soils must be designed to resist differential volume changes and to prevent damage to the supported structures. With implementation of Mitigation Measure 9-4, the potential for expansive soils to create risks to life and property as a result of the Project will be reduced to less than significant. For the foregoing reasons, the Board adopts Finding 1.

4.12 Geology, Soils, and Paleontological Resources—Potential Destruction of Paleontological Resources

Please refer to Draft EIR Chapter 9 for an analysis of impacts to geology, soils, and paleontological resources, including from the potential destruction of paleontological resources (Impact 9-5).

4.12.1 Potential Effects and Rationale Supporting Finding

The potential for ground-disturbing construction activities associated with implementation of the solid waste management and complementary and programmatic elements to disturb or destroy undiscovered paleontological resources will be a significant impact.

4.12.2 Required Mitigation Measures

Mitigation Measure 9-5: Potential Destruction of Paleontological Resources

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

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 will be prepared. If the find is determined to be significant by the qualified paleontologist, they will 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 will be followed.

4.12.3 Finding

Implementation of Mitigation Measure 9-5 establishes the required procedures to be followed if paleontological resources are discovered during construction activities, including immediately stopping work and retaining a qualified paleontologist to evaluate the find and determine significance. Because this mitigation will result in the avoidance of paleontological resources if they are discovered or other appropriate measures (for example, documentation or recovery) if avoidance is not possible, the impact will be reduced to less than significant. For the foregoing reasons, the Board adopts Finding 1.

4.13 Hazards, Hazardous Materials, and Wildfire—Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including from the potential for construction activities to expose the public or the environment to hazardous materials (Impact 11-1).

4.13.1 Potential Effects and Rationale Supporting Finding

Sitewide

Construction on the western and eastern properties could result in the exposure of workers or the environment to hazardous materials spilled during construction or soils that have been contaminated by prior agricultural operations. Due to the public health concerns associated with this exposure, this impact will be significant.

Complementary and Programmatic Elements

Construction activities associated with the project level of complementary elements include excavating for utilities and building foundations and grading for internal roadways and parking lots. These construction activities have the potential to expose contaminated soils. Therefore, construction of the project level of complementary elements may have a significant impact.

Build out of the programmatic elements involve the same construction activities identified for the project level elements. Construction of the additional programmatic elements (1.6 million square feet [sf]) also have the potential to expose contaminated soils. Therefore, construction of the program level of complementary and programmatic elements may have significant impact.

4.13.2 Required Mitigation Measures

Mitigation Measure 11-1: Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials

A Phase I Environmental Site Assessment (ESA) shall be prepared prior to the construction of any facilities on the western or eastern properties in general conformance with the American Society for Testing Materials

ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquires," 40 Code of Federal Regulations (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 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.

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:

- Describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction.
- Describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials.
- Include measures to protect worker safety if signs of contamination are encountered.
- Identify sampling and analysis protocols for various substances that might be encountered.
- List required regulatory agency contacts if contamination is found.
- Include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way.
- Identify legal and regulatory processes and thresholds for cleanup of contamination.
- Include provisions for delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels.
- Require that the project contractor verify that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the California Vehicle Code and the requirements of the licensed receiving facility.

4.13.3 Finding

Implementation of these mitigation measures will reduce the potential for construction activities to expose the public or environment to hazardous materials and this impact will be reduced to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.14 Hazards, Hazardous Materials, and Wildfire—Potential for Landfill Gas to Accumulate in Occupied Structures

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including impacts from the potential for landfill gas to accumulate in occupied structures (Impact 11-3).

4.14.1 Potential Effects and Rationale Supporting Finding

The landfill generates LFG that could potentially accumulate in occupied structures developed on WPWMA properties for the Project. WPWMA is required to comply with CCR Title 27 Section 22190, which states that

all onsite construction within 1,000 feet of the boundary of any disposal area shall be designed and constructed to mitigate gas migration into a structure. These state standards are in place to minimize potential intrusion of migrating LFG into a structure. The protection measures identified in Title 27 Section 22190 are important for minimizing this potential public safety risk, and if these measures were not implemented for the Project, the impacts could be significant.

4.14.2 Required Mitigation Measures

Mitigation Measure 11-3: Potential for landfill gas to accumulate in occupied structures

For any structure sited within 1,000 feet of the WRSL within the project's boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included:

- A geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade.
- 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.
- A geotextile filter shall be used to prevent the introduction of fines into the permeable layer.
- Perforated venting pipes shall be installed within the permeable layer and shall be designed to operate without clogging.
- The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system.
- 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.
- In addition, 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.

4.14.3 Finding

Implementation of Mitigation Measure 11-3 will reduce the Project's potential impact to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.15 Hazards, Hazardous Materials, and Wildfire—Potential for Waste Relocation Activities to Release Hazardous Materials into the Environment

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including impacts from the potential for waste relocation activities to release hazardous materials into the environment (Impact 11-4).

4.15.1 Potential Effects and Rationale Supporting Finding

The Project includes excavating the contents of closed, pre-Subtitle D-lined, Modules 1, 2, 10, and 11, which encompass approximately 66 acres, and relocating these contents to a Subtitle D-compliant lined module within the permitted landfill footprint. Although it is anticipated that primarily municipal solid waste (MSW) will be encountered, there is the potential for onsite personnel to encounter hazardous waste during the waste relocation activities. The exposure of onsite personnel or the environment to hazardous wastes associated with these waste relocation activities will be a significant impact.

4.15.2 Required Mitigation Measures

Mitigation Measure 11-4: Potential for waste relocation activities to release hazardous materials into the environment

As described in Chapter 3 of the Draft EIR, Project Description, prior to commencing waste relocation activities, the WPWMA shall develop and implement a contingency plan in case hazardous 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.

4.15.3 Finding

Implementation of Mitigation Measure 11-4 will reduce the Project's impact associated with waste relocation activities to less than significant. For the foregoing reasons, the Board adopts Finding 1.

4.16 Hazards, Hazardous Materials, and Wildfire—Potential Conflict with an Adopted Emergency Response Plan

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including impacts from the potential conflict with an adopted emergency response plan (Impact 11-5).

4.16.1 Potential Effects and Rationale Supporting Finding

During construction activities, temporary lane closures may be necessary on Fiddyment Road and Athens Avenue and could result in temporary increases in traffic levels as traffic is detoured or slowed on some local roadways. Increased traffic congestion on Fiddyment Road and Athens Avenue during construction will be temporary and will not interfere with the use of surrounding roadways, including SR-65, for emergency evacuation. However, localized delays in emergency evacuation could occur. Substantial delays in emergency evacuation associated with project construction activities on local roadways will be considered a significant impact.

4.16.2 Required Mitigation Measures

Mitigation Measure 11-5: Prepare a Construction Traffic Management Plan

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.

4.16.3 Finding

Implementation of Mitigation Measure 11-5 will reduce the Project's potential impact on an adopted emergency response plan to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.17 Hazards, Hazardous Materials, and Wildfire—Risk of Vectors

Please refer to Draft EIR Chapter 11 for an analysis of impacts to hazards, hazardous materials, and wildfire, including impacts from the risk of vectors (Impact 11-7).

4.17.1 Potential Effects and Rationale Supporting Finding

The western and eastern properties provide a greater potential for vectors (specifically mosquitoes) to occur due to the presence of aquatic resources that may be disturbed during construction and operation (as discussed in Chapter 3 of the Draft EIR, Biological Resources). The disturbance of these aquatic resources could increase areas of standing water, which could increase breeding areas for mosquitoes. Therefore, the potential exposure of the public to health hazards from vector-borne diseases will be significant.

4.17.2 Required Mitigation Measures

Mitigation Measure 11-7: Risk of Vectors

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 during both construction and operation of the 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.

4.17.3 Finding

Implementation of Mitigation Measure 11-7 will reduce the Project's potential impact from vectors to a less-than-significant level. For the foregoing reasons, the Board adopts Finding 1.

4.18 Hydrology and Water Quality—Potential for Waste Excavation and Relocation to Degrade Surface Water or Groundwater Quality

Please refer to Draft EIR Chapter 12 for an analysis of impacts to hydrology and water quality, including from the potential for waste excavation and relocation to degrade surface water or groundwater quality (Impact 12-3).

4.18.1 Potential Effects and Rationale Supporting Finding

Removing and relocating previously buried waste could expose these materials during the construction period to erosive forces, including wind and rain, that could transport contaminants into local water bodies. If contaminants are transported to local water bodies, surface water quality could be degraded, and over time, groundwater supplies could also be degraded. In addition, the percolation of water through the exposed waste could contribute to groundwater contamination. Established water quality standards could be violated depending upon the level of surface and groundwater exposure to contaminants.

Exposure of waste to precipitation and surface water runoff during waste excavation and relocation has the potential to affect surface water quality directly and groundwater quality indirectly through infiltration of surface water affected by exposure to waste. This impact will be significant.

4.18.2 Required Mitigation Measures

Mitigation Measure 12-3: Potential for Waste Excavation and Relocation to Degrade Surface Water or Groundwater Quality

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 do the following:

- Amend the existing project SWPPP for the waste excavation and relocation component of the Project. The SWPPP may include the following BMPs:
  - Where excavation and removal occurs over a closed, pre-Subtitle D-lined, area, the Project will implement secondary containment in the direct path of hauling and removal.
  - Avoidance of excavation and relocation of waste between October 15 and April 30 unless such activities are adequately mitigated to avoid impacts during the rainy season.
  - If excavation and relocation of waste activities cannot be avoided during this period, the Project will implement use of tarps or soil cover over the exposed face overnight and when the activity will not occur for more than 24 hours.

The SWPPP will be prepared and implemented prior to ground-disturbing activities commencing for the waste excavation and relocation component of the Project.

4.18.3 Finding

Implementation of Mitigation Measure 12-3 establishes necessary development and implementation of an activity-specific SWPPP for waste excavation and relocation, including limitations on the timing of construction and waste excavation and relocation activities. Obtaining and complying with the SWPPP will mitigate the potential for violating water quality standards or WDRs or otherwise substantially degrading surface water or groundwater quality from waste excavation and relocation and reduce the impact to less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

4.19 Noise—Increase in Operational Noise Levels

Please refer to Draft EIR Chapter 14 for an analysis of impacts to noise, including impacts resulting from an increase in operational noise levels (Impact 14-2).

