VISION RECYCLING
GREENVILLE ROAD COMPOST FACILITY
INITIAL STUDY / NEGATIVE DECLARATION
ALAMEDA COUNTY, CALIFORNIA

PREPARED FOR:

ALAMEDA COUNTY
Community Development Agency

COUNTY OF ALAMEDA
COMMUNITY DEVELOPMENT AGENCY
224 WEST WINTON AVENUE, ROOM 111
HAYWARD, CA 94544

December 1, 2015

VISION RECYCLING
GREENVILLE ROAD COMPOST FACILITY
INITIAL STUDY / NEGATIVE DECLARATION
ALAMEDA COUNTY, CALIFORNIA

Prepared for:

County of Alameda
Community Development Agency
224 West Winton Avenue, Room 111
Hayward, CA 94544

BSK Project: E1405301S

December 1, 2015

Erik Ringelberg
Natural Resources and Land Planning Group Manager

Kevin Grove
Staff Scientist

BSK Associates
3140 Gold Camp Drive, Suite 160
Rancho Cordova, CA 95670
(916) 853-9293
(916) 853-9297 FAX
www.bskassociates.com

BSK

Table of Contents

TABLES

FIGURES FOLLOW PAGE 69_

APPENDICES

****Please note**, underlined text is updated, clarifying text from agency comments on the originally submitted Initial Study/Negative Declaration, dated September 28, 2015. These clarifying changes are compiled in Appendix E (Response to Comments).

SECTION I. DESCRIPTION OF THE PROPOSED PROJECT

A. GENERAL INFORMATION

1. Project Title and Entitlements

Vision Recycling Compost Facility is the project title. County land use entitlements needed for the project include approval of a Conditional Use Permit for a proposed aerobic compost facility on an approximately 3.47 acre (151,200-square foot) project site. The site will be leased from the owners of the adjoining Mills Ranch.

2. Lead Agency

Alameda County Community Development Agency
Planning Department
224 W. Winton Ave., Room 111
Hayward, CA 94544

3. Contact Person

Damien Curry, Staff Planner
Alameda County Community Development Agency
Planning Department
224 W. Winton Ave., Room 111
Hayward, CA 94544
510-670-5400

4. Project Location and Description

Vision Recycling proposes to operate a compost facility at 30 Greenville Road in Livermore, California, 94551. The approximately 3.47 acre (151,200-square foot) project site is located in unincorporated eastern Alameda County (County), east of the City of Livermore and south of the Interstate 580 (I-580) freeway. The Project site is located on a portion of APN 099B-5685-006-00, which is accessed via an unnamed private road that crosses APN 099B-5700-002-09 and APN 099B-5685-007-00; all currently owned by Mills Ranch or the County. Vision Recycling, the applicant, currently operates a chip and grind facility for wood and "green material" near the proposed project site. In this case, green material is defined as "yard trimmings, untreated wood wastes, natural fiber products, and construction and demolition wood waste" (14 CCR § 17852 subd. (a)(21)). The existing chip and grind facility would provide green material feedstock consisting of wood chips, mulches, soil amendment, and co-generation fuel for the proposed project. An existing access road between this other facility and the proposed site traverses the same parcel, with a small portion crossing the neighboring parcel to the east, with APN 099B-5685-005.

The project requires the permitting of a compost facility on a vacant site located near an existing chip and grind facility. A project vicinity map is provided in **Figure 1** of this document. The project area is shown in **Figure 2**, and **Figure 3** illustrates the proposed project area plan. All project figures are provided at the end of Section II of this document.

5. Current General Plan Land Use Classifications

According to the East County Area Plan (ECAP), an element of the Alameda County General Plan, the land use designation for the project site is Large Parcel Agriculture (Alameda County 2000, Land Use Diagram). This designation permits agricultural uses, agricultural processing facilities,

limited agricultural support service uses, secondary residential units, visitor-serving commercial facilities, recreational uses, public and quasi-public uses, solid waste landfills and related waste management facilities, quarries, windfarms and related facilities, utility corridors, and similar uses (Alameda County 2000, pg. 47, paragraph 3; pgs. ii, T-9, T-12). No change to the current General Plan land use designation is proposed.

6. Current Zoning

The project site is zoned Agricultural (A), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). No change to the existing A zoning on the site is proposed.

7. Existing Land Uses

The project site is located on a vacant area currently used to store construction equipment to the southeast of the existing chip and grind facility.

8. Surrounding Land Uses

The project site is located in the eastern portion of the Livermore Valley, in an unincorporated area of Alameda County. Surrounding land uses are primarily grassy, rolling open space to the north, south, east, and west of the property. Directly to the north, concrete road dividers are stored in an open area. Further to the northwest are the existing chip and grind facility and several construction company offices with outdoor equipment storage. The nearest residence is the lessor, the adjacent 125-acre Mills Ranch property.

9. Site Access, Circulation and Fire Safety

The project site is accessed from Greenville Road via an entry roadway that services the Mills Ranch, passes the existing chip and grind facility, and turns south towards the project site, then loops back. (See **Figure 2** Project Area Map.) The existing access road has a maximum grade of 8% and is 20 feet wide. Vehicles would access the Vision Recycling site via the existing entry, then enter the site past the proposed gate depicted in **Figure 3**, Project Area Plan. A 20-foot-wide perimeter fire lane would surround the site, and a perimeter berm would run along the outside of the road. Another 20-foot fire lane will be placed between the Phase 1 and Phase 2 composting areas. No heavy equipment will be stored on-site, and equipment will not be fueled on-site.

The project may be required to meet access and other fire safety standards established by the Alameda County Fire Department (ACFD). The project as designed would comply with the following county fire code requirements (AFCD 2014):

1. Pile sizes shall not exceed 25 feet in height, 150 feet in width and 250 feet in length. (2803.3 CFC)
2. Piles shall be separated from adjacent piles by approved fire apparatus access roads. (1908.4 CFC) The project's fire lanes are designed to be 20 feet wide.
3. Static piles shall be monitored by an approved means to measure temperature within the static piles. Internal pile temperatures shall be monitored and recorded weekly. (2808.6 CFC)
4. Fire extinguishers with a minimum rating of 4A 60B: C shall be provided on all vehicles, equipment operating on the piles, and at all processing equipment. (2808.8 CFC)
5. All access routes shall be all-weather and certified by an engineer that they will support the load of a 75,000 lb. piece of apparatus. (D102.1, Appendix-D CFC)
6. Maintain a ten thousand gallon water tank with appropriate hook-ups for firefighting purposes. The water tank shall be maintained in ready state and shall remain unobstructed at all times.
7. The storage, accumulation and handling of combustible materials and control of vegetation shall comply with Chapter 3 of the fire code.

10. Site Preparation

As indicated above, the project site is currently vacant, graded, and would not need to be cleared for the facility.

Construction at the site would last approximately one month and would include installation of a 10,000 gallon water tank; creation of an approximately eight-foot deep, machine compacted, 360,000-gallon stormwater pond; creating one employee parking space; and placing a shipping container approximately 20 to 40-feet long (no foundation) on the site to house computer monitoring equipment and basic supplies. Temporary construction equipment would include a grader, tractor, loader, backhoe, and rubber-tired bulldozer. As depicted in **Figure 3** Project Area Plan, site drainage will be contained within the site by the 1-foot perimeter berm and will be directed to the stormwater pond.

Typical operations and site equipment are described below under Section B, Operational Plan.

11. Utilities

Utilities will be limited to those currently serving the project area, as follows:

- There is no public water supply on the project site or planned for development. A well exists on the site, but it is not used by the existing chip and grind facility, nor will it be used by the proposed project. Water to be used for the 10,000 gallon water tank and for dust control, fire protection, and moistening of compost piles would be provided to the proposed project from an off-site grey water hydrant located along Greenville Road. This hydrant is currently used by the nearby existing chip and grind facility. Water from the grey water hydrant would be transported to the project area by the chip and grind facility's water truck. The project would use approximately 288,000 gallons of grey water per year. One employee will service the site, but will only visit the facility to perform daily inspections and move piles when necessary. Therefore, no on-site drinking water supply will be needed. Water for this employee will be available at the existing chip and grind facility, which provides employee drinking water through a commercial provider in 5-gallon bottles.

- There is no public wastewater service or septic system on the project site or planned for development. As described above, employee time at the site will be minimal. Portable toilet facilities are currently provided for employees of the existing chip and grind facility. The employee assigned to the composting facility would spend most of his/her time at the existing chip and grind facility and would use the portable toilet facilities there.

- Electrical service will be extended to the site and an electrical utility pole will be constructed on-site to provide power to run computer equipment, blowers and a conveyor. It is anticipated that there will not be high demand for electricity at the site.

- Telephone, internet service and other utilities besides electricity would not be needed or provided at the site. These utilities are provided at the by existing chip and grind facility and are available to employees there. When the employee for the composting facility is servicing the site, this person would use a cellular phone if telephone service is needed. Natural gas service is not provided now and would not be developed for the proposed project.

- Solid waste and food waste will not enter the site. The only material entering the site will be green material feedstock from the existing chip and grind facility. This green material feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel. Any solid waste incidentally generated at the existing chip and grind site is limited to small amounts of

non-green materials inadvertently brought to the facility, which are separated from wood materials prior to chipping, and subsequently transported to a licensed Alameda County landfill. In the event solid waste or food waste was inadvertently brought to or generated at the proposed compost facility, it would be removed by the compost facility employee and transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard container.

12. Regulatory Setting

In addition to the Alameda County Planning Department requirements for a Conditional Use Permit (CUP), regulatory oversight of compost facilities is provided by CalRecycle (formerly the California Integrated Waste Management Board [CIWMB]) and the Local Enforcement Agency (LEA), Alameda County Environmental Health. Vision Recycling will also be subject to Bay Area Air Quality Management District (BAAQMD) requirements as described in the air quality discussion, and will meet Alameda County Fire Department and Alameda County Mosquito Control District requirements.

CalRecycle will require that the project applicant meet design, operation, record keeping, environmental health standards, and employee training requirements for a Compostable Materials Handling Facility, apply for and maintain permit conditions, and be inspected annually or more often. A "Compostable Materials Handling Operation" is defined in Title 14 of the California Code of Regulations (CCR), section 17852, as follows:

> (a)(12) "Compostable Materials Handling Operation" or "Facility" means an operation or facility that processes, transfers, or stores compostable material. Handling of compostable materials results in controlled biological decomposition. Handling includes composting, screening, chipping and grinding, and storage activities related to the production of compost, compost feedstocks, and chipped and ground materials. "Compostable Materials Handling Operation or Facility" does not include activities excluded from regulation in section 17855. "Compostable Materials Handling Operation or Facility" also includes:
>
> (A) agricultural material composting operations;
> (B) green material composting operations and facilities;
> (C) research composting operations; and,
> (D) chipping and grinding operations and facilities.

The facility requires an EA Notification under the Central Local Enforcement Agency (LEA) Tiered Regulatory Placement chart (CalRecycle, 2012). Therefore, the project applicant will apply to the Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan. The applicant shall notify the Enforcement Agency of its intent to operate in writing prior to commencing operations. This written notification shall include the filing requirements stated in Title 14, Section 18103.1.

Furthermore, the facility is defined as a Tier I facility by the State Water Resources Control Board, as defined by the proposed Project's green material feedstock. In accordance with General Order WQ 2015-0121-DWQ, "new composting operations that proposed to begin operating after adoption of this General Order, are required to seek coverage by submitting a complete NOI, including the appropriate filing fee (Cal. Code Regs., tit. 23 § 2200), and a technical report including, but not limited to, information requested in Attachment D to the Regional Water Board. The NOI, filing fee and technical report must be submitted within one year of adoption of the General Order. The technical report shall include a proposed schedule for full compliance and must be as short as practicable but may not exceed 6 years from the date of the NOI" (SWRCB 2015, p. 8). Therefore, following approval of the proposed

Project, the project applicant will apply for coverage under Order WQ 2015-0121-DWQ "General Waste Discharge Requirements for Composting Operations."

B. OPERATIONAL PLAN

The following operational procedures are planned for project operation by Vision Recycling for the proposed compost facility to comply with environmental permits and other regulatory requirements.

1. **Materials and Receiving**
   The facility operational hours are between 6:30 a.m. and 5:00 p.m. Monday through Saturday and closed on Sundays. The facility will be designed to process green material from the nearby existing Vision Recycling chip and grind facility. This green material feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions. Yard waste will be received and processed at the chip and grind facility. The processed material would be transported to the proposed compost facility and stored for one to three days in the facility receiving and processing area, which would use a maximum footprint of 100 feet by 20 feet (see **Figure 3** Project Area Plan). There would be no more than 600 cubic yards of material stored in the receiving and processing area at any particular time. The expected tonnage of green material imported to the facility is approximately 6,000 tons/year, with a maximum facility capacity of 12,000 tons.

2. **Phase 1 Processing**
   Material would be moved from the receiving and processing area into the Phase 1 pile, where it would be composted through forced aeration for 28 days. The Phase 1 pile would contain a maximum of 2,400 cubic yards of material at any one time, and the pile's maximum dimensions would be roughly trapezoidal, 9 feet tall, 90 feet long, and 100 feet wide (see **Figure 3** Project Area Plan). Temperatures will be measured and logged on a daily basis using a 36-inch thermometer.

3. **Phase 2 Processing**
   Material would be moved to Phase 2 curing after 4 weeks in Phase 1. The Phase 2 pile would be roughly trapezoidal, 12 feet tall, 90 feet long, and 140 feet wide and have a volume of approximately 4,500 cubic yards (see **Figure 3** Project Area Plan). Material would stay in Phase 2 for 30-45 days.

4. **Storage and Transport**
   After Phase 2, material would be moved to the finished compost storage pile, which will have a maximum size of 2,400 cubic yards, would be roughly trapezoidal in shape, and will measure approximately 12 feet high, 90 feet long, and 75 feet wide. Material would be stored in this area for no more than two months. Once complete, the finished compost would be delivered to one of four possible locations: the existing nearby chip and grind facility, Vision Recycling's Newark Facility, to a biomass facility in Stockton, or directly to customers in the Bay Area.

5. **Employee Summary**
   Vision Recycling would typically have two employees who would be stationed at the existing chip and grind facility. One employee would work between the compost facility to perform daily inspections and move piles when necessary. This employee would be a current employee of the existing chip and grind facility; no new employees are anticipated to be hired for the proposed project.

6. Equipment

Equipment to be used on the proposed project site includes the following:

- Doosan front-end wheel loader – to move material. Stored and maintained at the chip and grind facility.
  271 horsepower (hp), Tier 4i rating

- 40-cubic-yard Truck – to haul material in and out of compost facility. Stored and maintained at the chip and grind facility.
  Peterbilt semi-truck with walking floor trailer, 485 hp with exhaust DPF filter

- McCloskey TF80 stacking electric conveyor – to reduce loader usage.
  100 hp, Tier 3, 4, or 4i rating

- Forced aeration system for Phase 1 compost processing.
  8 electric blowers, 1.5 hp each

7. Anticipated Vehicle Traffic

Anticipated vehicular traffic on public roadways would be limited to truck trips to move finished compost out of the facility via Greenville Road. The project would generate approximately 406 offsite truck trips annually for the purpose of taking finished compost to customers or to Vision facilities in other areas.

An estimated 156 vehicle trips per year will occur to haul chipped, ground green material from the existing chip and grind facility to the proposed project site to be composted, but these trips would occur on an existing internal access road between the chip and grind facility and the proposed project area, and would not entail travel on public roads. Employee trips to inspect and move piles would also take place on the existing internal access road and would not entail use of public roadways. No retail activity will occur on the proposed compost facility site, and the project will not require the hiring of new employees.

8. Nuisance Control

- Odors – The composting method used by the facility's Phase 1 pile would be an aerated static pile composting process. This process would bring the pile to a high internal temperature, which significantly reduces odors that would otherwise be created by cooler, slower decomposition. As required by the California Code of Regulations, the temperature within the Phase 1 pile will be maintained at a temperature of at least 131 degrees Fahrenheit for a pathogen reduction period of three days, and the pile would be covered with 6 to 12 inches of insulating material (14 CCR § 17868.3, subd. (b)(4)). This level and length of heating will result in rapid composting and effectively kill off odor-producing bacteria. Additionally, the forced aeration system will maintain oxygen levels in the pile, preventing anaerobic conditions that can produce objectionable odors. Material in the Phase II file would be fully broken down and so would not create offensive odors.

- Noise – Chipping and grinding operations have existed near the site for about 22 years, and noise levels associated with the compost operation are expected to be much lower than the chipping and grinding. Compost operation noise would be generated by use of the conveyor and front-end loader to move material and by trucks hauling material in and out of the facility. The operational noise is therefore consistent with the local area and uses. Equipment use associated with the operation would be limited to the business hours of the nearby existing chip

and grind operation, which is open from 6:30 a.m. to 5:00 p.m. Monday through Saturday and closed on Sundays.

- Vectors – No food material will be composted on site. Any miscellaneous food or similar waste material that is inadvertently brought to the site will be removed by the compost facility employee and transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard waste container.

  Mosquitoes will be controlled at the proposed stormwater pond by the facility operator in coordination with the Alameda County Mosquito Abatement District.

- Litter – Any miscellaneous litter material found in the loads that is inadvertently brought to the site will be removed by the compost facility employee and transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard waste container. The entire Vision facility is fenced with a litter fence and a main gate at the entrance near the chip and grind facility.

- Dust – There will be a water truck at the chip and grind facility that will be made available at all times to use for road dust control, to keep compost piles moist, to fill the 10,000 gallon water tank, and for any other non-firefighting facility needs on-site. Use of the water truck will meet BAAQMD required practices.

9. Equipment Maintenance

All equipment will be maintained in good operating condition. Oil leaks will be repaired when identified to prevent soil contamination. As needed, appropriate drip pans will be utilized during maintenance operations. Only small quantities of lubricants will be stored on-site for the operation. Vision Recycling has a very efficient work order system for equipment problems to be reported and repaired on a timely basis.

Equipment maintenance is typically completed using a field servicing truck. Vision has its own in-house mechanic, in addition to dealer service technicians. All equipment has current air board permits for diesel emissions. There will not be any fuel storage on-site, and equipment will not be fueled on-site.

10. Stormwater Plan

Surface flow on the site would drain from the northeast to the southwest, and would be directed to the proposed stormwater pond in the southwest corner of the project site (see **Figure 3** Project Area Plan). The perimeter of the project site would be bermed to a height of approximately 1 foot, designed to prevent run-on and run-off of stormwater.

As indicated above, mosquitoes will be controlled at the stormwater pond by the facility operator in coordination with the County Mosquito Control District, as identified in the Hydrology section.

11. Training

The Vision Recycling company training program consists of 24 safety training topics and 24 technical training topics. Training is performed on a 2 week basis (every other week) with 1 safety topic and 1 technical topic covered during each training. Attendees are logged into an attendance sheet and records are kept in the Vision corporate office. The safety topics cover both personal and public safety. The technical topics teach staff how to perform a professional, efficient job.

12. Site Safety

Safety is considered the most important issue for Vision Recycling. All site staff are required to wear safety vests, hardhats, and steel-toed and steel-shanked boots at all times on-site. The site will be closed to the public and will be accessed only by authorized employees.

13. Site Management

Each Vision Recycling facility is inspected by the Regional Site Manager on a weekly basis. Vision Recycling has a detailed inspection sheet which covers all specific site details. Items on the form include verification that temperatures are being monitored correctly, pile sizes are properly maintained, site is clean, staff are wearing proper personal protective gear, fire lanes are maintained, and all issues specific to the site are met. This monitoring form is then turned into the General Manager for review. Any issues of the site that are not within specifications will be dealt with promptly.

14. Experience

Vision Recycling has 20 years of experience in the composting and green and wood grinding industry. Clients include the City of Santa Cruz, County of Santa Cruz, Salinas Valley Solid Waste Authority, and County of Merced. Vision Recycling has also recently contracted with the County of Sacramento, Golden Bear transfer Station in Richmond, and other various operations. Vision Recycling operates the complete organics recycling program at both the County of Santa Cruz and Salinas Valley Solid Waste Authority. Vision operates as a contractor in the highly managed landfill operations sector, and has a great reputation. Vision will bring the same professional approach to the Greenville Road compost facility.

C. BEST MANAGEMENT PRACTICES AND OPERATIONAL PROCEDURES INCORPORATED IN THE PROJECT DESCRIPTION

Best Management Practices (BMPs) and operational procedures have been incorporated into the project description and planned operations, as listed below for air quality, hydrology, and traffic and circulation.

Air Quality

BAAQMD Best Management Practices: The project shall demonstrate implementation of the following BAAQMD guidance (BAAQMD 2012, Table 8-1; BAAQMD 1999, Table 2, p. 15).

1. All exposed surfaces (e.g., parking areas, staging areas, graded areas, and access roads) shall be watered to reduce dust at least twice each day except during rainy weather.
2. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
3. Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
4. All haul trucks transporting loose material off-site shall be covered.
5. All vehicle speeds on unpaved roads shall be limited to 15 mph.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).
7. All non-electric powered equipment will meet BAAQMD requirements for diesel emissions.
8. A publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints will be posted at the main entrance. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Hydrology

Stormwater:
Surface flow on the site would drain from the northeast to the southwest, and would be directed to the proposed stormwater pond in the southwest corner of the project area (see **Figure 3** Project Area Plan). The perimeter of the project area would be bermed to a height of approximately 1 foot, designed to prevent run-on and run-off of stormwater.

