Response to Comments

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS

Final Subsequent Environmental Impact Report

SCH No. 1991073040

May 2005

Prepared for

Yolo County
Planning and Public Works Department
Division of Integrated Waste Management

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225 Bush Street
Suite 1700
San Francisco, CA 94104
(415) 896-5900

436 14th Street
Suite 600
Oakland, CA 94612
(510) 839-5066

8950 Cal Center Drive
Building 3, Suite 300
Sacramento, CA 95826
(916) 564-4500

707 Wilshire Boulevard
Suite 1450
Los Angeles, CA 90017
(213) 599-4300

710 Second Avenue
Suite 730
Seattle, WA 98104
(206) 442-0900

4001 Office Court Drive
Suite 607
Santa Fe, NM 87507
(505) 992-8860

2685 Ulmerton Road
Suite 102
Clearwater, FL 33762
(727) 572-5226

5850 T.G. Lee Boulevard
Suite 440
Orlando, FL 32822
(407) 851-1155

ESA Environmental Science Associates

202102

TABLE OF CONTENTS

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

CHAPTER 1
INTRODUCTION

A. PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The Yolo County Central Landfill Permit Revisions Draft Environmental Impact Report) (SCH #1991073040) was released for public review and comment in September 2004. After completion of a draft environmental impact report (Draft EIR), the California Environmental Quality Act (CEQA) requires the Lead Agency to consult with and obtain comments from public agencies that have legal jurisdiction with respect to the proposed project, and to provide the general public with opportunities to comment on the Draft EIR. CEQA also requires the Lead Agency to respond to significant environmental issues raised in the review and consultation process. The Lead Agency for the Yolo County Central Landfill Permit Revisions EIR is the Yolo County Planning and Public Works Department.

The Yolo County Central Landfill Permit Revisions Draft EIR (SCH# 1991073040) was released for a 45-day public review and comment period beginning September 24, 2004 and ending November 8, 2004. The Draft EIR was made available to responsible agencies, trustee agencies, state agencies with jurisdiction by law, federal agencies, and interested parties and individuals. The County also held a public hearing on October 14, 2004, to receive verbal comments on the Draft EIR. This document has been prepared to respond to agency and public comments received on the Draft EIR for the Yolo County Central Landfill Permit Revisions Project. Together with the Draft EIR, this document constitutes the Final EIR for the project.

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving or denying a proposed project. As specified in CEQA Guidelines (Section 15132), the Final EIR shall consist of (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; (e) any other information added by the Lead Agency.

B. REPORT ORGANIZATION

Chapter 2 of this document contains copies of comments received during the comment period and responses to those comments. Each comment is numbered in the margin of the comment letter. Responses to all written comments are in the section following the letters. The comments and responses are referenced alphanumerically by letter and comment number; the comment letters are coded alphabetically from A through J. For example, the first comment in the first

letter (from the State Clearinghouse) is A-1. The minutes of the Public Hearing and responses to Public Hearing comments follow the written comments and responses. Where a response includes a change to the text of the Draft EIR, the text change is so indicated. Chapter 3 contains text changes to the Draft EIR, based on internal review and public and agency comments. This chapter is provided so that readers may readily review adjustments that have been made to the project and the analysis since publication of the Draft EIR.

The following is a list of all persons and organizations that submitted written comments or made verbal comments at the Public Hearing on the Draft EIR during the comment period:

Letter Code	Commenter
State, Regional, and County Agencies	
A	Terry Roberts, Director, State Clearinghouse
B	Lorraine Larsen-Hallock, Senior Hazardous Substances Engineer, Department of Toxic Substances Control
C	Dennis H. O'Bryant, Acting Assistant Director, Department of Conservation-Division of Land Resource Protection
D	Diana Post, Integrated Waste Management Specialist, California Integrated Waste Management Board
E	William Brattain, P.E., Water Resources Control Engineer, Land Disposal Program, Regional Water Quality Control Board, Central Valley Region
F	Daniel P. O'Brien, Associate Air Quality Planner, Yolo-Solano Air Quality Management District
G	Moushumi Hasan, Hazardous Materials Specialist, Yolo County Health Department Environmental Health Health Division (LEA)
Individuals and Businesses	
H	Janet K. Kuivenhoven
I	Ken Kuivenhoven
J	Kevin M. Kemper, Esq.
Public Hearing Comments	
K	Ken Kuivenhoven

C. MODIFICATIONS TO THE PROJECT

Since publication of the DEIR, DIWM has revised the proposed mining of filled landfill units and a Regional Water Quality Control Board waiver of Waste Discharge Requirements for compost facilities has expired. These two changes are described below. Neither change would result in any new or more severe impacts than those described in the DEIR. The change to the landfill mining project component will, in fact, eliminate one of the impacts identified in the DEIR.

LANDFILL MINING

Since the Draft EIR was published, the Yolo County Planning and Public Works Department Division of Integrated Waste Management (DWIM) has revised its landfill mining proposal. DIWM no longer proposes to mine the older units (WMUs 1 through 5) or WMUs 6A-6C, but only to mine WMU 6D and the remaining modules of WMU 6 and WMU 7. Mining would occur after the units are filled and stabilized, and, as described in the DEIR, would enable the County to recover reusable materials (such as fines useable for cover material) and redevelop the WMUs for additional use as disposal units. Because WMU 6D is constructed with a thick operations layer (a 3-foot thick layer of shredded tires) over a 6-12 inch drainage layer of gravel, the mining operation is not anticipated to damage the bottom liner. A compacted soil layer protects the side-slope liner. The cells to be developed in the future also will have similar operations layers protecting the landfill liner. In addition, "as-built" surveys of both bottom and side slope liners have been performed in Module 6D and will be performed following construction of all future modules. Information from these as-built surveys will be used to guide and control the mining activities, to ensure that excavations do not damage the liner. In the event that the bottom or side slope liner was damaged the liner would be repaired and re-certified in accordance with the applicable Title 27 regulations.

DEIR Section 2.2.3 of Chapter 2, Project Description (DEIR page 2-9) and Mitigation Measure 3.8.2 identified in the DEIR Section 3.8 are revised in this FEIR to reflect this change to the project. In addition, this revision eliminates Impact 3.5.4, which is deleted in this FEIR. Please refer to Chapter 3, Text Changes.

COMPOSTING

As described in the DEIR (page 2-10) the existing greenwaste processing facility at YCCL has a notification level composting permit. However, since publication of the DSEIR, the Central Valley Regional Water Quality Control Board's (RWQCB's) general waiver of Waste Discharge Requirements for composting facilities has expired. Therefore, the greenwaste processing facility has ceased composting operations and is now limited to chipping and grinding of greenwaste under the current landfill permit. DIWM is still proposing to revise the SWFP for the landfill to enable the composting operations described in the Project Description of the DEIR. The expiration of the RWQCB's general waiver means that, in addition to obtaining a revised SWFP, YCCL also will need to obtain Waste Discharge Requirements from the RWQCB before resuming (or revising) composting operations at the site.

CHAPTER 2

COMMENTS AND RESPONSES

2A. WRITTEN COMMENTS

Comment Letter A

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Jan Boel
Acting Director

November 9, 2004

Linda Sinderson
Yolo County Planning and Public Works Department
Division of Integrated Waste Management
292 West Beamer Street
Woodland, CA 95695

Subject: Yolo County Central Landfill Permit Revisions
SCH#: 1991073040

Dear Linda Sinderson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 8, 2004, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

Comment Letter A

SCH#	1991073040
Project Title	Yolo County Central Landfill Permit Revisions
Lead Agency	Yolo County

Type	**EIR** Draft EIR
Description	Draft EIR for the Yolo County Central Landfill (YCCL) proposed design and operation changes. The proposed changes to the design and operation of the YCCL included in the project are 1) expanding bioreactor operations, 2) landfill height increase, 3) landfill mining, 4) adding a material recovery facility, 5) expanding the composing facility, 6) expanding salvaging, 7) adding a permanent household hazardous waste collection facility, 8) purchasing land for a soil borrow area, and 9) expanding landfill gas use options.

Lead Agency Contact

Name	Linda Sinderson		
Agency	Yolo County Planning and Public Works Department		
Phone	530 666-8859	***Fax***	
email			
Address	Division of Integrated Waste Management 292 West Beamer Street		
City	Woodland	***State*** CA	***Zip*** 95695

Project Location

County	Yolo				
City	Davis				
Region					
Cross Streets	Roads 28H and 104				
Parcel No.	042-0140-001, -002, -006				
Township	9N	***Range*** 3E	***Section*** 29,30	***Base***	MDB&M

Proximity to:

Highways	
Airports	
Railways	
Waterways	Willow Slough Bypass
Schools	
Land Use	Yolo County General Plan Designation: Yolo County Zoning: A-1 (Agriculture)

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Economics/Jobs; Forest Land/Fire Hazard; Flood Plain/Flooding; Drainage/Absorption; Geologic/Seismic; Minerals; Noise; Public Services; Septic System; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Toxic/Hazardous; Vegetation; Wetland/Riparian; Water Supply; Water Quality; Wildlife; Landuse; Growth Inducing; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Fish and Game, Region 2; Department of Conservation; Delta Protection Commission; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; California Energy Commission; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received	09/24/2004	***Start of Review***	09/24/2004	***End of Review***	11/08/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.

Comment Letter B

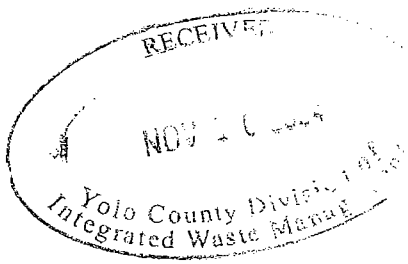
Department of Toxic Substances Control

Terry Tamminen
Agency Secretary
Cal/EPA

8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

November 8, 2004



Ms. Linda Sinderson
Yolo County
292 W. Beamer St.
Woodland, CA 95695

RE: Draft Subsequent EIR, Yolo County Central Landfill Permit Revisions
Sch# 1991073040

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report (DEIR) for the Yolo County Central Landfill Permit Revisions. The Department of Toxic Substances Control (DTSC) has the following comments:

1. Section 2.2.3 Landfill Mining. This section does not discuss the potential for the discovery / recovery of hazardous wastes during the Landfill mining operation. However, reference is made to this potential in section 3.8.2 that addresses the worker health and safety aspect of potential hazardous wastes. The DEIR needs to address the potential for the generation of hazardous wastes during the landfill mining operation. **B-1**
2. If the wastes generated are determined to meet the criteria for hazardous waste, in accordance with California Code of Regulations, title 22, division 4.5, the DEIR needs to address the management and disposal of the generated hazardous wastes as well any resulting hazardous waste generator requirements. **B-2**
3. If the project proposes to store hazardous wastes for greater than 90 days, a DTSC hazardous waste facility permit will be required, and the EIR needs to address this requirement and procedures. **B-3**

If you have any questions please contact me at (916) 255-3578.

Sincerely,

Lorraine Larsen-Hallock

Lorraine Larsen-Hallock
Senior Hazardous Substances Engineer
Northern California Permitting and Corrective Action Branch

Comment Letter B

cc: Mr. James M. Pappas, P.E.
Chief
Department of Toxic Substances Control
Northern California Permitting and Corrective Action Branch
8800 Cal Center Drive
Sacramento, California 95826

Mr. Guenther Moskat
Chief
Department of Toxic Substances Control
Planning and Environmental Analysis Section
P.O. Box 806
Sacramento, California 95812-0806

Comment Letter C

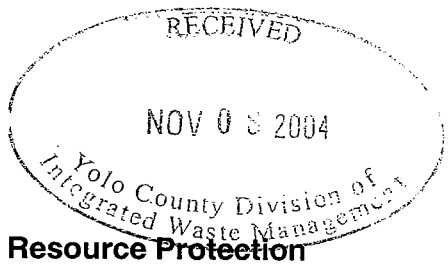
State of California **The Resources Agency**

MEMORANDUM

To: Project Coordinator
Resources Agency

Date: November 4, 2004

VIA FACSIMILE (530) 666-8853
Linda Sinderson
Yolo County
292 West Beamer Street
Woodland, CA 95695



Dennis J. O'Bryant, Acting Assistant Director
Department of Conservation – Division of Land Resource Protection

From:

Subject: Draft Subsequent Environmental Impact Report (DSEIR) for Yolo County Central Landfill Permit Revisions **SCH#1991073040**

The Department of Conservation's Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. The Division has reviewed the above DSEIR and offers the following recommendations with respect to the project's potential impacts on agricultural land.

The proposed project involves several changes to existing permits and other actions related to the Yolo County Central Landfill. Among these actions is acquisition of a 640-acre soil borrow site for supplying cover for the main landfill. The DSEIR notes that a specific borrow location has not been identified or purchased, however, it would be within five miles of the landfill. The DSEIR also lists areas to be excluded, e.g., mineral resources zones, from consideration. Although the DSEIR notes that use of prime agricultural land for the borrow site would conflict with Yolo County's Conservation Element Goal 12 (CONS-12), it does not suggest exclusion of agricultural areas as potential sites. Therefore, the Division recommends that the following information be provided in the Final SEIR, if appropriate; or in future site-specific documents addressing potential borrow sites. **C-1**

Agricultural Setting

The Final SEIR should describe the project setting, including potential areas for the borrow site, in terms of the actual and potential agricultural productivity of the land. The Division's 2002 Yolo County Important Farmland Map, which defines farmland according to soil attributes and land use, can be used for this purpose. In addition, we recommend including the following information to characterize the agricultural land resource setting of the project. **C-2**

- Current and past agricultural use of the area. Include data on the types of crops grown, and crop yields and farmgate sales values.
- To help describe the full agricultural resource value of the soils in the area, we recommend the use of economic multipliers to assess the total contribution of a

Comment Letter C

site's potential or actual agricultural production to the local, regional, and state economies. State and Federal agencies such as the UC Cooperative Extension Service and USDA are sources of economic multipliers. **C-2**

Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly (growth-inducement) from project implementation. This would also include information on whether the conversion would be temporary or permanent.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulatively considerable impacts on agricultural land. This would include impacts from the proposed project as well as impacts from past, current and probable future projects. **C-3**
- Impacts on agricultural resources may also be quantified and qualified by use of established thresholds of significance (California Code of Regulations Section 15064.7). The Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model, a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website noted later in this letter.

Public Uses/Improvements in Agricultural Preserves

The DSEIR notes that the proposed borrow area would be within five miles of the landfill. Since the five-mile radius includes areas in agricultural preserves and under Williamson Act contract, we recommend that the following items be considered and addressed during the borrow site evaluation and selection process.

- Location of agricultural preserves and contracted land within each preserve.
- State policy is to avoid the location of any federal, state, or local public improvements and any improvements of public utilities, and the resulting acquisition of land in agricultural preserves. (In this case, "public improvements" would also include "interests" in land, such as fee or easement; as well as facilities, as defined in Government Code Section 51290.5.) **C-4**
- It is also state policy that if an improvement is located in an agricultural preserve, the improvement be located on non-contracted lands. Agencies proposing location of public improvements on agricultural land should also give consideration to the public value of land, particularly prime agricultural land, within agricultural preserves.
- If it appears that land within an agricultural preserve may be required by a public agency for a public use, the public agency is required to advise the Director of Conservation and the local governing body responsible for the administration of the preserve of its intention to consider the location of a public improvement within the preserve. This step should occur early in the planning phases and not be delayed until final site selection has occurred. (See attachment for further details.) The notice should be mailed to Debbie Sareeram, Interim Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street, MS 18-01, Sacramento, CA 95814-3528.

Comment Letter C

Mitigation Measures and Alternatives

The DSEIR includes some mitigation measures that would avoid locations zoned or designated as agricultural land. The Division recommends that the mitigation measures be expanded to exclude areas of agricultural preserves and lands under Williamson Act contract. **C-5**

In the event that the only feasible borrow area is agricultural land, consideration should be given to the purchase of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. We highlight this measure because of its growing acceptance and use by lead agencies as mitigation under the California Environmental Quality Act. **C-6**

Mitigation using conservation easements can be implemented by at least two alternative approaches: the outright purchase of conservation easements tied to the project, or via the donation of mitigation fees to a local, regional or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding and maintenance of agricultural conservation easements. Whatever the approach, the conversion of agricultural land should be deemed an impact of at least regional significance and the search for mitigation lands conducted regionally, and not limited strictly to lands within Yolo County. **C-7**

Information about conservation easements is available on the Division's website, or by contacting the Division at the address and phone number listed below. The Division's website address is:

http://www.conservation.ca.gov/DLRP/ **C-8**

Thank you for the opportunity to comment on the DSEIR. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact the Division at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 324-0850.

Attachment

cc: Yolo County RCD
221 West Court Street, Suite 1
Woodland, CA 95695

Comment Letter C

ACQUISITION NOTIFICATION PROVISIONS OF THE WILLIAMSON ACT

Notification provisions of the Williamson Act (Government Code Section 51291) require an agency to notify the Director of the Department of Conservation of the possible acquisition of Williamson Act contracted land for a public improvement. Such notification must occur when it **appears** that land enrolled in a Williamson Act contract may be required for a public use, is **acquired**, the original public improvement for the acquisition is **changed**, or the land acquired is **not used** for the public improvement. The local governing body responsible for the administration of the agricultural preserve must also be notified.

NOTIFICATION (Government Code Section 51291 (b))

The following information must be included in the notification correspondence.

1. The total number of acres of Williamson Act contracted land to be acquired and whether the land is considered prime agricultural land according to Government Code Section 51201.
2. The purpose for the acquisition and why the land was identified for acquisition. (If available, include documentation of eminent domain proceedings or a property appraisal and written offer in lieu of eminent domain per GC §§7267.1 and 7267.2 to void the contract per GC §51295; include a chronology of steps taken or planned to effect acquisition by eminent domain or in lieu of eminent domain.)
3. A description of where the parcel(s) is located.
4. Characteristics of adjacent land (urban development, Williamson Act, noncontract agricultural, etc.)
5. A vicinity map and a location map (may be the same as #8).
6. A copy of the contract(s) covering the land.
7. CEQA documents for the project.
8. **The findings required under GC §51292 , documentation to support the findings and an explanation of the preliminary consideration of §51292.** (Include a map of the proposed site and an area of surrounding land identified by characteristics and large enough to help clarify that no other, noncontract land is reasonably feasible for the public improvement.)

C-9

ACQUISITION (Government Code Section 51291 (c))

The following information must be included in the notification when land within an agricultural preserve has been **acquired**. The notice must be forwarded to the Director within **10 working days** of the acquisition of the land. The notice must also include the following:

1. A general explanation of the decision to acquire the land, and why noncontracted land is not available for the public improvement.
2. Findings made pursuant to Government Code Section 51292, as amended.
3. If the information is different from that provided in the previous notice sent upon consideration of the land, a general description of the land, and a copy of the contract covering the land shall be included in the notice.

SIGNIFICANT CHANGE IN PUBLIC IMPROVEMENT (Government Code Section 51291 (d))

Once notice is given as required, if the public agency proposed any significant change in the public improvement, the Director must be notified of the **changes** before the project is completed.

LAND ACQUIRED IS NOT USED FOR PUBLIC IMPROVEMENT (Government Code Section 51295)

If the acquiring public agency does not use the land for the stated public improvement and plans to return it to private ownership, **before** returning the land to private ownership the Director must be notified of the action. **Additional requirements apply.** The mailing address for the Director is: **Debbie Sareeram, Interim Director, Department of Conservation, 801 K Street, MS 18-01, Sacramento, CA 95814.**

Comment Letter D

California Integrated Waste Management Board

Rosario Marin, Chair
1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov

rry Tamminen
Secretary for
nvironmental
Protection

Arnold Schwarzenegger
Governor

November 8, 2004

Linda Sinderson
Division OF Integrated Waste Management
County of Yolo Public Works Department
292 West Beamer Street
Woodland, California 95695

Subject: SCH No.1991073040: Draft Subsequent Environmental Impact Report for changes at the Yolo County Central Landfill (YCCL), Solid Waste Facility Permit No. 57-AA-0001, Yolo County.

Dear Ms. Sinderson:

The California Integrated Waste Management Board's (CIWMB or Board) Environmental Review (ER) staff has reviewed the Draft Subsequent Environmental Impact Report (DSEIR) cited above for the Yolo County Central Landfill (YCCL or Landfill). ER staff offer the following project description and analysis of the proposed project based on ER staff's understanding of the project as described in the above document, and in consultation with the Lead Agency. If the CIWMB project description varies substantially from the project as understood by the Lead Agency, ER staff request clarification of any significant differences in the Final Subsequent Environmental Impact Report.

The Yolo County Planning and Public Works Department acting as Lead Agency, has prepared and circulated a Draft Subsequent Environmental Impact Report (DSEIR) in order to evaluate potential environmental impacts related to the proposed design and operational changes at the YCCL. The proposed project will require revision of SWFP No. 57-AA-0001, and may require other federal, state and local approvals.

The YCCL facility is located northeast of the intersection of County Road 28H and County Road 104, approximately 2 miles northeast of the City of Davis. The facility is owned and operated by the Yolo County Planning and Public Works Department. The YCCL facility is currently permitted for solid waste disposal per the August 1995, SWFP No. 57-AA-0001

D-1

The YCCL is a 725 acre, non-hazardous, Class III landfill that has a permitted landfill disposal footprint area of 473 acres. The facility is currently permitted to receive a maximum of 1800 tons per day (tpd) of non-hazardous mixed municipal solid waste (MSW), agricultural waste, sludge, construction and demolition (C&D) debris, treated medical waste, non-friable asbestos, and tires. Permitted hours and days of operation are 6:00 a.m. to 5:00 p.m., Monday through Saturday; and 7:00 a.m. to 6:00 p.m. on Sunday. Permitted traffic volume is 1,047 vehicles per day. The maximum permitted elevation of the landfill is 80 feet above Mean Sea Level (MSL) and the estimated closure date is 2021.

Existing uses within the landfill site also include a landfill methane gas recovery and energy generation facility, a drop-off area for recyclables, a metal recovery facility, a wood and yard waste recovery area and two Class II surface impoundments for disposal of non-hazardous liquid wastes. In 1994, construction of two pilot-scale test cells began for the purpose of conducting research into bioreactor landfill technology. In 1995, YCCL was permitted to conduct a study on methane enhancement by Accelerated Anaerobic Composting in an enhanced cell and a control cell. Filling of these cells began in May 1995 and ceased in October 1995. Leachate was re-circulated and decomposition parameters monitored. In March 2000, YCCL was approved by the Board to construct and operate a 20-acre controlled landfill bioreactor demonstration project within the existing YCCL. D-1

The landfill site is zoned A-1 (Agricultural), and the land use designation in the General Plan is Agricultural. Adjacent land uses include a wastewater disposal area (spray irrigation fields) operated by Hunt-Wesson to the west of the site (which was scheduled to close in December 1999); the City of Davis Wastewater Treatment Plant to the south and east; and agricultural uses in the remaining adjacent areas. The Willow Slough by-pass runs parallel to the southern boundary of the site. There are 28 residences within a 2-mile radius of the facility, with the nearest approximately 1,600 feet south of the landfill.

PROPOSED CHANGES

The proposed project will include changes to the design and operation of the YCCL, which will be analyzed in the DSEIR, and will require revisions to the (SWFP). The proposed changes include:

Bioreactor Modules

In 1994, Yolo County constructed two pilot-scale test cells at Module B to conduct research into bioreactor landfill technology. Based on the success of these projects, Yolo County was granted approval from the US EPA to develop a full-scale bioreactor demonstration project in two phases at Module D of Waste Management Unit 6. Yolo County has completed construction of three bioreactor cells that constitute phase one: 6-acre, 3.5-acre and 2.5-acre anaerobic cells. D-2

Increase in Landfill Final Elevation

The YCCL proposes a 60-foot increase of the landfill's elevation - from 80 feet above mean sea level (MSL) to 140 feet MSL. The purpose of proposed vertical expansion is to approximately double the remaining site capacity and reduce costs by utilizing existing cells in lieu of the cost of constructing a new base liner for other modules.

Landfill mining of Waste Management Units
The Yolo County Department of Integrated Waste Management (Yolo County) proposes mining waste from completed portions of the Landfill. Priority would be given to mining the older Units. The County is seeking approval to conduct mining on any waste modules at the YCCL. Mined wastes would be sorted by size and type: metals and other recyclables removed; smaller inert matter and soil would be utilized as daily and intermediate cover at YCCL and the over-sized fraction would be land filled. Units 1 through 5 were constructed prior to Subtitle D of the Code of Federal Regulations and therefore are not lined with a modern composite liner. Due to a high water table, there are times when the bottom of these older units may be below the elevation of surrounding groundwater. These modules will be mined at least two feet below the bottom of refuse, and an engineered fill would be then be installed to increase the elevation of the base in order to meet the requirements of a 5 foot separation between waste and groundwater.

Construction and operation of a Material Recovery Facility (MRF)
Yolo County is proposing to develop a permanent MRF building approximately 45,000 square feet in size within the Landfill's property boundaries. The MRF would process self-haul, debris box and commercial loads of marketable materials. The MRF would be designed to handle up to 800 tons per days of materials, with a projected recovery rate of about 50 percent. Unrecoverable waste will be deposited in the landfill. Operation of the MRF would not increase permitted daily tonnage of waste at the landfill.

D-2

Expansion of an Existing Composting Facility (CF)
Yolo County is proposing to expand the existing greenwaste composting facility that would accept up to 500 tons per day of green waste, food waste, agricultural crop residues, manure and bio-solids (sewage sludge). Yolo County also proposes to accept mixed MSW for composting. Composted MSW would be used only for alternative daily cover (ADC). The composting facility will not increase the maximum daily tonnage for the site.

Expand Salvaging Operations
Yolo County is proposing revising the SWFP to allow salvaging of re-usable items from the tipping area and active face of the landfill. Salvaged items would be stored in a designated area for distribution and sale to the public, and for charitable organizations. Materials targeted for salvage would include building supplies, lumber, usable furniture and recyclable materials.

Household Hazardous Waste (HHW) Facility
Plans are to replace the existing HHW facility currently operating at the site with a permanent HHW facility at the YCCL. The facility is currently permitted through the Department of Toxic Substances Control. Implementing the proposed project would require revisions to the permit for additional collection hours and longer waste storage prior to shipment to an off-site HHW facility.

Purchase of additional land for a "soil-borrow" area
YCCL has a shortage of soil for daily, intermediate, and final cover material. YCCL is proposing to purchase property for the development of an off-site soil-borrow area.
The parcel of land has not yet been identified. YCCL estimates that a 640-acre parcel will be needed and should be located within 5 miles of the YCCL property.

Expanded landfill gas management and utilization options
Yolo County proposes to expand the existing landfill gas collection and utilization system and to diversify the landfill gas energy products. This might include an increase in electrical generation and transmission capacity, production of steam or alternative fuels such as methanol and liquid natural gas (LNG), commercial production of carbon dioxide (CO2), or other uses. D-2

CIWMB STAFF COMMENTS

ER staff will need complete and detailed information regarding the project description, environmental analysis, mitigations and findings, as well as complete responses to our comments, to be included in the Final SEIR in order to complete our review, and to make our recommendation to the Board that the Final SEIR is adequate for CEQA compliance purposes. If the following questions and comments are not addressed in the Final SEIR, it may not be possible for ER staff to recommend to the Board that the Final SEIR will be adequate under CEQA for permitting purposes. D-3

Project Phasing and Operation of Modules as Bioreactor Landfills
It is not clear from the project description in the DSEIR what all the proposed phases (i.e., timelines) of this project will be. The Final SEIR should have a complete and detailed description for each phase of this proposed project. This should include the number of landfill modules at the site that will be operated as bioreactors, when each of these will be under operation, whether all landfill modules will be utilized for this purpose (or only future modules), and if current/existing modules will ever be utilized as bioreactor modules. D-4 D-5

Increase in Final Fill Elevation
The region surrounding the YCCL landfill site is a very aesthetically sensitive area with high levels of public concern for the skyline views of the surrounding area. The Final SEIR must include photos showing views of the area from the north, south, east and west prior to, and digital representations of the views after the proposed increase in elevation. CIWMB ER Staff suggests that the project proponent consider the proposed alternative to decrease the height of the planned increase in landfill height. D-6 D-7

Landfill Mining
The Final SEIR should include the following:

- How cells will be mined.
- Where the mined waste will be sorted on site.
- How long the mined waste will be exposed.
- Identify the training the workers mining the waste will receive.
- Provisions for the security, protection, and safety of workers mining waste such as measures that will ensure stability of working area/face, eliminate exposure to hazardous waste and materials, and any other human health and safety issues relating to the proposed mining operation (i.e., the possibility of contact with pockets of methane, etc).
- Will mining be performed in non-daylight hours, and if so, when and how.
- Where materials separated from waste, (i.e., metals and recyclables, inert matter and soils, over-sized fraction) will be stored. D-8

- Describe how each of the materials will be used daily or stockpiled on-site.
- What will be done with waste after sorting?
- How cover, odor and vector issues will be addressed.