4.19.1 Potential Effects and Rationale Supporting Finding

Solid waste management activities at the WPWMA facility will continue and expand under the Project. Noise-generating activities will expand from the center property to the western and eastern properties, while the increase in activity level at the site will increase incrementally over the buildout of the Project. Assuming a doubling of operating equipment and vehicle activity from existing operations at the site, the existing ambient noise levels would be expected to increase by approximately 3 decibels (dB). The noise levels associated with site operations experienced at existing residences in the project vicinity will increase from current conditions; however, the offsite noise levels associated with onsite operational activities will not increase by greater than 3 dB. Because this increase will be less than the 5-dB increase in ambient noise levels established as the permanent noise level threshold, the solid waste management activities associated with the Project will result in a less-than-significant permanent noise impact.

The development of the complementary and programmatic elements will increase offsite noise, depending on where the uses are located on the site. At the project level, complementary elements could include a wide variety of potential manufacturing and industrial uses; it cannot be determined in advance whether the

ultimate uses will include activities that generate noise levels substantially higher than typical manufacturing and industrial uses, although the uses are anticipated to occur within 300,000 square feet of building space. Therefore, development of the complementary elements could generate noise levels at receiving land uses that could exceed the established noise threshold, and this impact will be significant.

In addition, the development of the programmatic elements could generate noise levels at receiving land uses that could exceed the established noise threshold, and this impact will be significant.

4.19.2 Required Mitigation Measures

Mitigation Measure 14-2: Increase in Operational Noise Levels

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 will document that either the proposed uses shall 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.

4.19.3 Finding

Implementation of Mitigation Measure 14-2 requires that an acoustical evaluation be conducted prior to the issuance of building permits so that the established noise threshold is not exceeded. Because this mitigation will prevent the complementary and programmatic elements from exceeding noise levels above the established threshold, the impact will be reduced to less than significant after mitigation. For the foregoing reasons, the Board adopts Finding 1.

5. Unavoidable Significant Environmental Impacts that Cannot be Mitigated to a Less-than-Significant Level

5.1 Aesthetics—Impacts to Visual Character and Quality

Please refer to Draft EIR Section 5 for an analysis of impacts to aesthetics, including on visual character and quality (Impact 5-1).

5.1.1 Potential Effect and Rationale Supporting Finding

The Project will expand complementary and programmatic elements and waste disposal elements onto the western property. The project elements on the eastern property will be visible to local viewers but will not represent a significant change to the overall landscape. The project elements on the eastern property will be consistent with the Eco-Industrial designation of the site. The Project will expand the landfill's footprint and increase its maximum elevation. While the existing landfill mound is at a low enough elevation that it tends to blend in with its setting, the landfill as proposed under the Project will be more prominent because of its larger size and height, resulting in greater levels of visual contrast with the surrounding open space and current agricultural land uses. In many nearby views, the landfill will grow to become the dominant visual element. The size of the Project may be discernable from some viewing locations, although not obvious. The Project also proposes the construction of a second, discrete landfill mound, which will increase the likelihood that a viewer will recognize the mounds as human-built landscape features, potentially having a negative effect on their experience of the view. Additionally, the landfill will screen east- and northeast-facing views toward the Sierra Nevada foothills and mountains, the key scenic resources visible from the project area. The overall visual character and quality of the local landscape will be reduced from current levels. These effects may affect sensitive receptors near the landfill, particularly residential communities immediately to the south and west. Therefore, the visual impacts associated with the Project will be significant.

5.1.2 Required Mitigation Measures

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

Because the Project will expand the landfill's final elevation substantially above the surrounding area, mitigation measures intended to visually screen the landfill from local and distant viewpoints will be ineffective. Therefore, no mitigation measures are available to reduce this impact to a less-than-significant level.

5.1.3 Finding

Impacts to visual character and quality will remain significant and unavoidable.

5.2 Aesthetics—Impacts from Offsite Litter Generation

Please refer to Draft EIR Section 5 for an analysis of impacts to aesthetics, including from offsite litter generation (Impact 5-3).

5.2.1 Potential Effect and Rationale Supporting Finding

Litter is generated offsite by uncovered waste-haul vehicles accessing the MRF and the WRSL facilities. Prior WPWMA environmental documents concluded that this impact will be considered significant and unavoidable because even with an extensive litter control program in place, substantial litter will continue to be generated on local roads from uncovered waste-haul vehicles. The Project will increase the amount of

material received at the facility, potentially increasing the amount of offsite litter generated. Based on the SAP EIR conclusion that offsite litter generation from waste-haul vehicles will be considered a significant and unavoidable impact, the Project's contribution to an increased amount of offsite litter generation and to the extended duration of this impact will also be considered significant and unavoidable.

5.2.2 Required Mitigation Measures

Mitigation Measure 5-3: Impacts from Offsite Litter Generation

Although an extensive offsite litter control program is in place at the facility and will continue in the future with implementation of the Project, the impact of increased litter through the extended life of the WRSL will be considered significant and unavoidable. Therefore, WPWMA will 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 will remain significant.

5.2.3 Finding

Impacts caused by offsite litter generation will remain significant and unavoidable.

5.3 Aesthetics—Cumulative (Light)

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on aesthetics.

5.3.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. For new light sources, the SAP development will contribute to substantial light that will adversely affect nighttime views in the area. These cumulative impacts were identified in the SAP EIR as significant and unavoidable. The Project does not include any uses that were not considered in the SAP EIR for the project site.

5.3.2 Finding

For the foregoing reasons, the cumulative aesthetic resource impacts from light are significant and unavoidable, which is consistent with the findings in the SAP EIR.

5.4 Air Quality—Construction Emissions of Criteria Air Pollutants and Ozone Precursors

Please refer to Draft EIR Section 6 for an analysis of impacts to air quality, including from construction emissions of criteria air pollutants and ozone precursors (Impact 6-2).

5.4.1 Potential Effect and Rationale Supporting Finding

The Project's construction-related activities will result in emissions of reactive organic gases (ROG), NOx, PM10, and PM2.5 (a subset of PM10) from construction, upgrade, expansion, and replacement of onsite facilities and construction of new landfill modules. Because the Project's estimated maximum daily construction PM10 emissions will exceed the PCAPCD's mass emissions threshold, the Project has the potential to contribute emissions that could impede the area's ability to attain the NAAQS and CAAQS. The higher emissions levels and human exposure to the associated ambient air concentrations could result in adverse health effects. It is possible that health complications associated with exposure to PM10 and PM2.5 in ambient air could be increased for nearby sensitive receptors due to project-related construction emissions, but it is not feasible to define the nature and extent of the health effects, if any, at this time.

Implementation of Mitigation Measures 6-2(a) through 6-2(c) will reduce these construction impacts to the extent feasible. However, impacts are considered significant and unavoidable, even after implementation of these feasible mitigation measures.

5.4.2 Required Mitigation Measures

Impacts will be reduced to the extent feasible by the following measures:

Mitigation Measure 6-2(a): Construction emissions of criteria air pollutants (PM10 and PM2.5) and ozone precursors

Construction contractor(s) shall document their capability and commitment to implement PCAPCD's recommended construction mitigation measures and the project design measures identified in the Draft EIR as part of their grading/improvement plan submittals. Prior to any construction activity, the contractor(s) shall submit a Construction Emission/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 PM10 emissions, the following additional mitigation measures, expanding on those identified in the Draft EIR as BMPs and project design measures, 26 shall be implemented to address exhaust PM10 and PM2.5 emissions and provide dust control.

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 of the Draft EIR, 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.

Mitigation Measure 6-2(c): The WPWMA shall implement a recordkeeping program to oversee and enforce compliance with the BMP requirement for diesel-fueled equipment to use engines that meet Tier 4 Final emission standards, as certified by CARB, or cleaner, prior to or during onsite grading and construction activities.

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:

A. Type of equipment

B. Engine year and age

C. Number of years since rebuild of engine (if applicable)

D. Type of fuel used

E. Engine horsepower

F. Verified diesel emission control strategy (VDECS) information, if applicable, and other related equipment data

If any new equipment is added after submission of the inventory, the contractor(s) shall contact the WPWMA regarding the new equipment being used.

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.

The WPWMA may waive the equipment requirement noted previously only under the following unusual circumstances:

- A particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available.
- The equipment will not produce desired emissions reduction due to expected operating modes.
- Installation of the equipment will create a safety hazard or impair visibility for the operator.
- There is a compelling emergency need to use other alternate off-road equipment.

If the WPWMA grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available. 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.

Table 6-9 of the Draft EIR describes the Off-Road Equipment Compliance Step Down approach:

- If engines that comply with Tier 4 Final off-road emission standards are not commercially available, then the contractor shall meet Compliance Alternative 1.
- If off-road equipment meeting Compliance Alternative 1 are not commercially available, then the project sponsor shall meet Compliance Alternative 2.
- If off-road equipment meeting Compliance Alternative 2 are not commercially available, then the project sponsor shall meet Compliance Alternative 3.

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.

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.

5.4.3 Finding

Implementation of Mitigation Measures 6-2(a) through 6-2(c) will result in additional reductions in fugitive dust and exhaust PM emissions. Due to the extensive list of emission reduction measures and BMPs incorporated in the Project as design measures, estimation of the achievable additional reductions would be speculative. Available information on the benefits of the proposed mitigation measures is not sufficient to quantify the additional emission reductions that will occur, so this analysis of significance after mitigation is qualitative and conservative in nature.

Even with incorporation of all available and feasible mitigation measures, it is likely that project-related construction emissions will continue to exceed PCAPCD-recommended thresholds of significance for PM_{10}. Because of the scale and extent of construction activities that will occur, as well as the uncertainty of specific construction activities and timing, construction activities could overlap, resulting in emissions that will exceed PCAPCD's daily construction thresholds for PM_{10}. Construction emissions, even after mitigation, could contribute further to the nonattainment status of the Placer County and the SVAB for PM_{10} and $PM_{2.5}$. This impact will remain significant and unavoidable.