This drainage area will be maintained by the facility operator in a manner that meets the recommendations of the Alameda County Mosquito Abatement District:

1. Eliminate as many sources of standing water as possible, as they can be mosquito-breeding areas:
   - Get rid of containers (no matter how small) that have standing water.
   - Remove debris – like leaves, twigs, and trash – from ditches.
   - Turn over, cover tightly, or remove equipment such as tarps, buckets, barrels, dumpsters, cans, wheelbarrows, tires, and other containers that accumulate water. When this is not practical, drill drain holes in the containers.
2. Use aeration, to the extent possible, in order to prevent mosquito growth in ponds, animal feeding and drinking troughs, and other bodies of standing water. Use mosquito dunks, small doughnut-shaped blocks that dissolve slowly in water. Available in hardware and garden stores, they contain BTi, a pesticide that kills mosquito larvae but is non-toxic to animals and fish. (California Department of Pesticide Regulation 2005, p. 1.)

Traffic and Circulation

Site traffic would be limited to truck trips to haul material in and out of the facility, and employee trips to inspect and move piles. The following BMPs are currently employed at the nearby existing chip and grind facility and would continue to be applied to assure that circulation remains the same or would be improved:

1. A notice will continue to be posted at the existing chip and grind facility entry gate that all vehicles must turn right, and yield as necessary, when re-entering Greenville Road.
2. If at any time the existing chip and grind facility operators identify traffic congestion at the entrance to Greenville Road from the project activities, they will direct traffic to park in the existing turn-around area to the south of the facility entrance until traffic conditions improve.

ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

Chris Bazar
Agency Director

Albert Lopez
Planning Director

224
West Winton Ave.
Room 111

Hayward
California
94544

phone
510.670.5400
fax
510.785.8793

www.acgov.org/cda

SECTION II. ENVIRONMENTAL CHECKLIST FORM PREPARED PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A. PROJECT SUMMARY

1. **Project Title**:

Vision Recycling Compost Facility Conditional Use Permit

2. **Project location**:

30 Greenville Road, Livermore, California, 94551. The Project site is located on an approximately 151,200-square foot portion of the Mills Ranch, which is accessed via an unnamed road from Greenville Road. The proposed facility is located on a portion of APN 099B-5685-006-00. The access to the site crosses APN 099-B-5700-002-09, APN 099B-5685-007, and APN 099B-5685-005. **Figures 1, 2** and **3** show the Project vicinity and area.

3. **Project sponsor's name and address**:

Vision Recycling
41900 Boscell Road
Fremont CA 94538
Contact: Tamotsu "Mots" Yamamoto, General Manager
Telephone: 510-353-6030 ext. 207
Email: mots@visionrecycling.com

4. **General plan designation**:
Large Parcel Agriculture

5. **Zoning**:
"A" (Agricultural) District

6. **Description of project**:

The proposed project is a composting facility that designed to process green material feedstock from the existing chip and grind facility located nearby. This green material feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel.

7. **Surrounding land uses and setting**:

The project area is located in the eastern portion of the Livermore Valley, in an unincorporated area of Alameda County. Surrounding land uses are primarily grassy, rolling open space to the north, south, east, and west of the property. Directly to the north, concrete road dividers are stored in an open area. Further to the northwest are the existing Vision Recycling chip and grind facility and several construction company offices with outdoor equipment storage. The nearest residence is the lessor, the adjacent 125-acre Mills Ranch property. **Figure 4 (a, b, c, and d)** provides photographs of the project area and vicinity.

8. **Other public agencies whose approval may be required**:

Cal-Recycle, Alameda County Environmental Health, and the Bay Area Air Quality Management District.

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Climate Change and Greenhouse Gas Emissions	☐ Cultural Resources
☐ Geology /Soils	☐ Hazards & Hazardous Materials	☐ Hydrology and Water Quality
☐ Land Use and Planning	☐ Mineral Resources	☐ Noise
☐ Population and Housing	☐ Public Services	☐ Recreation
☐ Transportation and Traffic	☐ Utilities / Service Systems	☐ Mandatory Findings of Significance

C. LEAD AGENCY DETERMINATION:

On the basis of this initial evaluation:

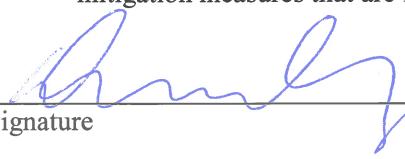
☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

December 3, 2015

Date

DIMIEN CURRY

Printed Name of Planner

D. EVALUATION OF ENVIRONMENTAL EFFECTS:

The Environmental Checklist and discussion that follows is based on sample questions provided in the CEQA Guidelines (Appendix G) which focus on various individual concerns within 17 different broad environmental categories, such as air and water quality, biological resources, climate change, cultural resources, land use, public services, noise and traffic (and arranged in alphabetical order). The Guidelines also provide specific direction and guidance for preparing responses to the Environmental Checklist. The sample questions are meant to be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential environmental impacts that are not listed in the checklist must also be considered. The sample questions are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

Each Checklist question requires a "yes" or "no" reply to indicate if the analysis or assessment (or an available reference document) shows that the project will or will not have a potentially significant environmental impact on the subject aspect of the environment. However, there are three possible types of "no" responses, including: "NO: Less Than Significant with Mitigation", which means that potentially significant impacts would clearly be avoided or reduced to an acceptable level by changes to the project or mitigation measures that the project proponent and the Lead Agency have agreed to; "NO: Less Than Significant Impact", which means that while there may have been concerns about possible impacts that require analysis, the "threshold of significance" is not exceeded and the impact is not significant; and "NO: No Impact", which means that for clearly evident reasons documented by a map, reference document, the nature of the project or the setting, the specific kind of environmental impact addressed by the question is not possible or would be nearly insignificant. The following describes in more detail the four different possible answers to the questions in the Checklist, and the types of discussions required for each response:

a) YES: Potentially Significant Impact. Checked if a discussion of the existing setting (including relevant regulations or policies pertaining to the subject) and project characteristics with regard to the environmental topic demonstrates, based on substantial evidence, supporting information, previously prepared and adopted environmental documents, and specific criteria or thresholds used to assess significance, that the project will have a potentially significant impact of the type addressed by the question.

   CEQA requires that if the analysis prompted by the Checklist results in a determination that the project will have one or more potentially significant environmental impacts, and the project proponent does not agree to changes or mitigation measures that would assure the subject impact can be avoided or reduced to less than significant levels, an environmental impact report (EIR) is required. In such instances, the discussion may be abbreviated greatly if the Lead Agency chooses to defer the analysis to preparation of the EIR. However, if the analysis indicates that all such impacts can be avoided or mitigated to less-than-significant levels, a Mitigated Negative Declaration can be prepared and this column will not be used for any question.

b) NO: Less Than Significant With Mitigation. Checked if the discussion of existing conditions and specific project characteristics, also adequately supported with citations of relevant research or documents, determine that the project clearly will or is likely to have particular physical impacts that will exceed the given threshold or criteria by which significance is determined, but that with the incorporation of clearly defined mitigation measures into the project, that the project applicant or proponent has agreed to, such impacts will be avoided or reduced to less-than-significant levels.

c) NO: Less Than Significant Impact. Checked if a more detailed discussion of existing conditions and specific project features, also citing relevant information, reports or studies, demonstrates that, while some effects may be discernible with regard to the individual environmental topic of the question, the effect would not exceed a threshold of significance which has been established by the Lead or a

Responsible Agency. The discussion may note that due to the evidence that a given impact would not occur or would be less than significant, no mitigation measures are required.

d) NO: No Impact. Checked if brief statements (one or two sentences) or cited reference materials (maps, reports or studies) clearly show that the type of impact could not be reasonably expected to occur due to the specific characteristics of the project or its location (e.g. the project falls outside the nearest fault rupture zone, or is several hundred feet from a 100-year flood zone, and relevant citations are provided). The referenced sources or information may also show that the impact simply does not apply to projects like the one involved. A response to the question may also be "No Impact" with a brief explanation that the basis of adequately supported project-specific factors or general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a basic screening of the specific project).

The discussions of the replies to the Checklist questions must take account of the whole action involved in the project, including off-site as well as on-site effects, both cumulative and project-level impacts, indirect and direct effects, and construction as well as operational impacts. Except when a "No Impact" reply is indicated, the discussion of each issue must identify:

a) the significance criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significance, with sufficient description to briefly explain how they reduce the effect to a less than significant level.

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D) of the Guidelines). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

1. **AESTHETICS** Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant with Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Have a substantial adverse effect on a scenic vista?			×	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				×
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				×
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			×	

Setting:
The project site is located in Alameda County, California, east of the City of Livermore, within an unincorporated area that has several large outdoor material storage and construction equipment storage areas immediately adjacent to and surrounding the site. Surrounding land uses include both grassy rolling open space, as well as commercial uses including the existing Vison chip and grind facility and several construction company offices with outdoor equipment storage near the abandoned rail right of way owned by the County. The project area is subject to the goals, objectives and policies of the Alameda County East County Area Plan (ECAP). The ECAP requires the protection of sensitive ridgelines, the maintenance of community separators largely in open space, and the protection and maximization of views of prominent visual features. A list of these sensitive ridgelines, community separators and viewsheds is provided in the land use chapter of the ECAP (Alameda County 2000, p. 30).

I-580 is located approximately 0.6 miles to the north of the project site. I-580 is designated as a scenic corridor per Alameda County's Scenic Route Element (County of Alameda 1966). The project would be located on a vacant site located near the existing chip and grind facility, which would provide green material feedstock consisting of wood chips, mulches, soil amendment, and co-generation fuel for the project's compost production. The project area is disturbed and has already been graded for its prior use for equipment storage

Impacts:

A screening-level visual impact analysis was performed for the proposed project (BSK 2015a, included as **Appendix A** to this document). This analysis examined the extent of potential visibility of the project to the neighboring areas, with the primary focus being the I-580 corridor and Greenville Road.
The viewshed analysis observed that the proposed project would not be visible to the majority of vantage points along I-580 and Greenville Road. The very narrow visibility of the proposed project from surrounding roadways limits the exposure of the project to the public, and therefore the project's impact on aesthetic resources would be ***less than significant***.

Mitigation Measures:

None.

Scenic Vistas

Would the project:
a) Have a substantial adverse effect on a scenic vista?

The project would not have a substantial adverse effect on a scenic vista. The project site is not located on a protected ridgeline; the nearest protected ridgelines to the project site are the ridgelines above Collier Canyon and Vasco Road and the ridgelines surrounding Brushy Peak north of Livermore. Each of these ridgelines are miles away from the project site, and operation of the proposed project would not affect views of these ridgelines. The project also would not impact views of the project vicinity from Greenville Road and from I-580. Field observations performed as part of the screening-level visual impact analysis observed that the project area is not visible to the majority of vantage points along I-580 and Greenville Road because the area is obscured by hills, commercial buildings, and an existing separate recycling/salvage facility (not associated with Vision Recycling) directly adjacent to Greenville Road (BSK 2015a). Geographic information system (GIS) modeling confirms these observations as shown in **Figure 5**, Viewshed GIS Analysis, and **Figure 6**, Viewshed GIS Analysis – Detail. The southwest corner of the project area will be visible from only a small section of Greenville Road. The very limited visibility of the proposed project from surrounding roadways limits the exposure of the project to the public, and so there is no need for screening measures for the proposed project.

In light of the location and ECAP policies that are applicable to the project site, the proposed project's impact with respect to scenic vistas would be ***less than significant***.

Scenic Resources

Would the project:
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no significant scenic resources in the project area such as rock outcroppings or historic buildings. The area is level and vacant. Although the project area can briefly be seen by motorists traveling along North Greenville Road, there are no state scenic highways in the project area vicinity; therefore the project would not substantially damage any scenic resources on the project site or immediate vicinity after it becomes operational. The project would have ***no impact***.

Visual Character and Quality

Would the project:
c) Substantially degrade the existing visual character or quality of the site and its surroundings?

The project would not substantially degrade the existing visual character of the site and its surroundings. The project area is disturbed and appears already cleared and graded, with an existing road. Development of the project would convert the site into an approximately 3.47 acre (151,200-square foot) composting facility with three compost piles, a finished compost storage pile, a 10,000 gallon water tank, and a stormwater pond. The heights of all material and compost piles would be limited to 12 feet (see **Figure 3**, Project Area Plan). Surrounding land uses include both grassy rolling open space, as well as commercial uses including an existing chip and grind facility and several construction company offices with outdoor equipment storage near the abandoned rail right of way owned by the County, and the project would not degrade the existing visual character or quality of the site or appear out of place. Moreover, field observations and GIS modeling performed for the project visual impact analysis indicate that the project

area is not visible to the majority of vantage points along I-580 and Greenville Road (see **Figure 5**, Viewshed GIS Analysis; **Figure 6**, Viewshed GIS Analysis – Detail; and **Appendix A**, Visual Impact Analysis. The project area is obscured by hills, commercial buildings, and an existing separate recycling/salvage facility (not associated with Vision Recycling) directly adjacent to Greenville Road (BSK 2015a). Therefore, the proposed project would not degrade the existing visual character of the site and its surroundings as part of the existing viewshed in the area. The project would have ***no impact***.

Light and Glare

Would the project:
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

The project site does not currently have on-site lighting. A single, shielded mercury vapor light (0.15 kWH) would be used to light the facility during operations, and no nighttime operations are planned. Additionally, as discussed above, the project area is not clearly visible from I-580 and Greenville Road, and is located some distance from both roadways. Thus, the project would not create a substantial new source of light or glare and would not impact motorists or adversely affect views in the area. Therefore, lighting or glare effects of the project would be ***less than significant***.

2. AGRICULTURE AND FOREST RESOURCES Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant with Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				x
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				x
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				x
d) Result in the loss of forest land or conversion of forest land to non-forest use?				x
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				x

Setting:

The project area is located in Alameda County, California, east of the City of Livermore, within an unincorporated area that has several large outdoor material storage and construction equipment storage areas immediately adjacent to and surrounding the site. Surrounding land uses include both grassy rolling open space, as well as commercial uses including the existing Vision Recycling chip and grind facility and several construction company offices with outdoor equipment storage near the abandoned rail right of way owned by the County. The project area is a vacant, disturbed site that is not used for agriculture. The site has a General Plan land use designation of Large Parcel Agriculture, and is zoned "A" – Agricultural), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035).). No change to the existing A zoning on the site is proposed.

The site is not forest and there is no forest on nearby lands.

Impacts: The project would have ***no impact*** on agricultural or forestry resources.

Mitigation Measures:

None.

Convert Farmland or Williamson Act Conflict

Would the project:
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project area is not currently farmed or designated as Farmland by the California Department of Conservation, or under a Williamson Act contract. The project area is zoned "A" (Agricultural), which

allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). No change to the existing A zoning on the site is proposed. Therefore, the project would have ***no impact*** related to the potential loss of farmland, conflict with Williamson Act procedures, or conflicts with existing agricultural zoning.

Potential Rezoning and/or Loss of Forest or Timberland to Non-Forest Use

Would the project:
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
d) Result in the loss of forest land or conversion of forest land to non-forest use?

The project area is not designated forest land or timberland, nor is it currently forested or used for forest resource purposes. There would be ***no impact*** related to the potential loss of forest or timber resources.

Other Changes That Could Result in Farmland Conversion

Would the project:
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

The project would not involve any other changes that could result in conversion of farmland to a non-agricultural use. The project would have ***no impact*** related to conversion of farmland.

3. AIR QUALITY Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant with Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			x	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			x	
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			x	
d) Expose sensitive receptors to substantial pollutant concentrations?			x	
e) Create objectionable odors affecting a substantial number of people?			x	

Setting:

The primary factors that determine air quality are the locations of air pollutant sources and the amount of pollutants emitted from those sources. Meteorological and topographical conditions are also important factors. Atmospheric conditions, such as wind speed, wind direction, and air temperature gradients, interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. Air quality is typically indicated by ambient concentrations of one or more of the following criteria pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and particulate matter (PM), which consists of PM less than or equal to 10 microns (PM10) and PM less than or equal to 2.5 microns (PM2.5).

BAAQMD is the regional government agency charged with regulating sources of air pollution in the San Francisco Bay Area to maintain clean air and protect the health of the public and the environment. BAAQMD has identified different climatological sub regions within the San Francisco Bay Area Air Basin. The project area is located in the Livermore Valley sub-region.

The Livermore Valley is a sheltered inland valley within the Diablo Range near the eastern border of the District. The western side of the valley is bounded by 1,000- to 1,500-foot hills with two gaps connecting the valley to the San Francisco Bay area, the Hayward Pass at the north and Niles Canyon at the south. The eastern side of the valley also has 1,000- to 1,500-foot hills, the Altamont Hills, with one major passage to the San Joaquin Valley called the Altamont Pass, and several secondary passages: Kellogg Creek, Patterson Pass, and Corral Hollow. To the north lie the Black Hills and 3,849-foot Mount Diablo. A northwest-to-southeast channel connects the Diablo Valley to the Livermore Valley and splits the Diablo Range into eastern and western sections. The south side of the Livermore Valley rises up to mountains of approximately 3,000 to 3,500 feet in the Diablo Range. The project area is located in the eastern portion of the Livermore Valley.

For the Livermore Valley, the air pollution potential is high, especially for photochemical pollutants. Dependent upon the meteorology for a particular summer and or fall, the frequency of elevated ozone levels at the BAAQMD's Livermore station can be significant, approaching, reaching, or exceeding Santa Clara Valley levels. The valley not only traps locally generated pollutants but can be the receptor of ozone and

ozone precursors from San Francisco, Alameda, Contra Costa, and Santa Clara counties. This can occur near the end of an ozone episode when the sea breeze regains its strength and carries these pollutants inland. On northeasterly flow days, not uncommon in the early fall, ozone may be advected from the San Joaquin Valley to the Livermore Valley. During the winter, the sheltering effect of the valley, its distance from the moderating marine air, and the presence of a strong high pressure system contribute to the development of a strong, surface-based temperature inversion. Within this stable layer, local pollutants from automobiles, fireplaces, and agricultural burning can concentrate, raising carbon monoxide and or particulate levels.

Impacts:

The significance thresholds for air quality impacts are based on the BAAQMD 1999 CEQA Guidelines thresholds (BAAQMD 1999, pp. 16-21).

An Air Quality and Greenhouse Gas Study was performed for the proposed project. (BSK 2015b, included as **Appendix B** to this document). This study identified, quantified, and analyzed potential emissions from the project using both state- and BAAQMD-approved air quality models and analytical tools. The study's analysis indicated that emissions associated with the project would be well below the thresholds of significance. Additionally, development of the project is consistent with the Alameda County Community Climate Action Plan, which aims to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. Therefore, given the project's lack of significant air emissions, and its consistency with County climate change policies, the project's impacts related to air quality would be ***less than significant***.

Mitigation Measures:

None.

Consistency with Air Quality Plan/ Violate Air Quality Standards

Would the project:
a) Conflict with or obstruct implementation of the applicable air quality plan?
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Project air quality impacts are divided into two categories: construction-related and operations-related. Construction activities will occur for approximately one month on-site to build the compost piles, excavate the stormwater pond, place the 20 to 40-feet long shipping container, route electricity within the site, and construct other improvements as shown in **Figure 3**, Project Area Plan. Operational emissions would occur through use of a front-end wheel loader and conveyor to move compost material, through generation of electricity used to power the blowers for forced aeration of the Phase 1 compost pile, and through truck trips between the nearby existing chip and grind operation and the project site to deliver compost feedstock and/or remove finished compost. Operational emissions could also occur from off-site truck trips to deliver finished compost to customers or to Vision facilities in other areas.

The project is located in an area with other types of activities and operations consistent with the proposed activities. There closest sensitive receptor is the landowner for the project area at approximately 880 feet. All other potential sensitive receptors are over 1 mile away from the project area.

Construction Emissions

Construction-related emissions are regarded as less than significant if appropriate management practices are taken; therefore, the BAAQMD Best Management Practices (BMPs) listed below will be implemented to minimize PM_{10} (BAAQMD 1999, p. 14 to 15 and Table 2; BAAQMD 2012, Table 8-1). In addition to the BMPs, the project will review the use of California Air Resource Board (CARB) and its CalCert Environmental Technology Certification Program-approved dust control technologies (lignin-polymers and other non-toxic dust palliatives) for reducing PM emissions from the unpaved roadway.