D-8

Material Recovery Facility (MRF)

Please assure that the Final SEIR contains the following detailed information:

- Whether the County will be applying for a separate permit for the MRF.
- Location and site plan maps as well as descriptions of the site showing exactly where the MRF will be located.
- Descriptions and maps showing detailed traffic flow for the MRF and how it relates to the traffic flow of the landfill, and the proposed compost, HHW, and salvage facilities.

D-9

Expansion of Salvaging Operations

The Final SEIR must include detailed analysis of the following:

- Descriptions of all types and estimated quantities of waste to be salvaged.
- Who will be allowed to salvage waste?
- Will salvaging be performed in non-daylight hours, and if so, how and for how long per day
- Plans for salvaging operations performed during evening hours such as night lighting and glare.
- Training workers will receive.
- Provisions for the security, protection, and safety of salvage workers such as measures that will ensure stability of working face, eliminate exposure to hazardous waste and materials, and any other human health and safety issues relating to the proposed salvaging operation.
- Where salvaged materials will be stored.
- How salvaged material will be distributed to the public or organizations as proposed.
- Is a public buy-back area planned, and if so, where this area will be located on-site.
- Whether or not the salvaged goods will be sold.
- If there be workers monitoring salvage material storage area.

D-10

Composting Facility (CF)

In order for ER staff to understand the scope of the project and determine the adequacy of the Final SEIR for this proposed project, the Final SEIR should contain a complete and detailed description of the composting facility operations. This should include, but not be limited to, detailed descriptions of the proposed composting processes such as:

- If County will be applying for a separate SWFP for the CF.
- Varieties of all feedstock.
- Composting methods (i.e., windrows, static pile, in-vessel).
- Average and maximum peak quantities of each individual type of feedstock to be received daily (in tons and cubic yards).
- Maximum volume of feedstock and active compost on-site at any time, etc.

The environmental document will also need to include consideration of potential environmental, public health and safety impacts from all phases of the proposed project. Please be advised that when this aspect of the project is better defined, additional CEQA analysis may be required.

D-11

Purchase of Additional Land for Soil-Borrow Use

When the location of the property for this proposed project is identified, additional environmental documentation will be needed in accordance with CEQA in order for ER staff to evaluate potential environmental impacts from proposed project. ER staff request notification of any information pertaining to the identification and location of property for this proposed project as soon as information is available. D-12

Consideration and Discussion of Alternatives to the Proposed Project

The Final SEIR should include alternatives to the proposed project that will be feasible yet would also achieve the Counties objectives. The County should clarify exactly what they hope to accomplish from the proposed projects *as a whole*. D-13

After these objectives are defined, the County must include in the Final SEIR, detailed alternatives to the proposed projects. Public Resources Code (PRC) §15126.6 (c) states; "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or lessen one or more of the significant effects." This analysis should include a "No Project" alternative. D-14

As stated in our previous comment letter, one of the alternatives that should be considered in the Final SEIR in order to comply with the waste reduction and recycling mandates of AB 939, are measures for waste reduction. In addition, an analysis of the significant aesthetic effects on the surrounding community from the proposed increase in the YCCL height should be addressed. The County states that many of the proposed projects (i.e., MRF, CF, mining waste, recycling waste, and bioreactor modules) will increase remaining capacity, reduce fill height, divert waste and lengthen the life of the landfill. Taking into consideration these statements by the County, as well as the significant impacts on the aesthetics of the area, ER staff request an assessment as to whether the County's objectives (when defined) would be feasibly attained, and significant effects avoided or lessened by the implementation of the proposed projects, without the vertical expansion of the site. D-15 D-16 D-17

Cumulative Impacts

The Final SEIR for the proposed project should include detailed discussion of the cumulative impacts from implementation of the proposed project. This analysis should take into account any planned development that may modify the effect of aesthetics, composting and landfill odors, vectors, traffic and noise impacts. D-18

New Construction and Demolition Debris Regulations

The CIWMB recently promulgated regulations requiring Construction and Demolition (C&D) debris processing operations and facilities, to contact their Local Enforcement Agency (LEA), which implements the state permit requirements for Construction and Demolition debris processing operations or facilities, for assistance in determining if the proposed project may require a solid waste facility permit (SWFP) under the new regulations. D-19

Operations and facilities that receive, store, handle, transfer, or process construction and demolition debris or inert debris that is commingled with solid waste that does not meet the

definition of C&D debris or inert debris, shall be regulated as transfer/processing operations and facilities.

D-19

For further information, please see the complete text of the regulations on our Website: http://www.ciwmb.ca.gov/regulations/title14/ch3a59a.htm#c3a5_9

Closure Plan

Please be advised that the CIWMB and the Office of Administrative Law has approved new solid waste regulations for Closure and Post-closure Maintenance Plans. These regulations require the preliminary closure plan to be approved before the issuance of a revised SWFP. For a full text of these regulations see our Website: http://www.ciwmb.ca.gov/RuleArchive/2004/ClosureLoan

D-20

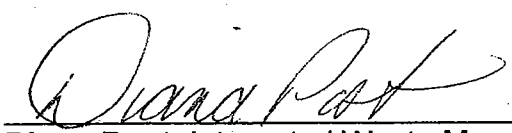
SUMMARY

ER staff thanks the Lead Agency for the opportunity to review and comment on this DSIER and requests copies of responses to comment in this letter at least two weeks prior to certification of the Final SEIR. ER staff also requests copies of any other environmental documents and any Notices of Determination for this project. Communication with the public on this project is required in the form of meetings and availability of all documents related to this project. The Final SEIR should be certified during a public hearing. CIWMB ER staff requests notice of this meeting at least two weeks in advance.

D-21

If you have any questions regarding these comments, please contact me via telephone: (916) 341-6727, or e-mail: dpost@ciwmb.ca.gov.

Sincerely,



Diana Post, Integrated Waste Management Specialist
Region 1 Environmental Review Staff
Permitting and Inspection Branch
Permitting and Enforcement Division
California Integrated Waste Management Board

Pc: Mary Madison-Johnson, Supervisor
Permitting and Inspection Branch, Region 1
Permitting and Enforcement Division
California Integrated Waste Management Board

Erica Weber, Integrated Waste Management Specialist
Permitting and Inspection Branch, Region 1
Permitting and Enforcement Division
California Integrated Waste Management Board

Comment Letter D

Pc: Felix Yeung
County of Yolo Health Department
Environmental Health
10 Cottonwood St
Woodland, CA 95695

State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

California Regional Water Quality Control Board
Central Valley Region
Robert Schneider, Chair

Terry Tamminen
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

Sacramento Main Office
Internet Address: http://www.swrcb.ca.gov/rwqcb5
11020 Sun Center Drive #200 Rancho Cordova, CA 95670-6114
Phone (916) 464-3291

Comment Letter E

19 October 2004

Linda Sinderson
Division of Integrated Waste Management
Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95965-2598

SCH #1991073040, COMMENTS ON DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT, YOLO COUNTY CENTRAL LANDFILL, YOLO COUNTY

We have reviewed the Draft Subsequent Environmental Impact Report (Draft SEIR) for Yolo County Central Landfill (YCCL) in Yolo County. It is our understanding that County of Yolo, Planning and Public Works Department (County) is proposing the following nine changes to their facility:

1) Operation of future landfill modules as bioreactor landfills;
2) Increase in the landfill's final elevation from 80 feet above mean sea level (MSL) to 140 feet;
3) Landfill mining of all waste units;
4) Construction and operation of a material recovery facility (MRF);
5) Construction and operation of a composting facility;
6) Expanded salvaging operations;
7) Conversion of the existing temporary household hazardous waste collection facility to permanent status;
8) Development of a soil borrow area in an as-yet undetermined location; and
9) Expanded landfill gas management and utilization options.

E-1

Based on our review of the information, our comments are as follows:

Mining of Bioreactors and Mining and Clean Closure of Unlined Landfill Units

Comment Nos. 1 through 5 below are directed toward the proposal to mine bioreactor units and to mine and clean close the unlined landfill units at the YCCL. Conceptually, we agree with the idea of eliminating the potential ongoing source of groundwater pollution at the unlined landfills and mining of units to recover recyclables; however, we have some concerns about how it will be carried out as discussed below.

E-2

Comment #1:
Waste Discharge Requirements (WDRs) Order No. R5-2004-0134, adopted by the Regional Board on 10 September 2004 require the unlined landfill units to be closed in accordance with a specific schedule,

E-3

as proposed by the County in the Final Closure Plan (FCP) for these unit. This schedule is given in Facility Specification No. 26 as follows:

26. The closure schedule for WMUs 1 through 5 shall be as follows:

Table IV

Closure Schedule for WMUs 1-5		
WMUs to be Closed	***Date to Complete Filling***	***Date to Complete Closure Construction***
WMU 1/2[1]	*2010*	*2011*
WMU 3	*2005*	*2006*
WMU 4/5[1]	*2012*	*2013*

[1] *WMUs 1 & 2 and 4 & 5 will be filled as single units.*

E-3

In particular, we note that WMU 3 must be closed before the end of 2006. It is not clear if the County intends to close these units with their final cover as proposed in the current FCP, or to mine and clean-close them as proposed in the Draft SEIR. If they are to be mined and clean-closed, this would require a revision of the WDRs prior to the required closure date for WMU 3.

Comment #2:

The timing of mining and clean-closure of the unlined landfill units is a concern. If this were to occur during the wet-season, or to be incomplete before the wet-season begins, there would likely be issues with contamination of storm water runoff. The same would apply for mining of bioreactor units. The Final SEIR should discuss the envisioned timing of these operations and any contingencies necessary to prevent contamination of storm water runoff and/or plans to revise the SWPPP if operations are anticipated during the wet-season.

E-4

Comment #3:

WDRs Order No. R5-2004-0134, Discharge Specification No. 1 states: *The treatment, storage, or disposal of wastes shall not cause pollution or a nuisance, as defined in the California Water Code, Section 13050.* The definition of "nuisance" in that section, in summary, allows the Regional Board to require that waste disposal or treatment not cause offensive odors that could affect a nearby community.

E-5

For Impact 3.2.2, it is not clear that the buffer area sited in this section is adequate to prevent odors from landfill or bioreactor mining from causing a nuisance in nearby communities. We believe that the Final SEIR should present a more thorough discussion of the potential impact of odors from landfill and bioreactor mining and the reasons why they will be less-than-significant.

Comment #4:

We note that the mitigation measure for Impact 3.5.5 includes the proposed development of a site-specific demonstration to evaluate the suitability of mined bioreactor landfill material for daily, intermediate and final cover. It is not clear if material mined from the unlined landfills is also to be used as cover material. This is indicated in section 2.2.10 of the Draft SEIR on Page 2-13, but is not

E-6

mentioned as an impact later in the report. If the material from the unlined landfills is to be used as cover material, this should be noted as a potential impact and a mitigation measure(s) should be proposed. Also, the closure standards in Section 21090 of Title 27, California Code of Regulations (CCR) require that the erosion resistant layer contain no waste; therefore, it is unlikely that mined material from any unit could be used in the erosion resistant layer of a final cover. E-6

Comment #5:
During mining of bioreactor units, the liner system could be damaged by equipment and could cause water quality impacts. This is especially a concern on the side-slopes and near the anchor trenches. This should be addressed as a potential impact in the Final SEIR and any necessary mitigation measures should be presented. E-7

Expansion of Composting Operations

Comment Nos. 6 through 8 are related to the proposal to expand the composting operations and to accept other materials for composting than clean wood and green waste. The listed additional wastes include food waste, agricultural crop residues, manure, biosolids, and mixed municipal solid waste. We conceptually agree with the idea of diverting these wastes from landfills when possible; however, we have some concerns regarding this proposal as discussed below. E-8

Comment #6:
The requirements for containment systems at composting facilities are very site-specific and waste-specific. The requirements depend on the types of materials to be received for composting, the composting operation methods, and site-specific factors such as depth to groundwater, soil type and underlying groundwater quality. Given the nature of the additional wastes listed in the Draft SEIR, it should be assumed that all applicable regulations in Title 27, CCR for Class II waste management units would apply to the proposed composting operation. This would mean containment systems designed to Class II standards for waste piles, and if applicable, for surface impoundments. As noted under Impact 3.5.6, the compost pads would need to be impermeable which is similar to the Class II performance standard of no migration of wastes. This comment is primarily for informational purposes, but needs to be considered in finalizing the SEIR. E-9

Comment #7:
Part of the proposed mitigation for Impact 3.5.6 is to direct runoff in the composting area to a properly designed sump and then pump the runoff to a truck for disposal in the leachate impoundments or the WWTP. The current wood and green waste processing area is designed for up to 200 tons per day and would be expanded to handle up to 500 tons per day of compostable materials. Assuming the expanded facility is proportionally larger, the compost pad area and feedstock storage areas might be 20 acres or more. Although the design storm event for such a facility has yet to be determined, if a 100-year, 24-hour storm event were used, the sump would need to be on the order of 300,000 cubic feet or greater in volume. The sump, if constructed from concrete, would not qualify for an exemption under Section 20090(i) of Title 27, CCR due to its large size. This means the sump would likely need to be designed to full Class II standards for a surface impoundment. This comment is primarily for informational purposes, but needs to be considered in finalizing the SEIR. E-10

Comment #8:
It is not clear that the existing leachate impoundments have adequate additional capacity to contain all storm water that would drain from the compost pad area during either an average or a 100-year wet season. The volume of storm water draining from the composting area during a 100-year wet season would be over 2,000,000 cubic feet using assumptions from Comment #7, above. The amount of excess capacity (if any) in the existing leachate impoundments in relation to the anticipated annual runoff from the composting area should be considered in Mitigation Measure 3.5.6 in the Final SEIR. E-11

We appreciate the opportunity to comment on the Draft SEIR. Many of the proposed changes to the operation of the landfill appear to be potentially beneficial to water quality at the facility. E-12

If you have any questions, please call me at (916) 464-4622.

WILLIAM BRATTAIN, P.E.
Water Resources Control Engineer
Land Disposal Program
Lower Sacramento River Watershed

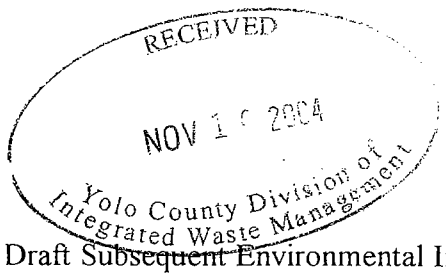
cc: State Clearinghouse, Sacramento
Diana Post, California Integrated Waste Management Board, Sacramento
Felix Yeung, Yolo County Department of Environmental Health, Woodland

Comment Letter F

1947 Galileo Court, Suite 103 • Davis, California 95616

(530) 757-3650 • (800) 287-3650 • Fax (530) 757-3670

November 8, 2004



Yolo County Planning and Public Works Department
Linda Sinderson, Solid Waste Division Manager
292 West Beamer Street
Woodland, California 95695-2598

Subject: Yolo County Central Landfill Permit Revisions Draft Subsequent Environmental Impact Report (SCH No. 1991073040)

Dear Ms. Sinderson,

The Yolo-Solano Air Quality Management District has reviewed the DEIR analyzing the proposed changes to the design and operation of the Yolo County Central Landfill, which include the following:

1. Operation of future landfill modules as bioreactor landfills,
2. Increase in the landfill's final elevation from 80 feet above msl to 140 feet,
3. Landfill mining of all waste management units,
4. Construction and operation of a material recovery facility at the landfill,
5. Expansion of the existing composting facility at the landfill,
6. Expanded salvaging operations,
7. Converting the existing temporary household hazardous waste collection facility to permanent status,
8. Purchase additional land for development of a soil borrow area, and
9. Expanded landfill gases management and use options.

F-1

Based on the information reviewed, the District appreciates the thorough evaluation of a complex project and asks that the recommended mitigation measures be strictly enforced.

Kind regards,

Daniel P. O'Brien
Associate Air Quality Planner

Comment Letter G

County of Yolo

HEALTH DEPARTMENT

Environmental Health
20 Cottonwood Street, Woodland, CA 95695
PHONE - (530) 666-8646 FAX - (530) 666-8664

Bette G. Hinton, M.D.
Director – Health Officer
Tom To
Director – Environmental Health

November 8, 2004

Linda Sinderson
Division of Integrated Waste Management
Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695

Subject: Comments on Draft Subsequent Environmental Impact Report, Yolo County Central Landfill (SCH No. 1991073040)

Dear Ms. Sinderson,

Yolo County Environmental Health (YCEH) has reviewed the Draft Subsequent Environmental Impact Report (Draft SEIR) for the Yolo County Central Landfill (YCCL). The Draft SEIR states that the County of Yolo Planning and Public Works Department is proposing the following changes to the design and operation of YCCL:

1. Operation of future landfill modules as bioreactor landfills;
2. Increase in the landfill's final elevation from 80 feet above mean sea level to 140 feet above mean sea level;
3. Landfill mining of all waste management units;
4. Construction and operation of a material recovery facility at the landfill;
5. Expansion of the existing composting facility at the landfill;
6. Expanded salvaging operations;
7. Conversion of the existing temporary household hazardous waste collection facility to permanent status;
8. Development of a soil borrow area in an as-yet undetermined location; and
9. Expanded landfill gas management and utilization options.

G-1

Our comments on the proposed changes are as follows:

1. YCCL currently has a Solid Waste Facility Permit (SWFP) with specific terms and conditions. A permit revision will have to be done to include proposed physical and operational changes.

G-2

2. For the current composting operation, YCCL has submitted only Notification paperwork. YCCL will need to apply for the applicable tier permit in order to increase volume and

G-3

range of raw materials used in the composting operation. The new composting operation may also be included in the revised SWFP. G-3

3. In order to operate the proposed 800 tons per day materials recovery facility, YCCL will need to apply for a full SWFP for Large Volume Transfer/ Processing Facility. In this case too, the new operation may be included in the revised SWFP. G-4
4. As mentioned in the Draft SEIR, increasing the number of bioreactor landfill units will result in increased landfill gas production. This could lead to potentially explosive concentrations within the waste mass or off-site. YCCL will need to continue landfill gas monitoring and reporting, and meet state and federal requirements for LFG management. G-5
5. As mentioned in the Draft SEIR, excavation of hazardous waste found while mining the older landfill units could result in the exposure of workers and the environment to harmful substances. In addition, operation of a materials recovery facility and expanded salvage operations could pose health and safety threats to workers. YCCL is planning a site-specific Health and Safety Plan (HASP). Please do submit the plan to YCEH for review and approval before starting operations. G-6
6. As mentioned in the Draft SEIR, expanding the composting operations could increase the health threat to workers from exposure to *Aspergillus fumigatus* and endotoxins. In addition, composting of mixed municipal solid waste (MSW) could result in a contaminated compost product. YCCL will have to comply with applicable current state and federal regulations in order to minimize any public health and safety issues resulting from expanded composting activities. YCCL should continue the existing load checking program to screen any hazardous substances. G-7

Thank you for the opportunity to comment on the Draft SEIR. I can be reached at (530) 666-8646 for any questions.

Sincerely,

Moushumi M. Hasan

Moushumi Hasan
Hazardous Materials Specialist
LEA/ Solid Waste Program Staff

Cc: Erica Weber, California Integrated Waste Management Board, Sacramento.
William Brattain, California Regional Water Quality Control Board, Sacramento.

Comment Letter H

Mrs. Janet K. Kuivenhoven
44643 County Road 29
Davis, CA 95616

November 8, 2004

Linda Sinderson, Solid Waste Division Manager
Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695

Dear Linda:

RE: Yolo County Central Landfill Draft EIR

As the closest resident to the current landfill I must **strongly** oppose the proposed extension of the life and capacity of this landfill. **H-1**

The issues of increased traffic, noise, smell and unsightliness are not adequately addressed. **H-2** I don't believe that this location is truly the best one anymore. **H-3** Woodland is expanding at a rapid rate and Davis has expanded also. Soon many more residents will be directly impacted by the operations of the landfill. **H-4**

Certainly there are several locations north of the current site that would be a better alternative for everyone. None seem to have been explored! **H-5**

My family has owned for over 140 years the 120 + acres my husband, daughter and I live on. We are hardly "new" to the area. We were well aware that the landfill existed where it does, but were not told of the proposed plans for expansion until we had already built our home. **H-6**

The report and other comments made by County officials claim that very few complaints regarding current operations have been received. This is incorrect! Your office has received many from us and would have received many more if the office was open at regular living hours and seven days a week! **H-7**

There have been several times when the smell coming from the Landfill and the ponds has been absolutely **hideous**!! **H-8** The current view from our house is unsightly and I am not at all convinced that any of the proposed "remedies" to the unsightliness or smell of a landfill twice the height are adequate. **H-9**

Comment Letter H

Current traffic to and from the landfill is causing road wear and tear that is difficult for the County to maintain. Trash, nails and other large items such as couches, chairs, appliances are left alongside many surrounding country roads on a daily basis already. The amount will surely increase. As the Woodland and Davis populations increase this will become a bigger and bigger hazard. **H-10** **H-11**

One of the last issues I wish to address is the increasing potential contamination of the ground and other water of the area. Again, I don't believe the proposed plan adequately assures the safety of drinking and crop water to all residents. **H-12**

I urge the County to close the current landfill as originally scheduled and open a new one at a more appropriate location. In the long-run the cost of moving to and operating at a different location further from current and future residents will be less than the cost of paying for the impact of the currently proposed expansion. **H-13**

Sincerely,

Janet Kuivenhoven on behalf of my immediate family and all the Snyders

Comment Letter I

Yolo County Planning and Public Works Department
Attn: Linda Sinderson
Solid Waste Division Manager
292 West Beamer Street
Woodland, CA. 95695

11/8/2004

Ken Kuivenhoven
44643 County Rd. 29
Davis, CA 95616

RE: Draft EIR for the Yolo County Central Landfill.

Dear Ms. Sinderson

Upon cursory review, as the Yolo County Planning Commission chose not to extend the response period for this complex EIR as requested, please find items of particular concern and disagreement below. I-1

1. I believe, after reading the Environmental Impact Report, that the alternative 5.2.1 NO PROJECT ALTERNATIVE, is the least environmentally impactive option. Obviously, it does not meet the economical desire of Yolo County to extend the existing site, but this is the Environmental Impact report, not the fiscal impact report. As stated in the report, I-2

Aesthetics
The No Project alternative would have a less severe aesthetic impact than the project since the project calls for a height increase of 60 feet. This height increase would result in significant and unavoidable impacts to views and the character of the land. ***The landfill already has a substantial impact on the view of the area. It is a huge tumor on a flat landscape. Nearly doubling the height only doubles the aesthetic impact. There are areas of Yolo County that are hilly terrain. The landfill should be located where it blend into the existing terrain, and in areas further from the current growth of Woodland and Davis.*** I-3 I-4

Air Quality
The project would potentially result in significant impacts on air quality. Even after the implementation of the identified mitigation measures, the project would result in more severe air quality impacts than the No Project alternative. ***Even after mitigation, air quality is more severe. The air quality from the existing landfill is tainted. Strong odor of decomposition and toxic gas already escape the confines of the landfill and are felt by the surrounding residents. Exposing people to increased levels of toxic air for longer periods of time is irresponsible, ~~in~~ if in private sector would be criminal.*** I-5 I-6

Comment Letter I

Biological Resources

The project would result in more severe biological impacts than the No Project alternative, in the form of regional losses of important foraging habitats and threats to wildlife…development of a soil borrow area could result in impacts on habitat, including foraging habitat, that the No Project alternative would entirely avoid. ***The borrow area needs to be identified and assessed as part of this Environmental Impact report, as it is requisite for this project to be reviewed in entirety.*** I-7 I-8

Geology

Potential geologic impacts of the project are greater than the No Project alternative. These impacts include potential slope seismic and static instability and effects on settlement and differential settlement due to higher slopes and greater landfill mass. ***The original systems were not designed with this lifespan, loads or slopes in mind. Even if they were designed with a "cushion factor", increasing the strain and lifespan on the original systems is irresponsible.*** I-9 I-10

Hydrology and Water Quality

Potential hydrology and water quality impacts of the project are greater than the No Project alternative. ***Water quality is a prime concern in this region. Crop contamination by impacted groundwater and runoff could get in to the food supply. Drinking water contamination by a break in the un-proven life cycle liner system for this project could affect people downstream.*** I-11 I-12

Land Use and Planning

The project would potentially include siting a soil borrow area on a parcel designated and zoned for agricultural use. Therefore, the No Project alternative would potentially have a lesser impact on land use and planning. ***In the over two years since this Environmental Impact report has been in preparation, no borrow area has been identified. This area is referenced in numerous areas throughout this report. It must be within 5 miles of the landfill. Within approximately 2 miles is the City of Woodland and the City of Davis. As these cities expand, and they are both expanding in the direction of the landfill, there is more demand on land resources. I believe the borrow area is critical to the increased operation of the landfill, is a substantial component of the EIR, yet as it is "un-identified" is left out of the overall scope of this report. The borrow area must be identified and it's impact assessed to be part of a complete assessment of this report.*** I-13 I-14

Public Services and Utilities

The potential increase in demand for fire protection services associated with bioreactor technology ***The bioreactor is a waste management system in it's infancy. When the landfill was originally created, it utilized the then current systems for operating. Obviously, looking at these systems now, they were flawed. No liners, waste below the seasonal water table, etc.*** I-15

The bioreactor system is an unproven technology for the full life cycle of a landfill. Creating a larger scale version of a potentially dangerous system for the purpose of economy could be environmentally disastrous and life threatening. Who will be responsible should the liners fail under the increased life span and loads, utilizing re-cycled leachate which is even more toxic and the potential for it's release into the groundwater. The Increased gas levels, if ignited could be explosive and catastrophic. There is certainly a potential impact for Life safety personnel and resources. I-16 I-17

Population and Housing

There are no population and housing impacts of the project, or of this alternative. ***To this comment, I take exception. The impact to residents currently residing around the Yolo County*** I-18

Central landfill certainly are less impacted by the reduced lifespan under the current permitted status. These same residents were told by the Planning department that the landfill was to be operated for 30 years, beginning in the 1970's. Now these families are being told that their lives, and the lives of their children and grandchildren will be impacted by this landfill. This is a definite impact. I-18

Additionally, the current location has seen an over 30% increase in the housing level within 3500 feet of the facility. It is located directly between the city of Davis approximately 2 miles to the South, and the City of Woodland approximately 2 ½ miles to the North, both of which are currently growing rapidly toward one another. The housing impact of this region over the next 75-100 years, which is the proposed NEW duration of the landfill must be taken into consideration. This landfill is poorly situated given the populous of the county and the neighboring counties job base. It is short sighted to believe that the housing impact will not continue to put pressure on this location, and increase the impact the landfill will have on current and future residents. I-19

Specific Concerns:

NOISE

Noise is addressed in depth in the EIR, as far as what noise is, what constitutes receptors, etc. Noise is a constant detractor of our existence living next to the landfill. There is noise from the facility 24 hrs/day, 365 days per year. Even when in-active, the turbines from the electric generators sing all night long. Then there are the air cannons that go off every 32 seconds – especially annoying when not turned off at night. The "screechers" as we call them which are to be a deterrent to the seagulls (who ignore both these and the air cannons from the conditioning). Then, at 6 a.m. the engines start, with the backup beepers, the truck traffic, the banging of metal gates when containers are dumped, the chipping machine, etc. etc. Noise is a constant problem. To add facilities, mine the existing landfill 7 days/week and raise the site will only exacerbate the problem. I would like to point out that this proposed expansion goes AGAINST Yolo County General plan as stated: I-20 I-21

Yolo County General Plan
County of Yolo goals and policies pertaining to noise are set forth in the General Plan (Yolo County, 1983). The following goals and policies are relevant to the proposed project:

Goal. Improve the beauty, peace, and quiet of the County. ***This project does none of these items. It makes the area uglier and noisier.*** I-22

Policy N1. Yolo County shall regulate, educate, and cooperate to reduce excessive noise levels within the environment and particularly those noise levels which impinge upon the home environment. ***It is already impinging on the home environment. The increased usage will only exacerbate the already offensive elements.***