MRF Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented and would potentially result in changes in quantities, timing, and release locations of project-related air emissions estimated for construction. The proposed changes would involve accelerated and expanded diversion of organic material, including OFMSW, for composting in CASP composting systems and increased recovery and diversion of recyclables. Changes may also involve addition of an enclosed building for organics receipt and processing.

To accommodate the proposed increase in the quantity of material processed at the organics management facility, the facility would need to be built sooner than anticipated. The proposed total processing capacity would not exceed the full buildout capacity evaluated in the Project and the proposed CASP processes are similar to the ASP process analyzed as part of the Project, so facility sizing and design would not be expected to differ from the Project. Construction of an enclosed building for organics receipt and processing was not specifically analyzed as part of the Project and could result in a shifting of the year(s) for construction emissions or increased construction emissions for the organics management facility during the years when construction occurs. Increased diversion would reduce the amount of waste residuals sent to the landfill, reducing the frequency of landfill cell construction over time. Processing of increased quantities of organic material and recyclables could be accommodated within the existing MRF facility.

The conservative approach used to calculate potential maximum daily construction emissions associated with the Project included assessment of multiple overlapping construction projects to allow flexibility in the timing of individual projects. It is anticipated that shifting the timing of construction of individual project elements to accommodate earlier construction of the organics management facility would not result in emissions exceeding those calculated for the Project, even with the potential addition of an enclosed building for organics receipt and processing.

The PCAPCD recently issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system would require preconstruction review and permitting by the PCAPCD as a stationary source. As the permitting process is undertaken, the WPWMA facility must continue to comply with applicable regulatory and permitting requirements.

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this air quality impact analysis, and the conclusions of the project-level analysis related to construction emissions of criteria air pollutants would not change.

5.5 Air Quality—Operational Emissions of Criteria Air Pollutants and Ozone Precursors

Please refer to Draft EIR Section 6 for an analysis of impacts to air quality, including from operational emissions of criteria air pollutants and ozone precursors (Impact 6-3).

5.5.1 Potential Effect and Rationale Supporting Finding

Operation of the solid waste elements, complementary and programmatic elements, and supporting elements will result in emissions of ROG, NOx, PM10, and PM2.5. Because the Project's estimated net daily emissions increases will exceed the PCAPCD's mass emissions thresholds for NOx and PM10, the Project has the potential to contribute emissions that could impede the area's ability to attain the NAAQS and CAAQS. Higher emissions levels and human exposure to the associated ambient air concentrations could result in adverse health effects. It is possible that health complications associated with exposure to ozone, PM10, and PM2.5 in ambient air could be increased for nearby sensitive receptors due to project-related construction emissions, but it is not feasible to define the nature and extent of the health effects, if any, at this time.

The Project's adherence to the Mitigation Measures 6-3(a) through 6-3(b) will reduce operational impacts to the extent feasible. However, these impacts will remain significant and unavoidable, even after implementation of these mitigation measures.

5.5.2 Required Mitigation Measures

Impacts will be reduced to the extent feasible by the following measures:

Mitigation Measure 6-3: Operational emissions of criteria air pollutants and ozone precursors.

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 the Draft EIR as part of their contracts and plan submittals. To further mitigate the significant air quality impacts identified for operational emissions of NOx and PM_{10}, the following additional mitigation measures, expanding on those identified in the Draft EIR as BMPs and project design measures,[2] shall be implemented.

Mitigation Measure 6-3(a): Fund NOx emissions reductions through an Offsite Mitigation Fee Program.

The operation of solid waste elements, complementary elements, and supporting elements under the Project will result in net emissions increases in operational emissions that will exceed PCAPCD's recommended operational significance thresholds of 55 lb/day for NOx, even with implementation of the BMPs and project design measures. The estimated total increase in NOx emissions estimated in excess of the significance threshold for this Project is approximately 97.2 lb/day, equivalent to 8.9 tons per ozone season. To mitigate the net project-related increases in operational NOx emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs:

- Establish and fund an offsite mitigation project to result in a NOx 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 NOx emission reduction mitigation projects include, but are not limited to retrofitting, repowering, or replacing heavy-duty engines from mobile sources (for example, buses,

[2] 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.

construction equipment, on-road haulers), provision of electrical charging stations to support vehicle electrification, or other programs to reduce regional NOx emissions.

- Participate in the District's Off-Site 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. The estimated mitigation fees for the NOx emissions increase associated with project operations is approximately $167,000 for the Project, 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, 2021a). 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.
- Any combination of the previous or other measures, as determined feasible by WPWMA and PCAPCD.

Mitigation Measure 6-3(b): Fund PM_{10} emissions reductions through an Off-Site Mitigation Fee Program.

The operation of solid waste elements, complementary elements, and supporting elements under the Project will result in net emissions increases in operational emissions that will exceed PCAPCD's recommended operational significance thresholds of 82 lb/day for PM_{10}, even with implementation of the BMPs and project design measures listed in the Draft EIR. The estimated total increase in PM_{10} emissions estimated in excess of the significance threshold for this Project is approximately 263.7 lb/day, equivalent to 23.9 tons per winter season. To mitigate the net project-related increases in operational PM_{10} emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs:

- Establish and fund an offsite mitigation project to result in a PM_{10} 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_{10} emission reduction mitigation projects include, but are not limited to 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_{10} emissions.
- Participate in the District's Off-Site Mitigation Fee Program by paying the equivalent amount of money, to mitigate the net project contribution of PM_{10} that exceeds the 82 lb/day threshold over a single season. The estimated mitigation fees for the PM_{10} emissions increase associated with Project operations is approximately $144,600 for the Project, based upon an assumed cost-effectiveness rate of $6,050 per ton used for PM_{10} in the SAP Draft EIR (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.
- Any combination of the previous or other measures, as determined feasible by the WPWMA and PCAPCD.

5.5.3 Finding

Implementation of Mitigation Measure 6-3(a) and 6-3(b) will result in additional reductions in NOx and PM10 emissions and funded measures may also reduce PM2.5. Available information on the benefits of the mitigation measures is not sufficient to quantify the additional emission reductions that will occur, so the analysis is qualitative and conservative in nature.

Even with incorporation of all available and feasible BMPs, project design measures, and mitigation measures to reduce emissions, including funding of one-time mitigation fees, it is likely that project-related operational emissions could continue to exceed PCAPCD-recommended thresholds of significance for the ozone precursor NOx and PM10. Even though the operational emissions of some elements developed under the Project will not individually generate emissions of NOx that exceed PCAPCD's operational threshold of 55 lb/day, or

PM10 that will exceed the threshold of 82 lb/day, the combined level of operational emissions associated with the project elements could exceed PCAPCD's thresholds. Participation in a verified NOx or PM10 offset program cannot be assured. Operational emissions, even after mitigation, could contribute further to the nonattainment status of the SVAB for ozone, PM10, and PM2.5. No additional feasible mitigation measures are available to reduce this impact. This impact will remain significant and unavoidable.

MRF Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented and would potentially result in changes in quantities, timing, and release locations of estimated project-related air emissions from operations. The proposed changes would involve accelerated and expanded diversion of organic material, including OFMSW, for composting in CASP composting systems and increased recovery and diversion of recyclables. Changes may also involve addition of an enclosed building for organics receipt and processing.

To accommodate the proposed increase in the quantity of material processed at the organics management facility, facility operation would need to increase sooner than anticipated, but the proposed total processing capacity would not exceed the full buildout capacity evaluated for the Project. The proposed CASP processes are similar to the ASP process analyzed as part of the Project and would provide similar or better control of fugitive emissions from active composting. Use of an enclosed building for organics receipt and processing was not specifically analyzed as part of the Project but is not expected to result in increased operational emissions. Processing of increased quantities of organic material and recyclables could be accommodated within the existing MRF facility but may require use of additional equipment which could generate increased air emissions. Increased amounts of recyclables recovered from the MRF would also be anticipated to result in a near-term increase in outbound traffic taking material to market and associated air emissions.

Increased diversion would reduce the amount of waste residuals sent to the landfill, reducing the operational emissions associated with landfill waste disposal. Diversion of more OFMSW from the landfill within a faster timeframe would correspond to a near-term (next 10 years) reduction in LFG production, including reduced emissions of fugitive LFG.

The conservative approach used to calculate potential maximum daily emissions associated with operation of the Project included application of a peaking factor to address variability in material quantities received and processed, and the assumption that maximum daily emissions for each facility could occur on the same day. While the proposed changes have the potential to result in near-term emissions increases for the organics management facility and MRF, they also have the potential to result in decreased emissions from waste disposal operations and LFG. Overall, operational activity is not expected to exceed the levels analyzed for full buildout of the Project with implementation of the proposed changes.

The PCAPCD recently issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system would require preconstruction review and permitting by the PCAPCD as a stationary source. As the permitting process is undertaken, the WPWMA facility must continue to comply with applicable regulatory and permitting requirements.

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this air quality impact analysis, and the conclusions of the project-level analysis related to operational emissions of criteria air pollutants and ozone precursors would not change.

5.6 Air Quality—Objectionable Odors Affecting a Substantial Number of People

Please refer to Draft EIR Chapter 6 for an analysis of impacts to air quality, including from objectionable odors affecting a substantial number of people (Impact 6-6).

5.6.1 Potential Effect and Rationale Supporting Finding

The WPWMA Site-Wide Odor Plan (SWOP) describes both the odor control measures that are currently being implemented and those that will be fully implemented as part of the Project. The SWOP identifies four facilities or operations at the WPWMA facility with the greatest potential to produce odors: MRF building, composting operation, WRSL active landfill areas, and LFG collection and control system. Operation of these facilities and other solid waste elements and supporting elements under the Project could result in increases in odorous emissions.

Various new commercial and industrial facilities developed as complementary and programmatic elements under the Project could potentially result in the siting of new sources of odors. Development may include research facilities, an LFG to compressed natural gas or other renewable fuel facility, or other compatible technologies. Because no specific projects or sites have been identified for such future uses, however, the degree of impact with respect to potential odors associated with future projects and their effects on adjacent receptors is uncertain. Emissions of odors from such facilities will be subject to PCAPCD's Rule 205, Nuisance, which prohibits the discharge of air contaminants or other materials that will cause detriment, nuisance, or annoyance to any number of people.