BAAQMD Best Management Practices: During construction and operations, the project would demonstrate implementation of the following BAAQMD guidance, (BAAQMD 2012, Table 8-1; BAAQMD 1999, Table 2, p. 15).

f) All exposed surfaces (e.g., parking areas, staging areas, graded areas, and access roads) shall be watered to reduce dust at least twice each day except during rainy weather.
g) Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
h) Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
i) All haul trucks transporting loose material off-site shall be covered.
j) All vehicle speeds on unpaved roads shall be limited to 15 mph.
k) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]).
l) All non-electric powered equipment will meet BAAQMD requirements for diesel emissions.
m) A publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints will be posted at the main entrance. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Although quantification of construction-related emissions is not required, the Air Quality and Greenhouse Gas Study estimated these emissions, which are presented below in **Table 1**:

TABLE 1
CONSTRUCTION-GENERATED PARTICULATE MATTER (PM) EMISSIONS PER YEAR BEFORE AND AFTER COMPLIANCE WITH BAAQMD PM CONTROL PROVISIONS

Sources	Fugitive PM_{10} (Tons)	Exhaust PM_{10} (Tons)	Fugitive $PM_{2.5}$ (Tons)	Exhaust $PM_{2.5}$ (Tons)	Total PM (Tons)
Construction without PM Control	1.93	3.09E-03	0.19	2.88E-03	2.13
Construction with PM Control	**0.16**	**2.84E-03**	**0.09**	**2.65E-03**	**0.25**

Operational Emissions

The Air Quality and Greenhouse Gas Study used the California Emissions Estimate Model (CalEEMod) to model potential operational emissions for the project, including carbon monoxide, reactive organic gases (ROG), nitrogen oxides (NO_X), and PM_{10}. The proposed project does not exceed the 550 lb./day vehicle emissions local carbon monoxide threshold established by BAAQMD. The project also does not exceed the BAAQMD's other carbon monoxide thresholds because the project does not impact the LOS of nearby

intersections or contribute an increase of 10% or more to traffic volumes (BAAQMD 1999, p. 16). The proposed project's operational emissions without mitigation of ROG, NO_X, and PM_{10} are well below BAAQMD thresholds, as presented in **Table 2**:

TABLE 2
PROPOSED PROJECT OPERATIONAL EMISSIONS WITHOUT MITIGATION

Sources	Emissions Generated (tons/year)		
	ROG	**NO_X**	**PM_{10} Total**
BAAQMD 1999 Thresholds (tons/year)	**15**	**15**	**15**
Project Area Sources	1.61E-03	0.00	0.00
Project Energy	0.00	0.00	0.00
Project Mobile Sources	4.3E-03	0.03	0.10
Project Off-road	0.09	1.02	0.06
Project Waste	-	-	0.00
Project Water	-	-	0.00
Project Total Emissions	**0.10**	**1.05**	**0.16**

Analysis of the proposed composting facility emissions of toxic air contaminants (TACs) indicated that these emissions would not exceed the 10 in 1 million probability of contracting cancer for the Maximally Exposed Individual (MEI). Due to its small size, the type of material processes, and limited vehicle use, the proposed facility is not expected to emit TACs, and therefore the Hazard Index would be less than the significance threshold of 1 for the MEI.

Cumulative Regional Air Quality Emissions

The BAAQMD states that "for any project that does not individually have significant operational air quality impacts, the determination of significant cumulative impact should be based on an evaluation of the consistency of the project with the local general plan and of the general plan with the regional air quality plan" (BAAQMD 1999, p. 19). The Alameda County Community Climate Action Plan aims to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. Therefore, the proposed project is consistent with the local general plan and would not have cumulative air quality impacts.

Because the project's construction and operational air emissions would be below the thresholds of significance, the project's impacts related to these emissions are considered ***less than significant***.

Sensitive Receptors

Would the project:
d) Expose sensitive receptors to substantial pollutant concentrations?

The project site is in the Livermore Valley, east of the City of Livermore, which is an urbanizing area of Alameda County. However, the dominant land use designation in this unincorporated area of the County is outdoor storage and agricultural with few residential uses. In terms of air quality, construction activities typically have the greatest impact on sensitive receptors. The project's construction and operations

incorporate implementation of the BAAQMD's control measures for emissions management, as outlined in the project description (Section I of this IS/ND) and listed above. There are no schools, hospitals, elderly care facilities, or similar types of land use in the vicinity of the project area that would have sensitive receptors. Therefore, the impact would be ***less than significant***.

Objectionable Odors

Would the project:
e) Create objectionable odors affecting a substantial number of people?

The proposed project site is located in an industrial/agricultural area of the County where the nearest sensitive receptor is the property owner, and the next closest sensitive receptor is over 1 mile NNW of the project area on the far side of I-580. Under the BAAQMD guidelines, facilities known to emit objectionable odors that are located within certain project screening distances should undergo evaluation by the Lead Agency for odor impacts (BAAQMD 1999, pp. 17-18, Table 4). For composting facilities, the project screening distance is 1 mile. This means that if the project were considered likely to emit objectionable odors, it should undergo evaluation by the Lead Agency for odor impacts. However, beyond the property owner, the nearest sensitive receptor is greater than 1 mile and the composting operations proposed under the proposed project would not have the potential to frequently and significantly expose members of the public to objectionable odors because project composting would occur under a controlled aerobic process. In the composting process, objectionable odors can arise when anaerobic conditions (i.e., a lack of oxygen) are allowed to occur. Anaerobic conditions would not occur in the project's composting facility because oxygen would be constantly introduced to the facility's Phase 1 pile using pressurized air from blowers. Additionally, the aerobic composting method used by the facility's Phase 1 pile would bring the pile to a high internal temperature, which significantly reduces odors that would otherwise be created by cooler, slower decomposition. As required by the California Code of Regulations, the temperature within the Phase 1 pile would be maintained at a temperature of at least 131 degrees Fahrenheit for a pathogen reduction period of three days, and the pile would be covered with 6 to 12 inches of insulating material (22 CCR § 17868.3, subd. (b)(4).This level and length of heating would result in rapid composting and effectively kill off odor-producing bacteria. Material in the Phase II file would be fully broken down and so would not create offensive odors.

Furthermore, even if a limited amount of objectionable odors were generated by the Phase 1 pile, the project is located in a windy area subject to good air mixing, and any odor would be quickly diluted and dispersed. BAAQMD recommends that Lead Agencies consider the influence of local meteorological conditions, particularly prevailing winds, in evaluating potential odor impacts (BAAQMD 1999, p.17). Prevailing winds in the Livermore area tend to blow in a west to east direction, not a south to north direction, which indicates that even if the facility produced limited odors, they most likely would be blown away from, rather than toward, the sensitive receptor located over 1 mile to the NNW (BAAQMD 1999, pp. D-3 to D-4 and Table D-1).

Additionally, no food material, which is known to be an odor source, will be accepted on site, with any miscellaneous food or waste material found in the loads to be placed in a commercial solid waste dumpster which will be emptied weekly.

Therefore, there would be a ***less than significant*** impact associated with the project's potential to create objectionable odors affecting a substantial number of people.

4. BIOLOGICAL RESOURCES Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian, aquatic or wetland habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service				X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
g) Result in conversion of oak woodlands that will have a significant effect on the environment?				X

Setting:

Biological resources in the project area include common plant and animal species, and special-status plants and animals as designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), National Marine Fisheries Service (NMFS), and other resource organizations, including the California Native Plant Society. Biological resources are protected under the federal and state Endangered Species Act, and additional regulations.

The project area would occupy approximately 3.47 acre (151,200 square feet) in an unincorporated portion of eastern Alameda County, California located east of the City of Livermore and as mapped on the USGS Altamont Quadrangle. The site is flat and has no trees, shrubs or vegetated areas. South and east of the site, the topography is composed of moderately sloped rolling hills while to the north and west, the terrain is relatively flat. There are no streams or wetlands on the site, but wetland areas exist in the project vicinity to the southeast and northeast (**Figure 7**). **Figure 2**, Project Area Map, and **Figure 4 (a, b, c, d)**, Site Photographs show the lack of natural habitat on the site**.**

Impacts:

A biological study was performed for the proposed project that incorporated a search of relevant databases and maps as well as a reconnaissance-level site visit conducted by a BSK Associates Senior Biologist on February 9, 2015 (BSK 2015c, included as **Appendix C** to this document).

The study indicated that no special-status species have been observed within the project area, and no evidence was observed to suggest that special-status species have been present or would use the site habitat. The project area is heavily compacted with negligible nesting and foraging habitat for listed species and is fenced, minimizing habitat connectivity. The project would have ***no impact*** on biological resources.

Mitigation Measures:

None.

Special-Status Wildlife and Plant Species

Would the project:
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The reconnaissance-level site visit and the CNDDB search yielded no observations of special status species within the proposed project area, which is heavily compacted with negligible nesting and foraging habitat for listed species.

The CNDDB special-status species search indicated that the biological habitats near the project site were determined to have historically supported special-status animal species, including the California tiger salamander (CTS) and long-horn fairy shrimp (LFS) are associated with vernal (seasonal) wetland features. Red-legged frogs (RLF) were also identified, and these are associated with more-permanent wetlands; in this case, dammed sections of the creek and stock pond. CTS can also use upland areas as well as wetlands for part of their life-cycle. The name, regulatory status, critical habitat, and determination of effect for each of these species are identified in **Table 3**, below.

TABLE 3
SPECIAL STATUS SPECIES LIST

Common Name	Scientific Name	Federal Status	State Status	Critical Habitat	Effect Determination
California Tiger Salamander	*Ambystoma californiense*	Threatened	Threatened	None	No Impact
Long-horn Fairy Shrimp	*Branchinect longiantenna*	Endangered	None	None	No Impact
Red Legged Frog	*Rana draytonii*	Threatened	None	None	No Impact

According to the CNDDB search, the nearest documented special status species observations were of CTS approximately 0.4 miles to the west-northwest of the proposed project and RLF approximately 0.5 miles southeast of the proposed project area (CNDDB 2015). The proposed project is located approximately 0.25 miles west of RLF critical habitat (USFWS 2015). This species habitat consists typically of permanent

wetlands. The proposed project area does not contain suitable habitat for RLF, LFS or CTS due to the highly disturbed and compacted site, current use of equipment storage in the area, lack of cover such as burrows, lack of food sources, and lack of wetland characteristics. Additionally, project activities would not indirectly affect the steeply downgradient off-site habitat RLF and CTS habitat areas.

Given that the project area does not contain any evidence of use special status species and does not provide suitable habitat for special status species, the proposed project would have ***no impact***.

Riparian Habitat/Sensitive Natural Communities/Wetlands/Waters of the US

Would the project:
b) Have a substantial adverse effect on any riparian, aquatic or wetland habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The project area is disturbed and appears to have been leveled and graded, and does not contain any riparian habitat, wetlands, or other sensitive natural community. The biological study included a review of the National Wetland Inventory (NWI) as well as the Federal Emergency Management Agency (FEMA) flood zone maps. There are no wetlands in the project area indicated on the NWI Map or evidence of Waters of the United States and State (see **Figure 7**). The NWI dataset documented two (2) freshwater palustrine emergent wetlands located near the proposed project area. The first wetland is approximately 4.79 acres and is located approximately 600 feet southeast of the proposed project area. The second wetland is approximately 8.28 acres and approximately 800 feet to the northeast of the proposed project area. The proposed project location is on the top of a south-facing raised hill, overlooking a valley, and it does contain wetlands or support characteristics of a wetland. Therefore, the proposed project would not adversely affect a wetland.

The review of FEMA flood zone maps indicated that the proposed project area is located within Zone X, meaning it is within an "area of minimal flood hazard" (FEMA 2015). The proposed project is over 0.5 miles from the nearest floodplain and therefore, would not adversely affect any riparian habitat or sensitive natural communities.

As described above, the project area is flat; appears to have been leveled and graded; and has no trees, shrubs, or vegetated areas. There is no riparian, aquatic, or wetland habitat or other sensitive natural community identified at the site, or in local or regional plans or policies, or by any regulatory agency with jurisdiction over the project area. Therefore, the project would have ***no impact***.

Movement of Species

Would the project:
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The existing Vision Recycling site is already fenced along its boundaries, and that fence encompasses the project area. There are additional nearby fences associated with the County property. Other significant topographic barriers include the former railroad right of way and Greenville Road, as well as the nearby I-580 freeway. Given the highly disturbed site and surrounding area, the elevated linear rail road grade and road and the perpendicular highway, and the existing nearby chip and grind facility, there is also essentially no habitat connectivity for potential migration or dispersal of these species from more favorable habitat.

The proposed project would not change the use or otherwise interfere with the movement of any native resident or migratory fish or wildlife species. Therefore, there would be ***no impact*** in this regard.

Local Policies/Tree Ordinance/Conservation Plan

Would the project:
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
g) Result in conversion of oak woodlands that will have a significant effect on the environment?

The project would not conflict with any other local policy or ordinance for the protection of biological resources. There are no trees, including no oak woodlands, and there is no natural habitat available within the project area. The project area is located within Conservation Zone 9 of the East Alameda County Conservation Strategy (EACCS) (EACCS 2010, Figure 3-1). As was discussed above, RLF critical habitat is located 0.25 miles west of the project area, but there is no critical habitat located within the project area. The proposed project area does not contain suitable habitat for RLF due to the current use of the area for equipment storage, lack of cover, and lack of wetland characteristics within the proposed project area. Therefore, the project would have ***no impact***.

5. CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?				X

Setting:

In addition to the air pollutants discussed in the Air Quality section, other emissions may not be directly associated with adverse health effects but are suspected of contributing to "global warming" or "climate change." Global warming has occurred in the past as a result of natural processes, but the term is often used now to refer to the warming predicted by computer models to occur as a result of increased emissions of greenhouse gases (e.g., carbon dioxide, methane, chlorofluorocarbons, nitrous oxide, ozone and water vapor). Naturally occurring and anthropogenic-generated (generated by humankind) atmospheric gases, such as water vapor, carbon dioxide, methane, and nitrous oxide, are theorized to have a significant effect on global temperatures.

Gases that trap heat in the atmosphere are called greenhouse gases (GHG). Solar radiation enters the earth's atmosphere from space, and a portion of the radiation is absorbed at the surface. The earth emits this radiation back toward space as infrared radiation. GHGs, which are mostly transparent to incoming solar radiation, are effective in absorbing infrared radiation and redirecting some of this back to the earth's surface. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This is known as the greenhouse effect.

.

Other than water vapor, the GHGs contributing to global warming include the following gases:

- Carbon dioxide, primarily a byproduct of fuel combustion.
- Nitrous oxide is a byproduct of fuel combustion and also associated with agricultural operations, such as fertilization of crops.
- Methane is commonly created by off gassing from agricultural practices (e.g., keeping livestock) and landfill operation.
- Chlorofluorocarbons that were widely used as refrigerants, propellants and cleaning solvents, however their production has been mostly reduced by international treaty.
- Hydrofluorocarbons are now used as a substitute for chlorofluorocarbons in refrigeration and cooling.
- Perfluorocarbons and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

In 2009, the California Natural Resources Agency (Resources Agency) finalized its guidance on GHG emissions and CEQA. Under Senate Bill 97 (Chapter 148, Statutes of 2007), the Governor's Office of Planning and Research (OPR) was required to prepare amendments to the state's CEQA Guidelines addressing analysis and mitigation of the potential effects of GHG emissions in CEQA documents. The legislation required the Resources Agency to adopt the amended Guidelines by 2010. The CEQA

Guidelines Amendments adopted by the Resources Agency made changes to 14 sections of the Guidelines. This discussion follows those guidelines.

Impacts:

The most recently adopted BAAQMD CEQA thresholds of significance are contained in BAAQMD's 1999 CEQA Guidelines. However, these guidelines do not contain a threshold for GHG emissions. Although this threshold is not currently recommended by BAAQMD due to ongoing CEQA litigation, use of this threshold for the purposes of this project is supported by the fact that it was developed as the project emissions that would not be expected to substantially conflict with California legislation adopted to reduce statewide GHG emissions (BAAQMD 2009b, p. 38; County of Alameda 2014, p. 133, BAAQMD 2012, p. 2-5). GHG emissions from land use projects built in compliance with these thresholds would be approximately 26 percent below business-as-usual 2020 conditions and thus would be consistent with achieving required Assembly Bill (AB) 32 equivalent GHG reductions (BAAQMD 2009b, p. 52). This 26 percent reduction would achieve an aggregate reduction of approximately 1.6 MMT CO2e/yr, which is the "fair share" of emission reductions from Bay Area land use sources needed to meet the AB 32 goals (BAAQMD 2009b, p. 52).

An Air Quality and Greenhouse Gas Study was performed for the proposed project. (BSK 2015b, included as **Appendix B** to this document). This study identified, quantified, and analyzed potential GHG emissions from the project using both state- and BAAQMD-approved air quality models and analytical tools. The study's analysis indicated that GHG emissions associated with the project would be well below the proposed BAAQMD threshold of significance. Additionally, development of the project is consistent with the Alameda County Community Climate Action Plan, which aims to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. Therefore, given the project's lack of significant GHG emissions, and its consistency with County climate change policies, the project's impact related to GHG emissions would be ***less than significant***.

Mitigation Measures:

None.

Greenhouse Gas Emissions

Would the project:
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction-related GHGs would be generated through activities to build the compost piles, excavate the stormwater pond, place the 20 to 40-feet long shipping container, route electricity to the site, and construct the perimeter berm and other improvements as shown in **Figure 3,** Project Area Plan.

Project operation activities would emit GHGs, primarily through consumption of energy for transportation of compost materials and for on-site equipment usage. The composting process itself could generate small amounts of methane, although the forced aeration process proposed to be used would significantly reduce potential methane emissions. The Air Quality and Greenhouse Gas Study used the California Emissions Estimate Model (CalEEMod) to model potential operational GHG emissions for the project.

The proposed project's construction and operational GHG emissions without are well below the proposed BAAQMD threshold of significance, as presented in **Table 4**, below.

TABLE 4
OPERATIONAL GHG EMISSIONS PER YEAR

Sources	GHG Emissions CO_2e(MT)
Significance Threshold[1] (MT/year)	**1,100 MT**
Project Unmitigated Constructions Emissions (Total MT/year)	6.91 MT
Project Unmitigated Operational Emissions (Total MT/year)	103.46 MT

[1] Based on proposed BAAQMD Threshold (BAAQMD 2009a, p. 1)

Given that the project's construction and operational GHG emissions are below threshold levels, the project's impact would be ***less than significant***.

Greenhouse Gas Reduction Plan Consistency

Would the project:
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

As described above, the project's GHG emissions would be less than significant. Additionally, the proposed project supports local activities required to comply with local, state, and federal regulations associated with the reduction, diversion, and recycling of waste and diversion of waste from landfills. Moreover, the Alameda County Community Climate Action Plan aims to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. Therefore, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions, and the project would have ***no impact*** in this regard.

6. CULTURAL RESOURCES Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				×
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				×
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				×
d) Disturb any human remains, including those interred outside of formal cemeteries?				×

Setting:

The existing use of the project area as a disturbed, vacant, graded area with an existing road shows that the site is currently used for truck and equipment access and use. There are currently no permanent structures on the project site, and none are planned.

Impacts:

The project would have ***no impact*** on cultural resources.

Mitigation Measures:

None.

Historical Resources

Would the project:
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

During environmental review of the existing chip and grind facility, a search of ethnographic and historical literature, including the *California Register of Historical Resources* and the *National Register of Historic Places* did not reveal records of historic cultural resources within one-half mile radius of the chip and grind facility site. The proposed project is located less than a half-mile (0.3 mile) from the chip and grind facility, and so it was encompassed in this review.

Based on the vacant, graded state of the site, and the fact that no previously recorded resources were identified in the records search, the project would not result in a substantial adverse change in the significance of an historical resource. Therefore, this impact is considered to be ***no impact***.

Archaeological & Paleontological Resources and Human Remains

Would the project:
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
d) Disturb any human remains, including those interred outside of formal cemeteries?

There are no apparent or unique archaeological or paleontological resources on the site, and the site has already been graded. There would be minimal grading of previously disturbed surfaces on the project site during its construction. Therefore the project would have ***no impact***.

7. GEOLOGY AND SOILS Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				×
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				×
ii) Strong seismic ground shaking?				×
iii) Seismic-related ground failure, including liquefaction?				×
iv) Landslides?				×
b) Result in substantial soil erosion or the loss of topsoil?				×
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				×
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			×	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				×

Setting:

The project site is located on a disturbed, vacant, graded area that is not on filled land. The project site is relatively flat with an on-site slope of less than 10%.

The California Legislature passed the Alquist-Priolo Earthquake Fault Zoning Act in 1972 to mitigate the hazard of surface faulting to structures for human occupancy (CDMG, 1997). The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. Local agencies must regulate most development in fault zones established by the State Geologist. Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, the city or county with jurisdiction must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active or potentially active faults.

The California Seismic Hazards Mapping Act of 1990 (California Public Resources Code Sections 2690-2699.6) addresses seismic hazards other than surface fault rupture, such as liquefaction and seismically induced landslides. The California Geologic Survey reports were prepared pursuant to the Seismic Hazards Mapping Act of 1990 (Public Resources Code, Chapter 7.8, Division 2), which directs the California State Geologist to compile maps that identify *Seismic Hazard Zones* consistent with requirements and priorities established by the California State Mining and Geology Board (SMGB; California Department of Conservation, 1997). The Act requires that site-specific geotechnical investigations be performed for most urban development projects situated within seismic hazard zones before lead agencies can issue the building

permit. The Act also requires sellers of real property within these zones to disclose that fact at the time such property is sold.

Impacts:

The project would have ***less than significant*** effects on geology and soils.

Mitigation Measures:

None.

Exposure to Fault Rupture and Seismic Ground Shaking

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

The site is located in the Coastal Range geomorphic province, which is characterized by north-south trending ridges and valley that are typically highly folded with numerous faults. The project site is located in the Altamont Hills in a tectonically active region associated with movement along the boundary of the Pacific and North American plates. Numerous faults in the San Francisco Bay Area, including the San Andreas, Hayward, Calaveras, and Greenville faults, are capable of producing strong ground motion. The Livermore Valley is a product of tectonism, formed as synclinal basin bounded on the west by the Calaveras Fault and on the east by the Greenville Fault. Basin rocks and sediments are also cut by several westerly-trending thrust faults.