Policy N2. Yolo County shall regulate the location and operation of land uses to avoid or mitigate harmful or nuisance levels of noise. ***Alternative of no change of use will aid in the avoidance of increased nuisance noise.***

Policy N3. Noise shall be prevented, avoided, and suppressed by controlling noises at the source, providing barriers or buffers, by the implementation of a noise ordinance and by means of wise land use planning and implementation. ***These can be implemented now. There is no room for increased noise levels.*** I-22

The report bases it's acceptability of noise levels to be at 65 db. which they feel is in the mid range of 60-70 db of acceptable ranges for residential communities. ***However, Rural areas are shown to be approximately 20 db as the norm***. This is a rural area, and as such, the landfill's current noise levels of 64 db. I find it convenient that the threshold is just barely above the existing noise levels. ***64 db is un-acceptable in the quiet of a rural environment.*** The new facilities will generate more noise than the current levels, therefore, there will be impact. ***No mitigation of the noise is set forth in this document, aside from land buffers, which do not currently address noise adequately*** I-23 I-24

One mitigation alternative would be to increase the buffer between the landfill and the nearest receptor, which is our residence. As the property has been in our family for nearly 130 years, we would like to remain on it. ***A potential mitigation would be for the county to move our home and infrastructure to the opposite end of the property, adding nearly 2000 ft of separation from the landfill activities. This, combined with other noise, odor and visual mitigation measures may aid in resolution of this dispute.*** I-25

Additionally, <u>Construction and mining activities should not begin earlier than 7 a.m. Monday through Friday, 8 a.m. to 5 p.m. Saturday, and no construction or mining activities allowed Sunday.</u> I-26

<u>The Proposed MRF Area</u>

Construction and operation of a material recovery facility at the landfill
DIWM is proposing to construct a permanent material recovery facility (MRF) at the YCCL site, to enable the County to process selected self-haul, debris box, and commercial loads to recover marketable materials. The proposed building would be approximately 45,000 square feet, and would probably be located in the area immediately west of the City of Davis's wastewater treatment ponds. Both automated equipment and manual labor would be used to recover materials. The MRF would be designed to handle up to 800 tons per day of materials, ***This area is of great concern to us, as it is proposed to be located directly North of our residence, and will be the closest component of the landfill. The major concerns are the noise, visual impact of a 45,000 sf facility, traffic and odor of living directly adjacent to an industrial facility, operating 7 days per week. This area is zoned Agricultural General, and an industrial component does not meet this criteria. This, in essence is a County run Salvage operation. It should be located in an industrial area, or managed at the waste transfer station level.*** I-27 I-28

Noise – Machinery and Dumpsters dropping commercial loads, sorting, loading and hauling are all very noisy activities. This aspect is not addressed in the EIR – only the visual aspect which states it should look "Agricultural". Hay barns are quiet, and typically open on all sides. I-29

Impact 3.2.3: Landfill changes could result in the temporary generation of odors that could affect adjacent residences. (Significant)

*****As of 2003, the new LEA inspector had not received any formal complaints regarding odors, and was not aware of past odor complaints at the landfill (Yeung, 2003). ***I take <u>STRONG</u> exception to this remark. We were told in 2003 at the preliminary meeting for this expansion to contact the county when we were noticing odors. We telephoned numerous times, e-mailed, etc. We called the Sherrif's department when the "air cannons" were going off all night long. We complained at the entrance gate to the landfill. We were given the contractor's phone number to call in the future. We called the contractor and complained to their voice mail. We have been very vocal about the landfill. Perhaps the "NEW" LEA inspector wasn't notified, but there were many complaints.*** There was an odor complaint in early 2004, from odors from an on-site pond. That odor problem has been corrected ***This "odor" was from the pond that had gone anaerobic. The smell was so bad for weeks that we could not open the windows or work outside our home without feeling ill! You would retch when you breathed the air. It has gone mildly anaerobic since, but not to the same extent. Prior to the 2004 incident, I had called for the same odor and was told that it wasn't them, it was fertilizer off the field. I can tell which way the wind is blowing, and it wasn't from anywhere but the landfill.*** (Sinderson, 2004). The YSAQMD indicated that they would not receive odor complaints regarding the landfill, those complaints would be directed to the LEA. ***Who is the "LEA" and how are the nearby residents informed of the "correct" procedures by which to live their lives?*** To further document the existing odor at the landfill, ESA conducted odor surveys on two days at the western and southern boundaries of the landfill and at the nearest sensitive receptors. On one of the two days a weak garbage odor was detected on Road 104 just west of the working face (within 600 feet). No other landfill odors were noticed off the landfill property. ***TWO DAYS??? For how long per day? What were the wind conditions. That is a horribly incomplete study! This is the same group that didn't know their pond was anaerobic.*** The areas surrounding the landfill have other odors that are also obvious at times. Freshly cut agriculture fields are common in this area. ***Freshly cut grass is a most different odor than rotting garbage and toxic gas, and the comparative is very <u>self serving</u> to attempt to minimize the perception of the odor problem!***

I-30

I-31

I-32

Future Air Pollutant Emissions with the Project

Level of Significance After Mitigation

<u>The above mitigation measures would not reduce this impact to less-than-significant.</u> The impact of the emissions during the extended life of the landfill, due to changes in this project, would be significant and unavoidable. It should be noted that without the project, future wastes in the wasteshed would need to be processed and that processing, regardless of location, would result in emissions from transport of the wastes and emissions from decomposition of the materials. When compared to future operations at the YCCL, a replacement landfill or processing center could require increased transportation (and resulting emissions) and could ***THIS IS KEY – " could" not shall – there has been no assessment of another location, and marginal assesement of the feasibility of this location. This area is one of the most prone to development in Yolo county. It is centrally located directly between growth paths of the City of Davis and the City of Woodland. Since the 1992 EIR, the # of residences near the landfill have grown more than 30%. This trend will continue as more pressure is put on the area.*** be located in the proximity of more sensitive receptors.

I-33

I-34

Impact 3.2.5: The project would increase the amount of ROG and PM-10 emissions from expanded composting activities. (Significant)

DIWM is proposing to expand the existing composting facility to accept up to 500 tons per day of

I-35

waste. The composting facility would accept a variety of materials that would be separated from other wastes at their source, including greenwaste, food waste, agricultural crop residues, manure, biosolids (sewage sludge), and MSW. This would be an increase of 300 tons per day above existing composting operations, which are permitted to process up to 200 tons per day of clean wood and greenwaste. ***This is more than double the current volume allowed. The existing facility is noisy, has fugitive dust on windy days, and produces odor. More than doubling this component will only more than double it's impact to residents.*** I-35

The information available for quantifying ROG emissions from composting facilities is still new and subject to further scrutiny and debate. ***(UNPROVEN and EXPERIMENTAL)*** However, the proposed increase in composting operations would lead to an exceedance of the YSAQMD thresholds of significance for ROG. ***And As such should not be allowed!*** I-36

Impact 3.2.6: Emissions of toxic air contaminants could pose a risk to human health. (Significant)
The project could potentially result in increased exposure of people to TACs. Increased emissions of TACs from the project would be from several different sources. These include:
• TAC emissions from LFG generated by the decomposition of more waste than is currently permitted to be placed in the landfill; ***The Threshold is 1 in 1 million – The proposed contaminant levels would be 44 in 1 million. This is a substantial impact, and exposing nearby residents to carcinogenic discharge for an extended duration is irresponsible, and if this action were private criminal.*** I-37
• TAC emissions from the increased size of the composting operations, and
• TAC emissions from diesel trucks and equipment used to haul and process future wastes not currently permitted.
The risk factors allegedly don't change – I don't see how that's possible with increased production and doubling of the permitted allowance. Even if true however, by increasing the life span of the landfill, you increase the exposure duration, which MUST increase the risk.

SUMMATION

This Draft EIR has many areas of substantial deficit. The extension of the landfill operation in it's current location, and the proposed expansion put neighboring residents at undue health risk and substantial aesthetic impact. I-38 I-39
As it certainly appears the County is determined to proceed due to the financial benefit to itself, at the physical, mental, and quality of life cost of it's neighbors, I feel it important to point out that there is a financial cost to those same neighbors as well. Although not an Environmental component, it is obvious that cost savings is the desire of the county. The value of the property of the adjoining neighbors is certainly depressed as a result of this County project, and remuneration should be part of the County's planning. I-40
Finally, I would like to point out the extreme conflict of interest in having the County be the determining party on acceptance of the EIR's impact, and whether to proceed regardless, when the County is also the EIR preparer's client, and the County is the benefactor of the report. I-41

Kenneth J. Kuivenhoven

Comment Letter J

Law Offices
GEORGE E. PHILLIPS

2306 Garfield Avenue
Carmichael, California 95608
Telephone (916) 979-4800
Telefax (916) 979-4801

November 8, 2004

Ms. Linda Sinderson
Yolo County Planning and Public Works Dept.
292 West Beamer Street
Woodland, CA 95695

Re: Yolo County Central Landfill Permit Revisions – Draft Supplemental Environmental Impact Report

Dear Ms. Sinderson:

This office represents the Gidaro Group LLC, and on behalf of our client we appreciate the opportunity to submit the following comments on the Draft Supplemental Environmental Impact Report (Draft EIR) issued for the proposed Yolo County Central Landfill Permit Revisions (the "Project"). As described in the Draft EIR, the Project would entail a series of significant changes to the design and operation of the Yolo County Central Landfill ("YCCL), including: (1) bioreactor or wet cell operations, (2) doubling the permitted landfill height, (3) landfill mining, (4) a materials recovery facility (MRF), (5) an expanded composting facility, (6) expanded salvaging operations, (7) a permanent household hazardous waste collection facility, (8) land acquisition for a soil borrow area, and (9) expanded landfill gas operations. **J-1**

We believe that the Draft EIR generally identifies the impacts associated with the Project, but in order to fully comply with CEQA further analysis is necessary, as identified below. For ease of reference, the order of our comments tracks the organization of the Draft EIR, by subject matter section. **J-2**

Section 3.1 – Aesthetics

Page 3.1-8: The discussion of Impact 3.1.1 correctly concludes that the Project is inconsistent with the goal of the Yolo County General Plan to enhance the community and preservation of rural scenery, as well as two General Plan **J-3**

Comment Letter J

policies intended to promote landscaping to enhance scenic qualities and screen unsightly views (Policies CON 27 and SH 7). The Draft EIR identifies strategic tree planting as a mitigation measure (MM 3.1.1), but erroneously concludes that impacts related to General Plan inconsistency are reduced to a less-than significant level as a result of this mitigation. Given that the Draft EIR concludes that impacts from particular viewshed vantage points are significant and unavoidable, it follows that the Project remains inconsistent with General Plan goals and policies related to the protection and enhancement of rural scenery, notwithstanding the mitigation identified by the Draft EIR and thus this impact is significant and unavoidable as well. J-3

The Aesthetics analysis in the Draft EIR is fundamentally flawed in that it focuses on the aesthetic impact of the proposed increase in height of the landfill (from 60' to 120' above ground level) at five particular locations, without analyzing the impacts associated with the fact that as landfill height increases, an expanded area (including portions of the Cities of Davis and Woodland) will be subjected to a view of the landfill. As landfill height increases, the distance at which the landfill will be visible increases exponentially. The Draft EIR must not only address the impacts associated with a doubling of the permitted height of the landfill at nearby locations, but must also address the fact that raising the permitted height of the landfill to 120 feet above ground level will make the landfill an obvious and negative feature on the landscape over a far greater area than described. J-4

Page 3.1-17. The discussion of Impact 3.1.7 recognizes that the proposed increase in height of the landfill will result in greater visibility of operations on the working face of the landfill, but concludes that impacts are less than significant because the duration of operations would be "temporary and short term" As indicated in the Draft EIR, approval of the Project would extend the working life of the landfill to the year 2100, a period of time that exceeds a normal human lifetime and which is not short-term from an impact perspective. This impact is significant and unavoidable, and must by identified as such by the Draft EIR. J-5

Section 3.2 – Air Quality

Page 3.2-18. The Draft EIR notes that many of the activities proposed by the project have the potential to result in substantial odors, particularly activities related to anaerobic bioreactors and composting. For example, the Draft EIR states that compost piles have the potential to create anaerobic decomposition, and under such circumstances can result in noxious odors affecting areas up to one mile away or more. It is likely that under certain conditions, odor impacts associated with Project activities will increase compared to current circumstances and given the proximity of existing development in the City of Davis (approximately 1.5 to 2 miles from the Project site), such odors will have a significant impact. Project Mitigation Measure J-6

Comment Letter J

3.2.3(a) requires the preparation of an "Odor Impact Minimization Plan" for the compost facility, but does identify any set of standards that much be achieved in order for mitigation to be judged as successful. Absent the inclusion of an enforceable set of performance standards for odor reduction, the Odor Impact Minimization Plan cannot be considered as adequate mitigation under CEQA. See *CEQA Guidelines* §15126.4 ("Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." See also *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692 (1990)(post-project approval formulation of mitigation plan violated CEQA where possibility of mitigation uncertain) **J-6**

Section 3.10 – Transportation and Traffic

The traffic analysis improperly relies upon the 1992 EIR to establish a baseline for traffic conditions and to assess traffic impacts associated with the Project. Under CEQA, the significance of environmental impacts are measured in terms to the change in existing physical conditions associated with the proposed activities analyzed by the Draft EIR. See *CEQA Guidelines* §15126.2 ("In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. "). See also *Environmental Planning and Information Council v. County of El Dorado*, 131 Cal.App.3d 350 (1982). While it is recognized that existing landfill operations are a component of the existing environmental baseline, the Draft EIR must assess Project impacts against existing conditions. Instead, the Draft EIR evaluates the significance impacts based upon whether Project-related trips would exceed levels permitted by the landfill's existing permits, concluding that to the extent Project-related trips did not exceed permitted levels, no significant impact would occur. The Draft EIR does not identify the existing level of trips associated with the landfill, and does not provide a means by which to assess whether Project-related trips would result in a significant impact when evaluated against current physical conditions (whether or not existing permit conditions are exceeded). **J-7**

The flaws identified above with respect to the baseline used in the traffic analysis are carried forward in the Draft EIR's analysis of air quality impacts, which similarly concludes that air quality impacts are less than significant because trips would not increase beyond levels allowed by the existing permit. This is a potentially erroneous conclusion, and one that cannot be made until an air quality analysis is prepared to review the impacts of air emissions from the trips generated by the proposed project in light of the quantitative daily emissions thresholds promulgated by the YSAQMD. **J-8**

Comment Letter J

Section 4.2 – Cumulative Impacts

Section 15130 of the CEQA Guidelines requires an analysis of cumulative impacts to be based upon either "a list of past, present and probable future projects producing related or cumulative impacts," or a projection growth projections based upon applicable General Plans. In light of this requirement, the discussion of cumulative impacts in the Draft EIR should not be limited to a short list of projects in the unincorporated County and the City of Davis. Given the proximity of the City of Woodland to the Project site, the Draft EIR must recognize future development in the Woodland area as part of the cumulative context, for example the recently approved Spring Lake Specific Plan. The City of Woodland is currently undertaking planning efforts to determine the pattern and location of future growth, which is most likely to occur in areas south and east of the city, in the direction of the landfill. Moreover, the Draft EIR must analyze cumulative impacts associated with future growth in the Davis area, which is not necessarily limited to development associated with the Covell Village project. **J-9**

We appreciate the opportunity to comment on the Draft EIR, and look forward to further participation in the environmental review and planning process for this Project. If you have questions concerning our comments, please let us know. **J-10**

Very truly yours,

Kevin M. Kemper

Cc: Steve Gidaro

2B. RESPONSES TO WRITTEN COMMENTS

A. STATE CLEARINGHOUSE (GOVERNOR'S OFFICE OF PLANNING AND RESEARCH)

A-1: This comment acknowledges receipt and distribution to State agencies of the Draft EIR.

B. DEPARTMENT OF TOXIC SUBSTANCES CONTROL

B-1: Impact 3.8.2 in the DSEIR addresses the issue of the potential for encountering hazardous wastes during mining operations, and the potential for exposure of workers and the environment to harmful substances. This impact is identified in the DSEIR as significant, and mitigation measures are provided that would reduce the impact to a less-than-significant level. However, this impact refers only to mining of older landfill units, which were filled prior to the establishment of current waste acceptance criteria and loadcheck programs. The DIWM is no longer proposing to mine these older landfill units (see Section 1C of this FEIR), and only planning to mine completed, stabilized bioreactor units, which are much less likely to contain hazardous substances. To address the remote possibility that hazardous substances may be encountered in the mining of bioreactor units, and to eliminate references to mining of the older units, Impact 3.8.2 is modified as follows (new language is underlined; deleted language is indicated by ~~strikethrough~~ text):

> **Impact 3.8.2: Excavation of hazardous waste encountered in the process of landfill mining ~~the older landfill units~~ could result in exposure of workers and the environment to harmful substances resulting in adverse health impacts. (Significant)**
>
> DIWM proposes to mine the ~~older, unlined or non-Subtitle D lined landfill units at YCCL (Units 1 through 5)~~ completed, stabilized bioreactor units in order to reclaim these areas for future disposal ~~(after construction of an appropriate liner)~~, recycle any recovered metals, use recovered soil in current landfill operations, and dispose of any unrecoverable wastes in a properly lined, active landfill unit at the site. Wastes in these ~~older~~ units were or will be disposed of ~~prior to~~ under ~~the establishment of~~ current waste acceptance criteria and loadcheck programs~~, and information on the types of wastes that may be buried is limited~~ and are therefore unlikely to contain hazardous wastes. Nevertheless, it is remotely possible that ~~Disturbance of unknown,~~ buried hazardous or toxic materials could be discovered, and could expose workers to harmful materials/substances and/or release hazardous materials to the environment.

Mitigation Measures Proposed as Part of the Project

Mitigation Measure 3.8.2a: Yolo County has developed a site-specific Health and Safety Plan (HASP) for landfill mining at YCCL. The plan provides guidelines and establishes procedures for the protection of personnel performing the scope of activities involved in landfill mining against hazardous or toxic wastes that may have been deposited within the landfill (EMCON/OWT, 2001). The HASP provides guidance to initiate the work and calls for monitoring of site conditions to determine the required protection. It is intended to be continually updated, based on consistent monitoring and implementation of the HASP adjustments. The HASP encompasses the following topics:

- personnel requirements
- training requirements
- hazard evaluation, including:
  - potential chemical hazards,
  - physical hazards (including utility clearances, use of heavy equipment, electrical hazards, adverse weather conditions, slip/trip/hit/fall injuries, heat stress, and cold stress); and
  - biological hazards (vectors and poisonous plants);
- accident prevention (including fire prevention and control);
- personal protective equipment;
- air sampling and exposure monitoring;
- site control and establishment of work zones, including
  - provision of communication equipment,
  - establishment of a buddy system, and
  - maintenance of site security;
- decontamination procedures; and
- emergency response contingency procedures.

Mitigation Measures Identified in This Report

~~None required.~~ **Mitigation Measure 3.8.2b:** Yolo County shall sample and submit for laboratory analysis excavated materials during landfill mining operations, if and when something, such as a drum or other container, or a suspicious looking or smelling substance is encountered during the mining process that suggests that it may contain hazardous materials. The sampling and testing methods for these specific materials shall be determined by the Regional Water Quality Control Board in consultation with the Department of Toxic Substances Control, and shall be described in the facility's revised Waste Discharge Requirements. These requirements shall be sufficient to ensure that any potential hazardous materials are adequately characterized. Any mined material that is found to meet the criteria for hazardous waste, in accordance with California Code of Regulations, Title 22, Division 4.5, shall not be used as alternative daily cover, for other beneficial uses, or returned to any landfill unit at YCCL, but rather shall be handled, stored, transported, and disposed as hazardous waste in accordance with state and federal regulations governing hazardous waste. Hazardous waste shall not be stored on-site for more than 90 days.

Level of Significance After Mitigation

Mitigation Measures 3.8.2a and b would reduce the potential impacts from landfill mining to a less-than-significant level.

B-2: As noted in Mitigation Measure 3.8.2 (as modified; see previous response), the County has developed a site-specific Health and Safety Plan (HASP) for landfill mining at YCCL. The HASP notes that the most likely hazardous constituents that may be encountered during landfill mining are hazardous components of landfill gas, including methane and hydrogen sulfide, leachate, which may contain toxic or otherwise hazardous substances, and asbestos. The HASP also discusses the potential for encountering drums or other containers containing potentially hazardous substances during landfill mining operations. The HASP addresses monitoring requirements, maximum exposure levels, and emergency response procedures in case hazardous substances are encountered. DEIR impacts 3.5.4 and 3.5.5 in section 3.5 (Hydrology and Water Quality) discuss the potential for groundwater and surface water contamination from landfill mining activities and use of mined material, and particularly address the issue of the potential for mined waste to contain hazardous substances. Since publication the County has revised the project and no longer proposes to mine the older landfill units (as discussed in Section C of Chapter 1); this change eliminates potential impact 3.5.4, which is deleted in this FEIR (see Chapter 3, Text Changes). Mitigation Measure 3.5.5 addresses the potential for mined waste to contain hazardous substances, and the EIR concludes that these mitigation measures together would mitigate these impacts to less-than-significant levels.

B-3: Please refer to the response to Comments B-1 and B-2.

C. DEPARTMENT OF CONSERVATION-DIVISION OF LAND RESOURCE PROTECTION

C-1: Comment noted. Please see the following responses.

C-2: As described on page 1-9 of the DSEIR, the location of the proposed soil borrow area has not been identified. Therefore, the environmental impact analysis of this project component is at a programmatic level, in accordance with CEQA Guidelines section 15168. Impacts 3.6.1 and 3.6.2 in the DSEIR identify impacts related to land use conflicts if the County selects agricultural land for the proposed borrow area, and include general mitigation measures that would reduce these impacts to less-than-significant levels. The level of analysis requested in this and subsequent comments from this commenter is not practical or meaningful at this time. As stated on the above-referenced page in the DSEIR, after identification of a specific site for the borrow area, additional, project-level environmental review of this project element will be necessary. It is anticipated that the commenter's request for more detailed and specific analysis of

potential impacts on agricultural land will be addressed in a future environmental document.

C-3: Please see response to Comment C-2.

C-4: As noted on page 3.6-8 of the DSEIR, implementation of Mitigation Measures 3.6.1a, 3.6.1b, 3.6.1c, or 3.6.1d, or a combination of these measures, would likely reduce Impact 3.6.1 (conflict with agricultural uses) to a less-than-significant level. However, this impact will have to be re-visited in a project-level environmental review if and when a location is established for the off-site borrow area, as site-specific conditions will govern the severity of the impact and the effectiveness of mitigation measures. Please see also the response to comment C-6, below.

C-5: Please see responses to the previous comment and the following comment.

C-6: The following mitigation measure is added in the Final SEIR:

> **Mitigation Measure 3.6.1e:** In the event that the only feasible borrow area is agricultural land, the County shall purchase agricultural easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. This may take the form of outright purchase of conservation easements, or via the donation of mitigation fees to a local, regional, or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding, and maintenance of agricultural conservation easements. Mitigation lands may be located within Yolo County or the region of the Central Valley.

This Mitigation Measure, in combination with Mitigation Measures 3.6.1a through 3.6.1d can be expected to fully mitigate Impact 3.6.1. However, this impact will have to be re-visited in a project-level environmental review when a location is established for the off-site borrow area.

C-7: Please see response to the previous comment.

C-8: Comment noted.

C-9: Please see response to Comments C-4 and C-6.

D. CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

D-1: The description of the existing facility, its location, and its permit conditions, appears to be accurate. Please note that the Hunt-Wesson site is no longer used for disposal of process water and is no longer owned by Hunt-Wesson or its parent company ConAgra.

D-2: Please note that one of the three existing bioreactor cells (a 2.5-acre portion) in Module D is an aerobic cell, not an anaerobic cell, as stated.

D-3: The County acknowledges that the California Integrated Waste Management Board is a Responsible Agency as defined in the CEQA statute (PRC Section 21069), and will be making a decision on concurrence in the issuance of a new Solid Waste Facility Permit for the landfill based in part on this EIR.

D-4: As discussed on page 2-13 of the DSEIR, the County is seeking to revise the facility's permits to allow a high level of flexibility in future operations. It is possible that not all project elements would be developed immediately, and some might not be developed at all. This flexibility would give the County the opportunity to experiment with different methods of handling and recovering wastes, to respond to changing market conditions, and to find and optimal balance between economy of operation and conservation of resources. One possible future scenario that describes phasing and a likely mix of operations is presented on page 2-13 of the DSEIR. This is by no means the only possible future scenario, or even the most likely.

D-5: As described on page 2-4 of the DSEIR, the County is proposing to develop all future modules as bioreactors. This would include the remaining modules in WMU 6 and all of WMU 7 (see Figure 2-3, on page 2-5 of the DSEIR). As discussed in the response to Comment B-1 (and further described in Section 1C of this FEIR, the County has abandoned its earlier proposal to mine older, unlined modules, then to re-develop these modules with Subtitle D compliant liners, and to operate them as bioreactors as well. The County has also dropped its proposal to mine WMU 6 modules A, B, and C, which are lined, and to re-develop these modules as bioreactors. As described on page 2-4 of the DSEIR, the DIWM estimates that a new 20 acre module would be developed every 4-6 years, depending on the rate of fill. Active management of bioreactor cells would continue for about 10 years after completion of the cell, at which time the waste would be stabilized, and the module would be available for mining and re-filling.

D-6: The Aesthetics analysis in the DSEIR (section 3-1) presents photographs of existing views from the northwest, west, south, and southwest of the landfill. As the lands to the East and North of the landfill are agricultural and open space lands with no residences, no recreational facilities, and only very sparsely used roads, views from these directions are not needed for a complete aesthetics analysis. The four simulated views in the DSEIR are presented from different directions and distances to characterize both specific and general changes to views and the character of the landscape that the project would cause.

D-7: Comment noted.

D-8: This response provides additional information on the proposed landfill mining operation. As discussed in previous responses, and described in Section 1C of this FEIR, the County has modified their proposal, which now includes restriction of mining only to completed, stabilized bioreactor cells.

This response is based primarily on two documents (EMCON, 2001a, EMCON, 2001b), which were also the primary source documents for preparation of the DSEIR.

Landfill mining would be performed with a hydraulic excavator located on a stable pad. A maximum slope of 1:1 would be maintained in the excavation. Excavated material would be transported to a trommel screen, either via a conveyor belt or with articulated trucks. The trommel screen would be located within the landfill boundary in a stable location with sufficient space for the operation. This location would be moved from time to time to maintain the efficiency of the operation. The trommel screen would separate mined material into two fractions: a smaller fraction (fines) that falls through the screen (1 to 2-inch screen opening), consisting of cover soil, decomposed organic material, inert fines, and other fines; and larger material (overs) that do not pass through the screen. Overs, as well as any unscreened saturated wastes encountered during excavation (it is expected that the lower levels of waste placement may be wet) would be disposed at the current active face of the landfill prior to the end of the working day. Fines would also be removed prior to the end of the working day to the active face and used as daily or intermediate cover material. Ferrous metals may be separated from the overs using an electromagnet. If this option is used, recovered metals would be placed in a debris box and tarped at the end of the working day, or when full. The excavation itself would be covered with fines or with a geosynthetic tarp at the end of each working day. Thus, no materials would be exposed for more than the length of the working day, with the exception of fines used as cover material.

Mining is proposed to take place only during normal landfill operating hours (which would preclude operations during non-daylight hours) and only during the dry months of late spring, summer, and early fall. At the completion of each work season, a wet weather plan would be prepared. This would address issues of run-on, run-off, and erosion. During wet weather, the excavation would be covered with a minimum of 1 foot of soil.

Odors are expected to be worst during actual excavation, loading, hauling, and screening operations. Odors will be minimized by limiting excavation to only the dry season, and if necessary by using an odor counteractant spray, and by other means if odors continue to be a problem.

Worker training is described in the Specific Health and Safety Plan (HASP) for the proposed landfill mining operation (EMCON, 2001b). In addition to ensuring that personnel conducting work at the site had received suitable training in the tasks and equipment for which they had been assigned, all employees would also undergo site-specific training, which would include the following:

- A site-specific orientation meeting by County landfill management prior to the start of work
- An initial site-specific training prior to commencement of work and weekly supplemental safety meetings conducted by the project manager or site supervisor.