The WPWMA will continue to monitor odor, implement effective odor control measures, and take advantage of advanced technologies as they become available and financially feasible. Because odor impacts are subjective, there are no quantifiable thresholds of significance. The effectiveness of odor control measures to be implemented by the WPWMA cannot be determined at this time, and odor impacts may remain after implementation of odor control measures. This impact will be significant.

Implementation of the Mitigation Measures 6-6 will reduce the potential impacts of the Project. However, these impacts will remain significant and unavoidable, even after implementation of these mitigation measures.

5.6.2 Required Mitigation Measures

Impacts will be reduced to the extent feasible by the following measures:

Mitigation Measure 6-6: Implement Odor Reduction Measures

The following odor reduction measures shall be implemented in addition to the BMPs and project design measures listed in Table 6-1 of the Draft EIR as mitigation measures for the proposed project:

- 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 Odor Impact Mitigation Plan (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 2020) 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 to less than 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 to less than the allowable level.

- Enhance LFG Collection (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, the WPWMA shall establish stricter protocols for LFG collection. Because LFG must be used, flared, or stored in a leak-free container, minimizing odorous emissions involves operating the system for maximum containment of gas as well as cost-effective performance of the gas-to-energy system.
- Implement Enhanced Monitoring and Modeling (Tier 1, Sitewide Technologies and Operations). To monitor odor emissions in areas around the WRSL, odor sensors shall be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the WPWMA's dispersion modeling capabilities shall also be implemented to better predict the nature, location, and intensity of odor issues.
- Establish Tree-lined Perimeter of WRSL (Tier 1, Sitewide Technologies and Operations). Trees with aromatic foliage, such as pine or eucalyptus, shall be planted around the WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.
- Implement additional measures in accordance with the Odor Mitigation Memorandum of Understanding (MOU) (Churchwell White, LLP 2019; Schmidt and Card 2019).

5.6.3 Finding

The Project will implement numerous facility improvements, including more efficient waste management operations and odor-abatement strategies that are technically and economically feasible. However, the nature and effectiveness of these strategies are unknown, there are no quantifiable thresholds of significance for odor impacts, and there is no existing fee program or other mechanism by which to fund odor mitigation. This impact will remain significant and unavoidable.

MRF Operations Design Concept Evaluation

Proposed changes to MRF operations could be implemented and would potentially result in changes in project-related odors, primarily due to accelerated, expanded processes to sort and remove the organic fraction of the MSW (OFMSW) for composting in CASP composting systems. This would reduce the amount and organic content of waste residuals sent to the landfill. Diversion of more OFMSW from the landfill within a faster timeframe would correspond to a near-term (next 10 years) reduction in LFG production, including reduced emissions of fugitive LFG. Additionally, the organic content of MRF fines used as alternative daily cover (ADC) would be reduced, reducing the likelihood of odor generation from ADC application.

The OFMSW processes and composting would have the potential to increase odors, so additional odor control measures would be implemented. CASP composting systems would include covers on the composting piles to reduce odorous emissions, using either a membrane cover system (or similar), or a biolayer and positive ASP technology like that analyzed for the Project. If the aeration system for composting were changed to negative or reverse flow, a stand-alone biofilter for odor control would be installed and operated. Changes may also involve addition of an enclosed building for organics receipt and processing.

The PCAPCD recently issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system that may require permitting by the PCAPCD as a stationary source. As the permitting process is undertaken, the facility must continue to comply with

applicable regulatory and permitting requirements. As discussed with PCAPCD staff, implementation of the SWOP and OIMP, which PCAPCD intends to add to the operating permit for the WPWMA facility, should also reduce odors and the related odor notifications in the future (Springsteen, pers. comm., 2021).

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this air quality impact analysis, and the conclusions of the project-level analysis related to odor impacts and mitigation would not change.

5.7 Air Quality—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative air quality impacts.

5.7.1 Potential Effects and Rationale Supporting Finding

The SAP EIR concluded that development of the SAP and other cumulative projects will result in significant and unavoidable cumulative air quality impacts. These include significant and unavoidable construction emissions of criteria air pollutants and ozone precursors, long-term operational emissions of criteria air pollutants and ozone precursors, the exposure of sensitive receptors to TACs, and the exposure of sensitive receptors to odors. The cumulative generation of mobile-source CO emission concentrations were identified as less than significant.

Construction Emissions of Criteria Air Pollutants and Ozone Precursors

Construction activities related to the Project, in combination with the reasonably foreseeable regional urban development described in the SAP DEIR, will add emissions of the criteria pollutants for which the project region is in nonattainment under applicable health-protective federal and state ambient air quality standards, including emissions of the ozone precursors, ROG and NOx, and particulate matter (PM_{10} and $PM_{2.5}$). Development projects, while required to mitigate for adverse air quality impacts from construction, will contribute to regional emissions that may conflict with area air quality plans and attainment efforts. The Project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS will be cumulatively considerable. Because no mitigation is available beyond that recommended for the project, the cumulative impact for project-specific construction emissions will be significant and unavoidable. This finding for the Project is consistent with the findings of the SAP EIR, which determined that project construction emissions will be cumulatively considerable, and the cumulative impact will be significant and unavoidable.

Operational Emissions of Criteria Air Pollutants and Ozone Precursors

As described in the SAP DEIR, ozone-related impacts are the result of cumulative emissions from numerous sources in the region and transport from outside the region. The SAP DEIR concluded that reasonably foreseeable development will add urban growth on over 50,000 acres of primarily undeveloped land in the region, increasing the ambient concentrations of precursor emissions, like NOx, that contribute to ozone impacts. Sources of particulate matter emissions (PM_{10} and $PM_{2.5}$) have similar regional cumulative impacts when concentrations increase over time, especially during periods of dry conditions with high winds or high levels of earth disturbing activities. When all sources throughout the region are combined, they can result in ambient concentrations of pollutants that exceed the NAAQS and CAAQS (Placer County 2018). The Project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS will be cumulatively considerable. Because no mitigation is available beyond that recommended for the Project, the cumulative impact for project-specific operational emissions will be significant and unavoidable. This finding for the 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 will be cumulatively considerable, and the cumulative impact will be significant and unavoidable.

Exposure of Sensitive Receptors to TACs

The exposure of sensitive receptors to TACs, which has been evaluated at the project-level under Impact 6-5, is also an impact of localized, cumulative concern. The approved SAP/PRSP included an amendment to County General Plan Policy 4.G.11, to reduce the 1- mile (5,280-foot) buffer for new residential uses around the WPWMA property. Under the approved SAP/PRSP, new residential uses beyond 2,000 feet but within one mile of the WPWMA property boundary could occur if approved under a specific plan, master plan, or development agreement. Therefore, the General Plan amendment may result in future development of residential uses within 1 mile of the WPWMA property in currently undeveloped areas.

The SAP EIR concluded that development of the SAP and other cumulative projects will result in significant and unavoidable exposure of sensitive receptors to TACs. While emission reduction approaches and technologies will be implemented by the WPWMA as part of the Project, the nature and effectiveness of these measures are unknown at this time, and TAC-related impacts associated with the proposed project will be cumulatively considerable. Cumulative impacts related to exposure of sensitive receptors to TACs will 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 will be cumulatively considerable, and the cumulative impact will be significant and unavoidable.

Creation of Objectionable Odors Affecting a Substantial Number of People

The SAP EIR predicted that cumulative development will make use of the WPWMA facilities for waste disposal, composting, and material recovery, which will result in a substantial increase in the incoming waste stream and associated odor emissions. The SAP EIR concluded that because the development of the SAP will result in the exposure of a substantial number of people to objectionable odors, the cumulative odor impacts will be significant and unavoidable.

While odor abatement approaches and technologies will be implemented by the WPWMA as part of the Project, the nature and effectiveness of these measures are unknown at this time, and odor impacts will be cumulatively considerable. Therefore, the cumulative impact for odors will 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 will be cumulatively considerable, and the cumulative impact will be significant and unavoidable.

5.7.2 Finding

For the foregoing reasons, cumulative impacts associated with construction emissions of criteria air pollutants and ozone precursors, long-term operational emissions of criteria air pollutants and ozone precursors, the exposure of sensitive receptors to TACs, and the exposure of sensitive receptors to odors are significant and unavoidable. These findings are consistent with the findings of the SAP EIR.

5.8 Cultural and Tribal Resources—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on cultural and tribal resources.

5.8.1 Potential Effects and Rationale Supporting Finding

For historical resources, the SAP EIR concluded that although no known historical resources are located within the boundaries of the SAP, cumulative buildout could potentially destroy or damage historical cultural resources that have not yet been identified or evaluated. The destruction of or damage to historical resources was identified in the SAP EIR as a considerable contribution to a significant cumulative impact that will remain significant and unavoidable.

5.8.2 Finding

For the foregoing reasons, cumulative impacts on historical resources are significant and unavoidable and consistent with the findings of the SAP EIR.

5.9 Greenhouse Gas Emissions and Climate—Construction and Operational Greenhouse Gas Emissions

Please refer to Draft EIR Section 10 for an analysis of impacts to GHG emissions and climate change, including from construction and operational GHG emissions (Impact 10-1).

5.9.1 Potential Effect and Rationale Supporting Finding

Construction-related activities for the Project will result in nonbiogenic GHG emissions (CO_2, CH_4, and N_2O) from fuel combustion in on-road and off-road vehicles used for construction, upgrade, expansion, and replacement of onsite facilities and construction of new landfill modules. Operational GHG emissions estimated for the development and implementation of solid waste elements, complementary elements, and supporting elements under the Project will exceed the bright-line threshold of 10,000 MT CO_2e/year. Exceedance of the PCAPCD threshold indicates that GHG emissions associated with the Project will result in a cumulatively considerable contribution to global climate change.

Implementation of the Mitigation Measures 10-1 will reduce the potential impacts of the Project. However, these impacts will remain significant and unavoidable, even after implementation of these mitigation measures.

5.9.2 Required Mitigation Measures

Impacts will be reduced to the extent feasible by the following measures:

Mitigation Measure 10-1: Fund GHG Emissions Reductions through an Offsite Mitigation Fee Program.