Holocene active faults extend through or are contained within the surrounding area and include the Greenville fault. The Greenville Fault, which forms the eastern boundary of Livermore Valley, crosses from the northwest to the southeast. The California Geological Survey, under the Alquist-Priolo Earthquake Fault Zoning Act, has identified it as an Earthquake Fault Zone (EFZ). The Greenville Earthquake Fault Zone within the Altamont quadrangle is marked by a roughly 1 km wide zone of discontinuous surface fault traces that includes the project site (see **Figure 8**).

A high potential for surface ground rupture due to fault displacement exists in the EFZ. The threshold for significance for surface ground rupture is that structures intended for human occupancy cannot be placed on or within 50 feet of an active fault. To our knowledge, a surface fault rupture hazard investigation has not been completed for the project area. State and County guidelines require that a fault rupture hazard investigation be performed for development which includes structures that are intended for human occupancy, but structures intended for human occupancy are not part of this project.

There are currently no permanent structures on the project site, and none are planned. A shipping container approximately 20 to 40-feet long is proposed to be placed on the site to house computer equipment and provide storage for supplies. This structure would not have a foundation and therefore is not anticipated to require a grading or building permit. However, an electrical permit would be required by the County Building Department. Grading of the Project site for site preparation is expected to be minimal. There will be no residential use of the site. An employee of the existing nearby chip and grind operation will manage the site on a part-time basis as needed.

The site is located on rock units mapped as Pliocene age Orinda Formation consisting of pebble conglomerate, sandstone, and claystone.[1] Rock units of this type and age not susceptible to liquefaction or seismic settlement, therefore the risk associated with liquefaction or seismic settlement is minimal and there would be ***no impact***.

Landslides

Would the project:
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
iv) Landslides?

The site is relatively level, indicating that the potential impacts from landslides occurring on the site are minimal. The Landslide Inventory Map indicates that the site is not located on an active or dormant landslide. A mature dormant landslide was mapped approximately 1,200 feet east of the site.[2]

The hillsides located just south of the site slope down at approximately 27 percent. The break in slope from level to 27 percent downslope is located approximately 120 feet south of the southern project boundary. Due to the distance, surcharge from the weight of the stockpiled organic matter would be minimal and have little impact on the slope stability.

The risk of impacts associated with landslides at the site are low given the lack of steep slopes on the site and therefore the project would be considered to have ***no impact***.

Soil Erosion, Loss of Topsoil, Unstable and Expansive Soils

Would the project:
b) Result in substantial soil erosion or the loss of topsoil?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
d) Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2006, as it may be revised), creating substantial risks to life or property?
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The proposed project will not disturb site soils or result in new activities that could cause or accelerate erosion at the site. The project site is already graded to drain internally, and would not result in substantial soil erosion or the loss of topsoil. The project would have ***no impact*** related to substantial soil erosion or the loss of topsoil**.**

As stated above, the project area is located on rock units that are not susceptible to liquefaction, seismic settlement or lateral spreading. The site is not located in an area that is known for subsidence from groundwater or petroleum withdrawal. The site soils are not of the types that are prone to hydrocompaction or collapse due to wetting. The project would have ***no impact*** related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

As shown on **Figure 9**, Soils Map, the project is located on soil units identified by the USDA as Altamont clay (moderately deep, 30 to 45 percent slopes, eroded). According to the USDA soil data, these soils are

[1] Dibblee, T.W., and Minch, J.A., 2006, Geologic map of the Altamont quadrangle, Alameda County, California: Dibblee Geological Foundation, Dibblee Foundation Map DF-197, scale 1:24,000.
[2] California Geologic Survey, 2010, Landslide Inventory Map, Altamont Quadrangle.

identified as having a Unified Soil Classification System symbol of CH, that suggests highly plastic clay. Highly plastic clays are typically also highly expansive. The effects of expansive soils could damage foundations of structures, paved roads and streets, and concrete slabs. Soil creep can occur on sloped ground with expansive soils and cause damage to structures with vertical walls below grade. Paved roads are not planned as part of the project, and the project will not construct any structures with foundations. Additionally, as a condition of approval to secure a building permit, the project applicant will be required to obtain an engineer's certification that all access routes are all-weather and will support the load of a 75,000 pound piece of apparatus (AFCD 2014). The project would have a ***less than significant*** impact related to expansive soils.

The site soils have a high percentage of clays that would result in low permeability and may limit to use of septic tanks with leach fields. Waste water disposal is not part of the project, therefore the low permeability of the soils would have ***no impact*** related to the use of septic tanks or alternative waste water disposal systems.

8. HAZARDS AND HAZARDOUS MATERIALS Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			×	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			×	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			×	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				×
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				×
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				×
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				×
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			×	

Setting:

The project area, which has no permanent structural improvements, has been used as part of a chip and grind facility for about 22 years. A search of the California State Department of Toxic Substances Control (DTSC) database (http://www.envirostor.dtsc.ca.gov/) indicates no known hazardous conditions exist at the site (DTSC 2015). There are no schools near the project area, and it is not located within two miles of an area governed by an airport land use plan. It is not in an area with wildfire hazards threats.

Impacts:

The project would have a ***less than significant*** impact related to hazards or hazardous materials.

Mitigation Measures:

None.

Public Hazard Through the Routine Use of, or Resulting From Accidental Release of Materials

Would the project:
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials; nor would it result in a public hazard resulting from accidental release of hazardous materials. The project involves the operation of the project area as a compost facility that would be managed by Vision Recycling. Operation of the site would involve the routine use and transport of potentially hazardous materials such as oils and combustible fuels; however, significant quantities of hazardous material would not be stored on-site. Potential impacts related to the use, transportation or accidental release of potentially hazardous materials are reduced to a ***less than significant*** level with the implementation of normal operating practices and procedures or standard preventative and protective measures.

Hazards Near Schools

Would the project:
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no schools in proximity to the project area. As discussed above, the proposed use would not involve the handling or transportation of significant amounts of hazardous materials. Moreover, the project area is in a sparsely populated agricultural area east of the City of Livermore. An accidental release of any hazardous materials that may be present at the site would have a ***less than significant*** effect.

Hazards From a Listed Hazardous Site

Would the project:
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

A search of the California State Department of Toxic Substances Control EnviroStor Database, the statewide hazardous materials database, determined that neither the project area, nor any other parcels in the project area's vicinity, is included (DTSC 2015). There is ***no impact*** in this regard.

Proximity to Airport Plan or Private Air Strip

Would the project:
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project area?
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the Project area?

The project area is not located within an airport land use plan or within two miles of a public or private use airport. There is ***no impact*** in this regard.

Emergency Response

Would the project:
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

None of the project's proposed activities or proposed uses would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, there would be ***no impact***.

Wildland Fire Hazards

Would the project:
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project is located in an industrial/agricultural area surrounded to the east by open lands with few trees, and it is not in or near a wildland fire hazard zone. The Alameda County Fire Department (ACFD) does not have current maps delineating the Urban Wildland Interface; however, maps compiled by the state indicate that the project area is not in or near an area considered to be a very high fire zone area (Source: CalFire, http://frap.cdf.ca.gov/webdata/maps/alameda/fhszl_map.1.pdf - Internet accessed July 17, 2015).

Operation of the compost facility in the project area would be subject to conditions of approval specified by the Alameda County Fire Department, including conditions on pile size restrictions, pile separation distances, temperature monitoring, fire access routes, and provision of a 10,000 gallon water tank for firefighting (AFCD 2014). Additionally, as discussed in the project description, the project is designed to incorporate BAAQMD Best Management Practices, including daily watering of exposed surfaces. Compliance with these conditions and practices would ensure that the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland or other fires, and therefore the risk of loss involving wildland fires is considered ***less than significant***.

9. HYDROLOGY AND WATER QUALITY Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Violate any water quality standards, conflict with water quality objectives, fail to meet waste discharge requirements, significantly degrade any surface water body or groundwater, or adversely affect the beneficial uses of such waters, including public uses and aquatic, wetland and riparian habitat?			x	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				x
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site (i.e., within a watershed)?				x
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff (e.g., due to increased impervious surfaces) in a manner which would result in flooding on- or off-site (i.e. within a watershed)?				x
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems due to changes in runoff flow rates or volumes?				x
f) Result in a significant increase in pollutant discharges to receiving waters (marine, fresh, and/or wetlands) during or following construction (considering water quality parameters such as temperature, dissolved oxygen, turbidity, and typical stormwater pollutants such as heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash)?			x	
g) Result in an increase in any pollutant for which a water body is listed as impaired under Section 303(d) of the Clean Water Act?				x
h) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				x
i) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				x
j) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				x
k) Inundation by seiche, tsunami, or mudflow?				x

Setting:

Potential water quality impacts under this topic fall into two categories, short-term and long-term, with short-term impacts generally due to construction activities. There are not anticipated to be significant short-term construction impacts because only minor grading is anticipated and there would be no installation of permanent structures in the project area. However, long-term impacts could occur due to project operation of the compost facility if non-approved materials, e.g., non-green or non-wood waste materials, came in contact with the ground and were subject to transport by rain in the winter. The existing Vision facility has strict material management protocols to reduce the presence of non-green, non-wood waste material, including weekly removal of incidental trash. The active use of the property could result in the generation of operational runoff and could in theory increase the potential for polluted runoff off-site. However there are no water bodies adjacent to or near the project area that could potentially receive off-site runoff, including none that are listed as impaired under Section 303(d) of the Clean Water Act. A well exists on the site, but it has not been used by the existing chip and grind facility, nor will it be used by the proposed project.

Impacts:

The project would have a ***less than significant*** effects on hydrology.

Mitigation Measures:

None.

Degradation of Water Quality/Violation of Standards

Would the project:
a) Violate any water quality standards, conflict with water quality objectives, fail to meet waste discharge requirements, significantly degrade any surface water body or groundwater, or adversely affect the beneficial uses of such waters, including public uses and aquatic, wetland and riparian habitat?
f) Result in a significant increase in pollutant discharges to receiving waters (marine, fresh, and/or wetlands) during or following construction (considering water quality parameters such as temperature, dissolved oxygen, turbidity, and typical stormwater pollutants such as heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash)?

The proposed project will prevent discharges to waters through internal drainage and retention of stormwater on-site through use of a stormwater pond and 1-foot perimeter berm. The project will retain stormwater on-site through use of a stormwater basin with an additional 1-foot perimeter berm. The stormwater basin was designed as a retention basin for a 24-hour, 25-year design rain event, with a total capacity of over 360,000 gallons. The retention basin would be completed with a machine-compacted, native clay-lined bottom. The basin is located at an elevation of approximately 60 feet above the surrounding valley. According to the Natural Resources Conservation Service (**Figure 9**, Soils Map), the project stormwater pond is located on the Altamont clay soil unit (moderately deep, 30 to 45 percent slopes, eroded). According to the USDA soil data, these soils have moderate water holding capacity (USDA 1966; p.13); with an 11.56 inch net actual evaporation (precipitation minus annual evaporation) [USDA 1966; p. 9]. The stormwater pond sizing, the lining, the dense natural clay soils and the significant height above the surrounding terrain would all protect groundwater quality.

Furthermore, the facility is defined as a Tier I facility by the State Water Resources Control Board, as defined by the proposed Project's green material feedstock. In accordance with General Order WQ 2015-0121-DWQ, "new composting operations that proposed to begin operating after adoption of this General Order, are required to seek coverage by submitting a complete NOI, including the appropriate filing fee

(Cal. Code Regs., tit. 23 § 2200), and a technical report including, but not limited to, information requested in Attachment D to the Regional Water Board. The NOI, filing fee and technical report must be submitted within one year of adoption of the General Order. The technical report shall include a proposed schedule for full compliance and must be as short as practicable but may not exceed 6 years from the date of the NOI" (SWRCB 2015, p. 8). Therefore, following approval of the proposed Project, the project applicant will apply for coverage under Order WQ 2015-0121-DWQ "General Waste Discharge Requirements for Composting Operations." The potential impact on water quality is considered to be ***less than significant***.

Groundwater Supplies and Recharge

Would the project:
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

A well exists on the site, however, it is not intended to be the water supply for the proposed project, and instead trucked water will be used, as the chip and grind facility currently uses. The project will retain stormwater on-site through use of a stormwater basin with an additional 1-foot perimeter berm. The proposed project is considered to have ***no impact*** on groundwater resources.

Alteration of the Existing Drainage Pattern/ Exceed Storm Drainage Capacity and Flooding/ Increase Impairment

Would the project:
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
d) Substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site (i.e. within a watershed)?
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems due to changes in runoff flow rates or volumes?
g) Result in an increase in any pollutant for which a water body is listed as impaired under Section 303(d) of the Clean Water Act?
h) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
i) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?
j) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
k) Inundation by seiche, tsunami, or mudflow?

There are no streams or rivers, wetlands, or other drainageways in the project area. There are no wetlands indicated on the National Wetlands Inventory, and no historic perennial or ephemeral streams shown near the site on the USGS Altamont Quadrangle Map. There are no levees or dams on-site or in the vicinity. There are no 303(d) listed streams near the site. The site is vacant and appears to have been graded. The project is over 0.5 miles from the nearest floodplain, and the proposed project area is located within Zone X, meaning it is within an "area of minimal flood hazard" (FEMA 2015). The proposed project will retain stormwater on-site through use of a stormwater pond and 1-foot perimeter berm. The project will not construct housing. The area is not located on steep slopes or near a body of water, and so there is no potential for inundation by seiche, tsunami, or mudflow. Therefore, there is considered to be ***no impact*** related to flooding or inundation, on- or off-site.

10. LAND USE AND PLANNING Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Physically divide an established community.				×
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				×
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				×

Setting:

The County General Plan sets goals and policies for Alameda County and designates its General Plan Land Use categories. In 2000, County voters passed a County-wide initiative known as "Measure D." The voter-approved initiative is intended to "preserve and enhance agriculture and agricultural lands, and to protect the natural qualities, the wildlife habitats, the watersheds and the beautiful open spaces of Alameda County from excessive, badly located and harmful development" (Alameda County 2000, p. ii). Measure D revised the County Urban Growth Boundary and amended the ECAP. The project area is located on a site within this ECAP area and has a Large Parcel Agriculture land use designation (Alameda County 2000, Land Use Diagram). As indicated above, the project area is zoned "A" (Agricultural), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). The facility requires an EA Notification under the Central Local Enforcement Agency (LEA) Tiered Regulatory Placement chart (CalRecycle, 2012). Therefore, the project applicant will apply to the Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan. The applicant shall notify the Enforcement Agency of its intent to operate in writing prior to commencing operations. This written notification shall include the filing requirements stated in Title 14, Section 18103.1.

Impacts:

The project would have ***no impact*** on land use or planning.

Mitigation Measures:

None.

Physical Division of Community / Land Use Compatibility

Would the project:
a) Physically divide an established community?

The proposed project would not physically divide an established community. The 151,200-square-foot project area is located in the east end of the Livermore Valley, an unincorporated area characterized by industrial uses near Greenville Road with open space and agricultural uses to the east and south. Because the proposed project area is not located within an existing community, no established community will be physically divided as a result of this project. Therefore, there is ***no impact*** in this regard.

Land Use Plan or Policy Conflict

Would the project:
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

ECAP General Plan: The project area is located in the east end of the Livermore Valley. This unincorporated area is characterized by industrial uses near Greenville Road and agricultural uses to the east and south. Under the ECAP, its General Plan Land Use Designation is Large Parcel Agriculture (Alameda County 2000, Land Use Diagram). Under the provisions of the Measure D Initiative, this designation permits agricultural uses, agricultural processing facilities (for example wineries, olive presses), limited agricultural support service uses (for example animal feed facilities, silos, stables, and feed stores), secondary residential units, visitor-serving commercial facilities (such as tasting rooms, fruit stands, bed and breakfast inns), recreational uses, public and quasi-public uses, solid waste landfills and related waste management facilities, quarries, windfarms and related facilities, utility corridors, and similar uses. Because the proposed composting facility use is considered to be included within the listed land use "related waste management facilities, it is considered to be in accord with the "Large Parcel Agriculture" land use category" (Alameda County 2000, p. 47, paragraph 3).

General Plan Policies: The ECAP policies relevant to the proposed project are provided below. The project adheres to the ECAP policy direction by reducing solid waste with a facility that provides environmentally-safe transformation of chipped, ground green material to compost in a large-parcel agricultural area, while meeting the required criteria for an agricultural support service use within a Large Parcel Agriculture area.

- Policy 78: In areas designated Large Parcel Agriculture, the County shall permit agricultural processing facilities (for example wineries, olive presses) and limited agricultural support service uses that primarily support Alameda County agriculture, are not detrimental to existing or potential agricultural uses, demonstrate an adequate and reliable water supply, and comply with the other policies and programs of the Initiative.
- Policy 79: The County shall require any proposal for agricultural support service uses within areas designated "Large Parcel Agriculture" or "Resource Management" to meet at a minimum the following criteria:
  - The project will not require the extension of public sewer or water.
  - The project will not detract from agricultural production on-site or in the area.
  - The project will not create a concentration of commercial uses in the area.
  - The project is compatible with and will not adversely affect surrounding uses.
- Policy 248: The County shall promote use of solid waste source reduction, recycling, composting, and environmentally-safe transformation of wastes.
- ECAP Definition - Solid Waste Facilities: These include a solid waste transfer station or processing station, a composting facility, a co-composting facility, a transformation facility, and a disposal facility.

Zone District: Project site is zoned "A" (Agricultural), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035).

Summary: Because the proposed project land use fits its ECAP land use category, meets relevant policies and is zoned to allow outdoor storage of materials, the project would not conflict with applicable land use plans, policies or regulations. Therefore, there is ***no impact***.

Conservation Plan

Would the project:
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

The project area is not subject to an adopted habitat conservation plan or a natural community conservation plan. The project area is subject to a conservation plan, the East Alameda County Conservation Strategy (EACCS) released in May 2011 (EACCS 2011, p. 1). The project area is located within Conservation Zone 9 of the EACCS (EACCS 2010, Figure 3-1). RLF critical habitat is located 0.25 miles west of the project area, and CTS critical habitat is located approximately 0.4 miles to the west-northwest of the proposed project, but there is no critical habitat for any species located within the project area. The proposed project area does not contain suitable habitat for RLF or CTS due to the highly compacted site, current use of the area for equipment storage, lack of cover, lack of food sources, and lack of wetland characteristics. Additionally, project activities would not affect the steeply downgradient off-site habitat RLF and CTS habitat areas. Therefore, the project would have ***no impact*** related to conflict with any applicable habitat conservation plan or natural community conservation plan.

11. MINERAL RESOURCES Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x

Setting:

The Alameda County General Plan (ECAP) does not identify any regionally or locally-important mineral resources in the proposed project area or within its vicinity. The Department of Conservation Designated Area Update for the Altamont quadrangle also does not define any mineral resources (USGS 1996).

Impacts:

The project would have ***no impact*** on mineral resources.

Mitigation Measures:

None.

Mineral Resources

Would the project:
a) Result in the loss of availability of a known mineral resource?
b) Result in the loss of availability of a locally important mineral resource?

Geology and soils at the site do not indicate the potential for valued mineral resources to be present. Therefore, there is ***no impact*** in this regard.

12. NOISE Would the project result in:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				×
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				×
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				×
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				×
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				×
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				×

Setting:

As detailed in the Project Description, Vision Recycling proposes to operate a compost facility near its existing chip and grind facility. The approximately 151,200-square-foot project site is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the I-580 freeway. There would be no increase in the number of employees working at the site, and there are no residential uses existing or planned for the project area or the area around it. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions.

The existing land use in the vicinity of the project area to the northeast is largely industrial in nature, with ongoing access by semi-trailers and use of heavy equipment including grinders. West of the site is Greenville Road, a four-lane arterial that connects with I-580 about one-half mile north of the project area. Vacant open space occupies the area to the south and west of the site. The nearest residence is the lessor, the adjacent 125-acre Mills Ranch property. There are no schools, hospitals or other sensitive noise receptors within the project vicinity.

Impacts:

The project would have ***no impact*** on noise or vibration.

Mitigation Measures:

None.

Construction and Operational Noise or Vibration

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction of the compost facility would generate temporary noise at the site. Operational noise would be would be associated with operation of the blowers for forced aeration of the Phase 1 compost pile. Approximately 3 vehicle trips per weekday would occur to perform daily pile inspections and deliver green material feedstock and/or remove finished compost. Weekend traffic to the compost facility would be minimal. Given these minimal noise sources, the existing industrial and open space land uses, the absence of sensitive receptors in the area, and the rapid, logarithmic fall-off in sound levels over long distances, ***no impact*** would occur related to construction or operational noise.

Airport or Private Airstrip

Would the project result in:

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The site is not located within two miles of a public airport or private airstrip, therefore, there is ***no impact*** from noise from aircraft operations.

13. POPULATION AND HOUSING Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
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?				×
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				×

Setting:

As detailed in the project description, Vision Recycling proposes to operate a compost facility near its existing chip and grind facility. The approximately 151,200-square-foot project area is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the I-580 freeway. There would be no increase in the number of employees, because the compost facility would be serviced by one of the chip and grind facility's existing employees. There are no residential uses existing or planned for the project area or the area around it.

Impacts:

The project would have no effect on population or housing.

Mitigation Measures:

None.