The initial training would include instruction on:
- Personnel responsibilities;
- Content and implementation of the HASP;
- Site hazards and controls
- Site-specific hazardous procedures;
- Medical and training requirements;
- Use of direct reading monitoring equipment
- Levels of protection;
- Action levels for upgrading/downgrading levels of personal protective equipment (PPE);
- Emergency information, including local emergency response team phone numbers, route to nearest hospital, and emergency response procedures;
- Instruction in the completion of required forms.

The HASP evaluates the probable hazards that could be encountered during landfill mining operations, the severity of the risk, and procedures to minimize risk and to respond to hazardous situations. Topics covered include the following:

- Chemical hazards (methane gas, hydrogen sulfide gas, and leachate are identified as the most likely hazardous chemical that would be encountered);
- Physical hazards, including working in close proximity to heavy equipment, engulfment, suffocation from trench/excavation work, noise, utilities, slip/trip/hit/fall injuries, heat stress/cold stress, and limited dexterity and visibility from use of PPE;
- Biological hazards, including vector diseases (especially those transmitted by ticks and fleas), and poisonous plants (poison oak);
- Accident prevention, including fire prevention and control.

In addition, the HASP covers the topics of PPE use; air monitoring during excavation for levels of oxygen, hydrogen sulfide, and explosive gasses, and for volatile organic compounds whenever chemical vapors or hazardous materials are encountered; site control and work zones; decontamination procedures; and emergency response contingency procedures.

D-9: The County is not applying for a separate SWFP for the MRF, but rather would like the MRF operation to be specified in the landfill's SWFP. As shown in Figure 2-3 in the DSEIR, the MRF would be located in the area south of the wood and yard waste composting area, west of the City of Davis Wastewater Treatment Plant. As detailed plans for the MRF have not yet been prepared, traffic flow patterns have not yet been laid out. However, the County plans to use the existing landfill gate for all ingress and egress for all landfill activities. On-site roadways will be developed to accommodate large truck traffic, with appropriate controls and signage at intersections and queuing locations. In addition, site personnel will direct traffic to the appropriate tipping area.

D-10: As described in the Project Description, the expanded salvaging operation would target building supplies, lumber, usable furniture, and recyclable materials such as metals. DIWM plans to contract the salvaging operation to a private contractor; salvaging would be performed only by the contractor, and no salvaging by the general public would be

allowed. All salvaging operations would occur during the landfill's regular hours of operations, which would preclude nighttime operation. Site personnel will examine incoming loads and direct those that contain salvageable items to a designated section of the tipping area. Salvaging will occur during unloading onto the tipping pad; no hand salvaging will take place within the working face of the landfill itself. A specific Health and Safety Plan (HASP) has not yet been developed for the proposed salvaging operation, but one will be produced and submitted to the LEA for approval prior to the commencement of salvage activities (Mitigation Measure 3.8.3b of the DSEIR).

Salvaged materials will be stored temporarily near the working face in a designated area inaccessible to the general public, then removed prior to the end of each work day to another, as yet undetermined location within the site. At this location, which would be staffed during landfill operating hours, salvaged items will be prepared for reuse or recycling, including categorizing, cleaning, minor repairs, and removal of any hazardous components (such as mercury switches and PCB-containing capacitors). DIWM is proposing to establish a retail area at the landfill for sale of recovered items to the general public. Some materials may be donated to charitable organizations, who would be responsible for transporting these items off-site. Recycled materials, such as metals, would be separated, categorized, or classified and loaded into debris boxes for sale to a scrap metal recycler or dealer.

D-11: The existing greenwaste processing facility had received a notification level composting permit, as described in the DSEIR. However, since publication of the DSEIR, the RWQCB's general waiver of Waste Discharge Requirements for composting facilities expired. The greenwaste processing facility has therefore ceased composting operations and is now limited to chipping and grinding of greenwaste under the current landfill permit.

DIWM is still proposing to revise the SWFP for the landfill to enable the composting operations described in the Project Description of the DSEIR (page 2-10). However, the County is not proposing to increase the overall volume of waste nor the number of vehicles permitted to arrive at the facility site each day (in other words, increased volume of composting facility traffic would be offset by a decreased volume of landfill traffic). The types of feedstock that would be accepted at the composting facility are described in the Project Description. These include source-separated greenwaste, food waste, agricultural crop residues, manure, and biosolids. DIWM is also proposing to accept mixed MSW for composting.

Composting of source-separated material would be performed using either windrows or static aerated piles. Composting of MSW would be accomplished using static aerated piles or a composting vessel. If an in-vessel system is used, after a short (approximately 72 hours) residence in the vessel, the material would be discharged and placed into static aerated piles. The total amount of wastes proposed for composting each day would not exceed 500 tons, or about 1,500 cubic yards of material assuming a density of 666 pounds per cubic yard. While the County has not proposed a maximum daily rate of

acceptance of the different material types proposed for acceptance, it is anticipated that the LEA or RWQCB may wish to limit the quantity of certain materials, and will condition the permits accordingly.

All wastes received for composting would be processed and placed into windrows, piles, or vessels within 72 hours of acceptance (24 hours for biosolids, food waste, manure, and MSW). Therefore, there would be no more than 1,500 tons of feedstock on-site at any given time. Average residence time for material in windrows and static piles would be 30 days. Therefore, the maximum amount of actively composting material on site at any give time would be 15,000 tons, or about 45,000 cubic yards at an average density of 666 pounds per cubic yard (note that the actual amount would likely be somewhat less than these figures, since actively composting material loses both volume and weight). At the conclusion of active composting, the material would either be placed in a curing pile for 30-90 days or used immediately as ADC

These general operational parameters were taken into account in the preparation of the DSEIR, which assumes a worst-case scenario for the impact analysis. Potential impacts related to the proposed composting operation are described in Impacts 3.1.6 (Section 3.1, Aesthetics); 3.2.3, 3.2.5, 3.2.6 (Air Quality); 3.5.6, 3.5.7, 3.5.8 (Hydrology and Water Quality); 3.6.3 (Land Use and Planning), 3.7.1 (Noise), 3.8.4, 3.8.5, 3.8.7 (Public Health and Safety), 3.9.1, 3.9.7, 3.9.9 (Public Services, Utilities, and Energy), 3.10.1 (Traffic), and 3.11.1 (Cultural Resources). More detailed information on composting facility design and operations, which DIWM will prepare as part of its completion of its application package for a revised SWFP for the composting operation, is not expected to affect the analysis nor the conclusions regarding potential impacts of the proposed composting operation presented in the DSEIR.

D-12: The need for additional environmental documentation on the proposed soil borrow area, once the site has been identified, is discussed on page 1-9 of the DSEIR.

D-13: Project goals and objectives are discussed on page 1-5 of the DSEIR. The DSEIR identifies four alternatives to the project, which were selected because they are feasible, would attain some or all of the project sponsor's objectives, and would avoid or substantially lessen the project's environmental impacts. Alternatives are discussed, analyzed, and compared to the project in Chapter 5 of the DSEIR.

D-14: Please see the previous response. The No Project alternative is one of those analyzed in Chapter 5 of the DSEIR.

D-15: Many aspects of the proposed project, including expansion of composting operations, salvage operations, and establishment of a MRF, are consistent with the waste reduction and recycling mandates of AB939. The potential conflict of the project with the County's waste reduction and recycling mandate is discussed in Impact 3.6.3 of the DSEIR. The mitigation measures specified for this impact are incorporated in the Mitigated

Alternative, which is discussed in Chapter 5 of the DSEIR. The DSEIR identifies the Mitigated Alternative as the Environmentally Superior Alternative.

D-16: Aesthetic impacts of the proposed height increased are analyzed in Section 3.1, Aesthetics, of the DSEIR. Chapter 5 includes discussion of a Reduced Height Alternative, which was crafted specifically to address the significant unavoidable aesthetic impacts identified in the Aesthetics analysis. The Mitigated Alternative eliminates the proposed height increase entirely. This alternative, which is identified as the Environmentally Superior Alternative, both meets many of the County's objectives for the project (though it does not fully meet the objective to operate the landfill more economically, compared to the proposed project), and reduces or avoids entirely the significant unavoidable impacts associated with the project (see Table 5-2 in the DSEIR).

D-17: Please see the previous response.

D-18: Cumulative impacts are discussed in Chapter 4 of the DSEIR. See also responses to comments H-4 and J-9.

D-19: Currently the landfill recycles only clean loads of inert materials and wood waste. The proposed MRF would handle mixed C&D loads. It is assumed that if the project is approved, that the MRF would be permitted as a transfer/processing operation.

D-20: DIWM will prepare and submit revised Closure and Post-Closure Maintenance Plans as part of its completed application package for a revised SWFP.

D-21: Certification of the FEIR will be considered by the County Planning Commission at a public meeting following a public hearing. The meeting and the public hearing, as well as availability of the Final EIR, will be announced at least 14 days prior to the meeting. See Section 1C regarding the process for circulation and adoption of the FEIR.

E. CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY REGION

E-1: The commenter's list of proposed project elements is correct.

E-2: Comment noted. Please see responses to comments E-3 through E-7.

E-3: Please see the response to comment D-20. The County intends to prepare a revised schedule for closure of the older units as part of the revised Preliminary Closure Plan, which will be submitted as part of the completed application for the project. Note, however, that the County no longer proposes to mine the older, unlined units nor WMUs 6a-c. See Section 1C of this FEIR for changes to the project since publication of the DSEIR.

E-4: Please see response to comment D-8. Mining is proposed to take place only during the dry months of late spring, summer, and early fall. At the completion of each work season, a wet weather plan would be prepared. This would address issues of run-on, run-off, and erosion. During wet weather, the excavation would be covered with a minimum of 1 foot of soil. More detail on the proposed mining operation, including environmental controls, can be found in EMCON/OWT, 2001a and 2001b.

E-5: As identified on page 3.2-13, the nearest residence is 600 feet south of the southern boundary of the landfill. Most of the area slated for landfill development is located much further than 600 feet away. Also, as stated on page 3.2-17 of the DSEIR, a literature review did not identify off-site odors as a significant problem with landfill mining. Although increased odors occur from uncovering decomposing wastes, the U.S. EPA concludes that landfill reclamation projects have been successfully implemented at MSW facilities across the country since the 1980s.[1] The County Local Enforcement Agency (LEA) regularly monitors the landfill for environmental nuisances.

To further control any off-site odors, the potential for odors should be assessed during the initial site characterization of areas proposed for landfill mining. If initial testing determines that an area could be particularly odorous, additional measures should be added to the Health and Safety Plan to control odors. Mitigation measure 3.2.2b, on page 3.2-17 of the DSEIR is modified as follows:

> **Mitigation Measure 3.2.2b:** One month prior to initiation of landfill mining activities, the HASP shall be forwarded to the Local Enforcement Agency (LEA) and YSAQMD for comments and suggestions. Appropriate suggestions shall be incorporated into the HASP and new features of the HASP shall be communicated to the workers. If additional gas monitoring equipment is needed, the equipment shall be purchased and tested prior to commencing landfill mining operations. <u>The HASP shall include a section with measures to control off-site odors (e.g., recovering freshly excavated areas if they produce nuisance-level odors, or excavating only when winds are blowing away from residential receptors).</u>

E-6: As described in Section 1C of this FEIR, the County has modified their proposal and no longer proposes to mine the older, unlined waste management units, nor WMUs 6a-c, which are lined but which were not constructed as bioreactors.

E-7: The existing bioreactor units are constructed with an operations layer consisting of 3-feet thick of coarsely shredded tires, placed over a drainage layer, consisting of 6-12 inches of gravel. This is placed over the geosynthetic liner, which itself is placed over 5 feet of compacted clay. Because of the thickness of the operations layer, and its resistance to excavation, no damage to the bottom lining of the landfill is anticipated during landfill mining operations. Future bioreactor units would also be constructed with a similar base design. In addition, "as-built" surveys of both bottom and side slope liners have been performed in Module 6D and will be performed in all future modules and this

[1] U.S. EPA. *Landfill Reclamation*. EPA530-F-97-001. July 1997.

information will be used to control the mining of waste and will ensure excavations are not dug deep enough to damage the liner. On side slopes below the surrounding grade, where soil is used as the operations layer, the as-built survey would be used to control the depth of the excavation, and avoid damaging the liner. In the event that the bottom or side is damaged, it would be repaired and re-certified in accordance with the applicable Title 27 regulations.

E-8: Please refer to the following responses.

E-9: The County intends to submit as part of its completed application packages for revision of the SWFP for the composting facility and for the facility's Waste Discharge Requirements detailed engineering plans for the composting facility. This will include detailed information on site conditions and plans and specifications for pad, drainage, and containment design that are consistent with Title 27 and with Mitigation Measure 3.5.6. The County assumes that the new WDRs may contain additional limitations or performance standards to ensure that the composting operation does not impact ground or surface water quality.

E-10: Comment noted. Please refer to the previous response.

E-11: As described on page 1-3 of the DSEIR, the existing Class II surface impoundments – WMUs G and H – have a combined capacity of 17.5 million gallons. Mitigation Measure 3.5.7b on pages 3.5-24 and 3.5-25 of the DSEIR requires the County to evaluate the possible need to develop additional storage capacity, and, prior to project implementation (if the project is approved) to develop a revised maintenance and operations plan that includes details of expected leachate and contact water generation rates and any additional storage capacity that would be required to contain it.

F. YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

F-1: In accordance with the requirements of CEQA, a Mitigation Monitoring and Reporting Program (MMRP) will be prepared prior to consideration of adoption of this SEIR.

G. YOLO COUNTY HEALTH DEPARTMENT ENVIRONMENTAL HEALTH DIVISION (LOCAL ENFORCEMENT AGENCY)

G-1: Comment noted.

G-2: Table 1-1 in the DSEIR lists current permits and the permit revisions that would be required for the project. This list includes SWFP 57-AA-0001, and notes the requirement to revise the SWFP to incorporate the proposed physical and operational changes.

DIWM plans to prepare a complete application package for a revised SWFP incorporating mitigation measures identified in this SEIR, if the SEIR is certified.

G-3: Table 1-1 in the DSEIR notes that the existing compost facility has a Notification Level SWFP, and that the proposed expanded facility would require a full SWFP. DIWM plans to prepare a complete application package for a revised SWFP incorporating mitigation measures identified in this SEIR, if the SEIR is certified.

G-4: Table 1-1 in the DSEIR notes that the proposed materials recovery facility would require a full SWFP for a Large Volume Transfer/Processing Facility. DIWM plans to prepare a complete application package for a SWFP incorporating mitigation measures identified in this SEIR, if the SEIR is certified. As stated in the response to comment D-9, the County would prefer that the SWFP for the MRF operation is incorporated in the revised SWFP for the landfill.

G-5: Explosion hazards from increased LFG generation from use of bioreactor technology is identified as a significant impact in the DSEIR (Impact 3.8.1). Mitigation Measures 3.8.1a-c require YCCL to meet state and federal requirements for LFG management and monitoring, and to take remedial action in the event elevated levels of LFG are detected at the site perimeter. The DSEIR concludes that these mitigation measures will reduce this impact to a less-than-significant level.

G-6: DIWM will submit a HASP for the MRF operation as part of the application packet for the full SWFP for a Large Volume Transfer/Processing Facility. See also responses to comments G-4 and D-8.

G-7: Topics raised in this comment are discussed and analyzed in the DSEIR in impacts 3.8.4 and 3.8.5. Mitigation Measures 3.8.5b and 3.8.5c would require continuing and strengthening of the existing load checking program to screen compost feedstock for any hazardous substances.

H. MRS. JANET K. KUIVENHOVEN

H-1: The commenter's opposition to the project elements that would result in expanded landfill capacity and site life is noted.

H-2: Potential impacts in the areas of traffic, noise, odors, and unsightliness are addressed in Chapter 3 of the DSEIR. The DSEIR was prepared in accordance with the CEQA statute and guidelines and with the standards of practice for environmental impact reports. Regarding noise and odor, please see also response to Comments H-7 and H-8.

H-3: Section 3.6 of the DSEIR discusses land use compatibility of the proposed project. Table 3.6-1 on page 3.6-2 of the DSEIR indicates that the landfill itself is consistent with

County General Plan land use designations and other relevant policies. Chapter 5 of the DSEIR compares the project to an Off-Site Alternative that would involve locating a new landfill elsewhere in the County. Please refer also to the following response.

H-4: The City of Woodland General Plan Policy Document (City of Woodland, 2002) provides information on the future growth patterns and plans of that city. The document defines three planning areas: the General Plan Area, the Planning Area, and the area within the Urban Limit Line. These are shown in Figures 2 and 3 in that document. The General Plan Area extends south to County Road 27, one mile north of the landfill boundary. This includes areas outside of the Planning Area Boundary, within unincorporated Yolo County, that are designated for agricultural uses, and so are not available for residential development under current zoning and land use designation. These areas are outside of the land use jurisdiction of the City of Woodland.

The Planning Area Boundary, which includes all land designated for or to be considered for future development as part of Woodland; extends south to County Road 25a and 25, about 3 miles from the landfill boundary. This includes some areas designated as "Urban Reserve", which means that they can in the future be considered for development with urban uses, but only after a General Plan amendment to specify the primary land use designation. Allowable uses in the Urban Reserve designation (without a General Plan amendment) include wastewater treatment facilities, and other uses specified under the Agriculture and Open Space designations (City of Woodland, 2002, p. 1-8 and Figure 1-4).

The Urban Limit Line encompasses all land to be considered for urban development within the time frame of the General Plan (i.e., through 2020). The southeast corner of the Urban Limit Line is the junction of Country Road 25A and County Road 102, about 3 miles from the landfill boundary. A major new development within the Urban Limit Line is described in the recently approved Spring Lake Specific Plan (City of Woodland, 2001), which encompasses 1,097 acres located primarily south of Gibson Road, west of County Road 102, and North of County Road 25A, within the southeast corner of the Urban Limit Line. The Spring Lake Specific Plan provides for development of over 4,000 residential units with supporting commercial, parkland, and other public uses, with buildout projected to occur by 2015 (City of Woodland, 2001).

Therefore, according to the Woodland General Plan, no urban development will occur within about 3 miles of the landfill boundary as part of that city's future growth. If there is future residential development in areas designated Urban Reserve, this would expose more people to impaired, though distant, views of a larger landfill, if the project is approved. Since impaired distant views are already identified as a significant unavoidable impact of the project, the severity of this impact would not be affected by the effect of additional development within an expanding Woodland. Other operational impacts of the project, including noise and odors, are not expected to impact residents living 3 or more miles away. The air quality impacts that could affect residents living at this distance (impact 3.2.4 and 3.2.6) are already identified in the EIR as significant and

unavoidable. Therefore, the DSEIR adequately evaluates the effects of the project on any future residents of the southern Planning Area of Woodland, if this area is in fact developed as a residential area in the future.

The City of Davis General Plan (City of Davis, 2001) provides information on the future growth plans and patterns of that city. The Plan indicates that YCCL and the surrounding lands are within its Planning Area (City of Davis, 2001). This document shows an Open Space for Public Health and Safety zone within one mile of the landfill and adjacent wastewater treatment facility, and states that, "The intent is that residential development is prohibited within this area due to public health concerns including vectors and odors."

The DSEIR notes the proposed development of Covell Village in the eastern outskirts of the City of Davis, and states that this project has the potential to combine with the landfill project to create cumulative environmental effects (DSEIR, p. 4-4). The closest point of this proposed development is about 2 miles southwest of the landfill. Vantage Point 2 in Figure 3.1.2 of the DSEIR is taken from this point. The DSEIR notes that approval of both projects would result in more residents being subjected to impaired distant views as the landfill developed. Figure 3.1.5 in the DSEIR shows simulated views of the proposed landfill project from Vantage Point 1, which is about 1 mile east of Vantage Point 2, and about 1.5 miles southwest of the landfill. Impact 3.1.2 in the DSEIR indicates that views from this point would be significantly and unavoidably impacted by development of the landfill project. If the Covell Village project were approved and developed, more residents would also be exposed to toxic air contaminants generated by the landfill. Exposure of nearby residents to toxic air contaminants is identified as a significant unavoidable impact of the project (Impact 3.2.6). Therefore, the DSEIR adequately evaluates the impacts on future residents of the City of Davis, if it continues to grow eastward.

H-5: As noted on page 3.6-1 of the DSEIR, the parcels to the North and East of the existing landfill site are designated as "Possible Future Landfill Expansion" areas in the Yolo County General Plan. As discussed on page 5-2 of the DSEIR, a lateral expansion of the landfill onto adjacent lands was rejected as an alternative to the project, because it would not meet the project objective of operating more economically and would have caused equal or more severe environmental impacts. It is unclear whether the commenter may be referring to other parcels to the North of the existing landfill site.

H-6: This comment indicates that the landfill has been at its current location for some time; specifically, YCCL has been operating at the current site since 1975. The YCCL Preliminary Closure and Post-Closure Maintenance Plan (June 1996) and Solid Waste Facility Permit (August 1995), which were current at the time the commenter constructed their home, projected a site life for the landfill through the year 2021. This estimate was based on anticipated rates of waste acceptance and landfill capacity. According to County records, the commenter applied for and received a County building permit for her residence on September 17, 1999. Thus, it was a matter of public record that the site would be in operation for at least 20 more years when the building permit was issued. It

may also be worth noting here that landfill site life is, in very general terms, based on anticipated rates of waste receipt and permitted landfill capacity. Due to lower waste acceptance rates than were previously anticipated, as well as minor operational changes at the facility, the County has more recently revised the site life projections for YCCL. According to the facility's Revised Closure and Post-Closure Maintenance Plan, published in 2004, the current site life for YCCL, without any changes to existing permits, is projected to extend through 2045.

H-7: The Yolo County Planning and Public Works Department keeps regular business hours, and has a voice mail system for leaving messages after hours. Please refer to response I-30 regarding odor complaint procedures.

H-8: Please see responses to comments I-30, I-31, and I-32, below.

H-9: Impact 3.1.4 in the DSEIR identifies a significant impact on views from the area south of Willow Slough Bypass, in the vicinity of the commenter's residence. However, the DSEIR concludes that this impact can be mitigated through the planting of screen trees and by selecting an appropriate design for the proposed materials recovery facility.

H-10: Increased wear and tear on area roads is identified as a significant impact (Impact 3.10.2) in the DSEIR. Please note that both County Road 105 and 28H were recently repaved. However, the document concludes that this impact can be mitigated to a less-than-significant level (Mitigation Measure 3.10.2).

H-11: As the project does not include an increase in the amount of material that can enter the landfill on a daily basis, it is not expected to result in an increase in litter or illegal dumping along area roadways. Currently, County road crews and probation crews remove litter from the road sides. This practice is expected to continue. In addition, the County Board of Supervisors recently approved a "Good Samaritan" pilot program, whereby landfill customers on the way to the facility may pick-up litter, dispose of it for free, and receive a $12 coupon toward disposal costs. Please refer to the response to comment H-4 regarding future growth of Woodland and Davis.

H-12: Groundwater conditions at the site, groundwater quality, and groundwater monitoring are discussed on pages 3.5.5 through 3.5.7 of the DSEIR. Impacts 3.5.1, 3.5.2, 3.5.3, and 3.5.5 examine the potential impacts of the project on groundwater beneath the site. Of these, all but Impact 3.5.2 is identified as significant. However, the report finds that these impacts can be mitigated to less-than-significant levels.

H-13: The DSEIR provides discussion of an Off-Site Alternative to the project, and compares the likely impacts of developing a new landfill in another location with the likely impacts of the project as proposed. The DSEIR concludes that, while the Off-Site Alternative would avoid the site-specific unavoidable impacts of the project, it would likely result in other equally or more severe impacts. See Chapter 5 of the DSEIR. Economic analysis of alternatives is beyond the scope of an EIR.

I. MR. KEN KUIVENHOVEN

I-1: The DSEIR was circulated for public review for the statutorily-required 45 day period.

I-2: The DSEIR concludes (on page 5-19) after an examination of several alternatives to the project and their comparison to the project, that even though the No Project alternative would avoid all of the significant unavoidable impacts of the project, this alternative would not realize several environmental benefits of the project, including greater environmental controls associated with bioreactor operation, energy recovery, and increased waste diversion capacity. The DSEIR concludes that the Mitigated Alternative is the Environmentally Superior Alternative based on its ability to avoid the significant unavoidable impacts of the project while still providing the environmental benefits of the project.

I-3: This comment repeats the text of the DSEIR.

I-4: The comment seems to agree with the analysis contained in the DSEIR, which concludes that the project would cause several significant, unavoidable impacts to the visual resources of the area. The Off-Site Alternative examines generally the impacts that would be associated with development of a new landfill elsewhere in Yolo County. The analysis concludes that it is likely that development of another landfill would likely result in similar visual impacts, though in another part of the County.

I-5: The commenter is referring to text on page 5-3 of the DSEIR. As stated by the commenter, and identified in the DSEIR, the project would result in generation of more air pollutants at the site than the No Project Alternative. Impacts 3.2-4, Impact 3.2-5, and Impact 3.2-6 (pp. 3.2-19 through 3.2-32 in the DSEIR) each analyze the increased air pollutants that would result from the project.

I-6: As described in the DSEIR, the decomposition of materials in the landfill would result in emissions of criteria air pollutants, toxic air contaminants (TACs), and odors. This occurs at all landfills. The County proposal includes the use of bioreactor cells at the landfill. Because of the increased rate of decomposition of the wastes in the bioreactor and the comprehensive gas collection system planned for bioreactor cells, the landfill gas collection system is expected to operate more efficiently than in a conventional landfill, thereby minimizing the effects of the fugitive emissions from decomposition of wastes.

I-7: The comment repeats the text of the DSEIR

I-8: As stated on page 1-9 of the DSEIR, the proposed off-site borrow area is described and analyzed in the DSEIR in a general, programmatic manner. Implementation of this project component would occur after a specific site for the borrow area has been identified, and after completion of any required subsequent project-level environmental documentation.

Inclusion of the programmatic analysis of an off-site borrow area is provided in this document in order to examine the project in its entirety.

I-9: The comment repeats the text of the DSEIR.

I-10: Engineering studies reviewed during preparation of the DSEIR indicate that the proposed expansion can be accomplished without compromising site safety or environmental controls. However, Mitigation Measures 3.4.1b and 3.4.3b in the DSEIR require additional engineering analysis and regulatory review thereof prior to issuance of final permits to enable landfill expansion, if the project is approved.

I-11: The comment repeats the text of the DSEIR

I-12: Please see the response to Comment H-12.

I-13: The comment repeats the text of the DSEIR.

I-14: Please see the response to Comments I-8 and H-4.

I-15: The beginning of this comment repeats the text of the DSEIR. As discussed in the DSEIR (see for example Appendix C), one advantage of bioreactor technology is the reduced time required to achieve stabilization of a completed cell. This reduces the possibility of environmental controls failing before the landfill has stabilized. While it is true that the bioreactor design is relatively new, the USEPA has granted regulatory flexibility to enable states to permit their development. See pages 1-5 through 1-7 of the DSEIR. Potential environmental, health and safety impacts of the bioreactor operations are discussed throughout the DSEIR.

I-16: Under provisions of Title 27, CCR, Section 20380(b), landfill operators are required to obtain and maintain assurances of financial responsibility for initiating and completing corrective action for all known or reasonably foreseeable releases from the landfill. As noted on page 3.5-14 of the DSEIR, research has shown that leachate recirculation in bioreactor landfills achieves a significant decrease in the concentration of pollutant constituents in leachate over time. Therefore, contrary to the statement of the commenter, recycled leachate is in fact less toxic, and poses a lower risk of contamination of ground and surface water.

I-17: Increased generation and potential accumulation of landfill gas at explosive concentrations is identified as a significant impact in the DSEIR (Impact 3.8.1). However, the DSEIR finds that this impact can be mitigated (see Mitigation Measure 3.8.1).

I-18: Appendix G of the CEQA *Guidelines* indicates that a significant impact on population and housing would occur if a project were to:

a) induce substantial population growth in an area, either directly (for example, by

proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
b) displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
c) displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Clearly, the project evaluated in this EIR would not cause impacts of this kind. The DSEIR does, however, note significant unavoidable impacts that would primarily affect residents near the landfill, including aesthetic impacts from permanent alteration of the landscape (Section 3.1) and increased health risks from a longer period of facility operation and therefore a longer period of exposure to toxic air contaminants (Impact 3.2.6).