WPWMA and their operation contractor(s) shall document their capability and commitment to implement the GHG BMPs and project design measures identified in Table 10-1 of the Draft EIR as part of their contracts and plan submittals. To further mitigate the significant GHG impacts identified for the Project, WPWMA shall participate in one of the following voluntary offsite mitigation programs:

- 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 PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD.
- 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.)
- Any combination of these or other measures, as determined feasible by WPWMA and PCAPCD.

If an offsite mitigation measure is required for a land-use project, that mitigation measure shall explicitly identify the required GHG emission 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.

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 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 will generate the same amount of surplus GHG emission reductions by renewable energy.

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.

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:

- CAPCOA GHG Reduction Exchange Program (GHG Rx)
- CARB Compliance Offset Protocols
- Verified Carbon Standard (Verra)
- American Carbon Registry
- Climate Action Registry

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.

5.9.3 Finding

Implementation of Mitigation Measure 10-1 will result in additional reductions in GHG emissions. Available information on the benefits of the mitigation measure is not sufficient to quantify the additional emission reductions that will occur, so this analysis is qualitative and conservative in nature.

Even with incorporation of all available and feasible BMPs, project design measures, and mitigation measures to reduce emissions, including funding of mitigation fees or purchase of offsets, it is likely that project-related GHG emissions could continue to exceed PCAPCD's recommended bright-line threshold of 10,000 MT CO2e/year. Participation in a verified GHG emission offset program cannot be assured. No additional feasible mitigation measures are available to reduce this impact. This impact will remain significant and unavoidable.

Material Recovery Facility Operations Design Concept Evaluation

As described in Chapter 3, Project Description, and Chapter 4, Approach, proposed changes to material recovery facility (MRF) operations could be implemented and would potentially result in changes in

quantities, timing, and release locations of estimated project-related GHG emissions from construction and operations. The proposed changes would involve facility improvements to accommodate accelerated and expanded diversion of organic material, including organic fraction of municipal solid waste (OFMSW), for composting in covered aerated static pile (CASP) composting systems and increased recovery and diversion of recyclables. Changes may also involve the addition of an enclosed building for organics receipt and processing.

To accommodate the proposed increase in the quantity of material processed at the organics management facility, facility operation would need to increase sooner than anticipated but the proposed total processing capacity would not exceed the full buildout capacity evaluated for the Project. The proposed CASP processes are similar to the ASP process analyzed as part of the Project and would provide similar or better control of fugitive emissions from active composting. Use of an enclosed building for organics receipt and processing was not specifically analyzed as part of the Project, but it is not expected to result in increased operational GHG emissions. Processing of increased quantities of organic material and recyclables could be accommodated within the existing MRF facility, but it may require use of additional equipment, which could indirectly generate increased GHG emissions. Increased amounts of recyclables recovered from the MRF would also be anticipated to result in a near-term increase in outbound traffic taking material to market and associated GHG emissions.

The expanded use of CASP would have a corresponding increase in energy use in the near term, indirectly increasing GHG emissions associated with the electricity used for blowers. Increased diversion would reduce the amount of waste residuals sent to the landfill, reducing the frequency of landfill cell construction over time and reducing the construction and operational GHG emissions associated with landfill waste disposal. Diversion of more OFMSW from the landfill within a faster timeframe would correspond to a near-term (next 10 years) reduction in LFG production, including reduced fugitive LFG and related GHG emissions.

The conservative approach used to calculate emissions associated with construction and operation of the Project included assessing multiple overlapping construction projects to allow flexibility in the timing of individual projects and application of a peaking factor to address variability in material quantities received and processed. While the proposed changes have the potential to result in near-term emissions increases for the organics management facility and MRF, they also have the potential to result in decreased emissions from waste disposal operations and LFG. Overall, operational activity is not expected to exceed the levels analyzed for full buildout of the Project with implementation of the proposed changes.

PCAPCD recently issued permits to the WPWMA related to ASP composting; however, these permits would likely require updates as the Project proceeds. The enclosed building for organics processing, if constructed, would be equipped with an odor control system and would require preconstruction review and permitting by PCAPCD as a stationary source. As the permitting process is undertaken, the WPWMA facility must continue to comply with applicable regulatory and permitting requirements.

Based on this qualitative review, the proposed MRF operations design concept changes would be covered under the current assumptions of this GHG emissions impact analysis, and the conclusions of the project-level analysis related to GHG emissions would not change.

5.10 Greenhouse Gas Emissions—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative greenhouse gas emission impacts.

5.10.1 Potential Effects and Rationale Supporting Finding

The SAP EIR concluded that development of the SAP and other cumulative projects will result in a significant and unavoidable cumulative GHG impact. This impact includes specifically the generation of significant and

unavoidable operational GHG emissions that could conflict with the state's ability to meet its statewide GHG targets.

The analysis of GHG emissions associated with the Project is inherently a cumulative impact analysis. GHG emissions from one project cannot, on their own, result in changes in climatic conditions, therefore, the emissions of individual projects must be considered in the context of their contribution to cumulative global emissions. The emissions estimates prepared to support this Draft EIR indicate that the level of construction and operational emissions associated with implementation of the Project will exceed PCAPCD's bright line threshold of 10,000 MT CO_2e per year, and therefore will be cumulatively considerable. Implementation of GHG reduction measures and mitigation measures, along with establishment of offsets or purchase of carbon credits, will not reduce GHG emissions to less than 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.

5.10.2 Finding

For the foregoing reasons, cumulative greenhouse gas emission impacts are significant and unavoidable and consistent with the findings of the SAP EIR.

5.11 Noise—Cumulative

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts from noise.

5.11.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative noise impacts analysis. The Project will not create new cumulatively considerable noise impacts that were not considered in the SAP EIR. The Project will 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.

5.11.2 Finding

For the foregoing reasons, cumulative impacts from short-term construction noise and long-term operational noise (stationary and transportation) will be considered significant and unavoidable. Implementation of a noise-reduction program (SAP Program N-2) was identified as a way to minimize transportation noise associated with cumulative development, although not to a less-than-significant level.

5.12 Transportation—Increase in Vehicle Miles Traveled

Please refer to Draft EIR Section 16 for an analysis of impacts to transportation, including from an increase in vehicle miles traveled (VMT) (Impact 16-2).

5.12.1 Potential Effect and Rationale Supporting Finding

The increase the regional VMT in South Placer County over year 2018 existing conditions associated with project implementation will substantially exceed the identified significance thresholds. These increases in regional VMT will be primarily driven by the increased generation of solid waste associated with the anticipated growth in residential development, employment, and services within the area. The Project by its nature will accommodate the increase in waste and recyclable materials in response to the increased population within the area.

The increase in VMT in South Placer County associated with project implementation is considered a significant impact. This conclusion is consistent with the impact conclusion included in the SAP/PRSP EIR for the project site.

Implementation of the Mitigation Measures 16-2 will reduce the potential impacts of the Project. However, these impacts will remain significant and unavoidable, even after implementation of these mitigation measures.

5.12.2 Required Mitigation Measures

Impacts will be reduced to the extent feasible by the following measure:

Mitigation Measure 16-2: Increase in Vehicle Miles Traveled

Prior to the initiation of project construction activities, the WPWMA will prepare a Transportation Demand Management Plan to minimize the increase in VMT, including specific measures intended to reduce employee vehicle trips, such as carpool and ride-share incentive strategies.

5.12.3 Finding

The identified mitigation measure will reduce VMT associated with project implementation. However, because of the nature of the Project, which is proposed in part to accommodate growth in the waste stream within South Placer County, a net increase in VMT will be expected with project implementation. This increase will be greater than the identified significant threshold, and this impact will remain significant and unavoidable.

5.13 Transportation—Cumulative (VMT)

Please refer to Draft EIR Chapter 19 for an analysis of cumulative impacts on transportation VMT.

5.13.1 Potential Effects and Rationale Supporting Finding

The Draft EIR tiers off the analysis included in the SAP EIR for the cumulative impacts analysis. The SAP EIR assumed the generation of substantially greater VMT from the project site than is anticipated in the Final EIR. The SAP VMT per capita will remain above the regional average VMT per capita, as forecast in the Sacramento Area Council of Governments 2016 Metropolitan Transportation Plan (SACOG 2016). Therefore, cumulative transportation impacts have been adequately addressed in the SAP EIR. The Project will not create new cumulatively considerable transportation impacts that were not considered in the SAP EIR.

5.13.2 Finding

For the foregoing reasons, the Project will result in significant and unavoidable cumulative impacts related to the generation of VMT.

6. Growth-Inducing Impacts of the Action

Section 15126.2(e) of the State CEQA Guidelines requires that an EIR "discuss the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Please refer to Draft EIR Section 20.4 for an analysis of the potential growth-inducing impacts of the Project.

In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any one of the four criteria: (1) removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area); (2) economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.); (3) establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or (4) development or encroachment in an isolated area or one adjacent to open space (being different from an "infill" type of project).

The Project has been developed to identify the physical and operational waste recovery and waste disposal changes needed at the WPWMA facility to continue providing high-quality solid waste management services in response to a fast-growing population in an increasingly complex regulatory environment and rapidly changing global recycling markets. The area surrounding the project site consists of undeveloped open space, and no existing residential subdivisions are located within 1 mile of the site.

The Project will provide for ongoing waste disposal and recovery operations and could increase local employment to accommodate these operations. However, workers will be expected to come from the existing workforce within the surrounding communities. The implementation of the complementary and programmatic elements will further expand the demand for workers. Depending upon how quickly the complementary and programmatic elements are developed, the increased demand for workers could increase the demands on the local housing supply. However, the Project is consistent with the land use and zoning designation in the SAP, and by extension, the employment, public facility development, and housing assumptions evaluated in the SAP EIR. Implementation of the Project is expected to generate employment opportunities for current and future residents consistent with the SAP's goals and policies. Therefore, the Project is not expected to induce substantial unplanned population growth or housing demand in the County and is not expected to be growth inducing.

7. Findings Regarding Alternatives to the Project

Public Resources Code Section 21002 provides that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The same statute states that the procedures required by CEQA are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.