Population Inducement

Would the project:
a) Induce substantial population growth in a manner not contemplated in the General Plan?

The proposed project area is vacant and appears to be graded. The project would be managed by personnel from the existing chip and grind facility, resulting in no population growth related to new employment from the proposed project. There will be no extension of roads or other infrastructure for the proposed project. The project would have ***no impact*** related to inducing population growth.

Displacement of Housing and/or People

Would the project:
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere in excess of that contained in the City's Housing Element?
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere in excess of that contained in the City's Housing Element?

The project area, in an unincorporated area of Alameda County, is currently zoned Agricultural (A), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). No

change to the existing A zoning on the site is proposed. There are no residential uses existing or planned for the project area or the area around it. Therefore the project would not displace existing housing or people and ***no impact*** would occur.

14. PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Fire protection?				×
b) Police protection?				×
c) Schools?				×
d) Parks?				×
e) Other public facilities?				×

Setting:

As more fully detailed in the project description, Vision Recycling proposes to operate a composting facility in an existing industrial/rural area. The approximately 151,200 square-foot project site is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the I-580 freeway. The project site is located near the existing Vision Recycling chip and grind facility, which is on a site that has been used for over 20 years for similar wood and green material processing, in an area zoned for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). There would be no increase in the number of employees, because the compost facility would be serviced by one of the chip and grind facility's existing employees. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions. There are no residential uses existing or planned for the project site or the area around it.

Impacts:

The project would have ***no impact*** on public resources.

Mitigation Measures:

None.

Public Services

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

a) Fire protection?
b) Police protection?
c) Schools?
d) Parks?

e) Other public facilities?

Fire protection in the project area is provided by Alameda County Fire Department (ACFD). The nearest station is Station 20, located south of the project at 7000 East Avenue, in building 323 on the Lawrence Livermore National Laboratory site, Livermore, California. Fire protection resources response is based on Automatic Vehicle Locator (AVL) in Livermore Valley. Therefore, the closest unit, including Livermore and Pleasanton resources, responds based on their location. The project will be designed to adhere to its own set of conditions of approval established by AFCD, described above in the project description (AFCD 2014). The project would not create demand for fire protection services that would result in the need for new or physically altered fire protection facilities.

Law enforcement in the project vicinity is provided by the Alameda County Sheriff's Department from the Pleasanton Substation located at 5672 Stoneridge Drive, Pleasanton, CA. Assistance is also provided by the City of Livermore Police Department located at 1110 South Livermore Avenue, Livermore, CA.
The project area is also served by the Livermore Valley Unified School District and the East Bay Regional Park District. No other public facilities are located in the project area.

The project would not result in a significant increase in demand for public services, and it would not create a need for new physical facilities or significantly affect the ability of service providers to maintain current levels of service. There are ***no impacts*** related to fire protection, police protection, schools, parks, or other public facilities.

15. RECREATION Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Setting:

As detailed in the project description, Vision Recycling proposes to operate a compost facility near its existing chip and grind facility. The approximately 151,200-square-foot project area is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the I-580 freeway. There would be no increase in the number of employees, because the compost facility would be serviced by one of the chip and grind facility's existing employees. There would be no residential uses developed in the project area.

Impacts:

The project would have ***no impact*** on recreation.

Mitigation Measures:

None.

Accelerated Physical Deterioration of Facilities

Would the project:
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

There are no residential uses existing or planned for the project area or the area around it. The City of Livermore Parks Department and the East Bay Regional Park District provide recreational services in the project area; however there are no City Park or District facilities located near the project area. The proposed composting activities in the project area would have ***no impact*** on recreational resources, including neighborhood or regional parks**.**

Effect of New or Expanded Facilities

Would the project:
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed above, the project does not include recreational facilities, nor would it require the construction or expansion of City of Livermore or East Bay Regional Park District facilities. Therefore, there would be ***no impact***.

16. TRANSPORTATION Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			x	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			x	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				x
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				x
e) Result in inadequate emergency access?				x
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				x

Setting:

The project site would be accessed in the same manner as the existing nearby chip and grind facility: from Greenville Road via an unnamed access road that services the Mills Ranch. Vehicles exiting the Mills Ranch onto Greenville Road are limited to right-turn only, as indicted by existing traffic signs.

The following traffic and circulation BMPs are applied at the existing chip and grind Vision facility, and would be applied to the proposed project because both the existing and proposed facilities would share the same entrance:

1. A notice is posted at the entry gate that all vehicles must turn right, and yield as necessary, when re-entering Greenville Road.
2. If at any time the facility operators identify traffic congestion at the entrance to Greenville Road from the project activities they will direct traffic to park in the existing turn-around area to the south of the facility entrance until traffic conditions improve.

Impacts:

A screening-level traffic analysis was performed for the proposed project (BSK 2015d, included as **Appendix D** to this document). This analysis examined the extent of potential traffic impacts from the proposed project. The analysis indicated that the project would result in approximately 1.6 vehicle new trips per weekday on public roadways. This is not a sufficient amount to create Level of Service (LOS) deficiencies, or significantly impact local roadways. The project also will not impact air traffic patterns, increase traffic hazards, hamper emergency access, or conflict with public transit, bicycle, or pedestrian facilities. Therefore, the project's impact would be ***less than significant.***

Mitigation Measures:

None.

Traffic Plans and Congestion Management

Would the project:
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The construction of the proposed project requires minor ground disturbance and grading and is not anticipated to generate significant traffic. Regarding project operations, there will be no compost sales anywhere on the Greenville Road Vision facility site, including both the existing chip and grind operation and the proposed compost facility, and so no new passenger vehicle or retail customer traffic would be generated by the proposed project. The project would be managed by personnel from the existing chip and grind facility. Because the proposed project does not entail the hiring of new or additional employees, and employees inspecting the compost project and turning piles would use an existing access road on the facility grounds, the project would not generate any new employee traffic on public roadways. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions, and so no new traffic would be generated from deliveries to the chip and grind facility. Green material feedstock for the proposed project would come only from the nearby existing chip and grind operation. The transport of this feedstock would generate an estimated 156 internal truck trips per year (BSK 2015d, p. 2). These trips would be internal to the Vision Recycling facility site using an existing access road on the facility grounds, and so they would not impact Greenville Road or I-580 (BSK 2015d, p. 2). Approximately 406 off-site weekday truck trips per year, approximately 1.6 per weekday, would be generated for purposes such as taking finished compost to customers or to Vision facilities in other areas (BSK 2015d, p. 3). Weekend off-site trips would be minimal (BSK 2015d, p. 3). The proposed project's contribution of approximately 1.6 vehicle trips per weekday to local roadways is not a sufficient amount to create Level of Service (LOS) deficiencies, or significantly impact local roadways. Therefore, the project's impact would be ***less than significant***.

Air Traffic Patterns

Would the project:
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project would not erect tall structures, install bright lights, lead to an increase in the number of people in the project vicinity, or have other characteristics that would result in a change in air traffic patterns. Therefore, the project would have ***no impact***.

Site Access, Circulation and Hazards

Would the project:
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
e) Result in inadequate emergency access?

Access to the Project would be from Greenville Road, a 4-lane roadway. The roadway is generally straight as it approaches and leaves the project frontage, affording good sight distance in both directions. Vehicles exiting the Mills Ranch onto Greenville Road are limited to right-turn only. The Project would have no effect on the performance or safety of road facilities. As a condition of approval by the Alameda County Fire Department (ACFD), all access routes in the Project Area will be required to be all-weather and certified by an engineer that they will support the load of a 75,000 lb piece of apparatus. (D102.1, Appendix-D CFC) (AFCD 2014). The project would have ***no impact*** related to increased traffic hazards or inadequate emergency access.

Alternative Transportation and Transit

Would the project:
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The proposed project would not conflict with any adopted policies, plans, or programs supporting alternative transportation. The project area is located in an unincorporated area that is consistent with applicable plans and policies for land use and transportation in that part of Alameda County. Therefore, there would be ***no impact*** with regard to conflicts with adopted plans and policies or programs related to public transit, bicycle or pedestrian facilities.

17. UTILITIES AND SERVICE SYSTEMS Would the project:	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				×
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				×
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			×	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				×
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				×
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				×
g) Comply with federal, state, and local statutes and regulations related to solid waste?				×

Setting:

The project area is located near the existing Vision Recycling chip and grind facility, which is on a site that has been used for over 20 years for wood and green material processing, in an area zoned for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). The existing chip and grind facility uses an existing grey water hydrant for operations.

As is more fully detailed in the project description, Vision Recycling proposes to operate a composting facility in an existing industrial/rural area. The approximately 151,200-square-foot project area is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the I-580 freeway. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions.

Impacts:

The Project would have ***no impact*** on utilities or service systems.

Mitigation Measures:

None.

Wastewater Collection, Treatment and Disposal

Would the project:
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the providers' existing commitments?

There is no public wastewater service or septic system in the project area or planned for development. One employee will service the site, but will only visit the facility to perform daily inspections and move piles when necessary. Employee time at the site will be minimal. Portable toilet facilities are currently provided for employees of the existing chip and grind facility. The employee assigned to the composting facility would spend most of his/her time at the existing chip and grind facility and would use the portable toilet facilities there. ***No impact*** would occur related to wastewater treatment requirements, service capacity or other wastewater impacts.

Storm Drainage Facilities

Would the project:
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Surface flow on the site would drain from the northeast to the southwest, and would be directed to the proposed stormwater pond in the southwest corner of the project site (see **Figure 3**, Project Area Plan). The perimeter of the project site would be bermed to a height of approximately 1 foot, designed to prevent run-on and run-off of stormwater. A ***less than significant impact*** related to storm drainage capacity or systems would occur.

Water Supply

Would the project:
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

There is no public water supply in the project area or planned for development. A well exists on the site, but it has not been used by the existing chip and grind facility, nor will it be used by the proposed project. Water to be used for dust control and for wetting of compost piles would be provided by the chip and grind facility's water truck, which would be filled from the existing grey water hydrant currently used by the existing chip and grind facility. Water for fire protection would be provided to the proposed Project by an on-site 10,000 gallon tank (see **Figure 3**, Project Area Plan). Water for this tank would come from the existing grey water hydrant an off-site hydrant located off-site along Greenville Road, and water from the hydrant would be transported to the tank by the chip and grind facility's water truck. The project would use approximately 288,000 gallons of grey water per year.

One employee will service the site, but will only visit the facility to perform daily inspections and move piles when necessary. Therefore, no on-site drinking water supply will be needed. Water for this employee will be available at the existing chip and grind facility, which provides employee drinking water through a commercial provider in 5-gallon bottles. There are sufficient water supplies available to serve the project from existing resources, and ***no impact*** related to water supplies would occur.

Solid Waste Management

Would the project:
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
g) Comply with federal, state, and local statutes and regulations related to solid waste?

Solid waste and food waste will not enter the site. The only material entering the site will be green material feedstock, which consists of green material from the existing chip and grind facility. This green material consists of wood chips, mulches, soil amendment, and co-generation fuel. Any solid waste incidentally generated at the existing chip and grind site is limited to small amounts of non-green materials inadvertently brought to the facility, which are separated from wood materials prior to chipping, and subsequently transported to a licensed Alameda County landfill. In the event solid waste or food waste was inadvertently brought to or generated at the proposed compost facility, it would be removed by the compost facility employee and transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard 65 gallon container. The Project would comply with all federal, state and local statutes and regulations related to solid waste. Additionally, the proposed project would supports local activities required to comply with local, state, and federal regulations associated with the reduction, diversion, and recycling of waste and diversion of waste from landfills. For example, the Alameda County Community Climate Action Plan includes a goal to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. The project would result in ***no impact*** to waste disposal law violations, waste handling, regulations or landfill capacity.

18. MANDATORY FINDINGS OF SIGNIFICANCE	YES: Potentially Significant Impact	NO: Less Than Significant With Mitigation	NO: Less Than Significant Impact	NO: No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				x
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			x	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				x

Impacts:

The Project would have ***less than significant*** effects on cumulative impacts, and ***no impact*** upon other mandatory findings of significance.

Mitigation Measures:

None.

Quality of the Environment

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The proposed compost facility project would be operated on an Alameda County site that is currently part of a chip and grind facility that does not support sensitive plant or wildlife species. As described in the text above, operations would not significantly impact the site or surrounding area. For this reason, the project would not substantially degrade the quality of the environment. There are no important examples of major periods of California's history or prehistory identified on the project site, and only minor grading is anticipated. The project would have ***no impact***.

Cumulatively Considerable Impacts

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The project would have a slight incremental cumulative impact on GHG levels. The GHG analysis determined that these impacts will be less than significant. Therefore, when viewed in connection with the effects of past projects and other current projects, these effects are considered ***less than significant***.

Adverse Affects on Human Beings

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The project would not result in any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. The project would have ***no impact***.

E. REFERENCES

Alameda County. 2014a. Alameda County Code of Ordinances. Title 17, Chapter 17.06 A Districts as amended to present, 2014 (available at https://library.municode.com/index.aspx?clientId=16425; web accessed July 25, 2014).

Alameda County 2014b. Alameda County (Unincorporated Areas) Community Climate Action Plan. Available at http://www.acgov.org/cda/planning/generalplans/documents/110603_Alameda _CCAP_Final.pdf, web accessed June 10, 2015.2014.

Alameda County. 2013a. Vision Recycling Chip and Grind Facility Initial Study/Negative Declaration. Prepared by BSK Associates, February 4, 2013.

Alameda County. 2013b. Vision Recycling Chip and Grind Facility Addendum to Initial Study/Negative Declaration. Prepared by BSK Associates, August 16, 2013.

Alameda County. 2000. East County Area Plan (ECAP), revised by initiative Nov. 2000 (available at http://www.acgov.org/cda/planning/generalplans/documents/EastCountyAreaPlancombined.pdf; web accessed July 24, 2014).

Alameda County. 1966. Scenic Route Element of the General Plan. May, 1966. Amended May 5, 1994.

Alameda County Fire Department (AFCD). 2014. Letter to Alameda County Community Development Agency: Conditions of Approval for PLN 2014-00021, Conditional Use Permit to allow a composting facility. March 10, 2014.

Bay Area Air Quality Management District (BAAQMD). 2012. California Environmental Quality Act Air Quality Guidelines, updated May 2012.

BAAQMD 2009a. Staff-Recommended CEQA Thresholds of Significance Table .

BAAQMD 2009b. Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance.

BAAQMD 1999. BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans. December, 1999.

BSK Associates (BSK). 2015a. Visual Impact Analysis, Vision Recycling Compost Facility Project, Alameda County, California. March 18, 2015.

BSK Associates (BSK). 2015b. Proposed Vision Recycling Compost Facility Air Quality and Greenhouse Gas Study, Alameda County, California. June 10, 2015.

BSK Associates (BSK). 2015c. Proposed Vision Recycling Compost Facility Biological Study, Alameda County, California. June 11, 2015.

BSK Associates (BSK). 2015d. Proposed Vision Recycling Compost Facility Traffic Analysis, Alameda County, California. June 12, 2015.

California Natural Diversity Database (CNDDB) 2015. Query Results for project area quadrangle, accessed February 2015. Biogeographic Data Branch, Department of Fish and Wildlife, Sacramento, CA.

California Department of Pesticide Regulation. 2005. Fact sheet – Fight the Bite! Protecting Outdoor workers, May 2005 (available at http://www.mosquitoes.org/downloads/Worker.pdf; web accessed July 25, 2014).

DTSC, 2014. Department of Toxic Substance Control (DTSC), EnviroStor database results for 30 Greenville Road, Livermore, CA (available at http://www.envirostor.dtsc.ca.gov/public/mapfull.asp?global_id=&x=-119&y=37&zl=18&ms=640,480&mt=m&findaddress=True&city=30%20Greenville%20Road,%20Livermore,%20ca&zip=&county=&federal_superfund=true&state_response=true&voluntary_cleanup=true&school_cleanup=true&ca_site=true&tiered_permit=true&evaluation=true&military_evaluation=true&school_investigation=true&operating=true&post_closure=true&non_operating=true; web accessed July 17, 2015).

East Alameda County Conservation Strategy (EACCS). 2011. East Alameda County Conservation Strategy Final Draft transmittal letter, May 27, 2011 (available at http://www.eastalco-conservation.org/documents/sc_transmittal_letter.pdf; web accessed August 8, 2014).

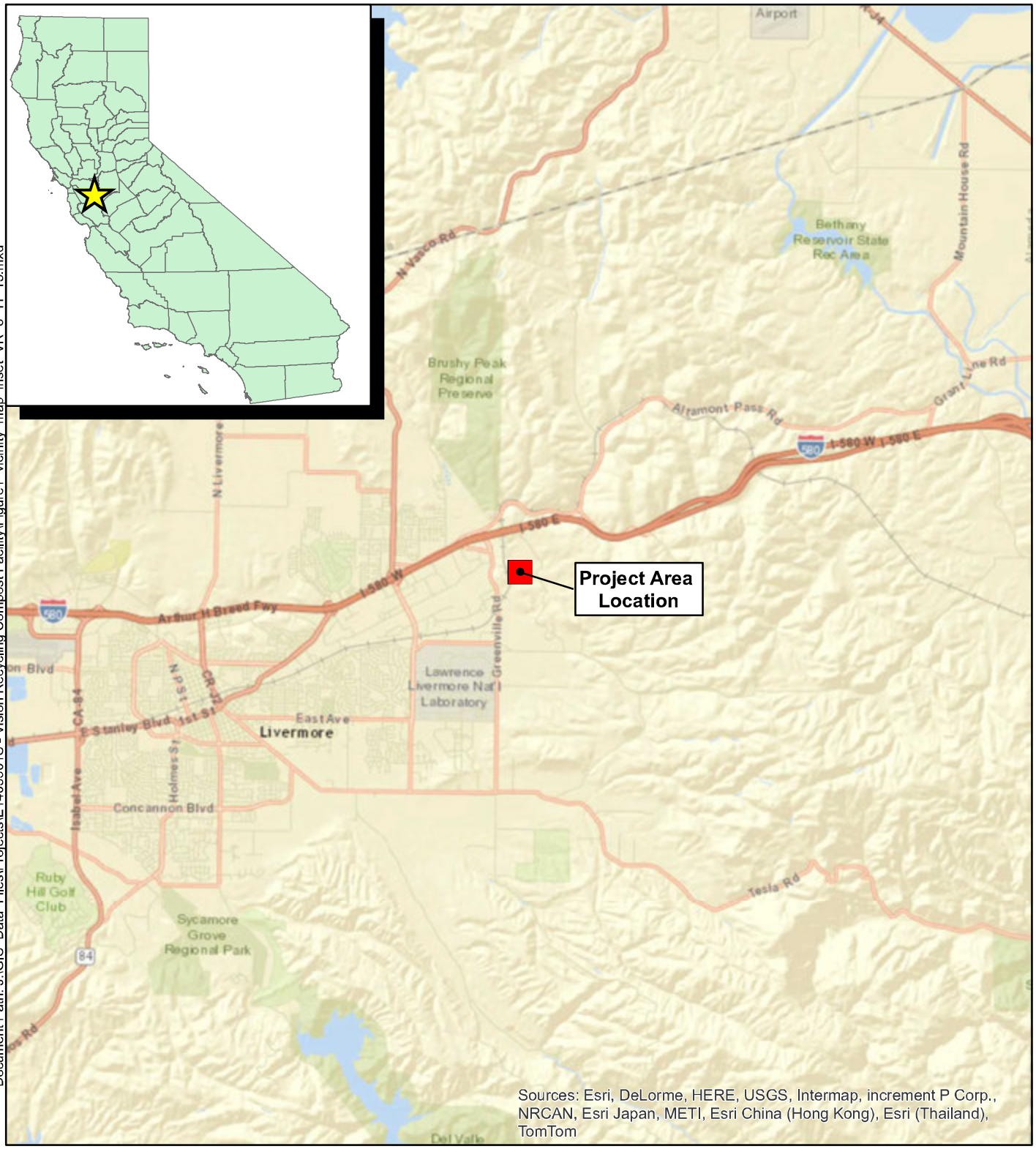
Federal Emergency Management Act (FEMA) 2015. Flood Zone Definition (available at: https://www.fema.gov/flood-zones) web accessed June 8, 2015.

United States Geological Survey. 1996. Designated Areas Updated, Altamont Quadrangle. (available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_96-03/OFR_96-03_Plate17.pdf) web accessed September 30, 2015.

F. BEST MANAGEMENT PRACTICES INCLUDED IN THE PROJECT AND AGREED TO BY THE PROJECT SPONSOR AND ALL SUBSEQUENT PROPERTY OWNERS AND PERMITTEES

No mitigation measures are required to reduce potentially significant impacts of the proposed project to a "Less Than Significant" or "No Impact" level. Best Management Practices and Operational Measures detailed in the project description shall be made conditions of approval for the project's Conditional Use Permit. These practices are described in Sections B and C on pages 8-13.

For every Best Management Practice and Operational Measure, the permittee will be responsible for implementation actions, schedule, funding and compliance unless otherwise stated in the project description.