I-19: An examination of aerial photographs and site reconnaissance indicate that the only new residence built within 3,500 feet of the landfill in the past 10 years is the commenter's. Only three residences currently exist within this distance of the landfill (see Table 3.7-1 on page 3.7-8 of the DSEIR). Several additional residences are located about 4,300-5,200 feet west of the site. Please refer to the response to comment H-4 regarding planned future growth of Woodland and Davis.

I-20: The commenter is disturbed by a variety of noises from the landfill operations. A short-term noise measurement was taken on Road 29 immediately north of the Kuivenhoven residence. The details of this noise measurement are presented in Table 3.7-3 on page 3.7-10 of the DSEIR.

The average noise level measured near the Kuivenhoven residence was 46.9 dBA and the noise level exceeded 10 percent of the time (the L_{10}) was 49 dBA. The noise measurement was taken during morning activity at the landfill and the backup beepers could be heard at this location (Road 29 just north of the Kuivenhoven residence). The backup beepers were about 50 dBA at this location.

The short-term measurements near the Kuivenhoven residence are higher than the background noise in the area, but the noise levels measured were well within the normal limits considered acceptable for residential land uses. Please see Figure 3.7-2 (page 3.7-6) of the DSEIR. As seen in the top row of this table, residential uses are normally acceptable if the background level is below 60 dBA.

I-21: Mining the facilities should not result in a major change in noise levels. The mined material is decomposed solid waste that would not require blasting to excavate, and the excavation would require less effort than excavation of native soils. The loudest noise from the mining would probably be from the back-up beepers, which is one of the noises mentioned in comment I-20. Please note that, as described in Section 1C of this FEIR, the County is no longer proposing to mine the older waste management units, and is now proposing to mine only WMU 6D, and, after they are filled and stabilized, the remainder

of WMUs 6 and 7. These are all at a considerable distance from the commenter's residence (the nearest portion of these WMUs is one half mile north of the southern property line of the landfill), which should be more than adequate to attenuate noise generated by landfill mining operations.

I-22: The project would not result in significant noise impacts at the proposed residence. Neither the long-term nor the short-term measurements provided in Table 3.7-3 indicate that noise levels at any residences are above 65 Ldn. The reason some of these noises seem so offensive is because of the lack of other noise sources at this rural location. Although the noises from the landfill are obviously annoying to this resident, the measured noise levels are not excessive or harmful at off-site locations. The noise attenuation provided by the 600-foot buffer (to the nearest resident) is consistent with Yolo County Policy N3. Even with the landfill noise, the total noise level at the Kuivenhoven residence is considered low: the short-term daytime measurement (during landfill operations) was approximately 50 dBA. Aesthetic impacts are discussed in Section 3.1 of the DSEIR.

I-23: Selection of the noise significance criteria is discussed on page 3.7-11 of the DSEIR. As explained, this is the same significance criteria for noise as was used in the 1992 EIR for the landfill. This noise level (65 dBA, CNEL) is midway between the state land use noise compatibility guidelines for normally acceptable (60 dBA) and the upper limit of the conditionally acceptable noise levels for residential areas (70 dBA, CNEL).

Rural areas do generally have lower background levels, making other noise sources seem louder. However rural areas are often affected by clearly audible noise from agricultural operations.

I-24: The 24-hour measurement of 64 CNEL was at Site #3 on the fence at the southwestern YCCL boundary (see Table 3.7-2 on page 3.7-10 of the DSEIR). There are no sensitive receptors at this location. Exterior noise at the nearest sensitive receptor was less than 50 Leq during landfill operations (see the bottom measurement in Table 3.7-3 on page 3.7-10 of the DSEIR). This indicates that the noise levels at the nearest sensitive receptor are less than 65 CNEL and also less than 60 CNEL. The potential for the project to increase noise from the facility is analyzed in Section 3.7.2 of the DSEIR. See also the response to comments I-26 and I-27, below.

I-25: While moving the commenter's residence to the opposite end of their property would decrease the nuisance effects of the landfill (both as it currently operates and as it would operate, if the project is approved) on the commenter and his family, this measure would not reduce to a less-than-significant level any of the impacts identified in the DSEIR as significant and unavoidable. Neither is this a necessary measure to reduce impacts that are either identified as less-than-significant, or for which other, effective mitigation measures are presented in the DSEIR.

I-26: Although not required to mitigate a significant impact, the County agrees that the mining activities can be limited per the suggestion of the commenter. The following mitigation measure is added to the SEIR:

> **Mitigation Measure 3.7.1d:** Exterior construction and landfill mining activities shall not begin earlier than 7 a.m. Monday through Friday, and 8 a.m. Saturday, nor continue after 5 p.m. Saturday. No exterior construction or mining activities shall be allowed on Sunday.

I-27: Typical noise levels associated with the operation of material recovery facilities (MRFs) are similar to noise from resource recovery facilities and solid waste transfer stations. Recent ESA noise measurements at existing facilities elsewhere in Northern California are presented in Table FEIR-1. The loudest operations measured at these existing facilities were from glass recycling (80 dBA at 50 feet), and the use of a wood waste grinder (96 dBA at 50 feet). Assuming that the Kuivenhoven residence is approximately 600 feet from the nearest possible MRF activities, a wood waste grinder could generate 69 dBA at the residence and the glass recycling could generate 53 dBA at the residence. The noise from the wood waste grinder would be very loud at the Kuivenhoven residence, but the MRF proposed at the YCCL does not include a wood waste grinder.

TABLE FEIR-1
TYPICAL NOISE LEVELS – TRANSFER STATION AND RESOURCE RECOVERY FACILITY

Location	Noise Levels (dBA Leq) Daytime (7 AM – 10 PM)	Noise Levels (dBA Leq) Nighttime (10 PM – 7 AM)	Notes
Resource Recovery Facility[a]			
25 feet from diesel engine	on idle: 71 – 72 full throttle: 75	--	Used to power the C&D sort line
50 feet from glass falling of conveyors into outdoor bins	80	--	
Transfer Station[b]			
40 feet from eastern fenceline	46 – 73	46 – 56	Open-air facility
50 feet from wood grinder	96	--	

[a] ESA, 2003, City of Santa Cruz Resource Recovery Facility Long-Term Facility Plan Initial Study and Mitigated Negative Declaration, prepared for the City of Santa Cruz Public Works Department, June 2003.

[b] ESA, 2004, Brentwood Transfer Facility Expansion Initial Study and Mitigated Negative Declaration, prepared for the City of Brentwood – Solid Waste Division, October 14, 2004.

The following mitigation measure is added to address any excessive equipment noise from the MRF.

> **Mitigation Measure 3.7.1e:** Noise equipment at the MRF that would generate noise levels of 80 dBA or greater at a distance of 50 feet should be located away from the southern property boundary or shielded by the MRF building or other means (e.g., soil berms or concrete walls), in order to attenuate potentially annoying noises at residences to the south of the property.

I-28: As identified on page 2-10 of the DSEIR, in the first complete paragraph, the MRF would assist in meeting the state-mandated requirement for Yolo County communities to divert 50 percent of all solid waste from landfilling. It is very common for MRF facilities (sometimes called by other names such as Resource Recovery Facilities) to be located at landfills. As indicated in Table 3.6-1 and on pages 3.6-3 through 3.6-5 of the DSEIR, landfill and materials recovery operations are consistent with the general plan designation and zoning for the landfill site, and the site has a Conditional Use Permit for landfill and related operations.

I-29: As seen in Table FEIR-1, average noise levels 40 feet from the fenceline of similar operations to the proposed MRF were measured at levels varying from 46 - 73 Leq. At a distance of 600 feet, these levels would attenuate to less than 50 dBA. Such noise levels would not significantly raise existing noise levels at the Kuivenhoven residence.

I-30: The commenter indicates that there have been more complaints about odors and noise from the landfill than are identified in the DSEIR. The preparers of the DSEIR made calls to both the LEA and the YSAQMD in preparation of the DSEIR. The EIR preparers also contacted the YSAQMD on several occasions subsequent to publication of the DSEIR and were not informed of any additional odor complaints or problems at the landfill. As identified on page 3.2-18 of the DSEIR, ESA also conducted odor surveys at the perimeter of the landfill. The DSEIR includes a "complaint response protocol" as Mitigation Measure 3.2.3a(3). The complaint response protocol would have a standard process for recording odor complaints, determining the cause of the odors, and taking actions to mitigate the odors.

I-31: The odor problem mentioned is identified on page 3.2-17 of the DSEIR. The commenter indicates it was a very bad odor problem. This problem was from a leachate pond that went anaerobic after heavy rains. This problem had not occurred before. As mentioned by the commenter, the odor problem was corrected. According to the LEA, the problem was corrected by installing aerators in the pond, a measure that would also prevent similar problems in the future.[2] Aeration is a common method to minimize odors from ponds and is included in Mitigation Measure 3.2.3a(5) on page 3.2-19 of the DSEIR.

[2] Moushumi Hasan, Hazmat Specialist, Yolo County Environmental Health Department, personal communication, August 6, 2004.

The LEA is the Local Enforcement Agency, the agency designated by the California Integrated Waste Management Board to enforce state regulations on landfill design and operation. In Yolo County, the LEA is the Yolo County Health Department Environmental Health Division. The LEA can be reached by calling (530) 666-8646.

I-32: With no record of on-going odor complaints, ESA, the EIR preparer, did not expect to find a major "odor problem" at off-site locations near the landfill. Still, ESA conducted odor surveys on two days specifically to document the intensity of any odors immediately adjacent to the landfill fence and near the closest residence. Each survey lasted about two hours and included 5-6 observation locations. On June 2, 2003 the winds were estimated to be from 0 mph to about 15 mph out of the north, and the temperature was approximately 90 degrees F. On June 5, 2003 the winds were either very light or no wind at some observation locations. On these random days there were no strong landfill smells at the nearest residential receptor.

I-33: The comment refers to the DSEIR page 3.2-25, first paragraph. The analysis is explaining that with or without the project, residual wastes from Yolo County would need to be hauled to a landfill or a MRF or composting site. The analysis notes that another landfill could be further away and result in more air emissions from hauling vehicles. This conclusion is based on the central location of the YCCL to Yolo County population centers; see the map on page 2-2 of the DSEIR. The YCCL is centrally located in terms of the major population centers in the County (i.e., Davis, Woodland and West Sacramento). Furthermore, the analysis also notes that other possible landfill locations could be near more sensitive receptors and have potential effects on more sensitive receptors. This statement is based on the relatively low density of residences in the area of YCCL. Table 3.7-1 on page 3.7-8 of the DSEIR shows that there are only nine residences within one mile of the YCCL. The Off-Site Alternative, presented in Chapter 5 of the DSEIR, generally evaluates the environmental impacts of development of a new landfill in an unidentified site that meets County and State minimum siting criteria for landfills.

I-34: Please refer to responses to comments H-4 and I-19.

I-35: Impact 3.2.5 assesses the potential impacts of the proposed increase in the permitted level of composting on PM-10 and ROG. The DSEIR provides several measures in Mitigation Measure 3.2.5a to reduce the impact from PM-10 and concludes this impact would be less than significant after implementation of Mitigation Measure 3.2.5a. The DSEIR concludes that ROG emissions would remain significant after all feasible mitigations. ROG is an ozone precursor that affects regional air quality. Odors from compost operations would be controlled through Mitigation Measure 3.2.3a.

As identified in the DSEIR beginning on page 3.2-26, the measurements of ROG emissions from composting are very limited. ESA selected a conservative emission factor for this estimation, which may overstate the ROG emissions. Regardless of the actual amount of ROG emissions from composting, California Integrated Waste

Management Board (CIWMB) staff indicated that ROG emission controls for greenwaste composting are cost prohibitive and may inhibit other environmental benefits (e.g., diverting materials from landfills) achieved by composting.

Mitigation Measure 3.2.5a includes several actions to reduce the PM-10 (or fine dust) from composting. Odors from the composting operation are discussed in Impact 3.2.3; see also Mitigation Measure 3.2.3a. Noise impacts from the expanded composting operation are discussed in Impact 3.7.1.

I-36: Exceedence of YSQAMD thresholds of significance for ROG from the proposed increase in the composting operation is identified in the DSEIR as a significant unavoidable impact. See Impact 3.2.5 in the DSEIR, commencing on page 3.2-25.

I-37: Impact 3.2.7 in the DSEIR identifies a significant unavoidable impact of the project, due to a predicted increase in the risk to human health caused by longer exposure to toxic air contaminants (TACs). This impact describes how TAC emissions will be reduced in the short term, due to increased efficiency of capture of landfill gas and the statewide program to reduce TACs present in diesel engine emissions. However, because the project proposes to extend the life of the landfill substantially, the period of exposure to TACs will be longer. This is the basis for the conclusion of a significant unavoidable impact.

I-38: The DSEIR, and this FEIR, are consistent with the requirements contained in the CEQA statute and *Guidelines*.

I-39: The DSEIR identifies significant unavoidable impacts to human health and aesthetics.

I-40: Economic effects of a project are not generally germane to an environmental impact analysis under CEQA.

I-41: Nothing in state or federal statutes or regulations prevents a public agency that is the applicant for a project to simultaneously serve as the lead agency for purposes of CEQA compliance.

J. MR. KEVIN M. KEMPER, ESQ.

J-1: The comment accurately summarizes the project. See Chapter 2 of the DSEIR for more detail.

J-2: Comment noted.

J-3: The goal and policies cited in Table 3.1-1 are interpreted strictly as relating to the use of landscaping as a means of enhancing rural scenery and for screening unsightly views. With this interpretation, Mitigation Measure 3.1.1 directly addresses the stated impact

and effectively mitigates it to a less than significant level. Nevertheless, other aesthetic impacts, directly related to public views of the landfill from particular vantage points, are identified as significant and unavoidable impacts.

J-4: The aesthetics analysis includes interpretation of simulated views of the completed landfill under project conditions, and compares these to simulated views of the completed landfill under current permit conditions. Vantage point 1, evaluated in Impact 3.1.2, is about 2 miles southwest of the southern edge of the landfill and is indicative of the effects on more distant views from the outskirts of the City of Davis. This impact is identified as significant and unavoidable. Therefore, the commenter is incorrect in stating that the DSEIR fails to evaluate the aesthetic effects of increasing the landfill's final height over a large area.

J-5: While the higher landfill would be a permanent feature of the landscape, the construction of the landfill occurs in phases over a large area. In any particular part of the landfill (other than areas of ongoing processing activities such as the composting and MRF operations, which, because of their lower elevation, are not visible from most vantage points) there would be long periods of inactivity. From any particular vantage point from which the landfill is visible there would only be relatively short periods (up to 2 years) of visible active operations, after which activities would cease for a number of years. Furthermore, as indicated in the simulated views presented in Section 3.1 of the DSEIR, while the landfill mass itself would be clearly visible from considerable distances, it is unlikely that activities occurring on the landfill would be discernible in middle and distant views of the site. Therefore, the conclusion presented in the DSEIR, that this impact is less than significant, is correct.

J-6: As described in Impact 3.2.3 in the DSEIR and in the response to comments I-30, I-31, and I-32, few odor complaints have been registered at the site. In most cases developments 1.5 to 2 miles away from a landfill or compost facility do not experience serious odor problems. In the rare cases that they do, the source of the odor is obvious and remedial actions to correct the situation can be undertaken. The one-mile screening distance is basically used to eliminate receptors outside that distance from further consideration. However, the commenter raises an important point regarding performance standards that could be better defined than in Mitigation Measure 3.2.3a. While an absolute measurable standard would be most desirable, there are not quantitative methods to measure odors. Individual responses to odors vary from person to person. Some research methods and applied methods have been developed to "quantify" odors (e.g., the odor methodology of the Bay Area Air Quality Management District) but generally odor complaints are verified by inspectors who have to determine if an odor is a nuisance at an off-site receptor. Regarding future growth of the City of Davis, please see the response to Impact H-4. See also the response to Comment J-9, below.

In response to this comment the following mitigation measure is added to the SEIR.

> **Mitigation Measure 3.2.3b**: As a part of the Odor Impact Minimization Plan or separately, the project sponsor, together with the LEA shall formulate a progressive odor management protocol. This protocol will allow the project sponsor to respond to odor complaints and revise operations as necessary. The LEA shall notify DIWM of all odor complaints received for the landfill. The protocol shall include progressive measures to be made in the event of repeated verified complaints. When the LEA verifies strong landfill odors or compost odors at off-site residences, the DIWM shall make changes in site operations to reduce the potential for odors. Odor may be reduced by limiting incoming throughput, limiting incoming materials to certain types of feedstocks, installing odor control equipment, removal and disposal of the odiferous compounds, or other activities (including the use of neutralizers, or deodorizers).

J-7: The issue of a proper baseline is a complex one, indeed. As an authority, the EIR preparers relied upon recent case law, as described in Chapter 1 of the DSEIR, on pages 1-8 through 1-9:

> "In *Fairview Neighbors v. County of Ventura* ([2d Dist. 1999] 70 Cal. App. 4th 238 [82 Cal. Rptr.2d 436]) the Court ruled that for an existing, permitted facility that was seeking a permit for a new or revised aspect of its operation, where the facility's previously permitted operations had previously undergone environmental review, the appropriate baseline should be the existing permitted operations, rather than the level of operations actually occurring at the time of the Notice of Preparation.
>
> "In accordance with this decision, the design, operations, and environmental controls described in the existing Solid Waste Facility Permit and other current permits, based on the 1992 FEIR, as well as other applicable permits that have undergone separate environmental review, constitute the baseline against which potential impacts of the project are measured in this EIR."

The transportation and traffic analysis presented in Section 3.10 of the DSEIR properly relies upon this ruling. Furthermore, the traffic analysis examines whether the existing and projected traffic volumes used for impact analysis in the 1992 EIR were still valid for use in this supplemental analysis. This examination resulted in the conclusion presented on page 3.10-5 of the DSEIR, that the roadway network and traffic conditions had changed little since the 1992 EIR traffic analysis was undertaken:

> "The roadway network serving the project vicinity is the same as existed at the time the 1992 EIR was prepared, except the bridge on CR 102 over the Willow Slough Bypass has been widened, which eliminated a constraint to traffic flow in that area.
>
> "Current (2003) daily traffic volumes on County Road 102 and County Road 29 are higher than the 1991 daily volumes reported in the 1992 EIR, but current peak-hour volumes (i.e., the basis for establishing traffic flow conditions) are similar to, or lower than, those reported in the 1992 EIR. For all other area roadways, the current traffic volumes are lower than those reported in the 1992 EIR for both daily and a.m. peak-hour conditions."

Therefore, the baseline used for the traffic analysis and the other analyses in the DSEIR is properly construed and consistent both with the CEQA *Guidelines* and case law interpreting the guidelines.

J-8: Please refer to the response to comment J-7 regarding definition of a proper baseline for the EIR analysis.

As identified on page 3.2-16, first sentence:

> "The YCCL's Solid Waste Facility Permit (SWFP) allows acceptance of up to 1,800 tons per day of waste and 1,047 vehicle trips per day, which the current project would not alter."

As identified in the discussion of Impact 3.2.1 (DSEIR page 3.2-16), this level of vehicle trips was previously analyzed in the 1992 EIR and thus, no changes in the conditions of air quality emissions were ascertained that would result in any new significant impacts or an increase in severity of the impacts from those analyzed in the 1992 EIR, other than those related to the projected increase in facility lifespan, as analyzed in Impact 3.2.4 and 3.2.6.

Although the air quality impact of vehicle trips is less than significant, other air quality impacts of the project have been identified as significant and unavoidable. These include Impact 3.2.4, which relates to the extended life of the landfill (see discussion beginning on page 3.2.19 of the DSEIR) and Impact 3.2.6, which relates to toxic air contaminants (see discussion beginning on page 3.2.27 of the DSEIR).

J-9: Please see response to comment H-4 regarding planned future development in the City of Woodland, including the Spring Lake Specific Plan. Because of the distance of the landfill (approximately three miles) from the City of Woodland's Urban Limit Line, the project is not expected to have a direct effect on current or future residents of that City. At this distance, any cumulative impacts that would be created by or contributed to by the project, in conjunction with impacts of planned future development of the City of Woodland, would be regional in nature, including air quality, traffic, land use, and biological resources. As described in Chapter 4 of the DSEIR, air quality impacts of the landfill project do not meet the YSAQMD's standard for determining cumulative air quality impacts; and the project does not propose to increase permitted traffic volume entering and leaving the landfill, and so would not contribute to a cumulative increase in traffic volume on regional roadways or impacts on roadway intersections. The landfill project could alter land use, if the proposed off-site borrow area is sited in an area not currently zoned for this purpose, such as an agricultural area. This could contribute to a cumulative loss of agricultural lands in Yolo County, as identified in Chapter 4 (page 4-5) of the DSEIR. Finally, the project would not contribute to loss of habitat or other biological impacts, because mitigation measures included in the SEIR would ensure no net loss of habitat and protection of special status species, and so would not contribute to a regional loss of wildlife habitat nor in impacts to special status species. Therefore, the

project would not make a considerable contribution to cumulative impacts brought about by future development of the City of Woodland.

The response to Comment H-4 also examines in more depth planned future growth of the City of Davis. The City of Davis General Plan Update (May, 2001), indicates that the proposed Covell Village project is the largest envisioned future development on the eastern edge of the City of Davis, and the closest envisioned future development area to the landfill. The cumulative analysis in the DSEIR properly considers potential cumulative impacts associated with approval of both the project and the Covell Village project. Other land use changes in the area south of the landfill and east of the City of Davis are being contemplated, including the possible development of an approximately 1,000 acre area north of Covell Blvd. and east of Mace Blvd by the Gidaro Group. However, no formal application has been submitted for such a project (Rowland, 2005). In addition, the Conaway Ranch, a large agricultural and open space holding to the north and east of the landfill, was purchased recently, though no application has been submitted for a change in land use. This property is also the subject of an eminent domain suit being brought by Yolo County, the purpose of which is to ensure that the land remains in its current use.

Since publication of the DSEIR, the Draft EIR for the Covell Village Project was published (City of Davis, 2004). Chapter 6 of that document analyzes growth inducement and cumulative impacts of the Covell Village project, and includes the following statement regarding future growth inducement in the project vicinity:

> "Although the infrastructure improvements would facilitate growth on the project site, the agricultural properties to the north of the site would be preserved under a conservation agreement, and the areas within the City of Davis to the west, south, and east of the site are already developed. Therefore, land is not available for further development in the project vicinity. Furthermore, the infrastructure which would be constructed for the Proposed Project or High Density Alternative has been designed to only serve the project site and, once installed on the site, would not be extended further to nearby properties. Therefore, adoption of the project would not increase pressure to develop adjacent areas within or adjacent to the City of Davis and in Yolo County, and implementation of the Proposed Project or the High Density Alternative would not result in significant and unavoidable growth-inducing impacts. (City of Davis, 2004, Chapter 6, Page 2)"

The Covell Village DEIR identifies numerous cumulative impacts of that project. The following examines the potential of the landfill project to make a considerable contribution to these impacts. In the following, the text of each cumulative impact identified in the Covell Village DEIR is in italics; this is followed by an analysis of the potential of the landfill project to make a considerable contribution to this impact.

Aesthetics

4.1-3 Long-term impacts to the visual character of the region from the proposed project in combination with existing and future developments in the Davis area.

The DSEIR notes that the landfill project will have a significant unavoidable impact on visual resources, and that this impact would be exacerbated by approval of the Covell Village project.

Agricultural Resources

4.2-3 Long-term impacts to Prime Farmland from the proposed project in combination with existing and future developments in the Davis area.

The landfill project does not propose to convert prime farmland to other uses, and so will not contribute to this impact.

Land Use

The land use impacts analyses* [in the main impact analysis section of the document] *include discussions of the existing and planned land uses in the project area. Because the analyses include discussions of planned land uses, the cumulative land use impacts would not differ from those identified for the project. The Proposed Project's portion of future land use would not be cumulatively considerable.

The DSEIR for the landfill project states (page 4-5) that if the proposed off-site borrow area is sited on agricultural land, this could combine with the Covell Village project to cause a cumulative impact to agricultural resources in Yolo County.

Traffic

4.4-4 Cumulative impacts to study intersections.

The cumulatively impacted study intersections identified in the Covell Village DEIR are along Covell Boulevard and Pole Line Road. These are not along typical haul routes to or from the landfill; therefore, landfill traffic will not contribute to deterioration of traffic level of service at these intersections.

4.4-5 Cumulative impacts to roadway segments of Covell Boulevard and Pole Line Road.

Again, these cumulatively impacted roadway segments are not along typical haul routes to or from the landfill, and will not be impacted by landfill traffic.

Air Quality

4.5-4 Long-term air quality impacts from the proposed project in combination with existing and future developments in the Davis area.

As noted in chapter 4 of the landfill DSEIR, the project does not meet the primary test for cumulative air quality impacts specified by the Yolo-Solano Air Quality Management District.

Noise

4.6-6 Cumulative impacts of off-site traffic on on-site noise-sensitive uses.

The Covell Village DEIR identifies future cumulative impacts on residents from traffic noise along Covell Boulevard, F Street, and Pole Line Road. These road segments are not along typical haul routes to or from the landfill. Therefore, noise from landfill traffic will not contribute to this impact.

4.6-7 Long-term traffic noise impacts to surrounding roadways from the proposed project, in combination with existing and future developments in the Davis area.

This impact takes into consideration noise impacts created by traffic along regional roadways in the year 2015, and concludes that there would be no significant cumulative impact if the Covell Village project were built. As the landfill project does not propose to increase traffic levels beyond currently permitted volumes, there would be no contribution of the project to this impact.

Cultural Resources

4.7-3 Long-term impacts to cultural resources from the proposed project in combination with existing and future developments in the Davis area.

The Covell Village DEIR identifies this as a significant impact that can be mitigated to less-than-significant levels. With mitigation, cultural resources impacts identified in the landfill EIR can similarly be mitigated to less-than-significant levels. After mitigation, there should be adequate preservation of the historic record and cultural artifacts to preclude a determination of a significant cumulative impact.

Biology

4.8-14 Cumulative loss of biological resources in the City of Davis and the effects of ongoing urbanization in the region.

As previously noted in this response, with the mitigation measures specified in the Biological Resources analysis in the landfill DSEIR, there will be no net loss of habitat nor impacts to special status plant or animal species. Therefore, the landfill project will not contribute to this cumulative impact.

Geology

4.9-4 Long-term geologic and seismic impacts from the proposed project in combination with existing and future developments in the Davis area.

The Covell Village DEIR identifies this as a site-specific, less-than-significant impact related primarily to exposing more people to seismic risks. The landfill project is not expected to contribute to such risks in this location or elsewhere in the vicinity.

Hazards

4.10-10 Long-term hazards-related impacts from the proposed project in combination with existing and future developments in the Davis area.

The Covell Village DEIR identifies this as a site-specific, less-than-significant impact related to the presence in the development area of various wells, electric transformers, and storage tanks, and the possibility that the area may be affected by pesticide residues or other hazardous materials used in the past. The hazards impacts identified in section 3.8 of the landfill EIR, which can all be mitigated to less-than-significance, are similarly site-specific, or, as in the case of Impact 3.8.4, are too distant to combine with such risks in the Covell Village development or elsewhere in the vicinity.

Hydrology, Water Quality, and Drainage

4.11-6 Long-term increases in peak stormwater runoff flows from the proposed project in combination with existing and future developments in the Davis area.

As the landfill currently controls and contains on-site all runoff from the site and will continue to do so in the future (and would also control runoff from an off-site borrow area, if one were to be developed) the landfill project will not contribute to this cumulative impact.

Public Services

4.12-8 Long-term impacts to public services and facilities from the proposed project in combination with existing and future developments in the Davis area

As noted in section 3.9 of the DSEIR, the landfill project, with the incorporation of specified mitigation measures, will not result in an increased demand for public services. Therefore, the landfill project will not contribute to this cumulative impact.

Population, Housing, and Employment

4.13-4 Long-term impacts to population and employment from the proposed project in combination with existing and future developments in the Davis area.

As discussed in the response to Comment I-18, the landfill project would not have an impact on population, housing, and employment. Therefore, the project would not contribute to impacts of this kind from the Covell Village project in combination with other existing and future developments in the Davis area.

In conclusion, the analysis presented in the DSEIR adequately and appropriately examines the potential for the project to combine with other past, present, and foreseeable future projects in the vicinity, and specifically with planned future developments in Woodland and Davis, to cause cumulative impacts.

J-10: Comment noted.