Under CEQA Guidelines Section 15126.6, an EIR must set forth a description of a range of reasonable alternatives to the Project or location of the Project, which would feasibly attain most of the objectives of the Project, but would avoid or substantially lessen any of the significant effects of the Project, and the EIR must also evaluate the comparative merits of the alternatives. The EIR must also evaluate a No Project Alternative. Based on the requirements of CEQA Guidelines Section 15126.6 and the Project objectives identified in Section 1.3 of this document, the following alternatives were included in Chapter 18.0 of the Draft EIR: (A) No Project Alternative; (B) Prioritize Waste Recovery; (C) No Organics Processing; (D) Three-Bin Clean MRF Alternative.

The Final EIR identifies the No Project Alternative as the environmentally superior alternative to the Project. Pursuant to the CEQA requirement that, when an EIR identifies the No Project Alternative as environmentally superior, the EIR must identify a superior alternative among the other alternatives, the EIR concludes that Alternative C, the No Organics Processing Alternative, would have lower overall adverse environmental effects compared to the rest of the build alternatives.

The Board finds that a good faith effort was made to evaluate all feasible alternatives in the EIR that are reasonable alternatives to the Project and could feasibly obtain the basic objectives of the Project, even when alternatives might impede attainment of the Project objectives and might be more costly. As a result, the scope of alternatives analyzed in the Final EIR is not unduly limited or narrow. The Board also finds that all reasonable alternatives were reviewed, analyzed, and discussed in the review process of the EIR and the ultimate decision on the Project.

7.1 Plan Concept 1

7.1.1 Description

Plan Concept 1 as described in the Draft EIR includes the following elements:

Expanded Landfill Capacity—The landfill area would be expanded to the eastern property to create one contiguous landfill footprint. The landfill's peak elevation would increase above the current permitted elevation by 30 feet to a total of 325 feet above mean sea level.

Existing Solid Waste Excavation—The northern closed, pre-Subtitle D-lined, portions of the existing landfill (Modules 1, 2, 10 and 11) are proposed to be excavated and relocated to a Subtitle D-compliant lined module. The relocation would facilitate expansion of processing and recycling operations in the northern portion of the center property.

Expanded and Redesigned Compost Operations—Composting operations and other organics management would be located in the central portion of the western property. The composting operations would be sized to accommodate anticipated material growth rates.

Expanded and Redesigned Construction and Demolition Waste Operations—Expanded C&D would be located within the northern portion of the center property.

Expanded and Redesigned Public Waste Drop-Off Area Operations—The expanded public waste drop-off area would be relocated to central portion of the western property near the relocated compost facility. These operations would be designed to ensure separation from the other waste management operations to ensure the safety and convenience of public customers.

Complementary/Programmatic Elements—The complementary/programmatic elements for Plan Concept 1 include compatible manufacturing, pilot study areas, university research areas, and a landfill gas to renewable fuels area. For the compatible manufacturing uses, areas have been designated in the northern and southern portions of the western property. The same areas on the western property would also be designated for university research uses and for pilot studies. A landfill gas to renewable fuels facility is identified as being located on the southern portion of the western property. Although space has been initially reserved for these elements primarily within the western property, opportunities may arise that would support locating some of these complementary/programmatic elements in closer proximity to the solid waste project elements or within areas not yet developed with solid waste project elements. Therefore, this plan concept assumes these complementary/programmatic elements could be located throughout the project site.

Supporting Elements—The supporting elements for Plan Concept 1 are primarily located in the northern portion of the center property where the majority of supporting activities currently occur. These elements include recovered materials storage areas, administration buildings, facility parking, existing Materials Recovery Facility (MRF), Household Hazardous Waste Facility (HHWF), maintenance area, and landfill gas-to-energy (LFGTE) plant. Within this area, the existing waste delivery entrance on Athens Avenue is proposed to be realigned to better accommodate customers. In addition, a new site entrance is proposed to be installed near the southwest corner of Athens Avenue and Fiddyment Road to provide vehicle access to the western property. A new road crossing near the south end of the MRF would consist of a tunnel, bridge, or conveyor system to connect the waste operations on the center property to those proposed on the western property.

7.1.2 Finding

For the reasons stated in the following sections, and each of them independently of the others, the Board finds that although Plan Concept 1 is feasible, the Board does not adopt this plan concept.

7.1.3 Facts Supporting the Finding

- Plan Concept 1 would include the implementation of the Renewable Placer: Waste Action Plan similar to Plan Concept 2 with the primary difference being the location of the landfill expansion. For Plan Concept 1, the landfill expansion would occur on the eastern property rather than on the western property. Based on the analysis included in the Final EIR, the environmental impacts of Plan Concept 1 and 2 would be very similar. However, the eastern property has extensive vernal pool and wetland swale habitat that would be entirely eliminated with placement of the landfill expansion on the eastern property. With Plan Concept 2, not all of the eastern property would need to be developed with implementation of the complementary/programmatic elements. Areas could be preserved between development footprints to maintain a portion of the existing aquatic habitat.
- Innovation-oriented development is being proposed on the properties east and south of the eastern property that would be compatible with the complementary/programmatic elements proposed with Plan Concept 2 on the eastern property. These developments would be less compatible with an expanded landfill footprint, as proposed with Plan Concept 1. Plan Concept 1 also has a smaller total landfill disposal capacity than Plan Concept 2, which makes Plan Concept 1 less effective at achieving the objective of ensuring that sufficient waste disposal capacity is available to accommodate anticipated long-term growth in the Participating Agencies' waste streams.

- With Plan Concept 1, substantial environmental monitoring and control systems are in place along the eastern edge of the current landfill that will require continued access and monitoring. The construction of a landfill mound over the top of these systems, as proposed with Plan Concept 1, would substantially complicate continued access and monitoring. This constraint is avoided with the implementation of Plan Concept 2.
- Finally, Plan Concept 1 would provide less operational flexibility to the WPWMA because it would require the removal and reburial of waste material from the waste excavation area sooner than would be required with Plan Concept 2. The substantial cost associated with this waste removal and reburial would limit the ability of the WPWMA to implement waste diversion activities due to funding constraints due to the high cost of the waste removal and reburial effort.

7.2 Alternative A: No Project Alternative

7.2.1 Description

The No Project Alternative (Alternative A) described in the Draft EIR is continued operation of the WPWMA facility under existing permits, without the Waste Action Plan. Ultimately, this results in phased closing of the WPWMA facility, which would eventually become an MRF and transfer station with limited organics and C&D waste processing.

Under Alternative A, the WPWMA would continue providing solid waste management services at the current location. Activities allowed under existing permits would continue until the WRSL reached capacity, at which time, the landfill portion of the facility would close. Solid waste management services would be constrained by limiting operation only to the center property and only to existing permit limits. Under Alternative A, there would be no change to how waste is collected and delivered to the site (single-stream mixed waste), and MSW would continue to be delivered to the site and processed through the MRF building accordingly.

The organics management facilities would be limited to the existing capacity, would not be upgraded under Alternative A to meet current regulatory requirements, and would not be expanded to a size adequate to address compliance with any future organics regulatory requirements. As the amount of incoming organic waste is projected to exceed the ability of the WPWMA facility to accommodate processing, the remaining organic waste would need to be managed on a jurisdiction-by-jurisdiction basis (i.e., Member Agencies would be given priority). Likewise, the C&D facility would be limited to the existing capacity and would not be upgraded to handle the complete C&D needs of the jurisdictions, with additional C&D material needing to be managed on a jurisdiction-by-jurisdiction basis.

Similar to the current use of the center property, a currently permitted landfill disposal area (Module 9) will be dedicated to the existing organics management and C&D areas. The WPWMA estimates that the remaining landfill capacity under Alternative A would be exhausted by 2058, at which time, the WRSL would close. After closure of the WRSL, MSW would be transferred to a disposal facility, possibly the Recology Ostrom Road Landfill, with the capacity to accept the MSW from the WPWMA service area. The WRSL would require a minimum of 30 years of post-closure maintenance.

7.2.2 Finding

For the reasons stated in the following sections, and each of them independently of the others, the Board finds that the No Project Alternative is not feasible and does not adopt this alternative.

7.2.3 Facts Supporting the Finding

Alternative A is a continuation of the existing operations under existing permits at the WPWMA facility until closure of the WRSL, without implementation of the Waste Action Plan. Activities allowed under existing

permits would continue until the WRSL reached capacity, at which time, it would close. Solid waste management services would be constrained by limiting operation only to the center property and only to the existing permit limits.

Alternative A would avoid or substantially lessen one or more potentially significant environmental impacts of the Project; however, those onsite impact reductions would likely be offset by increases in impacts resulting from the waste being sent offsite to an alternate facility.

Alternative A would not significantly reduce impacts associated with aesthetics, as the existing permitted height of the WRSL still represents a significant impact, and waste would still be delivered to the site, which would result in the same level of offsite litter visual impact. While air quality impacts near the site would be reduced under Alternative A as a result of fewer quantities of solid waste managed at the WPWMA's facilities, it is assumed that additional air emissions would be produced offsite by delivery of the waste to another facility. Alternative A would use neither the eastern property nor the northern half of the western property, where the majority of sensitive biological resources would be affected by the proposed project; however, there is potential for impacts to biological resources at alternate disposal locations where additional waste management activities would need to occur to replace those that could not expand at the WPWMA facility. While traffic impacts near the site associated with the proposed project would be reduced under Alternative A, it is assumed that additional traffic impacts would be produced by sending waste to an alternate facility.

As shown in Table 18-1 of the Draft EIR, Alternative A does not meet any of the objectives established for the proposed project. Alternative A will not allow the WPWMA to maintain a stable and relatively predictable cost structure through local control of solid waste. Alternative A will not expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emissions reductions, nor optimize the site to provide sufficient waste disposal capacity for long-term growth in the project area. Alternative A would not provide the WPWMA with the ability to respond to an increasingly complex and evolving regulatory environment nor allow the WPWMA to enhance customer safety by improving site access and internal circulation. By not using the eastern and western properties, Alternative A would not facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA, would not position the WPWMA facility as a hub of innovation with regard to a circular economy, and would not develop the WPWMA's properties in a manner consistent with the SAP.