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure1 vicinity map inset VR 6 11 15.mxd

Date Saved: 6/11/2015
By: KG

N
W E
S

0 1 2 4 Miles

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Figure 1 Vicinity Map BSK Project E1405301S

Document Path: J:\GIS_Data_Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure2_Project_Sitet_VR_6_11_15.mxd

Date Saved: 6/11/2015
By: KG

N
W E
S

0 200 400 800 Feet

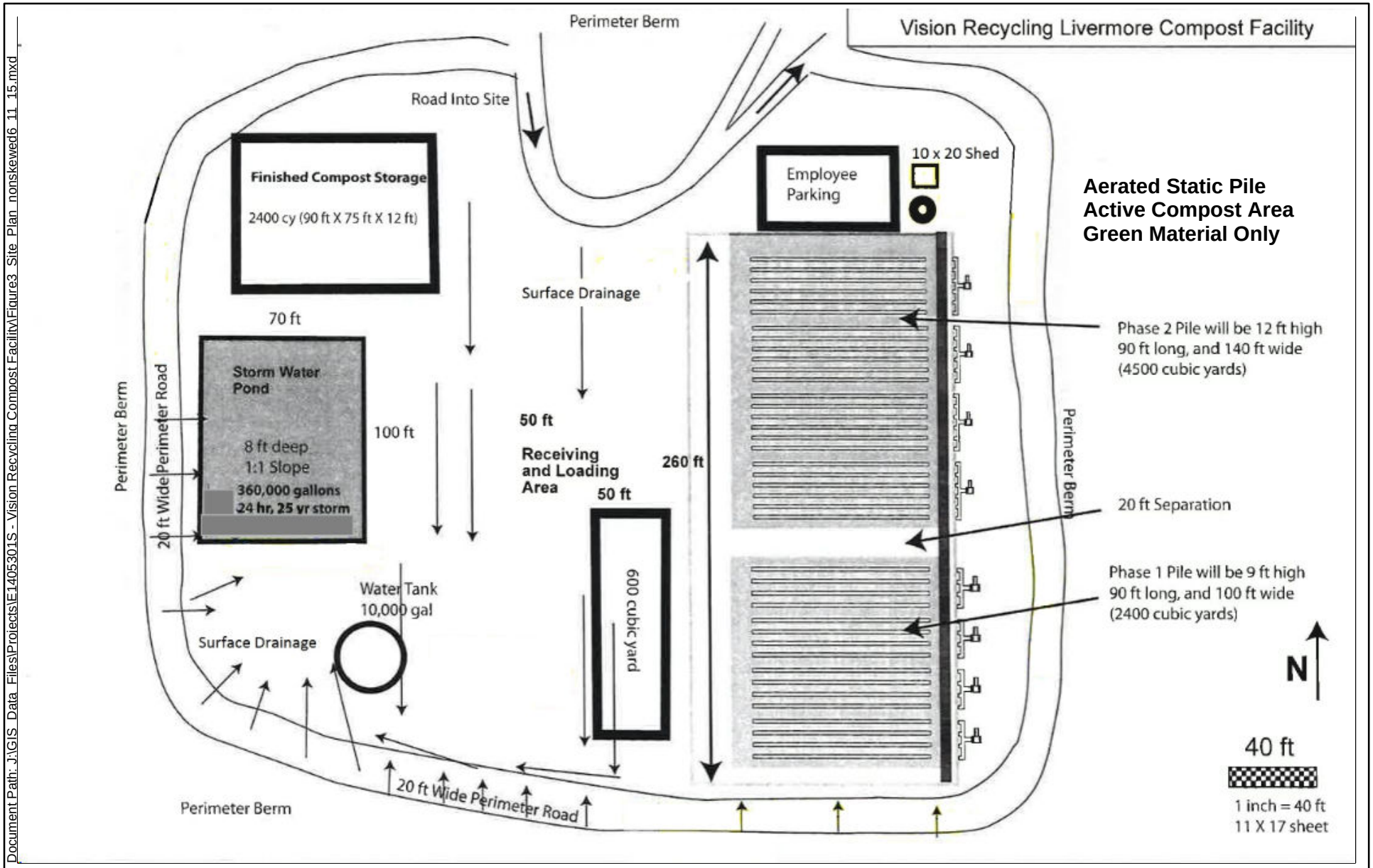
Legend

- Existing Access Road
- Existing Chip and Grind Facility
- Proposed Compost Facility

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 2
Project Area Map
BSK Project E1405301S



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure3 Site Plan nonskewed6 11 15.mxd

Date Saved: 7/17/2015

By: KG

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Figure 3 Project Area Plan BSK Project E1405301S

Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure4c Project Site9 1 15.mxd

Date Saved: 9/1/2015
By: KG

*All locations are approximate.

N
W E
S

0 250 500 1,000 Feet

Legend

- Proposed Compost Facility
- Photo Vantage Points

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 4a
Photo Vantage Points
BSK Project E1405301S

Photo 1: View from edge of project area looking northwest towards Interstate 580. (V-1)

Photo 2: View looking northwest from center of project area. (V-2)

BSK Associates Engineers & Laboratories	Site Photographs Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Date Taken: 2/9/2015 Figure 4b PROJECT: E1405301S

Photo 3: View of project area. Looking southwest from edge of project area. (V-3)

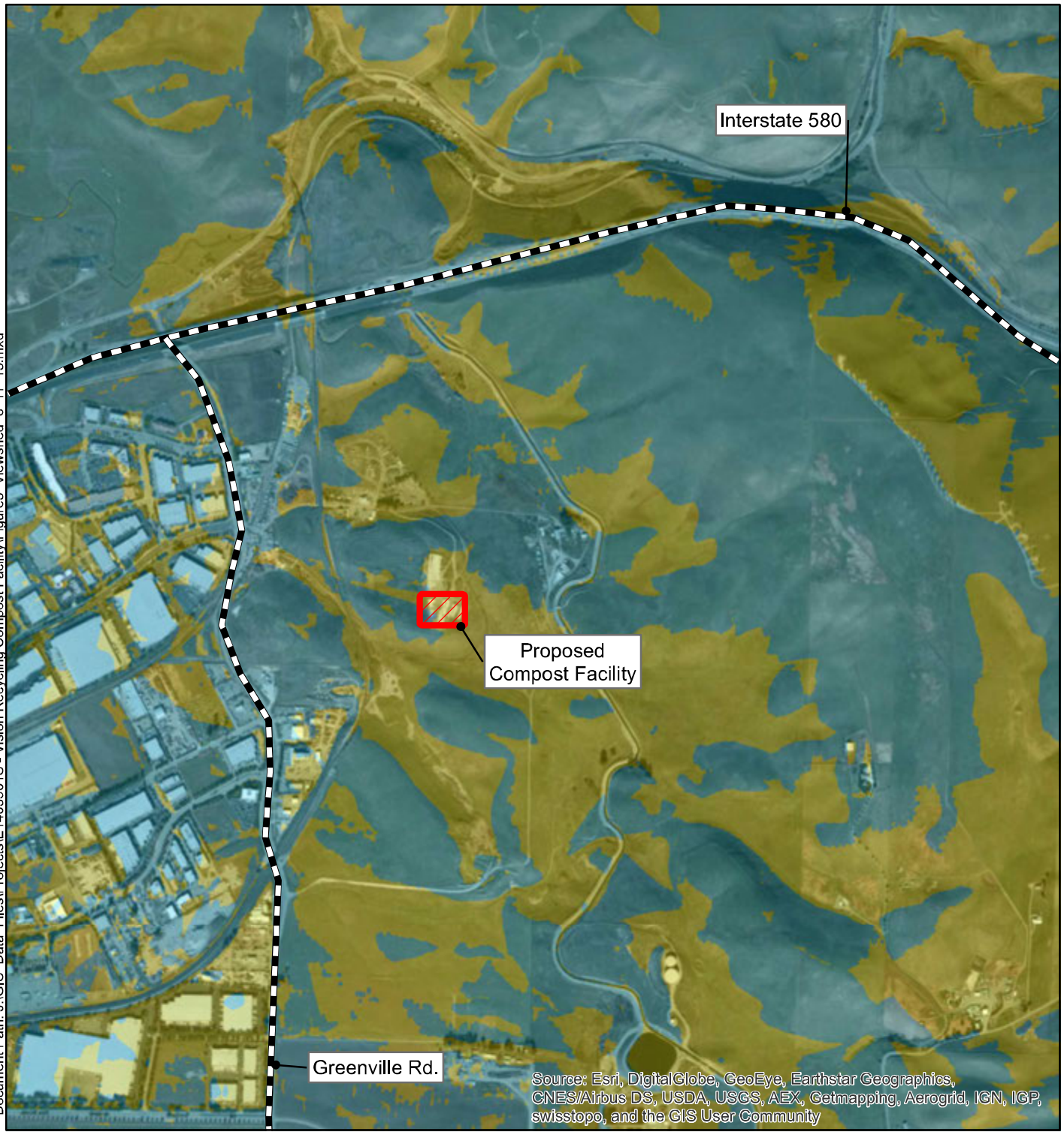
Photo 4: View looking northeast towards Interstate 580 from project area. (V-4)

BSK Associates Engineers & Laboratories	Site Photographs Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Date Taken: 2/9/2015 Figure 4c PROJECT: E1405301S

Photo 5: View from Interstate 580 looking southeast towards project area. View of project location is obstructed by hill. (V-5)

Photo 6: View from Interstate 580 looking south-southeast towards project area. View of project location is obstructed by hill. (V-6)

BSK Associates Engineers & Laboratories	Site Photographs Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Date Taken: 2/9/2015 Figure 4d PROJECT: E1405301S



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure5 Viewshed 6 11 15.mxd

*Data obtained from USGS National Elevation Dataset.

Date Saved: 6/11/2015
By: KG

N
W E
S

0 750 1,500 3,000 Feet

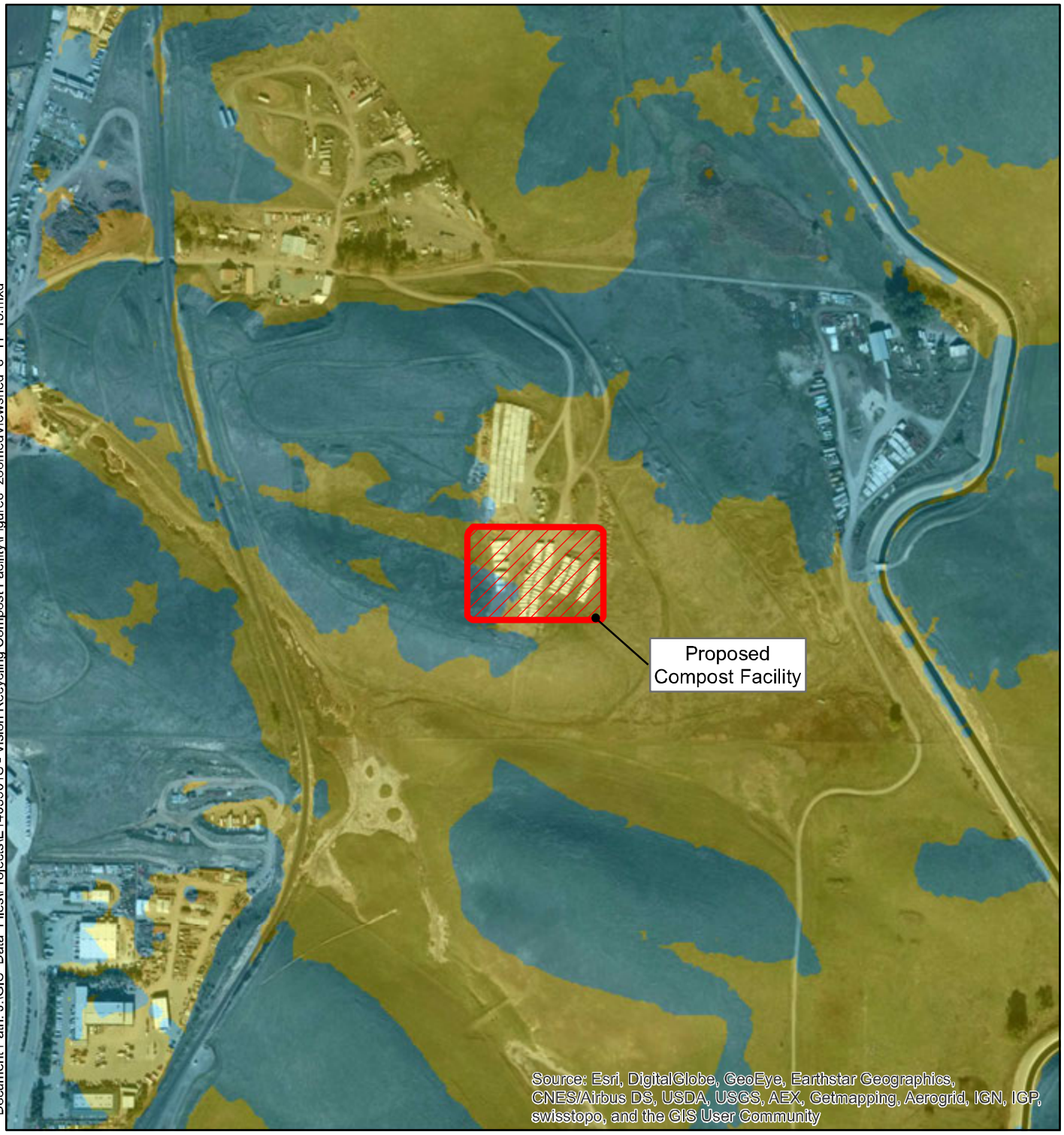
Legend

- Interstate 580 and Greenville Road
- Proposed Compost Facility
- Not Visible
- Visible

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 5
Viewshed GIS Analysis
BSK Project E1405301S



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure6 zoomedViewshed 6 11 15.mxd

Date Saved: 6/11/2015
By: KG

*Data obtained from USGS National Elevation Dataset.

N
W E
S

0 250 500 1,000 Feet

Legend

- Proposed Compost Facility
- Not Visible
- Visible

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 6
Viewshed GIS Analysis - Detail
BSK Project E1405301S

Document Path: J:\GIS_Data_Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure7_Project_Site_NWI_6_11_15.mxd

Date Saved: 6/16/2015
By: KG

N
W E
S

0 500 1,000 2,000 Feet

Legend

Proposed Compost Facility

WETLAND TYPE

Freshwater Emergent Wetland - Seasonal

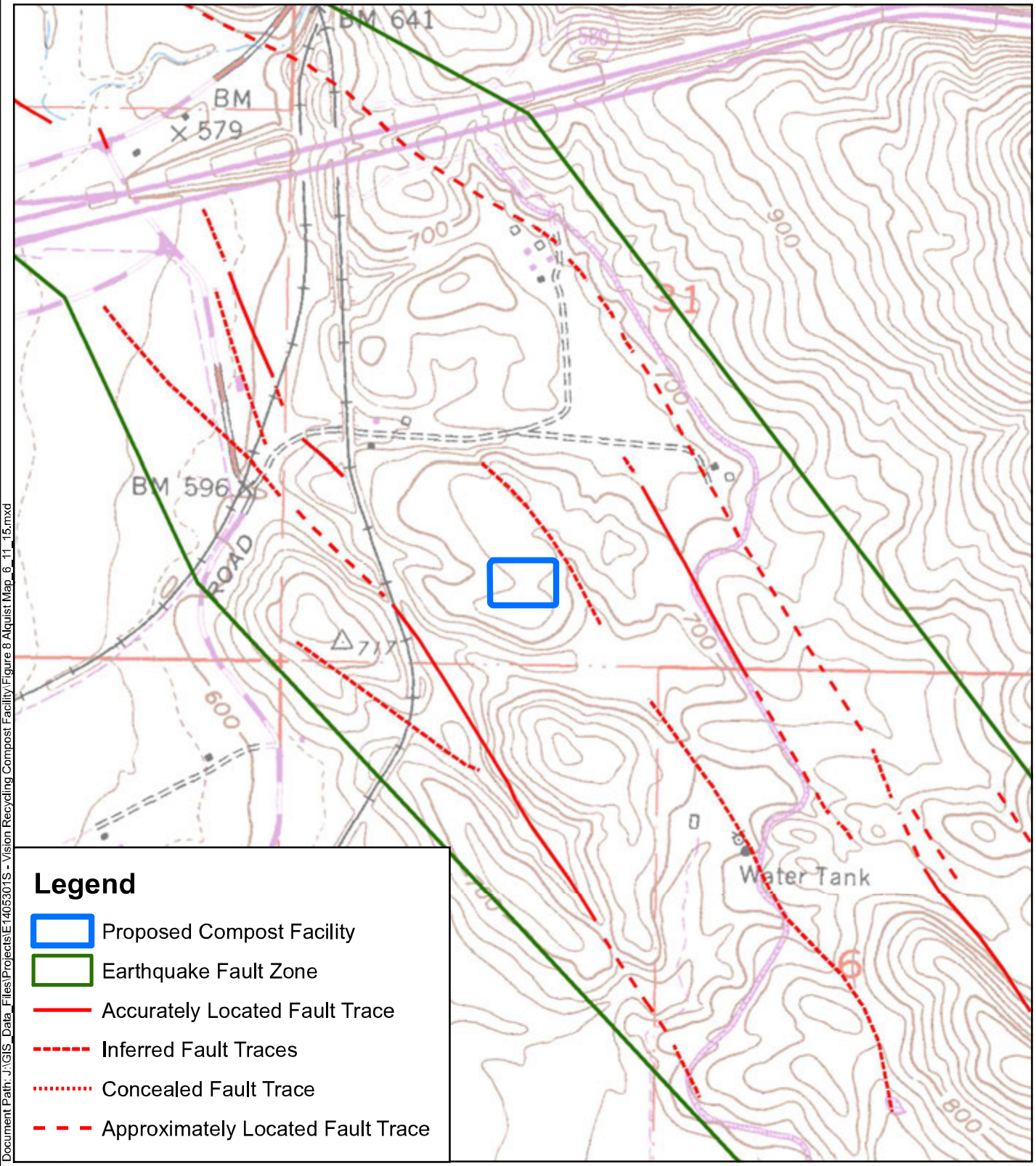
Freshwater Pond

Palustrine Seasonal Wetlands

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 7
National Wetland Inventory Map
BSK Project E1405301S



Document Path: J:\GIS_Data_Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure 8 Alquist Map_6_11_15.mxd

Date Saved: 6/11/2015
By: MBC

Alquist-Priolo source:http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm

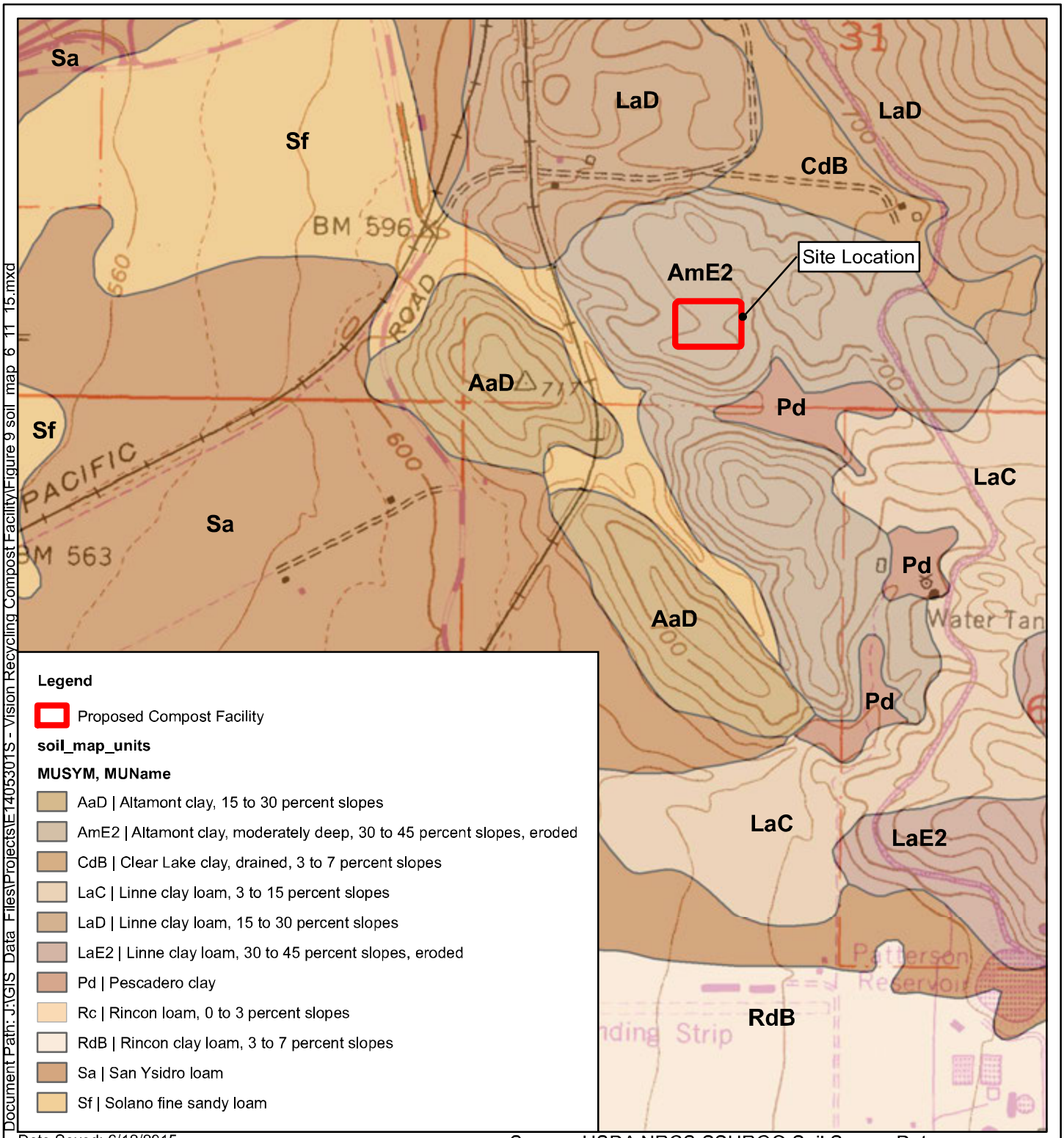
N
W E
S

0 250 500 1,000
Feet

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 8
Alquist-Priolo Fault Zones
BSK Project E1405301S



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure 9 soil map 6 11 15.mxd

Date Saved: 6/12/2015
By: KG

Source: USDA NRCS SSURGO Soil Survey Data
http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

N
W E
S

0 500 1,000 2,000 Feet

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 9
Soils Map
BSK Project E1405301S

APPENDIX A
VISUAL IMPACT ANALYSIS

BSK Associates Engineers & Laboratories
3140 Gold Camp Drive Suite 160
Rancho Cordova CA 95670
P 916.853.9293
F 916.853.9297
www.bskassociates.com

Technical Memorandum

Subject: Proposed Vision Recycling Compost Facility Visual Impact Analysis
Date: March 18, 2015
To: Vision Recycling
From: BSK Associates

This memorandum assesses the potential visual impacts that the Vision Recycling Compost Facility Project, herein referred to as "project," may have on the neighboring areas. This analysis explains the extent of potential visibility of the project to the neighboring areas, with the primary focus being Interstate 580 (I-580) and Greenville Road.