2C. PUBLIC HEARING MINUTES AGENDA ITEM 6.6

Comment Letter K

County of Yolo Planning and Public Works Department

Minutes
Yolo County Planning Commission
October 14, 2004

Agenda Item 6.6 Hearing to receive Comments on the Yolo County Central Landfill DEIR (Minutes page 21)

6.6 Public Hearing to receive comment on the Draft Environmental Impact Report (DEIR) for the proposed Use Permit at the Yolo County Central Landfill (YCCL). The landfill has been in operation since 1975, receiving waste from both incorporated and unincorporated areas of Yolo County. The YCCL is owned by the County of Yolo and operated by the Division of Integrated Waste Management (DIWM). DIWM is proposing several major changes to the design and operation of the YCCL. Proposed changes to the design and operation of YCCL which are analyzed in the Draft EIR include: 1) bioreactor or wet cell operations, 2) landfill height increase, 3) landfill mining, 4) a material recovery facility, 5) an expanded composting facility, 6) expanded salvaging, 7) a permanent household hazardous waste collection facility, 8) land purchase for a soil borrow area, 9) expanded landfill gas management and utilization options. The YCCL covers 725 acres in the A-1 (Agricultural General) Zone, located approximately four miles northeast of the City of Davis, and three miles southeast of the City of Woodland, near the intersection of County Roads 28H and 104 (Assessor's Parcel Numbers 042-004-001, 002, and 006). Applicant/Owner: Yolo County (L. Sinderson)

Linda Sinderson gave the staff report and answered questions from the Commission.

The public hearing was opened.

Ken Kuivenhoven, resident on County Road 29, directly south of the Landfill, said he was not notified directly of this hearing, and requested an extension to the public comment period due to the complexity of the EIR, its levels of impact that are significant but unavoidable, and the amount of time it will take to review the document. He pointed out some of his concerns, including: the significant and unavoidable toxic air contaminants that pose a risk to human health, noise, methane gas smell, dust, seagulls, and debris of the landfill. **K-1**

Linda Sinderson explained that the notice of availability of the document was sent, via mail, to all of the property owners within two miles of the site

David Morrison said that, in the future, mailings can be addressed to Resident at a specific address, without identifying a person's name.

The public hearing was closed.

2D. RESPONSES TO ORAL COMMENTS

K-1 The public comment period for the DEIR was 45 days, as required under CEQA. The Planning Commission elected not to extend the comment period. During the public hearing it was clarified that the notice of the DEIR review period had been mailed to (and received at) the address of the property owner listed in the County's records.

The commenter submitted written comments raising the issues raised at the hearing. Please refer to the responses to comments I-6 and I-37 (regarding toxic air contaminants); I-20 and I-21 (regarding noise impacts); I-30, I-31, and I-32 (regarding odors); and I-35 (regarding the potential increase in fine dust [PM-10] from expanded composting operations). As described in DEIR Section 3.8, Public Health and Safety, the landfill controls and standards contained in California Code of Regulations Title 27 require landfill operators to control vectors and birds (27 CCR 20810) and litter (20830), among other requirements. YCCL currently implements operating and maintenance practices to control litter and address potential problems related bird attraction. These practices would continue under the project.

References

City of Davis Community Development Department, 2004, *Covell Village, Draft Program Level Environmental Impact Report.* Prepared by Raney Planning & Management, Inc. December, 2004 SCH# 2004062089

City of Davis, *General Plan Update.* Adopted May, 2001.

City of Woodland, *General Plan Policy Document.* Adopted by the City Council on December 17, 2002.

City of Woodland, General Plan Final Environmental Impact Report. February, 1996. SCH #95053061.

City of Woodland, Spring Lake Specific Plan, Adopted December 18, 2001, Resolution No. 4330.

EMCON/OWT Solid Waste Services, *Operations Plan for Landfill Mining and Reclamation at the Yolo County Central Landfill*. Prepared for Yolo County Planning and Public Works Department, July 2001 (2001a)

EMCON/OWT Solid Waste Services, *Specific Health and Safety Plan for Landfill Mining at the Yolo County Central Landfill*. Prepared for Yolo County Planning and Public Works Department, July 2001 (2001b)

Rowland, Reese, Assistant Planner City of Davis, personal communication (telephone) with Dan Sicular, ESA, May 3, 2005.

CHAPTER 3
TEXT CHANGES TO THE DEIR

The following text changes are made to the Draft Environmental Impact Report (DEIR) and incorporated as part of the Final Environmental Impact Report. These include both text changes made in Chapter 2 of this document, in response to comments on the DEIR, and staff-initiated text changes and errata. New language is underlined and deleted language is indicated by ~~strikethrough~~ text.

CHAPTER 1

Page 11-1 (Necessitated by Changes in the Regulatory Environment)

The Water Quality section of Table 1- 1 of DEIR Chapter 1 is revised to add a new line indicating that Waste Discharge Requirements (WDRs) will be required for the YCCL compost facility. It is assumed that the Regional Water Quality Control Board, the permitting agency, would issue a separate permit for the compost facility; alternatively, the agency may choose to revise the existing landfill WDRs (Order No. R5-2002-0118) to include the compost facility.

CHAPTER 2

Page 2-9 (County-Initiated Change to the Project)

2.2.3 LANDFILL MINING

The DIWM is proposing to revise the facility's permits to allow mining in the future of ~~completed portions of the landfill~~ WMUs 6D through 6H (the remaining modules of WMU 6) and all of WMU 7, after they are filled and stabilized. ~~If approved, DIWM would give priority to mining the older, unlined landfill units, but the County would like the flexibility to practice landfill mining on any waste modules at the YCCL site. Waste Management Units (WMUs) 1 through 5 were constructed prior to adoption of federal and state regulations governing landfill design, and so are not lined with a modern (Subtitle D-compliant[1] composite liner. Due to the high water table, there are times when the bottom of these older units may be below the elevation of surrounding groundwater. DIWM proposes permit revisions that allow for mining of these old landfill units to protect groundwater from leachate or landfill gas contamination.~~

[1] Subtitle D, the solid waste program of the federal Resource Conservation and Recovery Act (RCRA), establishes requirements for the design of municipal solid waste landfills; Subtitle D requirements are codified in Title 40, Subparts 257 and 258, of the Code of Federal Regulations.

Mined waste would be processed with a trommel screen to separate it into three fractions: (1) metals and other recyclables; (2) an under-size fraction consisting of inert matter and soil suitable for use as daily and intermediate cover material or foundation layer for final cover for the landfill; and (3) an over-size fraction that would be landfilled. Waste would initially be excavated from a 10-acre area in an appropriate, filled and stabilized ~~older unlined~~ waste management unit. The waste would be sorted and the fraction that is not useable in any way would be hauled to the active lined waste management unit. ~~Once the initial 10 acres is reclaimed, the area would be graded and a composite base liner system constructed in this area. Excavation would be needed to an elevation at least two feet below estimated bottom of refuse (approximately elevation 13.5 feet msl). Engineered fill would then be installed to increase the elevation of the base to about 21 feet msl. This would place the base liner at a sufficient height for meeting the required 5 feet of separation between waste and groundwater.~~

Mining and subsequent redevelopment of WMUs 6D-6H and WMU 7 ~~1-5~~, in combination with the proposed height increase to elevation 140 feet msl and the proposed operation of new bioreactors, would significantly increase the capacity of the landfill~~, to about 66 million cubic yards~~. This would extend the active life of the YCCL to almost the year 2100. In addition, landfill mining would generate a considerable amount of fine materials suitable for use as cover material for the landfill that may otherwise have to be brought in from off-site. Removal of wastes from the unlined area would also eliminate a source of potential groundwater pollution. In order to better utilize site geometry, DIWM would relocate the existing high-pressure underground natural gas pipeline and above ground power lines that currently cross the site. DIWM also is proposing to extend the paved access road around the north and east perimeter of the site.

CHAPTER 3

Page 3.2-17 (Changed in Response to Comment E-5)

Mitigation Measure 3.2.2b: One month prior to initiation of landfill mining activities, the HASP shall be forwarded to the Local Enforcement Agency (LEA) and YSAQMD for comments and suggestions. Appropriate suggestions shall be incorporated into the HASP and new features of the HASP shall be communicated to the workers. If additional gas monitoring equipment is needed, the equipment shall be purchased and tested prior to commencing landfill mining operations. The HASP shall include a section with measures to control off-site odors (e.g., recovering freshly excavated areas if they produce nuisance-level odors, or excavating only when winds are blowing away from residential receptors).

Page 3.2-19 (Changed in Response to Comment J-6)

Mitigation Measure 3.2.3b: As a part of the Odor Impact Minimization Plan or separately, the project sponsor, together with the LEA shall formulate a progressive odor management protocol. This protocol will allow the project sponsor to respond to odor complaints and revise operations as necessary. The LEA shall notify DIWM of all odor complaints received for the landfill. The protocol shall include progressive measures to be made in the event of repeated verified complaints. When the LEA verifies strong landfill odors or compost odors at off-site residences, the DIWM shall make changes in site operations to reduce the potential for odors. Odor may be reduced by limiting incoming throughput, limiting incoming materials to certain types of feedstocks, installing odor control equipment, removal and disposal of the odiferous compounds, or other activities (including the use of neutralizers, or deodorizers).

Page 3.2-24 (County-Initiated for Clarification)

Mitigation Measure 3.2.4c: When replacing older diesel powered equipment used ~~vehicles~~ at the landfill, the County shall commit to replacing ~~them~~ it with diesel-powered ~~vehicles~~ equipment (with proven technologies) that generates less NO_x and PM-10 than the older ~~vehicles~~ equipment.

Page 3.3-31 (County-Initiated for Clarification)

Mitigation Measure 3.3.3b: In accordance with USFWS guidelines (Appendix I), all construction (e.g. grading, excavating, or filling) within aquatic ~~no grading, excavating, or filling may take place in or within 30 feet of potential aquatic~~ habitat for giant garter snake and adjacent uplands within 200-feet shall be conducted between May 1 ~~October 1~~ and October 1 ~~May 1~~ (the active period for the giant garter snake) unless otherwise authorized by the USFWS and CDFG.

Mitigation Measure 3.3.3d: ~~A qualified biologist shall be present on site during the excavation or filling of~~ Within 24-hours prior to commencement of construction activities in giant garter snake habitat, including uplands within 200 feet of aquatic habitat, between May 1 and October 1 a qualified biologist shall inspect the site for giant garter snakes. If a giant garter snake is found in the work area, all work shall cease until appropriate corrective measures have been completed or it is determined that the snake will not be harmed. Giant garter snakes encountered during construction activities should be allowed to move away from construction activities on their own. Capture and relocation of trapped or injured individuals can only be attempted by personnel or individuals ~~, and the applicant shall retain a qualified biologist~~ holding necessary permits ~~to remove the snake(s) from the construction area~~. Undisturbed habitat shall be re-inspected following a lapse in construction activity of two weeks or greater.

Page 3.5-18 and 3.5-19 (Changes to the Project Eliminate this Impact)

~~Impact 3.5.4: Mining and redevelopment of the older landfill cells could impact groundwater quality. (Significant)~~

~~As part of the project the DIWM proposes to mine the older, inactive landfill units at the site (WMUs 1 through 5). These landfill units were filled prior to adoption of current regulations establishing minimum standards for the design, construction and operation of MSW landfills and prior to establishment of current waste acceptance criteria and loadcheck programs. Consequently they were built without Subtitle D-compliant liners and information on the types of wastes that may be buried in the older units is limited. As noted in the setting section, above, the water table below the YCCL site ranges seasonally between 15 and 4 feet below ground surface (bgs) (i.e., at elevations between approximately 10 and 21 feet above msl in the vicinity of the older units). Wastes were deposited in WMUs 1 through 5 commencing at an elevation of 15.5 feet above msl (Yolo County, 2001a) (i.e., approximately 9.5 feet bgs) Waste at the bottom of WMUs 1 through 5 are at or below current groundwater levels during certain times of the year, which has caused an impact to groundwater in the area. The County operates a program to pump and treat contaminated groundwater and prevent the spread of the contaminant plume. In addition, to inhibit groundwater flow across these areas, the County constructed a slurry bentonite cutoff wall along portions of the north and west perimeters of the site near WMU-3 and WMU-5 and installed groundwater extraction wells south of the cutoff wall to artificially suppress the groundwater table to provide vertical separation of waste and groundwater (IT, 2001).~~

~~Following excavation, the base of the unit will be tested for signs of contamination within the underlying sub grade soil. The DIWM estimates that an additional two feet of soil below elevation 15.5 feet msl will need to be excavated to remove contaminated soil, although the actual base elevation is unknown (Yolo County, 2001b). Groundwater pumping and monitoring would continue during excavation of the older cells and could help contain any contamination encountered in the saturated zone of these units. Nevertheless, groundwater is very likely to be encountered in the course of excavating these older units during the portion of the year when groundwater levels are high. The DIWM has indicated interest, based on an evaluation of landfill operational strategies and disposal options at YCCL (EMCOM/OWT, 1999), in excavating all the waste in a mined unit from top to base at the same time, regardless of whether groundwater is encountered.~~

~~Because load checks and other programs to prevent the disposal of hazardous wastes also were generally less common when these units were operated than today, potentially harmful materials could be encountered during excavation. Disturbance of hazardous materials during mining operations could result in distributing the contaminant over a larger area and/or releasing hazardous materials to groundwater (CalRecovery, 1993). Excavation of wastes within the groundwater zone and/or the accidental disturbance of unknown hazardous materials could cause or exacerbate the release of contaminants to groundwater.~~

~~Mined wastes that could not be reused would be placed within the currently active, permitted landfill unit at the site. Following excavation, about 3 to 5 feet of earthfill would be placed to establish a five-foot separation between waste and the groundwater required by CCR Title 27, and a base liner that meets current regulatory standards would be constructed for future use of~~

~~the reclaimed landfill units. As proposed for WMUs 6 and 7, the new landfill units proposed for WMUs 1 through 5 would be constructed to a final elevation of 140 feet msl and may be developed as bioreactor landfills.~~

~~Removal of wastes from the unlined units, placement of any unrecoverable wastes into fully lined waste units, and replacement of the old WMUs with new landfill units that comply with all current regulatory standards would constitute beneficial effects of the project. However, incomplete removal of existing wastes from the mined units could result in continuing groundwater contamination, or continued risks thereof. In addition, settlement of foundation soils due to future landfill operations needs to be calculated to ensure that the five-foot separation between the base of the waste unit and groundwater is maintained throughout landfill development and following closure~~

~~Mitigation Measures Proposed as Part of the Project~~

~~Mitigation Measure 3.5.4a:~~ ~~Prior to excavating units the DIWM will research the history of the particular landfill unit and perform preliminary site investigations to determine, to the extent feasible, the types of materials that will be encountered.~~

~~Mitigation Measure 3.5.4b:~~ ~~The DIWM will test soils in excavated cells to ensure all wastes have been removed before placement of backfill. The soils will be tested at intervals determined in consultation with the RWQCB and as specified in YCCL's revised WDRs. (For example, a testing interval in the range of one test per acre has been acceptable to the RWQCB in similar situations, according to EMCOM/OWT [1999]). The following soil tests will be completed on each sampled area:~~

- ~~U.S. EPA CAM 17 Metals~~
- ~~Chlorinated Herbicides (U.S. EPA Method 8160)~~
- ~~Volatile Organic Compounds (U.S. EPA Method 8260)~~

~~Mitigation Measure 3.5.4c:~~ ~~DIWM's reclamation plan will include monitoring and incorporate the flexibility to address concerns as they arise once the program begins.~~

~~Mitigation Measure 3.5.4d~~~~: In reclaimed areas, approximately three to five feet of clean earthfill will be placed to reestablish the regulation-mandated five feet of separation between wastes and the groundwater table, prior to construction of the base liner for the landfill units.~~

~~Mitigation Measure 3.5.4e~~~~: If required by the RWQCB, saturated wastes that cannot be sorted will be dewatered as specified in the YCCL's revised WDRs, prior to disposal in an active, permitted landfill cell at the site. It is not expected that any wastes disposed of in a bioreactor would require dewatering.~~

~~Mitigation Measures Identified in this Report~~

~~Mitigation Measure 3.5.4f:~~ ~~Landfill mining work shall be conducted during the season of the year when the water table is low relative to other seasons.~~

~~**Mitigation Measure 3.5.4g:** The analysis of the settlement of foundation soils due to landfill operation conducted pursuant to Mitigation Measures 3.4.1a and 3.4.1b (in Section 3.4., Geology, Soils and Seismicity) shall be incorporated into the design of the reconstructed WMUs 1 through 5, including the determination of subgrade fill depth and the design of the future composite liner to meet the five feet of separation requirement.~~

~~***Level of Significance after Mitigation***~~

~~Implementation of measures 3.5.4a-g will reduce adverse short term impacts to groundwater during the mining operations to a less-than-significant level and provide for long term protection of groundwater in the vicinity of these units. With implementation of these measures, the removal of waste from unlined units, proper disposal of unrecoverable or contaminated materials encountered into a Subtitle D-compliant unit, and development of future cells in compliance with Subtitle D and Title 27 requirements will result in a long term beneficial impact.~~

Page 3.5-27 (County-Initiated for Clarification)

Mitigation Measure 3.5.9c: Drainage structures at the site will be designed and constructed to prevent the uncontrolled off-site discharge of surface run-off.

Page 3.6-8 (County-Initiated for Clarification)

Mitigation Measure 3.6.1e: In the event that the only feasible borrow area is agricultural land, the County shall purchase agricultural easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. This may take the form of outright purchase of conservation easements, or via the donation of mitigation fees to a local, regional, or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding, and maintenance of agricultural conservation easements. Mitigation lands may be located within Yolo County or the region of the Central Valley.

Page 3.7-14 (Changed in Response to Comments I-26 and I-27)

Mitigation Measure 3.7.1d: Exterior construction and landfill mining activities shall not begin earlier than 7 a.m. Monday through Friday, and 8 a.m. Saturday, nor continue after 5 p.m. Saturday. No exterior construction or mining activities shall be allowed on Sunday.

Mitigation Measure 3.7.1e: Noise equipment at the MRF that would generate noise levels of 80 dBA or greater at a distance of 50 feet should be located away from the southern property boundary or shielded by the MRF building or other means (e.g., soil berms or concrete walls), in order to attenuate potentially annoying noises at residences to the south of the property.

Pages 3.8-14 and 3.8-15 (Changed in Response to Comment B-1)

Impact 3.8.2: Excavation of hazardous waste encountered in the process of landfill mining ~~the older landfill units~~ could result in exposure of workers and the environment to harmful substances resulting in adverse health impacts. (Significant)

DIWM proposes to mine the ~~older, unlined or non-Subtitle D lined landfill units at YCCL (Units 1 through 5)~~ completed, stabilized bioreactor units in order to reclaim these areas for future disposal ~~(after construction of an appropriate liner)~~, recycle any recovered metals, use recovered soil in current landfill operations, and dispose of any unrecoverable wastes in a properly lined, active landfill unit at the site. Wastes in these ~~older~~ units were or will be disposed of ~~prior to~~ under ~~the establishment of~~ current waste acceptance criteria and loadcheck programs~~, and information on the types of wastes that may be buried is limited~~ and are therefore unlikely to contain hazardous wastes. Nevertheless, it is remotely possible that ~~Disturbance of unknown,~~ buried hazardous or toxic materials could be discovered, and could expose workers to harmful materials/substances and/or release hazardous materials to the environment.

Mitigation Measures Proposed as Part of the Project

Mitigation Measure 3.8.2a: Yolo County has developed a site-specific Health and Safety Plan (HASP) for landfill mining at YCCL. The plan provides guidelines and establishes procedures for the protection of personnel performing the scope of activities involved in landfill mining against hazardous or toxic wastes that may have been deposited within the landfill (EMCON/OWT, 2001). The HASP provides guidance to initiate the work and calls for monitoring of site conditions to determine the required protection. It is intended to be continually updated, based on consistent monitoring and implementation of the HASP adjustments. The HASP encompasses the following topics:

- personnel requirements
- training requirements
- hazard evaluation, including:
  - potential chemical hazards,
  - physical hazards (including utility clearances, use of heavy equipment, electrical hazards, adverse weather conditions, slip/trip/hit/fall injuries, heat stress, and cold stress); and
  - biological hazards (vectors and poisonous plants);
- accident prevention (including fire prevention and control);
- personal protective equipment;
- air sampling and exposure monitoring;
- site control and establishment of work zones, including
  - provision of communication equipment,
  - establishment of a buddy system, and
  - maintenance of site security;
- decontamination procedures; and
- emergency response contingency procedures.

Mitigation Measures Identified in This Report

~~None required.~~ **Mitigation Measure 3.8.2b:** Yolo County shall sample and submit for

laboratory analysis excavated materials during landfill mining operations, if and when something, such as a drum or other container, or a suspicious looking or smelling substance is encountered during the mining process that suggests that it may contain hazardous materials. The sampling and testing methods for these specific materials shall be determined by the Regional Water Quality Control Board in consultation with the Department of Toxic Substances Control, and shall be described in the facility's revised Waste Discharge Requirements. These requirements shall be sufficient to ensure that any potential hazardous materials are adequately characterized. Any mined material that is found to meet the criteria for hazardous waste, in accordance with California Code of Regulations, Title 22, Division 4.5, shall not be used as alternative daily cover, for other beneficial uses, or returned to any landfill unit at YCCL, but rather shall be handled, stored, transported, and disposed as hazardous waste in accordance with state and federal regulations governing hazardous waste. Hazardous waste shall not be stored on-site for more than 90 days.

Level of Significance After Mitigation

Mitigation Measures 3.8.2a and b would reduce the potential impacts from landfill mining to a less-than-significant level.

APPENDIX A

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

AUTHORITY AND PURPOSE

Pursuant to the California Public Resources Code, Section 21081.6 (Assembly Bill 3180), Yolo County Planning and Public Works Department Division of Integrated Waste Management (DIWM) is required to implement a mitigation monitoring and reporting program (MMRP) for the Yolo County Central Landfill Permit Revisions Project. The purpose of the MMRP is to ensure that the measures identified in the EIR to mitigate or avoid significant adverse environmental impacts of the project are implemented effectively.

COUNTY MONITORING AND REPORTING PROGRAM FEATURES

The MMRP lists the mitigation measures identified in the EIR to reduce or avoid significant project impacts and describes the monitoring, reporting, and verification roles and responsibilities of the DIWM and other agencies, as well as the timeline for implementation and verification of the mitigation measures contained in the EIR.

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Aesthetics					
3.1.1: The project is inconsistent with several goals and policies contained in the Yolo County General Plan. (LTS)	**3.1.1:** Prior to final project approval the County Department of Planning and Public Works shall prepare a landscaping plan that includes strategic plantings of tall, native trees to screen views of the landfill from public vantage points and rights of way, consistent with the other mitigation measures identified in this section.	DIWM	Plan preparation prior to final Project approval; plan implementation as soon as practicable so that trees will provide screening when currently permitted elevations are exceeded.	Yolo County Environmental Health Department (EHD)	Yolo County EHD, continuing periodic inspections
3.1.4: Vantage Point 5, View from south of Willow Slough Bypass, about 1,500 feet south of the southern edge of the landfill site, looking north. (LTS)	**3.1.4a:** The massing and exterior treatment of the proposed MRF structure should be designed to mimic a typical large agricultural structure.	DIWM and their MRF design/ engineering contractor(s).	MRF design, layout and landscaping plans to be completed prior to MRF construction; landscaping plan implementation upon completion of construction, prior to MRF operation. Maintenance ongoing thereafter.	Yolo County EHD	Yolo County EHD prior to MRF construction (plan review) and continuing periodic inspections (plan implementa-tion)
	3.1.4b: Planting of appropriate native trees along the southern boundary of the landfill would help to screen the landfill from this vantage point, and would serve to break-up the dominance of the mass of the landfill on the landscape. Trees should be selected for mature height and screening characteristics, and compatibility with natural stands in the area.	DIWM and their MRF landscaping contractor(s)	As soon as practicable following MRF site preparation; prior to MRF operation, and maintenance ongoing thereafter	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.1.8: Construction of future landfills cells as anaerobic bioreactors could introduce a new source of glare. (LTS)	**3.1.8:** When developing anaerobic bioreactor cells, the County shall use a cover that has low reflective properties.	DIWM	Upon construction of any new anaerobic cell.	Yolo County EHD	Yolo County EHD, continuing periodic inspections
3.1.9: Development of an off-site borrow area could degrade the visual character of the site and its surroundings by introducing physical features that are substantially out of character with adjacent land uses; alter the natural landscape characteristics of the site to such a scale or degree that the change appears as a substantial, obvious, and disharmonious modification of the overall scene; or conflict with adopted plans or policies regarding visual resources. (LTS)	**3.1.9a:** The soil borrow area shall be located outside of the viewshed of any designated or candidate scenic highway, as stated in the siting criteria to be used in identifying a suitable soil borrow area.	DIWM	Concurrent with site selection process.	DIWM, DPPW	DPPW, prior to issuance of mining permit
	3.1.9b: Consistent with Yolo County General Plan Policies CON 27 and SH 7, development of the soil borrow area will include a setback from roadways, and to the extent possible will retain existing trees and vegetation. The site will be landscaped, including use of screen trees.	DIWM	Prior to start of quarrying operations; maintenance of screening landscaping throughout soil borrow operations	DPPW	DIWM and DPPW, prior to start of operations and ongoing during soil borrow activities

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.1.9c: After completion of soil borrow activities, the site will be restored to an appropriate use, such as open space or wildlife refuge. This will include landscaping to produce a natural and harmonious character.	DIWM	Upon termination of soil borrow operations.	DPPW	DIWM and DPPW, upon cessation of soil operation activities.
Air Quality					
3.2.2: Landfill mining could release odors, methane, hydrogen sulfide, and other gases. (LTS)	**3.2.2a:** A *Specific Health and Safety Plan for Landfill Mining at the Yolo County Central Landfill* was prepared for the County in 2001. The Health and Safety Plan (HASP) as drafted shall provide the guidance necessary to initiate the work and allow monitoring of site conditions to determine the required protection. Continual updating of the HASP is emphasized in the HASP. The updates shall be based upon consistent monitoring and implementation of the HASP.	DIWM and their landfill mining contractor(s)	Prior to initiation of landfill mining.	DIWM, Yolo County EHD and YS AQMD	Yolo County EHD and YSAQMD, prior to start of landfill mining and as needed for HASP updates during operations

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.2.2b: One month prior to initiation of landfill mining activities, the HASP shall be forwarded to the Local Enforcement Agency (LEA) and YSAQMD for comments and suggestions. Appropriate suggestions shall be incorporated into the HASP and new features of the HASP shall be communicated to the workers. If additional gas monitoring equipment is needed, the equipment shall be purchased and tested prior to commencing landfill mining operations. The HASP shall include a section with measures to control off-site odors (e.g., recovering freshly excavated areas if they produce nuisance-level odors, or excavating only when winds are blowing away from residential receptors).	DIWM	Transmission to agencies: 1 month prior to initiation of mining activities. Modification of HASP per agency recommendations, communication of HASP to workers: Prior to start of operations. Communication to workers: Ongoing during mining operations.	Yolo County EHD; YSAQMD	Yolo County EHD and YSAQMD, upon receipt of HASP prior to start of landfill mining operations; continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.2.3: Landfill changes could result in the temporary generation of odors that could affect adjacent residences. (LTS)	**3.2.3a:** The project applicant shall formulate an Odor Impact Minimization Plan in accordance with the recently revised State composting regulations (Title 14 CCR § 17863.4.) This plan will be submitted to the LEA as part of the application for a solid waste facilities permit for the compost facility. In accordance with the above-cited regulations, the plan shall contain, at a minimum: 1) an odor monitoring protocol which describes the proximity of possible odor receptors and a method for assessing odor impacts at the locations of the possible odor receptors; and, 2) a description of meteorological conditions effecting migration of odors and/or transport of odor-causing material off-site. Seasonal variations that effect wind velocity and direction shall also be described; and, 3) a complaint response protocol; and,	DIWM	Prior to initiation of project composting operation	Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	4) a description of design considerations and/or projected ranges of optimal operation to be employed in minimizing odor, including method and degree of aeration, moisture content of materials, feedstock characteristics, airborne emission production, process water distribution, pad and site drainage and permeability, equipment reliability, personnel training, weather event impacts, utility service interruptions, and site specific concerns; and,				
	5) a description of operating procedures for minimizing odor, including aeration, moisture management, feedstock quality, drainage controls, pad maintenance, wastewater pond controls, storage practices (e.g., storage time and pile geometry), contingency plans (i.e., equipment, water, power, and personnel), biofiltration, and tarping.				