7.3 Alternative B: Prioritize Waste Recovery

7.3.1 Description

The Prioritize Waste Recovery Alternative (Alternative B) eliminates expansion of the WRSL onto the eastern or western properties and adds complementary and programmatic elements to the western property. No activity would occur on the eastern property or the northern portion of the western property.

Under Alternative B, waste relocation of the closed, pre-Subtitle D-lined, area of the landfill would occur within the first 2 years after Project approval. The relocation of waste would allow for expansion of the public waste drop-off area, organics management operation, and C&D operation to expand on the northern half of the center property. Waste disposal within the WRSL would be limited to the southern portion of the center property.

Under Alternative B, waste recovery could be implemented. The public waste drop-off area, organics management area, and C&D facilities would be sized to accommodate current and future regulatory requirements and would be potentially adequate to address the organic waste management needs of the WPWMA's Participating Agencies. Similarly, the C&D facility would be upgraded to handle the complete C&D needs of the jurisdictions.

Because Alternative B prioritizes waste recovery activities over waste disposal activities, the WRSL is reduced in size from the Project and from the currently permitted landfill. Consequently, the WRSL capacity would be exhausted in approximately 2041, and the facility would transition to a MRF and transfer station. Upon completion of transfer station construction, MSW remaining after processing would be transferred to an alternate waste disposal facility, assumed to be Recology's Ostrom Road Landfill, which is anticipated to have the capacity to accept MSW from the WPWMA's service area. The WRSL would require a minimum of 30 years of post-closure maintenance.

Alternative B reserves space for complementary and programmatic activities on the western property, similar to the Project. The western property provides ample area for the 1.9 million square feet of industrial uses that complement solid waste management included in the Project.

7.3.2 Finding

For the reasons stated in the following sections, and each of them independently of the others, the Board finds that Alternative B is not feasible, and does not adopt this alternative.

7.3.3 Facts Supporting the Finding

Alternative B (Prioritize Waste Recovery) concentrates waste recovery operations on the center property, restricts landfill capacity to the center property, and adds complementary and programmatic elements on the southern portion of the western property. No activity would occur on the eastern property or the northern portion of the western property.

Alternative B would reduce visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRSL from the currently permitted height and by avoiding two landfill mounds as in the Project; however, it would not reduce the potential for offsite litter visual impacts. Alternative B would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property, where the majority of habitat for special-status wildlife species that rely on vernal pool-type wetlands would be affected by the proposed project.

The WPWMA has a stated objective for the Project to increase the WRSL's permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies' waste streams. Alternative B would result in the projected closure of the WRSL in 2041 and would, therefore, not meet this Project objective.

When the WRSL closes, traffic associated with waste disposal would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill, which would be anticipated to increase traffic volumes on roads leading to the Recology facility, as well as adding VMT by waste vehicles traveling farther distances to deliver waste material.

Alternative B would be consistent and nonconflicting with applicable local plans or policies, including the general plan, specific plan, zoning ordinance, or habitat conservation plan. Alternative B would be consistent with the existing land uses that have been occurring at the site. However, Alternative B would not fully develop the site in a manner consistent with the land use and zoning envisioned in the SAP, which identified industrial uses on all three of the WPWMA's properties, consistent with the site's ECO zoning.

Alternative B partially meets the remaining Project objectives. By not fully using the eastern and western properties, Alternative B would enhance customer safety by improving site access and internal circulation but would only partially allow the WPWMA to expand the site's capacity to divert materials from landfill disposal or provide operational flexibility to accommodate an increasingly complex and evolving regulatory environment. As Alternative B uses the southern part of the western property for complementary and

programmatic elements, such as compatible technologies, the alternative would facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA, partially develop the WPWMA's properties in a manner consistent with the goals and policies of the SAP, and partially position the WPWMA facility as a hub of innovation that promotes a circular economy.

7.4 Alternative C: No Organics Processing

7.4.1 Description

The No Organics Processing Alternative (Alternative C) excludes processing of organic waste and uses all of the property available to WPWMA. The WRSL 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 over time, the C&D facility would be expanded, and other facilities would be expanded or redesigned similar to the Project.

Under Alternative C, the northern and southern parts of the western property would continue to be available for complementary and programmatic elements – industrial uses that complement solid waste management activities. However, consideration of potential future industrial uses on the Project site would be limited to those that do not contemplate management of organic wastes.

Alternative C would allow the WPWMA to provide long-term disposal capacity through expansion of the WRSL. This alternative would not allow the WPWMA to address onsite processing and diversion of organic material or provide SB 1383 compliance services to the Participating Agencies. As such, the management of organic waste would be necessary on a jurisdiction-by-jurisdiction basis. Alternative C would allow the WPWMA to comply with regulations associated with C&D waste. The WPWMA's ability to contribute to increased recycling rates and maintain local control of solid waste management activities would be limited.

Alternative C would provide long-term recycling capacity, enhance compatibility of waste recovery and waste disposal operations, and provide opportunities for innovation, although those opportunities would be limited compared with the Project, as Alternative C does not include processing of organic waste.

7.4.2 Finding

For the reasons stated in the following sections, and each of them independently of the others, the Board finds that Alternative C is not feasible, and does not adopt this alternative.

7.4.3 Facts Supporting the Finding

Alternative C (No Organics Processing) excludes processing of organic waste. Like the Project, Alternative C uses portions of all of the property available to the WPWMA.

Alternative C would reduce the potential for significant offsite odor impacts by eliminating processing of organic waste material at the WPWMA facility. Potentially significant impacts associated with aesthetics, biological resources, and transportation and traffic are unlikely to be reduced under Alternative C.

Alternative C partially meets the objectives established for the Project. Alternative C would allow the WPWMA to increase the WRSL's permitted footprint and height to provide long-term waste disposal capacity, enhance customer safety by improving site access and internal circulation, and continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses. Alternative C would also encourage implementation of the PCCP and integrate environmentally conscious practices into facility operations and allow for the development of the WPWMA's properties in a manner

consistent with the goals and policies of the SAP. Alternative C would partially allow the WPWMA to maintain a stable and relatively predictable cost structure through local control of solid waste management operations. By eliminating the management of organic waste material at the site under Alternative C, the WPWMA would have limited ability to expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions, less operational flexibility to accommodate an increasingly complex and evolving regulatory environment, and a lesser ability to position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.

7.5 Alternative D: Waste Reduction and Alternative Technologies

7.5.1 Description

The Three-Bin Clean MRF Alternative (Alternative D) is similar to Alternative A (No Project Alternative) 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 sorts only source-separated mixed recyclables (no mixed waste, green waste, or food waste). Because there would be no mixed-waste processing, the waste bin (referred to as a black bin) of the three-bin system would be delivered straight to the WRSL for disposal. Consequently, once black bin waste material is received onsite, there would be no opportunity for removal of household hazardous wastes, organics, or other recyclable materials from that part of the waste stream.

The existing area of the site designated for future Module 9 of the WRSL currently used for Waste Recovery operations would continue to be used in this manner, restricting long-term waste disposal capacity development. No waste excavation and relocation of the closed, pre-Subtitle D, landfill would occur.

Because Alternative D prioritizes a range of solid waste management activities occurring on the center property, the WRSL would be reduced in size from the Project and from the currently permitted landfill. Consequently, the WRSL capacity would be exhausted in approximately 2048, at which time it would close and transition to a MRF and transfer station. Upon completion of transfer station construction, residual materials remaining after the processing of source-separated recyclable materials and MSW directed to the WRSL would be transferred to an alternate waste disposal facility, assumed to be Recology's Ostrom Road Landfill, which is anticipated to have the capacity to accept the MSW from the WPWMA service area. The WRSL would require a minimum of 30 years of post-closure care.

To accommodate management of organic waste on the center property, the C&D operation would be eliminated under Alternative D. ASP composting, as described for the Project, would be the anticipated form of organics waste management under Alternative D. Because the C&D operation would be discontinued, management of C&D material would be handled on a jurisdiction-by-jurisdiction basis. Self-haul MSW and organic material would continue to be accepted and there would be no significant changes to the current operation of the public waste drop-off area.

Waste management operations would not be expanded to either the eastern or western properties. Accordingly, only those complementary and programmatic elements that would fit onto the center property would be accommodated.

7.5.2 Finding

For the reasons stated in the following sections, and each of them independently of the others, the Board finds that Alternative D is not feasible and does not adopt this alternative.

7.5.3 Facts Supporting the Finding

Under Alternative D, management of solid waste at the WPWMA facility would occur on the center property only. The current mixed-waste system for waste collection would convert to a three-bin system that would require each Member Agency and delivering entity to comply accordingly. Waste disposal capacity would be limited, and the C&D operation would be eliminated.

Alternative D would reduce the potential for significant visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRSL from the currently permitted height and by avoiding two landfill mounds; however, it would not reduce the potential for offsite litter visual impacts. Alternative D would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property, where the majority of habitat for special-status wildlife species that rely on vernal pool-type wetlands would be affected by the Project.

There are no objectives of the Project that would be fully met by Alternative D. Alternative D would allow the WPWMA to partially maintain a stable and relatively predictable cost structure through continued local control of select solid waste management operations, partially expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions, and partially enhance customer safety by improving site access and internal circulation. Alternative D would not allow the WPWMA to secure long-term waste disposal capacity and would not provide the WPWMA with the operational flexibility to accommodate an increasingly complex and evolving regulatory environment. Alternative D would not contribute to improved compatibility between current and future WPWMA operations and existing and proposed adjacent land uses, would not develop the WPWMA properties in a manner consistent with the goals and policies of the SAP, would not facilitate the siting and development of compatible technologies that would benefit from proximity to WPWMA, and would not position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.

7.6 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) requires the designation of an Environmentally Superior Alternative to the Project and, if the Environmentally Superior Alternative is the No Project Alternative, selection of an Environmentally Superior Alternative from among the remaining alternatives.