BACKGROUND

The proposed project is to construct an approximately 151,200-square-foot compost facility located approximately 0.6 miles south of I-580. The project area is located outside of the City of Livermore to the east in Alameda County. The project area terrain consists of hills of varying elevations. 1-580 is oriented east and west to the north of the project area. Greenville Road is oriented north and south to the west of the project area. These two roadways are the closest major roadways to the project area.

METHODS

BSK Associates (BSK) assessed the project location on February 9th, 2015. This investigation included traversing the project area by foot, walking the perimeter of the project area, and conducting a visual inspection analysis from I-580 and Greenville Road. BSK photographed from various locations along I-580, but was unable to see the project area from the highway (Photo Plate 1 and 2). The project area was obscured by hills, commercial buildings, and an existing separate recycling/salvage facility directly adjacent to Greenville Road. BSK also assessed the viewshed from Greenville Road. The southwestern corner of project area was visible from Greenville Road. This visibility was brief and only possible through a narrow gap between the neighboring hills.

From the project location looking outward, I-580 was not visible. Greenville Road was only visible through a narrow gap if standing in the southwestern corner of the site. Walking outside of the perimeter of the project area and up a small hill allowed small portions of I-580 and Greenville Road to come into view.

To complete the viewshed assessment, BSK performed a computer-based viewshed analysis using Geographical Information Software (GIS) software, ArcMap 10.3. This program creates a simulation of the area and the potential viewshed from various points or roads. The analysis was completed using I-580 and Greenville Road as the observation areas. Figure 2 and Figure 3 show locations that are visible from I-580 and Greenville Road. "Blue" locations are visible from either I-580, Greenville Road, or both, while "yellow" areas are not visible from those roads. Only a small portion of the southwestern corner of the project area was visible from Greenville Road (Figure 2 and Figure 3).

CONCLUSION

The viewshed analysis concluded that the proposed project area will not be visible to the majority of vantage points along I-580 and Greenville Road. The southwest corner of the project area will be visible from a small section of Greenville Road. The very limited visibility of the proposed project from surrounding roadways limits the exposure of the project to the public. Because of this very limited visibility, there is no need for screening measures for the proposed project.

LIMITATIONS

The analyses and recommendations submitted in this memorandum are based upon the data obtained from limited field investigation, software analysis, and site mapping. However, changes in the conditions of the project area can occur with the passage of time, whether caused by natural processes or the work of man, on this property or adjacent property. In addition, changes in applicable or appropriate standards may occur, whether they result from legislation, governmental policy, or the broadening of knowledge.

BSK has prepared this memorandum for the exclusive use of Vision Recycling (Client). The memorandum has been prepared in accordance with generally accepted practices which existed in northern California at the time the report was written. No other warranties either expressed or implied are made as to the professional advice provided under the terms of BSK's agreement with the Client and included in this memorandum.

Respectfully submitted,
BSK Associates

Erik Ringelberg
Natural Resources and Land Planning
Group Manager

Kevin Grove
Staff Scientist

Photo 1: View from Interstate 580 looking southeast towards project area. View of project location is obstructed by hill. (V-5)

Photo 2: View from Interstate 580 looking south-southeast towards project area. View of project location is obstructed by hill. (V-6)

Photo 3: View of project area. Looking southwest from edge of project area. (V-3)

Photo 4: View looking northeast towards Interstate 580 from project area. (V-4)

APPENDIX B
AIR QUALITY AND GREENHOUSE GAS STUDY

BSK Associates Engineers & Laboratories
3140 Gold Camp Drive Suite 160
Rancho Cordova CA 95670
P 916.853.9293
F 916.853.9297
www.bskassociates.com

Technical Memorandum

Subject: Proposed Vision Recycling Compost Facility Air Quality and Greenhouse Gas Study
Date: June 10, 2015
To: Alameda County
From: BSK Associates

The purpose of this memorandum is to provide a detailed analysis and description of the air quality and greenhouse gas (GHG) modeling used to identify and quantify emissions from the proposed Vision Recycling Compost Facility Project in Alameda County, California.

BSK Associates (BSK) calculated and assessed the project-related emission contributions of the project from construction and operational sources. The methods used were both state and Bay Area Air Quality Management District (BAAQMD) approved air quality models and analytical tools. The air quality and GHG emission analysis was completed using the California Emissions Estimate Model (CalEEMod) Version 2013.2. BSK assessed baseline air quality and GHG emissions within the area, and evaluated the criteria of significance set forth by the California Environmental Quality Act (CEQA) and the BAAQMD CEQA Guidelines. The analytical methods, assumptions, significance evaluation, and results are summarized below.

PROJECT SUMMARY

The construction of the proposed project requires minor ground disturbance and grading. The proposed project estimates approximately one (1) month of construction would occur. Once constructed, the proposed project is designed to be an aerobic composition facility to process residual "green" material from the nearby existing Vision Recycling chip and grind facility. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions. The project's composting process would utilize pressurized air from blowers to aerobically break down the material. Once complete, the finished compost would be delivered to one of four possible locations. These locations include delivery back to the Livermore Chip and Grind Facility (156 annual internal trips not using public roads), delivery to Vision Recycling's Newark Facility (approximately 26 miles away), to customers on the Northern San Francisco Peninsula (approximately 51 miles away), or to a biomass facility in Stockton (approximately 37 miles away). A watering truck would be used at least twice per day to suppress dust between during construction and as needed during operations. This memorandum analyzes the potential air quality and GHG emission impacts from the proposed project.

CalEEMod

To calculate the proposed project air quality and GHG emissions, BSK used the BAAQMD mandated CalEEMod Version 2013.2. This software allows the user to calculate proposed project air quality
and GHG emissions. While using this software, project-specific parameters are entered. When particular aspects of the project cannot be reflected in the model, or the information is unavailable, conservative assumptions are made to provide the most accurate results possible. These assumptions can be found within the CalEEMod report appended to this memorandum. It should be noted that due to the lack of a "compost facility" land use type within CalEEMod, the "general light industry" land use type was used for the proposed project. This land use type was chosen because its characteristics most accurately reflect the nature of the proposed project compared to the other types available in the CalEEMod software (CalEEMod 2013).

Furthermore, CalEEMod allows the user to change defaults within the program if site-specific information is supported with substantial evidence required by CEQA (CalEEMod 2013, p. 9). The CalEEMod modeling relied on default values based on BAAQMD data. These values influence the model's parameters including on-road vehicle emissions, trip lengths, water supply and treatment electricity use, solid waste disposal rates, amount of paved roads, days of landscaping equipment use, architectural coating emissions, and hearth usage (CalEEMod 2013, p. 11). Project-related assumptions were established via communications with Vision Recycling (Vision Recycling 2015).

One employee would service the site, but would only visit the facility to perform daily inspections and move piles when necessary. This employee's "home-to-work" vehicle trips were previously analyzed in the Initial Study/Negative Declaration for the existing Chip and Grind Facility (Alameda County 2013, pp. 56-59). As part of the proposed project, this employee would make trips between the existing chip and grind facility and the proposed compost facility to perform daily inspections and move piles, and these trips have been analyzed as part of the proposed compost facility traffic analysis. The employee would make approximately 250 inspections to the proposed compost project from the existing chip and grind facility per year (1 per weekday). This trip is approximately 0.5 miles each way.

Due to limitations within the CalEEMod model that do not allow for modeling of a single short vehicle trip, a conservative approach was taken to model internal trips between the existing chip and grind facility and the proposed project. The employee's internal trips were appended to the "Commercial-to-Work" class within CalEEMod. Trips entered into the model under this class include compost deliveries made to the existing chip and grind facility (approximately 0.5 miles one way), deliveries to the Newark facility (approximately 26.6 miles, and the employee's internal trips between the chip and grind and compost facilities (approximately 0.5 miles one way). Under the model, it was estimated that each of those deliveries and the internal trips are approximately 26.6 miles (distance to Newark). This distance considerably exceeds the internal trip distances for

the employee and the delivery trips to the existing chip and grind facility. Therefore, this provides a conservative estimate of emissions.

CONSTRUCTION-RELATED AIR EMISSIONS AND IMPACTS

This document was prepared pursuant to BAAQMD CEQA Guidelines, set forth in the document Assessing the Air Quality Impacts of Projects and Plans, December 1999. The BAAQMD approach to CEQA analyses of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions. Quantification of construction emissions is not necessary (BAAQMD 1999, p. 14). The BAAQMD identifies a set of feasible PM_{10} control measures for construction activities. The overall project size is less than 4 acres and therefore does not require the BAAQMD's "Enhanced Measures" (BAAQMD 1999, Table 2, p. 15). The following control measures are required by BAAQMD for the proposed project:

- Water all active construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

If all control measures identified previously are implemented, then air pollutant emissions from construction activities would be considered a less than significant impact (BAAQMD 1999, p. 14).

Table 1 below represents the fugitive dust created during construction of the proposed project before and after the BAAQMD control measures are put in place. Although not required, this analysis demonstrates the reduction of construction-related impacts from the proposed project using the required control measures. The only BAAQMD control measure not accounted for in modeling was "*cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard*." This fugitive dust source is not quantified by CalEEMod. Since it is not quantified, it is not appropriate to apply a percentage reduction (CalEEMod 2013, p. 40). This control measure would be used during construction, further reducing modeled construction-related emissions.

TABLE 1
CONSTRUCTION-GENERATED TOTAL PM AND GHG EMISSIONS PER YEAR
BEFORE AND AFTER COMPLIANCE WITH BAAQMD PM CONTROL PROVISIONS

Sources	Fugitive PM_{10} (Tons)	Exhaust PM_{10} (Tons)	Fugitive $PM_{2.5}$ (Tons)	Exhaust $PM_{2.5}$ (Tons)	Total PM (Tons)	GHG Emissions CO_2e (MT)
Unmitigated Construction	1.93	3.09E-03	0.19	2.88E-03	2.13	6.91
Mitigated Construction	**0.16**	**2.84E-03**	**0.09**	**2.65E-03**	**0.25**	**6.91**

Source: BSK Associates 2015.

PROJECT-RELATED OPERATIONAL AIR QUALITY AND GHG EMISSIONS AND IMPACTS

Air Quality Thresholds of Significance

The discussion below describes the CalEEMod emission results and threshold analysis for the Vision Recycling Compost Facility. The significance thresholds for air quality impacts are based on the BAAQMD 1999 CEQA Guidelines thresholds (BAAQMD 1999, pp. 16-21).

Carbon Monoxide Emissions

The proposed project does not exceed the 550 lb/day from vehicle emissions local carbon monoxide threshold established by BAAQMD (BAAQMD 1999, pp. 16-21). Furthermore, the project does not exceed the BAAQMD's other carbon monoxide thresholds because the project does not impact the LOS of nearby intersections or contribute an increase of 10% or more to traffic volumes (BAAQMD 1999, p. 16). The Alameda County and City of Livermore General Plans, readily available Specific Plans, and environmental review documents the were reviewed for traffic data for this memorandum, but traffic count data for Greenville Road in the project vicinity was not provided in these documents.[1] Similarly, a number of Caltrans Environmental Impact Reports (EIRs) and other environmental review documents for the project vicinity were consulted for this memorandum, but they also lacked traffic count data for Greenville Road in the project vicinity.[2] The web application Google Earth Pro provides an indication of traffic for the project vicinity, estimating that Greenville Road average daily traffic is approximately 9,985 vehicles per

[1] Environmental review documents reviewed included the Alameda County Initial Study/ Mitigated Negative Declaration for the Greenville Road Subdivision Project (2011) and the Alameda County Draft Environmental Impact Report for the Sand Hill Wind Project (2013).
[2] Caltrans EIRs and environmental documents reviewed included the I-580 Westbound HOV Lane Project EIR (2009), the I-580 Eastbound HOV Lane Project Environmental Assessment/Initial Study (2006), and the Interstate 580 Roadway Rehabilitation Project Initial Study/Mitigated Negative Declaration (2014).

day (Google Earth Pro 2015). The proposed project would contribute approximately 1.6 daily trips leaving the composting facility. This is well below the 10% threshold.

ROG, NO_X, PM_{10} Emissions

The following are the CalEEMod emission results for the Vision Recycling Compost Facility. Table 2 below represents the proposed project's operational emissions prior to mitigation compared to the BAAQMD thresholds (BAAQMD 1999, pp. 16-21). This table shows that the proposed project is below the significance thresholds for all three parameters.

TABLE 2
PROPOSED PROJECT OPERATIONAL EMISSIONS WITHOUT MITIGATION

Sources	Emissions Generated (tons/year)			
	ROG	NO_X	PM_{10} Total	GHG Emissions CO_2e
BAAQMD 1999 Thresholds (tons/year)	**15**	**15**	**15**	-
BAAQMD 2009 Proposed Thresholds (MT/year)	-	-	-	**1,100**
Project Area Sources	1.61E-03	0.00	0.00	2.00E-05
Project Energy	0.00	0.00	0.00	0.11
Project Mobile Sources	4.3E-03	0.03	0.10	8.39
Project Off-road	0.09	1.02	0.06	94.95
Project Waste	-	-	0.00	4.55E-03
Project Water	-	-	0.00	0.29
Project Total Emissions	**0.10**	**1.05**	**0.16**	**103.46**

Sources: BAAQMD 1999, pp. 16-21; BSK Associates 2015.

GHG Threshold of Significance

The 1999 BAAQMD CEQA Guidelines do not contain a threshold for GHG emissions, and so the significance thresholds for GHG impacts are based on the BAAQMD's 2009 staff-recommended GHG threshold of significance, 1,100 million tons (MT) of CO_2 per year (BAAQMD 2009a, p. 1). Although this threshold is not currently recommended by BAAQMD due to ongoing CEQA litigation, use of this threshold for the purposes of this project is supported by the fact that it was developed as the project emissions that would not be expected to substantially conflict with California legislation adopted to reduce statewide GHG emissions (BAAQMD 2009b, p. 38; County

of Alameda 2014, p. 133, BAAQMD 2012, p. 2-5). GHG emissions from land use projects built in compliance with these thresholds would be approximately 26 percent below business-as-usual 2020 conditions and thus would be consistent with achieving required Assembly Bill (AB) 32 equivalent GHG reductions (BAAQMD 2009b, p. 52). This 26 percent reduction would achieve an aggregate reduction of approximately 1.6 MMT CO2e/yr, which is the "fair share" of emission reductions from Bay Area land use sources needed to meet the AB 32 goals (BAAQMD 2009b, p. 52).

GHG Emissions

The proposed project's GHG emissions are estimated to be 103.46 MT of CO_2 per year, well below the 1,100 MT threshold (see Table 2, above). Additionally, the Alameda County Community Climate Action Plan includes among its primary goals to "encourage participation in recycling and composting throughout the community" (County of Alameda 2014, p. 9). The proposed project would provide infrastructure to achieve this goal and help reduce countywide GHG emissions.

Odor Emissions

The proposed project site is located in an industrial/agricultural area of the County where the nearest sensitive receptor is a single-family dwelling owned by the property owner, and the next closest residence is further than 1 mile NNW on the far side of I-580. Under the BAAQMD guidelines, facilities known to emit objectionable odors that are located within certain project screening distances should undergo evaluation by the Lead Agency for odor impacts (BAAQMD 1999, pp. 17-18, Table 4). For composting facilities, the project screening distance is 1 mile. This means that if the project were considered likely to emit objectionable odors, it should undergo evaluation by the Lead Agency for odor impacts. However, beyond the property owner, the nearest sensitive receptor is great than 1 mile and the composting operations would not have the potential to frequently and significantly expose members of the public to objectionable odors because project composting would occur under a controlled aerobic process. In the composting process, objectionable odors can arise when anaerobic conditions (i.e., a lack of oxygen) are allowed to occur. Anaerobic conditions would not occur in the project's composting facility because ambient oxygen would be constantly introduced to the facility's Phase 1 pile using pressurized air from blowers. Additionally, the aerobic composting method used by the facility's Phase 1 pile would bring the pile to a high internal temperature, which reduces odors that would otherwise be created by cooler, slower decomposition. As required by the California Code of Regulations, the temperature within the Phase 1 pile would be maintained at a temperature of 131 degrees Fahrenheit for a pathogen reduction period of three days, and the pile would be covered with 6 to 12 inches of insulating material (22 CCR § 17868.3, subd. (b)(4). This level and length of heating would result in rapid composting and effectively kill off anaerobic odor-producing bacteria. Material in the Phase II pile would be fully broken down and so would not create offensive odors.

Furthermore, even if a limited amount of objectionable odors were generated by the Phase 1 pile, the project is located in a windy area subject to good air mixing, and any odor would be quickly diluted and dispersed. BAAQMD recommends that Lead Agencies consider the influence of local meteorological conditions, particularly prevailing winds, in evaluating potential odor impacts (BAAQMD 1999, p.17). Prevailing winds in the Livermore area tend to blow in a west to east direction, not a south to north direction, which indicates that even if the facility produced limited odors, they would be blown away from, rather than toward, the sensitive receptor to the north northwest (BAAQMD 1999, pp. D-3 to D-4 and Table D-1).

Toxic Air Contaminant Emissions

The proposed composting facility would not emit toxic air contaminants (TACs) above the 10 in 1 million probability of contracting cancer for the Maximally Exposed Individual (MEI). The proposed facility is not expected to emit TACs and therefore the Hazard Index would be less than the threshold of 1 for the MEI.

CUMULATIVE REGIONAL AIR QUALITY EMISSIONS

The BAAQMD states that "for any project that does not individually have significant operational air quality impacts, the determination of significant cumulative impact should be based on an evaluation of the consistency of the project with the local general plan and of the general plan with the regional air quality plan" (BAAQMD 1999, p. 19). The Alameda County Community Climate Action Plan aims to "encourage participation in recycling and composting throughout the community" (County of Alameda 2014, p. 9). The proposed project would provide infrastructure to achieve this goal. Therefore, the proposed project is consistent with the local general plan and there are no cumulative impacts.

LIMITATIONS

The analyses and recommendations submitted in this report are based upon the data obtained from existing reports, limited field investigation, and site mapping. The report does not reflect variations which may occur beyond the mapped area.

The findings of this report are valid as of the present. However, changes in the conditions of the site can occur with the passage of time, whether caused by natural processes or the human-induced changes on this property or adjacent properties. In addition, changes in applicable or appropriate standards or practices may occur, whether they result from legislation, governmental policy, or the broadening of knowledge.

Respectfully submitted,
BSK Associates

Erik Ringelberg
Natural Resources and Land Planning
Group Manager

Kevin Grove
Staff Scientist

References

Bay Area Air Quality Management District (BAAQMD) 2012. California Environmental Quality Act Air Quality Guidelines, updated May 2012.

BAAQMD 2009a. Staff-Recommended CEQA Thresholds of Significance Table.

BAAQMD 2009b. Revised Draft Options and Justificaton Report, California Environmental Quality Act Thresholds of Significance.

BAAQMD 1999. BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans. December, 1999.

BSK Associates 2015. CalEEMod Report, 2015.

CalEEMod 2013. California Emissions Estimator Model (CalEEMoD), User's Guide Version 2013.2. July 2013.

County of Alameda 2014. Alameda County (Unincorporated Areas) Community Climate Action Plan.

Google Earth Pro 2015. Google Earth Pro, US Daily Traffic Counts. Greenville Road - 2002. Source: KSS Fuels. (web accessed June 8, 2015).

Vision Recycling 2015. Tamotsu Yamamoto, General Manager, Personal Communications, (5/5/2015, 5/1/2015, 7/25/2014).