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
MM 3.2.3b is from response to comment J-6	**Mitigation Measure 3.2.3b:** As a part of the Odor Impact Minimization Plan or separately, the project sponsor, together with the LEA shall formulate a progressive odor management protocol. This protocol will allow the project sponsor to respond to odor complaints and revise operations as necessary. The LEA shall notify DIWM of all odor complaints received for the landfill. The protocol shall include progressive measures to be made in the event of repeated verified complaints. When the LEA verifies strong landfill odors or compost odors at off-site residences, the DIWM shall make changes in site operations to reduce the potential for odors. Odor may be reduced by limiting incoming throughput, limiting incoming materials to certain types of feedstocks, installing odor control equipment, removal and disposal of the odiferous compounds, or other activities (including the use of neutralizers, or deodorizers).	Plan development by DIWM and LEA; Plan implementation by DIWM	Prior to initiation of project composting operation	Yolo County EHD	Yolo County EHD; continuing periodic inspections
3.2.4: The project could increase the annual emissions of criteria air pollutants and would extend the years of landfilling and composting at the site until the year 2100. (SU)	**3.2.4a:** Yolo County is seeking to revise its permits to allow the future landfill modules to be operated as bioreactor landfills. This would allow leachate recirculation, the addition of supplementary liquid (such as groundwater), and acceptance of wet wastes. This will result in a significant increase in the rate of production of landfill gas. Due to accelerated decomposition LFG would be produced sooner and overall capture rates of LFG are expected to rise to as much as 98 percent, reducing the fugitive air emissions that escape from the landfill cover.	DIWM and their LFG collection contractor(s)	Enhanced LFG collection will be ongoing during bioreactor operations.	DIWM, Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.2.4b: Various aspects of the proposed project, including future development of bioreactor modules and increasing the final height of the landfill, will result in a significant increase in the rate of production of landfill gas. Currently, YCCL has a landfill gas collection system, and the collected gas fuels on-site electric generators. The project proposes to expand the existing landfill gas collection and utilization system and to diversify the landfill gas products. This might include an increase in electrical generation and transmission capacity, production of steam or alternative fuels such as methanol and LNG, commercial production of CO_2, or other uses. The addition of new stationary source control equipment would be subject to permitting by the YSAQMD.	DIWM and their LFG collection contractor(s)	Variable, depending on available technologies and LFG production levels.	DIWM, Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections
	3.2.4c: When replacing older diesel powered equipment used at the landfill, the County shall commit to replacing it with diesel-powered equipment (with proven technologies) that generates less NO_x and PM-10 than the older equipment.	DIWM	Upon any vehicle replacement	Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, upon vehicle replacement
	3.2.4d: The County shall conduct periodic reviews to identify feasible retrofit equipment, or fuels that could lower vehicle emissions at the landfill.	DIWM in consultation with other DPPW divisions	Periodically throughout YCCL operations	DIWM, Yolo County EHD	Yolo County EHD and YSAQMD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.2.5: The project would increase the amount of ROG and PM-10 emissions from expanded composting activities. (LTS)	**3.2.5a:** Water composted or cured materials during final windrow tear down and before loading the finished compost onto vehicles, taking care not to over wet the material, which could produce leachate or run-off. This would ensure that potential impacts from PM-10 are mitigated. In addition, the following measures shall also be implemented to reduce PM-10 emissions.	DIWM or their compost operation contractor	Ongoing during compost operations	DIWM, Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections
	3.2.5b: The project applicant shall maintain records of all materials composted (either in terms of volume or weight by material type) and shall comply with all applicable rules, regulations and permit conditions. This would enable the DIWM and the YSAQMD to track ROG emissions from the composting operation so that emissions reductions can be claimed if specific controls are implemented in the future.	DIWM or their compost operation contractor	Ongoing during compost operations	DIWM, YSAQMD, Yolo County EHD	Yolo County EHD and YSAQMD, continuing periodic inspections
3.2.6: Emissions of toxic air contaminants could pose a risk to human health. (SU)	**3.2.6a:** The LFG collection system (and destruction via electrical generation or flaring) in combination with the bioreactor technology should substantially reduce the rate of fugitive emissions of LFG from the landfill.	DIWM and their LFG collection contractor(s)	During bioreactor operation	DIWM, Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections
	3.2.6b: The County shall retrofit diesel-fueled engines and vehicles to reduce diesel particulate matter (DPM) emissions where it is determined to be technically feasible and cost-effective.	DIWM	Upon determination of technical feasibility and cost effectiveness	Yolo County EHD, YSAQMD	Yolo County EHD and YSAQMD; variable

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.2.6c: The County shall use reduced sulfur fuel for existing on-road, off-road, and stationary diesel-fueled engines as soon as it is available, compatible with diesel-fueled engines on-site, and economically feasible.	DIWM	Upon availability of fuel compatible with diesel equipment and determination of cost effectiveness	Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD; variable
	3.2.6d: The County shall maintain the existing residential buffer areas surrounding the landfill and expand the buffer areas when opportunities arise in the future.	DIWM	Ongoing; expansion of future buffers when opportunities arise	Yolo County EHD and YSAQMD	Yolo County EHD and YSAQMD, continuing periodic inspections
Biological Resources					
3.3.1: The proposed project may have significant adverse impacts, either directly or through habitat modifications, to special status bird species as defined in this section. This would be a significant impact. (LTS)	**3.3.1a:** There will be a "rolling replacement" of lost grasslands as landfill modules are completed, covered with soil, and re-seeded.	DIWM	Ongoing during landfill operation	DIWM, Yolo County EHD	Yolo County EHD, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.1b: For construction of any facilities that will occur between March 15 and September 15 of any given year, the DIWM shall conduct preconstruction surveys in suitable nesting habitat within 0.5 mile of the project site for Swainson's hawk and within 1,000 feet of the project site for tree-nesting raptors. Surveys shall be conducted by a qualified biologist and will conform to the Swainson's Hawk Technical Advisory Committee (2000) guidelines (Appendix G). If nesting raptors are recorded within their respective buffers, the applicant will consult with CDFG regarding suitable measures to avoid impacting breeding effort.	DIWM biologist or consulting biologist	Prior to construction during the specified period	DIWM biologist or consulting biologist	Yolo County EHD, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.1c: In order to protect wildlife habitat and existing open space as described in the conservation and open space policies of the Yolo County General Plan (1983), and the pending Yolo County NCCP/HCP, the applicant shall purchase shares in an appropriate mitigation bank or purchase comparable raptor foraging area in consultation with the CDFG at an appropriate ratio (1:1) to maintain no net loss of wildlife habitat in the region from the proposed landfill expansion. This ratio shall be applied to on-site grassland and agricultural land that will be permanently altered from natural to developed state. This ratio also shall be applied to off-site agricultural lands if such lands are acquired for use as a soil borrow area. The applicant shall consult with CDFG to fulfill appropriate mitigation acreage and/or ratio requirements in consideration of the anticipated "rolling replacement" of upland grasslands within the landfill site.	DIWM	Periodically during YCCL operations, prior to development / alteration of existing habitat	Yolo County EHD, CDFG, USFWS, as needed	Yolo County EHD, CDFG, USFWS, as needed
3.3.2: The proposed project may have significant adverse impacts, either directly or through habitat modifications, on western burrowing owl. This would be a significant impact. (LTS)	**3.3.2a:** See Mitigation Measure 3.3.1a.	See Mitigation Measure 3.3.1a.	See Mitigation Measure 3.3.1a.	See Mitigation Measure 3.3.1a.	See Mitigation Measure 3.3.1a.

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.2b: For any construction that will occur between March 15 and September 15 of any given year, the applicant shall conduct preconstruction surveys in suitable nesting habitat within the project site and within 500 feet of the project site, for burrowing owls prior to construction. Surveys shall be conducted by a qualified biologist and will conform to the CDFG burrowing owl recommendations (Appendix H). Burrowing owl surveys shall be conducted in both the breeding and non-breeding season.	DIWM biologist or consulting biologist	Prior to construction during the specified period	Yolo County EHD, CDFG	Yolo County EHD, CDFG, USFWS, as needed
	3.3.2c: If nesting burrowing owls are detected within the project area, mitigation to avoid active nest sites or compensate for the loss of nest sites shall be developed in coordination with CDFG. Mitigation may include, but is not restricted to, precluding entry into buffer zones around nests, creating new burrows for every nest site lost at a 2:1 ratio, the passive relocation of resident owls, if necessary, and retention of a qualified wildlife biologist to monitor active nests during construction; this biologist would have the authority to halt construction if construction activities would result in the abandonment of a nest.	DIWM in coordination with CDFG; passive relocation, if needed, and construction monitoring by DIWM biologist or consulting biologist	Prior to construction within area owls have been detected	Yolo County EHD and CDFG	Yolo County EHD, CDFG, USFWS, as needed
3.3.3: The proposed project may have significant adverse impacts, either directly or through habitat modifications, on giant garter snake. This would be a significant impact. (LTS)	**3.3.3a:** The applicant will ensure that construction either within potential aquatic habitat for giant garter snake, and/or upland habitat within 200 feet of potential aquatic habitat (i.e., the unlined irrigation canals and ditches), shall conform to USFWS guidelines for procedures and timing of activities in giant garter snake habitat (Appendix I).	DPPW / DIWM biologist or consulting biologist	Prior to start of construction activities within potential aquatic and upland habitat	USFWS	Yolo County EHD, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.3b: In accordance with USFWS guidelines (Appendix I), all construction (e.g. grading, excavating, or filling) within aquatic habitat for giant garter snake and adjacent uplands within 200-feet shall be conducted between May 1 and October 1 (the active period for the giant garter snake) unless otherwise authorized by the USFWS and CDFG.	DIWM	During the specified period (between October 1 and May 1)	Yolo County EHD and USFWS	Yolo County EHD, CDFG, USFWS, as needed
	3.3.3c: Prior to construction, all construction workers shall take part in an environmental awareness program conducted by a qualified biologist (i.e., a biologist who has had prior experience with giant garter snake monitoring through USFWS-approved biological opinions and/or implemented HCPs). This training shall include, at a minimum, a description of giant garter snake, its habitat requirements, and a photograph or illustration of the species so that workers can recognize the species.	DPPW / DIWM biologist or consulting biologist	Periodically during YCCL operations, prior to construction of additional cells or new areas of the site.	Yolo County EHD and USFWS	Yolo County EHD, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.3d: Within 24-hours prior to commencement of construction activities in giant garter snake habitat, including uplands within 200 feet of aquatic habitat, between May 1 and October 1 a qualified biologist shall inspect the site for giant garter snakes. If a giant garter snake is found in the work area, all work shall cease until appropriate corrective measures have been completed or it is determined that the snake will not be harmed. Giant garter snakes encountered during construction activities should be allowed to move away from construction activities on their own. Capture and relocation of trapped or injured individuals can only be attempted by personnel or individuals holding necessary permits. Undisturbed habitat shall be re-inspected following a lapse in construction activity of two weeks or greater.	DIWM biologist or consulting biologist	During construction (excavation or filling) within garter snake habitat	Yolo County EHD and USFWS	Yolo County EHD, CDFG, USFWS, as needed
3.3.4: The proposed project may have significant adverse impacts to special-status plants. This would be a significant impact. (LTS)	**3.3.4a:** Prior to construction or development of landfill cells in the undeveloped eastern portions of the YCCL site, grassland, and seasonal wetland habitats and any vegetated portions of the proposed off-site soil borrow area on adjacent or nearby agricultural lands shall be surveyed by a qualified botanist for special-status plants using established CNPS protocols at the appropriate flowering period (March-June).	DIWM biologist or consulting biologist	During appropriate flowering period prior to cell construction or development	Yolo County EHD, CDFG, and USFWS, as needed	Yolo County EHD, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.3.4b: If special-status plants are detected within the project area, soil borrow area or the immediate vicinity, the applicant shall identify and protect their locations with orange fencing, avoid all specimens, and notify CDFG. If sensitive plants cannot be avoided by the project, additional minimization and mitigation measures will be developed by the applicant in consultation with CDFG, prior to construction.	DIWM and their biologist or consulting biologist in consultation with CDFG	Prior to construction	Yolo County EHD, CDFG, USFWS, as needed	Yolo County EHD, CDFG, USFWS, as needed
3.3.5: The proposed project may have adverse impacts on potential jurisdictional wetlands in the project area, that may be filled due to landfill expansion activities and construction. This would be a significant impact. (LTS)	**3.3.5:** Prior to construction, the applicant shall submit a formal wetland delineation report for the project area for verification through the ACOE. Any fill of wetlands or other waters of the U.S. would require a permit from the ACOE. If impacts to jurisdictional wetlands are proposed, the applicant shall be required to obtain a Section 404 (Clean Water Act) permit from the ACOE and/or a Section 401 permit from the RWQCB. In association with either or both permits, compensatory mitigation for impacts to jurisdictional wetlands may be required. Should mitigation be required, there may be potential on-site opportunity for wetland enhancement and/or creation. This may also be done in combination with upland habitat enhancement (e.g., upland special status plant habitat). ACOE mitigation guidelines emphasize on-site mitigation preference, but in the potential case that on-site mitigation is not available, the applicant shall purchase wetland mitigation credits from an ACOE-approved mitigation bank that services the area containing the proposed project.	DIWM	Delineation report already prepared; report verification and jurisdictional determination by the ACOE prior to project implementation. If needed, Section 401 permit obtained prior to implementation of project activities in jurisdictiaonal area(s)	ACOE	ACOE, prior to project implementation

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.3.8: Changing biological conditions on the project site over the life of the project could result in future disturbance of biological resources. (LTS)	**3.3.8.** Prior to construction of new developments at the YCCL, the County shall conduct a biological resource survey of the area to be disturbed and nearby areas (e.g., including a 100 ft. buffer surrounding proposed new construction, and/or enlarged buffer sufficient to comply with survey protocols for, for example, nesting raptors) that may be affected by the construction. For the purpose of this mitigation measure, new developments include construction of new landfill modules; grading, disking, plowing, or other site preparation for permanent or temporary facilities or for agricultural uses; alteration of existing drainage channels; and other activities that will result in the disturbance of portions of the landfill that have not been disturbed for at least two years, have vegetative cover, or are considered a water of the state or the U.S. The biological resource survey shall be consistent with the other mitigation measures detailed in this section and consistent with the prevailing regulatory environment at the time the survey is conducted.	DIWM biologist or consulting biologist	Periodically during YCCL operations, prior to start of new development on the site including any of the specified activities	Yolo County EHD, ACOE CDFG, USFWS, as needed	Yolo County EHD, ACOE, CDFG, USFWS, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Geology, Soils, and Seismicity					
3.4.1: Increasing landfill loads as a result of the project could change the amount of anticipated total and differential settlement of underlying materials, resulting in altering the flow of leachate and interfering with the proper drainage and function of the leachate collection and removal system (LCRS). (LTS)	**3.4.1a:** The DIWM's conceptual design and preliminary studies for the base liner and LCRS for the bioreactor cells take into account the added weight of the proposed landfill. The final engineering design has not been completed.	DIWM and their consulting landfill engineers	Conceptual design already implemented; final engineering design completed prior to start of construction	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, final design review prior to liner and LCRS construction; implementation verified by periodic inspections throughout construction
	3.4.1b: The final engineering design for the proposed bioreactor landfill shall include calculation of foundation settlements assuming refuse unit weights that are representative of refuse within a bioreactor environment and assuming the proposed landfill thickness. In addition, the analysis of differential settlement within the landfill footprint shall calculate the effects of landfill side slopes on differential settlement and the potential effects of differential settlement on LCRS drainage. Prior to the beginning of construction of the proposed landfill, the DIWM shall submit the Final Design Report to the RWQCB for review and approval. Construction shall not commence prior to RWQCB approval of the design report.	DIWM and their consulting landfill engineers	Prior to bioreactor construction	Yolo County EHD and RWQCB	Yolo County EHD, RWQCB, prior to bioreactor construction

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.4.2: Settlement of the refuse materials and the landfill surface could adversely affect drainage or disrupt the liner or final cover, or damage leachate collection and landfill gas collection structures. (LTS)	**3.4.2:** Operation of the bioreactor will accelerate settlement, and the landfill components, including the liner and LFG and leachate collection systems are designed and engineered to accommodate the anticipated settlement. In addition, the landfill design is required to comply with Title 27 requirements for final cover design, final surface grades, and continuing monitoring and maintenance to reduce potential impacts due to settlement.	DIWM and their consulting landfill engineers	Design of near-term landfill components already implemented. Design of future components to be completed prior to construction. Monitoring and maintenance are ongoing.	DIWM, their consulting landfill engineers, Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, continuing periodic inspections
3.4.3: If not properly designed, landfill slopes could fail as a result of seismic or static forces. (LTS)	**3.4.3a:** The DIWM's conceptual design and preliminary studies for the slopes for the bioreactor cells take into account the added weight from the increased height and bioreactor operation. Final engineering design has not been completed.	DIWM and their consulting landfill engineers	Conceptual design already implemented; final engineering design completed prior to start of construction.	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, continuing periodic inspections
	3.4.3b: Prior to project construction, engineering analyses shall be performed to evaluate static stability as well as seismic stability and/or deformations for the proposed final bioreactor refuse height.	DIWM and their consulting landfill engineers	Prior to construction.	Yolo County EHD and RWQCB	Yolo County EHD, CIWMB

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.4.5: The expansion and contraction of expansive soils underlying the proposed MRF and HHWCF, in response to cycles of wetting and drying, could damage building foundations and concrete slabs. (LTS)	**3.4.5a:** Foundation preparation and construction for the MRF and HHWCF buildings shall comply with all engineering design recommendations provided by the project geotechnical engineer. Mitigation shall include one or more of the following: a) moisture conditioning the expansive soil below foundation and slabs, b) providing select, non-expansive fill below slabs, c) supporting foundations below the zone of severe moisture change, and/or d) designing foundations to resist the movements associated with the volume change.	Design recommendations developed by project geotechnical engineer; preparation and construction by DIWM and their construction contractor(s)	Specified site preparation to be implemented prior to MRF and HHWCF construction	Yolo County EHD and Yolo County DPPW	Yolo County DPPW, prior to MRF and HHWCF construction
	3.4.5b: The project shall comply with all engineering design recommendations provided by the project geotechnical engineer to reduce the settlement potential of surficial soils underlying the proposed buildings. Mitigation shall include either: (a) over-excavation and recompaction of existing fill and the use of spread footings for building support, or (b) support of the building on spread footings founded on compacted aggregate piers or cast-in-place concrete piers extending through poorly compacted site soils.	DIWM and their construction contractor(s)	Engineering design recommendations to be completed prior to construction; compliance with recommendations ongoing during site construction	Project geotechnical engineer, Yolo County EHD, Yolo County DPPW	Yolo county DPPW; prior to building construction

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Hydrology and Water Quality					
3.5.1: Pressure from collected leachate on the bioreactor liner, especially in the collection trenches and sump areas, could result in leakage and the potential contamination of nearby groundwater. (LTS)	**3.5.1a:** The DIWM will design and construct future bioreactor cells with the same containment features included in the Project XL bioreactor at Module D (modified as necessary to accommodate the increased anticipated settlement of the proposed project). Monitoring instruments and sensors will be placed to ensure safe and efficient recirculation of leachate, as was done for the Project XL bioreactor, and a comparable monitoring program will be implemented.	DIWM and their consulting landfill engineers	Engineering design recommendations to be completed prior to construction; compliance with recommendations ongoing during site construction	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB. Continuing periodic inspections
	3.5.1b: The Maintenance and Operations Plan developed by the DIWM for the Module D Full Scale Bioreactor Project, pursuant to requirements in the facility's previous WDR, Order No. 5-00-134, or comparable plan approved by the RWQCB, shall be implemented for the proposed future bioreactor units. The Maintenance and Operations Plan will apply to the development and operation of the proposed future bioreactor cells and will be revised as warranted, pursuant to the applicable WDR order.	DIWM	Ongoing; Bioreactor MOP to be implemented concurrent with operation of all future bioreactor cells and revised as specified in applicable WDRs.	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, continuing periodic inspections
	3.5.1c: The DWIM will maintain a response plan to address the contingency of leachate production level exceeding expected levels, as described under item (e) of the Maintenance and Operations Plan for the Module D bioreactor project or a comparable plan.	DIWM	Maintenance of response plan: ongoing; implementation of response plan: as needed.	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, prior to project implementation

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.51d: The final engineering design plans for the proposed bioreactors will incorporate the containment features and recommendations for leachate collection trench and sump areas described in Golder's Liner Performance Demonstration for Module D (Golder 2002). The engineering plans and drawings shall be submitted to RWQCB for approval prior to project construction.	DIWM and their consulting landfill engineers	Final engineering design to be completed prior to construction of new bioreactor cell	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, prior to bioreactor construction
3.5.3: Liquids added to the bioreactor cell, including collected leachate, landfill gas condensate and other liquids as needed, could exceed the capacity of the LCRS and result in the discharge of leachate to groundwater or the surrounding environment if the LCRS capacity requirements are not adequately assessed. (LTS)	**3.5.3a:** The DIWM's conceptual design and preliminary studies pertaining to LCRS capacity requirements utilize the most current data garnered from the existing bioreactor demonstration project and provide capacity to accommodate twice the anticipated peak rate, consistent with Title 27 requirements. The final engineering design for the LCRS has not been completed.	DIWM and their consulting landfill engineers	Final engineering design to be completed prior to construction of new bioreactor cell	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, prior to project-related bioreactor development
	3.5.3b: The final engineering design for the LCRS for the proposed bioreactor landfill units will utilize all relevant, current data from the Module D project to calculate LCRS capacity requirements and provide the capacity to accommodate twice the anticipated peak rate, as required in Title 27. The LCRS design will be submitted to the RWQCB for review and approval prior to LCRS construction.	DIWM and their consulting landfill engineers	Final engineering design to be completed prior to construction of new bioreactor cell	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD, plan preview prior to construction, and continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.5.4: Project has been modified to exclude mining of older WMUs; therefore, Impact 3.5.4 in the DEIR is deleted.					
3.5.5: Future mining of the stabilized bioreactor landfill units could result in the remobilization of metals and other contaminants that were precipitated and sequestered in the soil/waste matrix during leachate recirculation, resulting in the contamination of water contacting mined materials. (LTS)	**3.5.5:** Because experience regarding the behavior of materials mined from bioreactor landfills is extremely limited or non-existent and soil materials from bioreactor units have not been approved by the CIWMB for use as ADC, prior to mining stabilized material from a bioreactor landfill unit, the DIWM shall, in consultation with the LEA, conduct tests on samples taken from the bioreactor cell to be mined. In consultation with the LEA and the RWQCB, the DIWM shall develop an appropriate site specific demonstration to evaluate the suitability of mined bioreactor landfill materials for daily, intermediate, or final materials. The demonstration project should address the potential remobilization of metals and other toxic constituents that typically are sequestered and stabilized within the waste matrix during leachate recirculation, when the materials are exposed to atmospheric conditions at the landfill surface, and other parameters as determined appropriate in consultation with the LEA and RWQCB. Testing may include TCLP parameters and other test(s) as specified by the LEA and/or RWQCB.	DIWM in consultation with Yolo County EHD and RWQCB	Demonstration project evaluating use of mined materials for ADC to be completed prior to full-scale use of such materials for that purpose.	Yolo County EHD and RWQCB	Yolo County EHD and RWQCB, continuing periodic inspections; DTSC, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.5.6: Expansion of composting or salvaging operations could degrade underlying groundwater. (LTS)	**3.5.6:** Composting operations and public salvage area operations shall be conducted on pads that are designed and constructed to limit infiltration and to control run-off. The pads shall be designed and constructed to promote surface drainage and prevent ponding. Runoff will be directed to a properly designed sump and pumped into a truck for disposal into the leachate ponds or into a sewage line to the WWTP.	DIWM	Prior to issuance of revised SWFP for composting operations	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD
3.5.7: Stormwater runoff from landfill, composting facility, and other facility surfaces, if not properly controlled, could contribute to peak flows downstream or degrade surface receiving waters. (LTS)	**3.5.7a:** The DIWM will update YCCL's Storm Water Pollution Prevention Plan (SWPPP), required under the NPDES General Industrial Storm Water Permit, to address pollution controls and the containment and control runoff at non-erosive velocities from new and expanded site operations. The updated SWPPP will address composting facility operations.	DIWM	Updated SWPPP to be prepared prior to issuance of revised SWFP	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD
	3.5.7b: Prior to project implementation the DIWM shall update its maintenance and operations plan (MOP) for YCCL. The revised MOP shall include calculations as to the amount of leachate expected to be generated as a result of precipitation contacting compost feedstock and composting materials, as well as any runoff from application of quench water applied to the composting materials. The MOP will outline strategies for managing the collected leachate to ensure that adequate capacity is maintained. The updated MOP shall be submitted to the RWQCB prior to implementation of the composting component of the project.	DIWM	MOP to be updated prior to issuance of revised SWFP.	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.5.8: Construction activities associated with construction of a MRF, a permanent HHW Collection Facility, composting pads and receiving area for the expanded composting operation, and pad for the salvaging operation, could increase soil erosion and result in the transport of sediments and other contaminants to off-site surface waters. Excavation undertaken during construction activities also could impact groundwater quality. (LTS)	**3.5.8a:** Due to the high groundwater beneath the site, the design of the proposed permanent HHW facility will not include a sub-floor. The facility will be designed to incorporate a double containment system to contain spills and water used for any fire control activities above ground. Excavation for the HHWCF and MRF will be limited to surface grading and preparation needed to meet building construction standards.	DIWM and their consulting structural engineers	Final HHWCF and MRF designs to be completed prior to construction of the respective buildings	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD
	3.5.8b: Prior to the start of grading or construction, the DIWM will prepare a Construction Storm Water Pollution Prevention Plan (SWPPP) that incorporates best management practices to minimize erosion and the off-site transport of soil and sediment, and minimize potential adverse impacts to water quality impacts associated with project construction. The objectives of the SWPPP are to identify pollutant sources that could affect the quality of storm water discharge, to implement control practices to reduce pollutants in storm water discharges, and to protect receiving water quality. The DIWM shall incorporate into contract specifications the requirement that the contractor comply with and implements the provisions of the SWPPP.	DIWM	Prior to start of any construction-related activities	RWQCB and Yolo County EHD	RWQCB and Yolo County EHD

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.5.9: Use of an off-site parcel as a soil borrow area could degrade groundwater or surface water quality on or near the borrow area site. (LTS)	**3.5.9a:** Prior to commencement of any quarrying or excavation at a new borrow area, the DIWM will produce a stormwater pollution prevention plan for the quarry site, or if the site is adjacent, update YCCL's existing SWPPP to include the borrow area. The SWPPP will describe activities and potential pollution sources at the site and best management practices to limit soil erosion and prevent the sedimentation of nearby surface drainage channels and other surface waters. Control measures may include, but are not limited to, placement of hay bales, sediment fences, and other structures to limit erosion and the transport of sediments, and limiting the size of the area being cleared and excavated to the minimum needed for the operation. The revised SWPPP will provide for reseeding exposed areas when they are no longer actively being quarried, and include a monitoring program. Pursuant to NPDES General Permit requirements, the revised SWPPP will be implemented, and a copy of the SWPPP will be retained at the YCCL site and available for RWQCB review upon request.	DIWM	Prior to commencement of soil borrow/quarrying activities at a new borrow area.	RWQCB and Yolo County DPPW	RWQCB, as needed

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.5.9b: Before quarrying activities commence, the DIWM shall obtain a permit if required by the Surface Mining and Reclamation Act (SMARA). Permit approval requires submission of a plan for returning the land to a usable condition (known as a "reclamation plan"), and financial assurances to guarantee costs for reclamation. New mining operations must also file an initial report with the Office of Mine Reclamation, pursuant to PRC §2207(d)(6).	DIWM	If needed, SMARA permit to be acquired prior to start of quarrying activities; initial mining report to be filed with Office of Mines and Reclamation prior to start of quarrying activities	State Geologist, California Office of Mine Reclamation	Office of Mine Reclamation, upon submission of Reclamation Plan
	3.5.9c: Drainage structures at the site will be designed and constructed to prevent the uncontrolled off-site discharge of surface run-off.	DIWM	Design to be completed prior to start of quarrying activities; drainage system installed prior to start of quarrying operation	RWQCB, State Geologist, California Office of Mine Reclamation	RWQCB, State Geologist, California Office of Mine Reclamation

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Land Use					
3.6.1: Development of an off-site borrow area could result in conflicts with agricultural uses. (LTS)	**3.6.1a:** The off-site soil borrow area should be sited in the "possible future expansion" areas identified in the General Plan, located directly east and north of Yolo County Central Landfill. Although these areas are currently designated as A-P, the intent of the general plan is to allow future landfill expansion in the adjacent northern and eastern parcels; therefore, the use of theses parcels as a borrow area should not conflict with the General Plan's intent to preserve agricultural land. Also, the Yolo County Zoning Regulations, Title 8, Chapter 2 Zoning, Sec. 8-2.404 states that upon review and approval, conditional uses such as the operation of a solid waste disposal site shall be authorized by a Minor Use Permit.	DIWM	Implemented, if feasible, in conjunction with the site selection process	Yolo County DPPW	Yolo County DWWP, Yolo County EHD, and CA Dept. of Conservation
	3.6.1b: The County could site the off-site borrow area in a location that is not zoned or designated as agricultural land.	DIWM	Implemented, if feasible, in conjunction with the site selection process.	Yolo County DPPW	Yolo County DPPW, upon issuance of mining permit
	3.6.1c: The County can re-zone and re-designate the borrow area site so the use of the site would not conflict with the land use designation. However, re-designating the site could conflict with other land use policies.	DIWM	If needed, prior to use of site as soil borrow area.	Yolo County DPPW	Yolo County DPPW, if needed, prior to use as soil borrow area
	3.6.1d: The County can use alternative sources of daily cover (e.g. fines from the landfill mining operations, the compost generated from the compost operations), which would reduce the need to develop an off-site borrow area.	DIWM	If feasible, prior to development of off-site borrow area.	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.6.1e: In the event that the only feasible borrow area is agricultural land, the County shall purchase agricultural easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land, as well as for the mitigation of growth inducing and cumulative impacts on agricultural land. This may take the form of outright purchase of conservation easements, or via the donation of mitigation fees to a local, regional, or statewide organization or agency, including land trusts and conservancies, whose purpose includes the purchase, holding, and maintenance of agricultural conservation easements. Mitigation lands may be located within Yolo County or the region of the Central Valley.	DIWM	Upon identification and acquisition of borrow area on agricultural land, prior to development of the site as a soil borrow area	Yolo County DPPW	Yolo County DPPW and CA Dept. of Conservation, prior to use of existing agricultural lands as soil borrow area
3.6.2: Development of an off-site borrow area could result in the inappropriate use of prime agricultural soils. (LTS)	**3.6.2:** The County should not locate the borrow area or areas on prime agricultural land where prime soils may be found. The California Department of Conservation's "important farmlands" designation may be used to identify the areas of prime agricultural soils.	DIWM	In conjunction with the site selection process.	Yolo County DPPW	Yolo County DPPW, CA Dept. of Conservation, upon selection of soil borrow site.