The Final EIR identifies the No Project Alternative as the Environmentally Superior Alternative to the Project. The remaining alternatives, Alternatives B (Prioritize Waste Recovery), C (No Organics Processing), and D (Three-Bin Clean MRF), each have the potential to avoid or reduce some of the significant and unavoidable impacts of the proposed project. By not fully using the WPWMA's eastern and western properties, Alternatives B and D eliminate the loss and degradation of habitat for special-status wildlife species that rely on vernal pool-type wetlands for at least part of their lifecycle, including federally listed vernal pool fairy shrimp and vernal pool tadpole shrimp and western spadefoot, a California species of special concern. However, the PCCP would address potential impacts to vernal pool-type wetlands on a Countywide basis, with or without implementation of the Project. Comparatively, by eliminating the processing of organic waste at the WPWMA facility, Alternative C would significantly reduce the potential for offsite odor impacts. Because offsite odor impacts have the potential to significantly affect adjacent residents, the WPWMA determined that reducing the potential for odor impacts was of greater concern than reducing impacts to vernal pools.

As such, the WPWMA has determined that, other than the No Project Alternative, Alternative C (No Organics Processing) is the Environmentally Superior Alternative.

8. Findings Regarding Monitoring Program

Section 21081.6 of the Public Resources Code requires that when a public agency is making the finding required by Section 21081(a)(1) of the Public Resources Code, the public agency shall adopt a reporting or monitoring program for the changes made to the Project or conditions of Project approval adopted to mitigate or avoid significant effects on the environment.

The Board hereby finds that the Mitigation Monitoring and Reporting Program, which is presented as Appendix A in the Final EIR, meets the requirements of Section 21081.6 of the Public Resources Code.

9. Location and Custodian of Record of Proceedings

In accordance with Public Resources Code Section 21167.6(e), the record of proceedings for the WPWMA's decision on the Project includes the following documents:

- The Notice of Preparation and all other public notices issued by the WPWMA in conjunction with the Project
- The Draft EIR for the Project (WPWMA 2021), including Appendices
- All comments submitted by agencies or members of the public during the Draft EIR comment period
- Documents cited or referenced in the Draft EIR and Final EIR
- The mitigation monitoring and reporting program for the Project
- Findings and resolutions adopted by the Board in connection with the Project and all documents cited or referred to therein
- Reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the WPWMA, consultants to the WPWMA, or responsible or trustee agencies with respect to the WPWMA's compliance with requirements of CEQA and with respect to the WPWMA's action on the Project
- Documents submitted to the WPWMA by other public agencies or members of the public in connection with the Project, up through the close of the Board's decision on the Project
- Any minutes and/or transcripts of all information sessions, public meetings, and public hearings held by the WPWMA or Board in connection with the Project
- Any documentary or other evidence submitted to the WPWMA or Board at such information sessions, public meetings, and public hearings
- Any documents expressly cited in these findings, in addition to those cited previously
- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6(e)

The custodian of the documents and other materials that constitute the record upon which these findings are based is the WPWMA. The record shall be available for public review at the WPWMA office, located at 3013 Fiddyment Road, Roseville, CA 95747.

10. Lead Agency's Independent Judgment

Pursuant to Public Resources Code Section 21082.1(c), the Board hereby finds that the lead agency (WPWMA) has independently reviewed and analyzed the Final EIR, and that the Final EIR reflects the independent judgment of the lead agency.

11. Nature of Findings

Any finding made by the Board shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes findings by the Board, whether or not any particular sentence or clause includes a statement to that effect. The Board intends that these findings be considered as an integrated whole, and, whether or not any part of these findings fail to cross reference or incorporate by reference any other part of these findings, that any finding required or committed to be made by the Board with respect to any particular subject matter of the Final EIR, shall be deemed to be made if it appears in any portion of these findings.

12. Reliance on Record

Each and all of the findings and determinations contained herein are based on substantial evidence, both oral and written, and shall be contained within the entire administrative record of proceedings relating to the Project. The findings and determinations constitute the independent findings and determination of this Board in all respects and are fully and completely supported by substantial evidence in the record as a whole.

13. Statement of Overriding Considerations

The Final EIR has identified and discussed significant environmental effects that will occur as a result of project implementation. With implementation of the mitigation measures and project design features discussed in the Final EIR, these effects can be mitigated to levels considered less than significant except for significant, unavoidable adverse impacts in the areas of aesthetics, air quality, construction and operational greenhouse gas emissions, noise, and transportation, as described in Section 5 of this document. Specifically, implementation of the Project will result in the following significant impacts even after imposition of all feasible mitigation measures and requires adoption of a Statement of Overriding Considerations.

13.1 Impact Summaries

13.1.1 Aesthetics (Project-Level and Cumulative)

The Final EIR finds that aesthetic impacts to visual character and quality and offsite litter will remain significant and unavoidable. The Project will expand the landfill's final elevation substantially above the surrounding area, and mitigation measures intended to visually screen the landfill from local and distant viewpoints will be ineffective. The WPWMA will implement offsite litter and truck tarping programs to manage and prevent litter but the impact of increased litter through the extended life of the WRSL will be considered significant and unavoidable.

13.1.2 Air Quality (Project-Level and Cumulative)

The Final EIR finds that air quality impacts for the following areas will be significant and unavoidable:

- Construction Emissions of Criteria Air Pollutants and Ozone Precursors: Construction emissions, even after mitigation, could contribute further to the nonattainment status of the Placer County and the SVAB for PM_{10} and $PM_{2.5}$.
- Operational Emissions of Criteria Air Pollutants and Ozone Precursors: Operational emissions, even after mitigation, could contribute further to the nonattainment status of the SVAB for ozone, PM_{10}, and $PM_{2.5}$. No additional feasible mitigation measures are available to reduce this impact.
- Objectionable Odors Affecting a Substantial Number of People: The Project will implement numerous facility improvements, including more efficient waste management operations and odor-abatement strategies. However, the nature and effectiveness of these strategies are unknown, there are no quantifiable thresholds of significance for odor impacts, and there is no existing fee program or other mechanism by which to fund odor mitigation.

13.1.3 Greenhouse Gas Emissions and Climate Change (Project-Level and Cumulative)

The Final EIR finds that Greenhouse Gas Emissions and Climate Change impacts related to construction and operational impacts will be significant and unavoidable. Even with incorporation of all available and feasible BMPs, project design measures, and mitigation measures to reduce emissions, including funding of mitigation fees or purchase of offsets, it is likely that project-related GHG emissions could continue to exceed PCAPCD's recommended bright-line threshold of 10,000 MT CO_2e/year. Participation in a verified GHG emission offset program cannot be assured. No additional feasible mitigation measures are available to reduce this impact.

13.1.4 Noise (Cumulative)

The Final EIR finds that impacts related to short-term construction noise and long-term operational noise (stationary and transportation) will be significant and unavoidable. Implementation of a noise-reduction

program (SAP Program N-2) was identified as a way to minimize transportation noise associated with cumulative development, although not to a less-than-significant level.

13.1.5 Transportation (Project-Level and Cumulative)

The Final EIR finds that transportation impacts related to an increase in vehicle miles traveled will be significant and unavoidable. The nature of the Project is proposed in part to accommodate growth in the waste stream within south Placer County, and as a result, a net increase in VMT will be expected with project implementation.

13.2 Regulatory Background

PRC Section 21081 provides that no public agency shall approve or carry out a project for which an EIR has been certified, which identifies one or more significant effects on the environment that would occur if the project were carried out, unless the agency makes specific findings with respect to those significant environmental effects. Where a public agency finds that economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR, and thereby leave significant unavoidable effects, the public agency must also find that, "specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR."

In making this determination, the Lead Agency is guided by CEQA Guidelines Section 15093, which provides as follows:

> (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
>
> (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
>
> (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

13.3 Statement of Overriding Considerations

Having considered the unavoidable adverse significant impacts of the Project, the Board hereby determines that all feasible mitigation measures have been adopted to minimize, substantially reduce, or avoid the significant impacts identified in the Final EIR, and that no additional feasible mitigation is available to further reduce significant impacts. Further, the Board finds that economic, social, and other considerations of the Project outweigh the significant and unavoidable impacts described previously, and adopts the following Statement of Overriding Considerations. In making this Finding, the Board has balanced the benefits of the Project against its significant and unavoidable environmental impacts and has indicated its willingness to accept those risks. The following statements support the WPWMA's action based on the Final EIR and/or

other information in the administrative record. Any one of these overriding considerations, in itself and independently of the other listed considerations, is sufficient to support the Board's determinations herein.

- The Project will assist the WPWMA in maintaining a stable and relatively predictable cost structure through continued local-government control of solid waste management operations that improve operational efficiencies and extend the operational life of the current WPWMA facility.
- The Project will expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded organics management, improved recovery of C&D materials, recycling, and public buy-back activities.
- The Project will increase the WRSL's permitted footprint and height to optimize the efficient use of land for Waste Disposal and so that sufficient Waste Disposal capacity is available to accommodate anticipated long-term growth in the Participating Agencies' waste streams.
- The Project will enhance customer safety by improving site access and internal circulation, which will minimize potential conflicts between commercial vehicles and public users.
- The Project will provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and verify that operations associated with Project implementation are conducted in the most environmentally responsible manner possible.
- The Project will facilitate the siting and development of compatible technologies that will benefit from proximity to the WPWMA. Compatible technologies could include both proven and innovative recycling strategies intended to capitalize on an evolving local recyclable materials market and potentially reduce dependence on foreign markets.
- The Project will assist the WPWMA in developing compatible technologies that could help achieve state-mandated waste diversion goals, offset costs associated with ongoing solid waste operations, and generate innovative and creative economic opportunities within the County consistent with the SAP's objectives (Placer County 2019).
- The Project will assist the WPWMA in continuing to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area's anticipated transition to a more urban environment.
- The Project will encourage implementation of the Placer County Conservation Program and the integration of environmentally conscious practices into facility operations.
- The Project will develop WPWMA properties consistent with the goals, policies, and implementation programs identified in the SAP (Placer County 2019).
- The Project will position the WPWMA facility as a hub of innovation that promotes the development of a circular economy[3] in Placer County.

[3] A circular economy aims to redefine growth, focusing on positive societywide benefits. It entails gradually decoupling economic activity from the consumption of finite resources, and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles: design out waste and pollution, keep products and materials in use, regenerate natural systems. (https://www.ellenmacarthurfoundation.org/circular-economy/concept)

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