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.6.3: Implementation of the proposed project may conflict with the County's goal to adhere to the disposal hierarchy of (1) source reduction; (2) recycling and composting; and (3) transformation and land disposal. (LTS)	**3.6.3a:** Yolo County charges differential rates depending on the type of load dropped off. Separated materials such as green waste and recyclables have a lower tipping fee than landfilled materials. This provides an incentive to deliver clean loads of material for recovery, rather than disposal.	DIWM	Already implemented; ongoing during YCCL operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.6.3b: Yolo County uses tipping fees from the YCCL to subsidize or pay for the costs associated with most of the County's recycling, reuse and waste reduction programs. This keeps recycling fees down as compared with disposal fees.	DIWM	Already implemented; ongoing during YCCL operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.6.3c: The current configuration of the landfill entrance allows customers to drop-off source separated recyclables prior to entering the paid area of the landfill. This arrangement will be maintained under the project.	DIWM	Already implemented; ongoing during YCCL operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.6.3d: The landfill entrance should be configured to allow customers access to the proposed salvage area without entering the paid area of the landfill	DIWM	Prior to start of project salvage operation	Yolo County EHD	Yolo County EHD, prior ot start of salvage operation
Noise					
3.7.2: Noise from activities at the "soil-borrow" area could affect sensitive receptors. (LTS)	**3.7.2a:** As stated in the siting criteria for the soil borrow operation in Chapter 2, Project Description, "Soil-borrow" activities shall be located in areas with a buffer zone of 2,000 feet to the nearest sensitive receptors.	DIWM	Ongoing during soil borrow activities, as needed depending on proximity to sensitive receptors, at off-site soil borrow area	Yolo County DPPW	Yolo County DPPW, ongoing during soil borrow area project implementation

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.7.2b: Soil borrow activities will be limited to achieve an hourly average noise level that does not exceed 65 dBA at the nearest sensitive receptor.	DIWM	Ongoing during soil borrow activities, as needed depending on proximity to sensitive receptors, at off-site soil borrow area	Yolo County DPPW and EHD	Yolo County DPPW, ongoing during soil borrow area project implementation
	3.7.2c: If haul routes pass sensitive noise receptors that are within approximately 50 feet of the roadway, hourly heavy truck trips should be limited to no more than 25 passbys of the sensitive receptor per hour.	DIWM	Ongoing during soil borrow activities, as needed depending on proximity of sensitive receptors to haul route	Yolo County DPPW and EHD	Yolo County DPPW, ongoing during soil borrow area project implementation
	3.7.2d: To avoid noise effects of nighttime operations, haul trips leaving the soil-borrow area shall be limited to 7 a.m. to 5 p.m.	DIWM	Ongoing during soil borrow activities, as needed depending on proximity of sensitive receptors to haul route	Yolo County DPPW and EHD	Yolo County DPPW, ongoing during soil borrow area project implementation
Public Health and Safety					
3.8.1: Increased LFG generation could potentially result in the accumulation of methane at explosive concentrations either off-site or within the waste mass. (LTS)	**3.8.1a**: YCCL will meet current state and federal requirements for LFG management.	DIWM and their LFG collection contractor(s)	Ongoing during landfill operations and the post-closure maintenance period, as long as LFG production continues	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.8.1b: YCCL will continue quarterly monitoring and reporting.	DIWM and their LFG collection contractor(s)	Ongoing, as long as LFG production continues	Yolo County EHD	Yolo County EHD, quarterly

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.8.1c: If monitoring indicates levels of gas above state requirements at the boundaries of the site, the perimeter monitoring system shall be expanded and modified to include extraction and collection and/or additional extraction wells can be installed in the landfill units nearest the problem area.	DIWM and their LFG collection contractor(s)	Immediately, as needed .	Yolo County EHD	Yolo County EHD, continuing periodic inspections
3.8.2: Excavation of hazardous waste encountered in the process of landfill mining could result in exposure of workers and the environment to harmful substances resulting in adverse health impacts. (LTS)	**3.8.2a:** Yolo County has developed a site-specific Health and Safety Plan (HASP) for landfill mining at YCCL. The plan provides guidelines and establishes procedures for the protection of personnel performing the scope of activities involved in landfill mining against hazardous or toxic wastes that may have been deposited within the landfill (EMCON/OWT, 2001). The HASP provides guidance to initiate the work and calls for monitoring of site conditions to determine the required protection. It is intended to be continually updated, based on consistent monitoring and implementation of the HASP adjustments.	DIWM and their landfill mining contractor	Implementation of HASP will be ongoing during landfill mining operations	RWQCB and DTSC	RWQCB and DTSC

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.8.2b: Yolo County shall sample and submit for laboratory analysis excavated materials during landfill mining operations, if and when something, such as a drum or other container, or a suspicious looking or smelling substance is encountered during the mining process that suggests that it may contain hazardous materials. The sampling and testing methods for these specific materials shall be determined by the Regional Water Quality Control Board in consultation with the Department of Toxic Substances Control, and shall be described in the facility's revised Waste Discharge Requirements. These requirements shall be sufficient to ensure that any potential hazardous materials are adequately characterized. Any mined material that is found to meet the criteria for hazardous waste, in accordance with California Code of Regulations, Title 22, Division 4.5, shall not be used as alternative daily cover, for other beneficial uses, or returned to any landfill unit at YCCL, but rather shall be handled, stored, transported, and disposed as hazardous waste in accordance with state and federal regulations governing hazardous waste. Hazardous waste shall not be stored on-site for more than 90 days.	DIWM and their landfill mining contractor	As needed (i.e., whenever something, such as a drum or other container, or a suspicious looking or smelling substance is encountered during the mining process that)	RWQCB and DTSC	RWQCB and DTSC, as needed
3.8.3: Operation of a materials recovery facility and expanded salvaging operations could pose health and safety threats to workers. (LTS)	**3.8.3a:** Current Yolo County Illness and Injury Prevention Plan practices and policies would be implemented as applicable at the new MRF and Salvaging Operations.	DIWM and their Salvage Operations contractor	Plan implementation to be ongoing during Salvage Operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.8.3b: DIWM (or its contractor) shall prepare a Health and Safety Plan (HASP) for MRF Operations and a HASP for salvaging operations, and submit the plan for approval to the LEA prior to commencement of MRF or salvaging operations, respectively. Each HASP shall include staff training requirements, emergency procedures and equipment, personal protective equipment for facility staff, communications equipment, and emergency contacts, hearing loss prevention, equipment maintenance, and other policies to ensure the protection of worker and public health and safety.	DIWM and their MRF and Salvage Operation contractor(s)	HASP development prior to start of MRF and Salvaging Operations; implementation ongoing during operations	Yolo County EHD	Yolo County EHD, prior to MRF and salvalge operations and continuing, periodic inspections
	3.8.3c: Prior to MRF construction the DIWM shall submit drawings showing the final facility layout to the LEA for approval.	DIWM	Prior to MRF construction	Yolo County EHD	Yolo County EHD, prior to MRF construction
3.8.4: Expanding the composting operations could increase the health threat to workers from exposure to *Aspergillus fumigatus* and endotoxins. (LTS)	**3.8.4a:** The County will operate the expanded composting facility in conformance with current state and federal regulations.	DIWM or their compost facility contractor	Ongoing, during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.8.4b: The project applicant shall follow sound composting management practices, including maintaining moisture, temperature and pH levels, and properly aerating, turning and mixing the composting materials. Specifically, the following practices will help minimize the generation and dispersal of dust and fungus spores during composting operations and thus limit exposure:	DIWM or their compost facility contractor	Ongoing, during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.8.5: Composting of mixed municipal solid waste (MSW) could result in a contaminated compost product, which could pose a public health and safety risk. (LTS)	**3.8.5a:** MSW composting would have to comply with state regulations regarding operation of composting facilities and testing of final product for pathogenic and chemical contaminants.	DIWM and their MSW compost facility contractor	Ongoing during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.8.5b: The existing load checking program would reduce or remove many hazardous substances that may be contained in MSW loads.	DIWM and their MSW compost facility contractor	Already implemented and would continue during MSW compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.8.5c: The design for the MSW processing system will include another level of visual screening of incoming materials to ensure that hazardous substances are removed prior to the composting operation.	DIWM and their MSW compost facility contractor	Ongoing during MSW compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.8.5d: DIWM will periodically test compost produced from MSW for a wide range of hazardous substances regulated under Title 22, but not required under the state regulations for composting facilities. If the material exceeds concentrations for any regulated substance, the load will be directed to a hazardous waste disposal site, and the DIWM will examine its waste acceptance and screening procedures for the MSW composting facility.	DIWM and their MSW compost facility contractor	Periodically during MSW compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Public Services, Utilities, and Energy					
3.9.1: The expanded composting facility could increase the risk of fire occurring at the landfill site. (LTS)	**3.9.1a:** Consistent with the currently permitted composting operations, for the expanded composting operation YCCL will continue to comply with the State minimum standards for composting operations as specified in Title 14, California Code of Regulations (CCR).	DIWM and their compost facility contractor	Ongoing during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.1b: Consistent with the currently permitted composting operation, YCCL will continue to adhere to composting management practices established by the Yolo County Environmental Health Department.	DIWM and their compost facility contractor	Ongoing during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.1c: Consistent with current operations, the County will continue to implement standard composting facility management practices.	DIWM and their compost facility contractor	Ongoing during compost facility operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
3.9.2: The proposed height increase could increase the risk of fire occurring at the landfill site. (LTS)	**3.9.2a:** YCCL will continue to reduce the impact associated with surface fires through green waste related procedures.	DIWM	Ongoing during YCCL operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.2b: YCCL will continue to follow existing operational policies.	DIWM	Ongoing during YCCL operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
3.9.3: The proposed landfill mining operations could increase the risk of fire occurring at the landfill site. (LTS)	**3.9.3a:** YCCL will continue to follow existing operational policies	DIWM and its landfill mining contractor	Ongoing during landfill mining operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	Measure 3.9.3b: The temperature of the excavation face will be monitored and the excavation face will be sprayed with water as needed to control temperatures and prevent the excessive buildup of heat.	DIWM and its landfill mining contractor	Ongoing during landfill mining operations	Yolo County EHD	Yolo County EHD, continuing periodic inspections
3.9.4: The proposed aerobic bioreactor cells could increase the risk of fire occurring at the landfill site. (LTS)	**3.9.4a:** YCCL will continue to follow existing operational policies: • Landfill personnel are trained to combat refuse fires. • A water tanker and sufficient cover material are maintained at a convenient location for use in fire suppression. • Groundwater is used as the main water supply, and there is a sufficient quantity stored on-site. • Heavy equipment would be called upon for fire suppression. • A fire extinguisher (trigger in the cab) is located in the cab of each vehicle. All landfill field staff carry cell phones. • DIWM monitors carbon monoxide (CO) levels within the bioreactor cells. A build-up of CO levels is an early indication of excessive heat production	DIWM	Currently implemented and ongoing during aerobic bioreactor operation	Yolo County EHD	Yolo County EHD, continuing periodic inspections

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.9.4b: Liquid will be introduced to the waste mass after the cell is filled, and before air extraction is begun to keep the waste moist and control temperature.	DIWM	Ongoing during aerobic bioreactor operation	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.4c: Consistent with current operation of the aerobic bioreactor cell, YCCL will monitor and control the temperature of the waste mass. The optimum temperature has been reported to be between 55 and 65 degrees Celsius for aerobic bioreactors.	DIWM	Currently implemented and ongoing during aerobic bioreactor operation	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.4d: Consistent with current bioreactor operations at Module D, YCCL will monitor and control moisture content of the waste mass. Recommended moisture content ranges from a minimum of 25 percent to optimum levels of 40-70 percent.	DIWM	Currently implemented and ongoing during aerobic bioreactor operation	Yolo County EHD	Yolo County EHD, continuing periodic inspections
	3.9.4e: Consistent with current bioreactor operations at Module D, YCCL will Monitor and control oxygen and methane levels within the landfill.	DIWM	Currently implemented and ongoing during aerobic bioreactor operation	Yolo County EHD	Yolo County EHD, continuing periodic inspections
Transportation and Traffic					
3.10.2: Operations of the proposed project would increase wear and tear on area roadways. (LTS)	**3.10.2:** Conduct periodic Pavement Studies of County Road 28H, County Road 105, County Road 102, and County Road 29, and maintain on an as-needed basis to reduce damage from increased truck traffic.	DIWM and DPPW Road Maintenance Staff	Studies conducted periodically, maintenance implemented as needed during YCCL operations	Yolo County DPPW Road Maintenance Division	Yolo County DPPW, Caltrans, periodically during YCCL operations

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
Cultural Resources					
3.11.1: Impacts to cultural resources may result either directly or indirectly during the pre-construction, construction, and operational phases of the project. (LTS)	**3.11.1a:** Although no cultural resources were observed during the focused pedestrian survey conducted on January 22, 2003, sites and objects may yet exist in the project area, but may be obscured by vegetation or buried by fill or natural sediments. If cultural resources are encountered during project implementation, construction (or project actions) shall, in accordance with CEQA Section 15064.5, be halted or diverted to allow an archaeologist an opportunity to assess the resource. Prehistoric archaeological site indicators include chipped chert and obsidian tools and tool manufacturing waste flakes, grinding implements such as mortars and pestles, and darkened soil that contains dietary debris such as bone fragments and shellfish remains. Historic site indicators include, but are not limited to, ceramics, glass, wood, bone, and metal remains.	DIWM and its construction contractor(s), and County archaeologist or consulting archaeologist, if needed	Immediately upon encountering cultural resources any time during project implementation	DIWM, Yolo County archaeologist or consulting archaeologist	Yolo County archaeologist or consulting archaeologist

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.11.1b: Since prehistoric burials (as evidenced by site CA-YOL-171) and associated isolates have been recorded in the immediate vicinity of the project site, there is a likelihood that cultural resources may be encountered during project-related site clearance and excavation. The presence of a qualified archaeological monitor during construction would permit excavated soils to be examined for the presence of archaeological site components. A monitor shall be present whenever subsurface construction excavation occurs within 100 meters (300 feet) of site CA-YOL-171, and on an intermittent basis (as determined by the archaeological Principal Investigator) during all other subsurface construction excavation associated with the project.	Yolo County archaeologist or DIWM's consulting archaeologist	Whenever subsurface construction excavation occurs within 100 meters (300 feet) of site CA-YOL-171, and on an intermittent basis (as determined by the archaeological Principal Investigator) during all other subsurface construction excavation associated with the project.	DIWM, Yolo County archaeologist or consulting archaeologist	Yolo County archaeologist or consulting archaeologist
	3.11.1c: Section 7050.5(b) of the California Health and Safety code should be implemented in the event that human remains, or possible human remains are located.	Yolo County archaeologist or DIWM's consulting archaeologist	Immediately as needed.	Yolo County archaeologist or DIWM's consulting archaeologist	DIWM, and County Coroner if needed
3.11.2: Excavation of the off-site borrow area could disturb previously unknown archeological resources or interred human remains. (LTS)	**3.11.2a:** A cultural resources survey of the site selected for the soil borrow area, including a site survey and records search, will be conducted by a registered archeologist prior to commencement of soil borrow activities. Any potential disturbance of identified cultural resources on the site will be properly mitigated on-site or through proper recording and removal of the artifacts.	Yolo County archaeologist or DIWM's consulting archaeologist	Prior to commence-ment of soil borrow activities; preferably the survey will be conducted prior to final selection of the borrow area site.	Yolo County archaeologist or DIWM's consulting archaeologist	DIWM, prior to use of soil borrow area.

YOLO COUNTY CENTRAL LANDFILL PERMIT REVISIONS
MITIGATION MONITORING AND REPORTING PROGRAM (continued)

IMPACT AND SIGNIFICANCE AFTER MITIGATION	MITIGATION MEASURES	IMPLEMENTED BY	WHEN IMPLEMENTED	MONITORED BY	VERIFICATION AND DATE
	3.11.2b: If cultural resources are encountered during project implementation, construction (or project actions) shall, in accordance with CEQA Section 15064.5, be halted or diverted to allow an archaeologist an opportunity to assess the resource.	DIWM and its quarrying contractor	Immediately upon encountering cultural resources any time during project implementation	DIWM, Yolo County archaeologist or consulting archaeologist	County archaeologist, as needed during excavation activities
	3.11.2c: Section 7050.5(b) of the California Health and Safety code should be implemented in the event that human remains, or possible human remains are located.	County archaeologist or DIWM's consulting archaeologist	Immediately as needed.	DIWM, Yolo County archaeologist or consulting archaeologist	DIWM, and County Coroner as needed
Cumulative Impact – Aesthetics					
CU-1: The project would contribute to the cumulative degradation of the visual character of the surrounding area. (SU)	Implementation of Mitigation Measures 3.1.1, 3.1.4a-b, 3.1.8, and 3.1.9a-c will reduce visual impacts of the project somewhat; however, measures to mitigate the significant unavoidable impacts of the project were determined to be infeasible. Similarly, feasible measures are not available to mitigate the significant cumulative impacts on visual resources.	See the referenced measures, above.	See the referenced measures, above.	See the referenced measures, above.	See the referenced measures, above.

Key:

Significance After Mitigation

LTS = Mitigated to a less-than-significant level
SU = Significant and unavoidable

Monitored By:

ACOE = U.S. Army Corp of Engineers
CDFG = California Department of Fish and Game
CIWMB= California Integrated Waste Management Board
DPPW = Yolo County Department of Planning and Public Works
EHD = Yolo County Environmental Health Division
RWQCB = Regional Water Quality Control Board, San Francisco Bay Region
USFWS = U.S. Fish and Wildlife Service
YSAQMD = Yolo Solano Air Quality Management District

APPENDIX B

DRAFT SEIR PUBLIC HEARING AGENDA

County of Yolo

PLANNING AND PUBLIC WORKS DEPARTMENT
292 WEST BEAMER STREET WOODLAND CA 95695-2598 530-666-8775 FAX 530-666-8156
www.yolocounty.org

JOHN BENCOMO
DIRECTOR

PLANNING COMMISSION AGENDA

DATE: **THURSDAY, OCTOBER 14, 2004**

TIME: The meeting will begin at 8:30 a.m.

LOCATION: **Yolo County Board of Supervisors Chambers**
625 Court Street
Woodland, CA. 95695

Please refer to the last page of this agenda for notices regarding accommodations for persons with disabilities and for appeals of Planning Commission actions.

8:30 a.m.

1. CALL TO ORDER

2. APPROVAL OF MINUTES: September 21, 2004

3. PUBLIC REQUESTS

The opportunity for members of the public to address the Planning Commission on any subject relating to the Planning Commission, but not relative to items on the present agenda. The Planning Commission reserves the right to impose a reasonable limit on time afforded to any individual speaker.

4. CORRESPONDENCE

4.1 Summer 2004 Edition of "The Commissioner" newsletter from the American Planning Association.

4.2 California County Planning Commissioners Association Packet of September 22, 2004, including State Conference Information and proposed CCPCA Bylaw revisions.

4.3 Planning Division Quarterly Report, October 2004

5. CONSENT AGENDA

5.1 **2004 – 033:** Certification of a Mitigated Negative Declaration to replace the existing County Road 85 Bridge (22C-0083) over South Fork Oat Creek. The subject bridge is located on County Road 85 at South Fork Oat Creek, approximately 6½ miles north of the town of Capay. Owner/Applicant: Yolo County (Xiaopei Qi).

6. REGULAR AGENDA

8:35 a.m.

6.1 **97 – 044:** Request for a one-year extension of time for Tentative Subdivision Map (TSM #3995, Dunnigan Junction) approved in 2000 and involving five highway commercial parcels and a designated remainder to allow a mix of highway service commercial land uses including a motel, gas station, family restaurant and fast-food restaurant. The project site is located in the Highway Service Commercial (C-H) Zone at the northwest corner of County Road 6 and Interstate 5. APN: 051-160-05. The requested extension of time is exempt from CEQA. Applicant/Owner: Dan Bhanabhai, Manilal Inc. (S. S. Dhaliwal)

8:45 a.m.

6.2 **2004 – 038:** Conditional Use Permit to allow for an olive oil processing facility. The facility will utilize a 30,000-sq. ft. building on a 130-acre parcel in the Agricultural General (A-1) zone. The project is located east of I-505, north of County Road 16 and 90B near the town of Zamora (APN: 054-230-16). A Negative Declaration has been prepared for this project. Applicant/Owner: Bariani Olive Oil Company. (L .A. Caruso)

9:00 a.m.

6.3 **2004 – 047:** Conditional Use Permit to construct and operate an unmanned wireless telecommunications facility. The facility will consist of a new 52' "water tank" with six (3 initial, 3 future) panel antennas located within the water tank. One pre-fabricated equipment shelter (10' X 16') will be placed on the ground within a 1,100± square foot lease. Project site is located at 15875 State Route 16, approximately 3 miles northwest of the town of Capay (APN: 048-050-02). A Negative Declaration has been prepared for this project. Applicant: Cingular Wireless Owner: Kevin & Elizabeth Campbell (L.E. Lowe).

9:15 a.m.

6.4 **2004 – 014:** Esparto Bridge Impact Fee Ordinance requiring new development to pay its fair share to finance, defray, or reimburse the County for all or a portion of the costs of constructing additional crossings over Lamb Valley Slough. The Ordinance implements provisions of the Esparto General Plan and applies to all development properties within the current General Plan. A Statutory Exemption has been prepared for this project. Applicant: Yolo County Planning & Public Works. (L.E. Lowe)

9:30 a.m.

6.5 **2003 – 076:** Public Hearing to receive comment on the Draft Environmental Impact Report (DEIR) regarding a General Plan Amendment, Rezoning, Development Agreement, Williamson Act Contract Cancellation or Rescission, and Floodplain Hazard Development Permit. The proposed project would be part of the Cache Creek Casino Resort and consists

of a championship 18-hole golf course, a driving range, decorative waterfall, golf clubhouse (including pro shop, restaurant, and parking), golf cart barn, comfort station (including bathrooms, drinking fountains, and seating), maintenance building, two ponds, and an irrigation system. The irrigation supply for the golf course would utilize tertiary treated wastewater from the adjoining Wastewater Treatment Plant. The subject site totals 314 acres in the Agricultural Preserve (A-P) Zone, including 235 acres owned by the Rumsey Band of Wintun Indians, and 79 acres held in trust for the Band by the U.S. Bureau of the Interior. The site is located east of State Highway 16 and immediately west of Cache Creek, in the Capay Valley, approximately nine miles west of the Town of Esparto (APNs: 048-020-17 and 18; 048-040-12, -13, -14, and –15). Owner/Applicant: Rumsey Band of Wintun Indians (D. Morrison)

9:45 a.m.

6.6 Public Hearing to receive comment on the Draft Environmental Impact Report (DEIR) for the proposed Use Permit at the Yolo County Central Landfill (YCCL). The landfill has been in operation since 1975, receiving waste from both incorporated and unincorporated areas of Yolo County. The YCCL is owned by the County of Yolo and operated by the Division of Integrated Waste Management (DIWM). DIWM is proposing several major changes to the design and operation of the YCCL. Proposed changes to the design and operation of YCCL which are analyzed in the Draft EIR include: 1) bioreactor or wet cell operations, 2) landfill height increase, 3) landfill mining, 4) a material recovery facility, 5) an expanded composting facility, 6) expanded salvaging, 7) a permanent household hazardous waste collection facility, 9) land purchase for a soil borrow area, 9) expanded landfill gas management and utilization options. The YCCL covers 725 acres in the A-1 (Agricultural General) Zone, located approximately four miles northeast of the City of Davis, and three miles southeast of the City of Woodland, near the intersection of County Roads 28H and 104 (Assessor's Parcel Numbers 042-004-001, 002, and 006). Applicant/Owner: Yolo County (L. Sinderson)

7. DIRECTOR'S REPORT

A report by the Assistant Director on the recent Board of Supervisor's meetings on items relevant to the Planning Commission and an update of the Planning and Public Works Department activities for the month. No discussion by other Commission members will occur except for clarifying questions. The Commission or an individual Commissioner can request that an item be placed on a future agenda for discussion.

8. COMMISSION REPORTS

Reports by commission members on information they have received and meetings they have attended which would be of interest to the commission or the public. No discussion by other commission members will occur except for clarifying questions.

9. FUTURE AGENDA ITEMS

The opportunity for commission members to request that an item be placed on a future agenda for discussion. No discussion by other commission members will occur except for clarifying questions.

9.1 Presentation by Ken Landau, Regional Water Quality Control Board, on December 9, 2004.

9.2 Selection of November, 2004, Planning Commission meeting date.

10. ADJOURNMENT

The next scheduled meeting of the Yolo County Planning Commission is a joint General Plan workshop with the Board of Supervisors on **Tuesday, October 26, 2004**.

Respectfully submitted by,

David Morrison, Assistant Director
Yolo County Planning and Public Works Department

****** NOTICE ******

If requested, this agenda can be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans with Disabilities Act of 1990 and the Federal Rules and Regulations adopted in implementation thereof. Persons seeking an alternative format should contact David Morrison, Assistant Director for further information. In addition, a person with a disability who requires a modification or accommodation, including auxiliary aids or services, in order to participate in a public meeting should telephone or otherwise contact David Morrison, Assistant Director as soon as possible and preferably at least 24 hours prior to the meeting. David Morrison, Assistant Director may be reached at 530-666-8041 or at the following address: Yolo County Planning and Public Works Department 292 West Beamer Street Woodland, CA 95695.

****** NOTICE ******

Any person who is dissatisfied with the decisions of this Planning Commission may appeal to the Board of Supervisors by filing with the Clerk of that Board within fifteen days from the date of the action. A written notice of appeal specifying the grounds and an appeal fee immediately payable to the Clerk of the Board must be submitted at the time of filing. The Board of Supervisors may sustain, modify or overrule this decision.