APPENDIX C
BIOLOGICAL STUDY

3140 Gold Camp Drive Suite 160
Rancho Cordova CA 95670
P 916.853.9293
F 916.853.9297
www.bskassociates.com

Technical Memorandum

Subject: Proposed Vision Recycling Compost Facility Biological Study
Date: June 11, 2015
To: Vision Recycling
From: BSK Associates

The purpose of this memorandum is to provide a detailed analysis and description of the reconnaissance-level biological study performed for the proposed Vision Recycling Compost Facility Project in Alameda County, California. BSK Associates (BSK) performed the biological study using methods approved by both state and local agencies. These methods include a California Natural Diversity Database (CNDDB) query, a review of the National Wetland Inventory (NWI), a review of the Federal Emergency Management Agency (FEMA) flood zone maps, and a proposed project area field reconnaissance. The methods and results of this study are summarized below.

PROJECT SUMMARY

The proposed project will be designed to be an aerobic composition facility to process residual material from the nearby existing Vision Recycling chip and grind facility. The material will be aerobically composted using pressurized air. The material will then be either sold at the chip and grind facility, transported to one of Vision Recycling's retail locations, or transported directly to customers. This memorandum documents the potential for impacts on the biological community from the proposed project.

The proposed project area is relatively flat and does not have trees, shrubs or vegetated areas. There are no streams or wetlands on the site. The regional vicinity map (Figure 1) and site map (Figure 2), show the lack of natural habitat on the site.

METHODOLOGY

As a part of this assessment, BSK reviewed state and federal databases for issues of ecological concern before conducting the site reconnaissance. The results of the database review are below.

A California Natural Diversity Database (CNDDB) search of the project site, the surrounding area, and the Altamont quadrangle was conducted to determine if special status species were observed on or near the proposed project area. The CNDDB search results did not show any special status species observed on the proposed project area.

The nearest documented special status species observation was of California tiger salamander (*Ambystoma californiense*) approximately 0.4 miles to the west-northwest of the proposed project and California red-legged frog (*Rana draytonii)* approximately 0.5 miles southeast of the proposed project area (CNDDB 2015). The proposed project is located approximately 0.25 miles west of California red-legged frog (*Rana draytonii*) critical habitat (USFWS 2015). This species habitat consists typically of permanent wetlands. The proposed project area does not contain suitable habitat for RLF or CTS due to the highly disturbed and compacted site, use of the area for equipment storage, lack of cover such as burrows, lack of food sources, and lack of wetland characteristics. Additionally, project activities would not indirectly affect the steeply downgradient off-site habitat RLF and CTS habitat areas. It should be noted that a white-tailed kite (*Elanus leucurus*) and a burrowing owl (*Athene cunicularia*) sighting are documented approximately 1.4 miles southwest of the proposed project area (CNDDB 2015). The CNDDB results for the Altamont Quad are appended to this memorandum.

The National Wetland Inventory (NWI) dataset documented two (2) freshwater palustrine emergent wetlands located near the proposed project area. The first wetland is approximately 4.79 acres and is located approximately 600 feet southeast of the proposed project area. The second wetland is approximately 8.28 acres and approximately 800 feet to the northeast of the proposed project area. Figure 3 shows the NWI dataset of the proposed project area. The proposed project location is on a south-facing raised hill, overlooking a valley. The proposed project area does not support characteristics of a wetland. Therefore, the proposed project would not adversely affect a wetland.

The FEMA flood zone maps were also reviewed. The proposed project area is located within Zone X, meaning it is within an "area of minimal flood hazard" (FEMA 2015). The proposed project is over 0.5 miles from the nearest floodplain and therefore, would not adversely affect any riparian habitat or sensitive natural communities. Furthermore, the proposed project would not interfere substantially with the movement of migratory fish or wildlife species.

The proposed project area reconnaissance was performed on February 9th, 2015. The proposed project area has been used for equipment storage for several years by the landowner. The condition of the proposed project area is not suitable habitat for special-status species within the area.

A list of species observed during the reconnaissance is included in Table 1 Wildlife Species Observations On or Near the Project Site (BSK 2015). Species listing status, as applicable, is also identified in Table 1.

TABLE 1
WILDLIFE SPECIES OBSERVATIONS DURING FIELD RECONNAISSANCE
FEBRUARY 9, 2015

Common Name	Scientific Name	State/Federal Status
Mammals		
California Ground Squirrel	*Otospermophilus beecheyi*	-/-
Cotton-tail rabbit	*Sylvilagus bachmani*	-/-
Birds		
American Crow	*Corvus brachyrhynchos*	-/-
American Goldfinch	*Spinus tristis*	-/-
Great Egret	*Ardea alba*	-/-
Northern Mockingbird	*Mimus polyglottos*	-/-
Purple Finch	*Haemorhous purpureus*	-/-
Western Meadowlark	*Sturnella neglecta*	-/-
White-crowned Sparrow	*Zonotrichia leucophrys*	-/-
Turkey Vulture	*Cathartes aura*	-/-

BSK Associates 2015. CDFW 2015.

CONCLUSIONS

On the basis of the field reconnaissance of the site and database queries, no special-status species have been observed on the site, nor has any evidence been observed to suggest that special-status species have been present. The site is heavily compacted with negligible nesting and foraging habitat for listed species.

LIMITATIONS

The analyses and recommendations submitted in this report are based upon the data obtained from existing reports, limited field investigation, and site mapping. The report does not reflect variations which may occur beyond the mapped area.

The findings of this report are valid as of the present. However, changes in the conditions of the site can occur with the passage of time, whether caused by natural processes or the human-induced changes on this property or adjacent properties. In addition, changes in applicable or appropriate standards or practices may occur, whether they result from legislation, governmental policy, or the broadening of knowledge.

The observations explained in this report were completed under field conditions prevalent at the time of the surveys. Conditions can change dramatically day to day, month to month, and season to season. Species can also be highly mobile or difficult to observe under non-protocol conditions.

Respectfully submitted,
BSK Associates

Erik Ringelberg
Natural Resources and Land Planning
Group Manager

Kevin Grove
Staff Scientist

REFERENCES

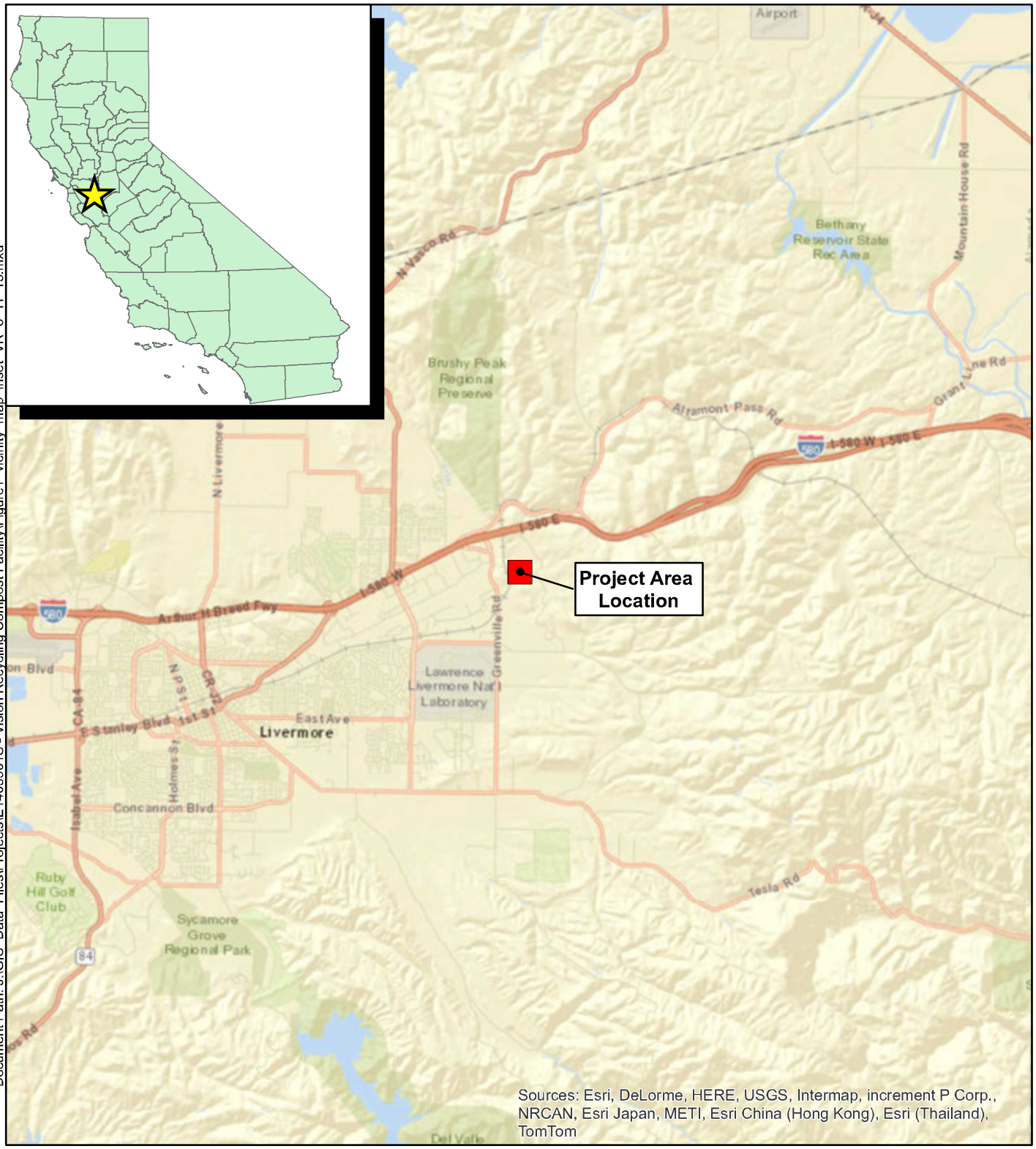
BSK Associates 2015. Proposed Project Area Reconnaissance on February 9, 2015.

California Natural Diversity Database (CNDDB) 2015. Query Results for project area quadrangle, accessed February 2015. Biogeographic Data Branch, Department of Fish and Wildlife, Sacramento, CA.

California Department of Fish and Wildlife (CDFW), Natural Diversity Database. March 2015. Special Animals List. Periodic publication. 51 pp.

Federal Emergency Management Act (FEMA) 2015. Flood Zone Definition (available at: https://www.fema.gov/flood-zones) web accessed June 8, 2015.

United States Fish and Wildlife Service (USFWS) 2015. FWS Critical Habitat for Threatened and Endangered Species. (available at http://ecos.fws.gov/crithab/). Web accessed June 9, 2015.



Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure1 vicinity map inset VR 6 11 15.mxd

Date Saved: 6/11/2015
By: KG

N
W E
S

0 1 2 4 Miles

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility 30 Greenville Road Alameda County, California	Figure 1 Vicinity Map BSK Project E1405301S

Document Path: J:\GIS Data Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure2 Project Sitet VR 6 11 15.mxd

Date Saved: 6/11/2015
By: KG

N
W E
S

0 200 400 800 Feet

Legend

- Existing Access Road
- Existing Chip and Grind Facility
- Proposed Compost Facility

BSK Associates
Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 2
Project Area Map
BSK Project E1405301S

Document Path: J:\GIS_Data_Files\Projects\E1405301S - Vision Recycling Compost Facility\Figure7_Project_Site_NWI_6_11_15.mxd

Date Saved: 6/16/2015
By: KG

N
W E
S

0 500 1,000 2,000 Feet

Legend

Proposed Compost Facility

WETLAND TYPE

Freshwater Emergent Wetland - Seasonal

Freshwater Pond

Palustrine Seasonal Wetlands

BSK Associates Engineers & Laboratories

Vision Recycling Compost Facility
30 Greenville Road
Alameda County, California

Figure 3
National Wetland Inventory Map
BSK Project E1405301S

APPENDIX D
TRAFFIC ANALYSIS

BSK Associates
Engineers & Laboratories

3140 Gold Camp Drive Suite 160
Rancho Cordova CA 95670
P 916.853.9293
F 916.853.9297
www.bskassociates.com

Technical Memorandum

Subject: Proposed Vision Recycling Compost Facility Traffic Analysis
Date: December 1, 2015
To: Alameda County
From: BSK Associates

The purpose of this memorandum is to provide a description of the reconnaissance-level traffic impact analysis performed for the proposed Vision Recycling Compost Facility Project in Alameda County, California. BSK Associates (BSK) performed the traffic analysis using publically available documents and indicators, as well as project area observations. The methods and results of this study are summarized below.

PROJECT SUMMARY

The construction of the proposed project requires minor ground disturbance and grading. The proposed project estimates that approximately one (1) month total of construction would occur. Once constructed, the proposed project is designed to be an aerobic composition facility to process residual "green" material from the nearby existing Vision Recycling chip and grind facility into compost. The compost would then either be sold at the chip and grind facility, transported to one of Vision Recycling's retail locations, or transported directly to customers. This memorandum analyzes the potential traffic impacts from the proposed project.

BACKGROUND AND BASELINE TRAFFIC CONDITIONS

The closest major road to the proposed project is Greenville Road. Greenville Road is a two-lane road with a 15,000 vehicle-per-day capacity (Alameda County 2011, p. 140). The nearest intersection is Greenville Road and Las Positas Road. This is a signalized intersection. Perpendicular to Greenville Road and north of the project area is Interstate 580 (I-580), which lacks access from Greenville Road.

The Alameda County and City of Livermore General Plans, readily available Specific Plans, and environmental review documents were reviewed for this memorandum, but traffic count data for Greenville Road in the project vicinity was not provided in these documents.[1] Similarly, a number of Caltrans Environmental Impact Reports (EIRs) and other environmental review documents for

[1] Environmental documents reviewed included the Alameda County Initial Study/ Mitigated Negative Declaration for the Greenville Road Subdivision Project (2011) and the Alameda County Draft Environmental Impact Report for the Sand Hill Wind Project (2013).

the project vicinity were consulted for this memorandum, but they also lacked traffic count data for Greenville Road in the project vicinity.[2] The web application Google Earth Pro™ provides an indication of traffic for the project vicinity, estimating that Greenville Road average daily traffic is approximately 9,985 vehicles per day (Google Earth Pro™ 2015).

The existing chip and grind facility located to the northwest of the site accounts for approximately 41 total vehicles per day (Alameda County 2013, p. 57). The 41 vehicles include approximately 3 transfer trucks, 8 dump trucks, and 30 pickup trucks (Alameda County 2013, p. 57). These trips were previously analyzed in the Initial Study/Mitigated Negative Declaration for the chip and grind facility. The chip and grind facility was determined to have a less than significant impact on current traffic conditions surrounding the project area (Alameda County 2013, p. 56).

BSK personnel visited the proposed project site on February 9, 2015 and made observations of traffic passing the facility entrance. Traffic maintained an even low flow, following turning rules and the directions of signage. No impairments to flow or traffic violations were observed.

PROPOSED PROJECT TRAFFIC

The proposed project would be accessed by an existing, unnamed, well-surfaced road. The entrance/exit is located at the intersection of Las Positas Road and Greenville Road. This road is currently being used by the existing chip and grind facility. The entrance and exit to this road is off of Greenville Road. The entrance/exit is limited to right-turn only, as indicated by existing traffic signs (Alameda County 2013, p. 56).

Construction Traffic

Construction of the proposed project would be approximately 1 month in duration. The proposed project would require minor grading and land disturbance. Construction equipment for the project would consist of a grader, tractor, loader, backhoe, and rubber-tired bulldozer. Equipment used for construction of the proposed project would use the proposed project entrance/exit. Traffic related to construction would be short term, few in relation to current traffic levels, and therefore is considered less than significant.

Operational Traffic

Operational vehicle trips on public roadways from the proposed project would come from deliveries of finished compost to customers and facilities. The existing chip and grind facility

[2] Caltrans EIRs and environmental documents reviewed included the I-580 Westbound HOV Lane Project EIR (2009), the I-580 Eastbound HOV Lane Project Environmental Assessment/Initial Study (2006), and the Interstate 580 Roadway Rehabilitation Project Initial Study/Mitigated Negative Declaration (2014).

already receives wood and green material and would grind it for green material feedstock for the proposed project. The green material feedstock received by the proposed project from the existing chip and grind facility consists of wood chips, mulch, soil amendment and co-generation fuel. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions, and so no new traffic would be generated from deliveries to the chip and grind facility. Once processed, this green material feedstock would be transferred to the proposed project to undergo the composting process. Once complete, the finished compost would be delivered to one of four possible locations. These locations include delivery back to the Livermore Chip and Grind Facility (156 annual internal trips not using public roads), delivery to Vision Recycling's Newark Facility (approximately 26 miles away), to customers on the Northern San Francisco Peninsula (approximately 51 miles away), or to a biomass facility in Stockton (approximately 37 miles away). Vision Recycling has provided details of estimated truck traffic trips for the proposed project. Table 1 presents the estimated truck traffic trips on public roadways anticipated to be generated by the project:

TABLE 1
ESTIMATED ANNUAL TRUCK TRAVEL DELIVERY TRIPS ON PUBLIC ROADWAYS FROM PROPOSED VISION RECYCLING COMPOST FACILITY

Newark Facility, Fremont, CA	Northern San Francisco Peninsula San Francisco, CA	Biomass Facility Stockton, CA	*Total Trips on Public Roadways*
156 trips	150 trips	100 trips	*406 trips*

Source: Vision Recycling 2015

As shown in Table 1, the total estimated vehicle traffic from the proposed project would be approximately 406 vehicle trips per year. This equates to approximately 1.6 vehicle trips per weekday. The facility would primarily make deliveries Monday through Friday. It is unlikely that delivery trips would occur on weekends. The total vehicle trips would be conducted using primarily 20-ton semi-trucks with walking floor trailers. These types of trucks typically have a high horizontal stack.

The project would also generate vehicle trips to the proposed project to and from the existing chip and grind facility, but these trips would occur on an existing internal access road between the existing chip and grind facility and the proposed compost project area, and would not entail travel on public roads. These trips would be approximately 0.5 mile in length, one way. One employee would service the site, but would only visit the facility to perform daily inspections and move piles when necessary. This employee would not be a new employee, but instead would be an existing employee of the existing chip and grind facility. Thus, the employee's "home-to-work" vehicle trips were previously analyzed in the Initial Study/Negative Declaration for the existing Chip and Grind Facility (Alameda County 2013, pp. 56-59). The employee's visits to the proposed

compost facility for daily inspections and pile movement would be internal within Vision Recycling's facilities and would not contribute any traffic to public roadways.

POTENTIAL IMPACTS

The proposed project would contribute approximately 1.6 vehicle trips per weekday to local roadways. This is not a sufficient amount to create new Level of Service (LOS) deficiencies, or significantly impact local roadways.

LIMITATIONS

The analyses and recommendations submitted in this report are based upon the data obtained from existing reports, limited field investigation, and site mapping. The report does not reflect variations which may occur beyond the mapped area.

The findings of this report are valid as of the present. However, changes in the conditions of the site can occur with the passage of time, whether caused by natural processes or the human-induced changes on this property or adjacent properties. In addition, changes in applicable or appropriate standards or practices may occur, whether they result from legislation, governmental policy, or the broadening of knowledge.

Respectfully submitted,
BSK Associates

Erik Ringelberg
Natural Resources and Land Planning
Group Manager

Kevin Grove
Staff Scientist

References

Alameda County. 2013. Vision Recycling Chip and Grind Facility Initial Study/Negative Declaration. Prepared by BSK Associates, February 4, 2013.

Alameda County. 2011. Greenville Road Subdivision Project Initial Study/Mitigated Negative Declaration. Prepared by Lamphier-Gregory, September, 2011.

APPENDIX E

RESPONSE TO COMMENTS

VISION RECYCLING
GREENVILLE ROAD COMPOST FACILITY
INITIAL STUDY / NEGATIVE DECLARATION
RESPONSE TO COMMENTS
ALAMEDA COUNTY, CALIFORNIA

PREPARED FOR:

ALAMEDA COUNTY
Community Development Agency

COUNTY OF ALAMEDA
COMMUNITY DEVELOPMENT AGENCY
224 WEST WINTON AVENUE, ROOM 111
HAYWARD, CA 94544

December 1, 2015

VISION RECYCLING
GREENVILLE ROAD COMPOST FACILITY
INITIAL STUDY / NEGATIVE DECLARATION
RESPONSE TO COMMENTS
ALAMEDA COUNTY, CALIFORNIA

Prepared for:

County of Alameda
Community Development Agency
224 West Winton Avenue, Room 111
Hayward, CA 94544

BSK Project: E1405301S

December 1, 2015

Erik Ringelberg
Natural Resources and Land Planning Group Manager

Kevin Grove
Staff Scientist

BSK Associates
3140 Gold Camp Drive, Suite 160
Rancho Cordova, CA 95670
(916) 853-9293
(916) 853-9297 FAX
www.bskassociates.com

Table of Contents

A. INTRODUCTION

This Response to Comments (RTC) on the Initial Study/Negative Declaration (IS/ND) has been prepared for Alameda County Community Development Agency as lead agency in accordance with the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The RTC evaluates the agency and other comments regarding the analysis of potential environmental effects associated with the development of the Vision Recycling Compost Facility project (hereinafter "project" or "proposed project"). The analysis and conclusions from the RTC are found on page 18. In summary the changes and additions to the IS/ND do not raise important new issues about significant effects on the environment.

1. Background and Purpose

Under CEQA, the purpose of an Initial Study/Negative Declaration (IS/ND) is to evaluate a project's potential effects on the environment and to demonstrate that the project's potential impacts do not exceed the Lead Agencies thresholds and are less than significant without mitigation. State policy encourages comments from the public and public agencies during the environmental review process in order to identify potential significant project effects and alternatives that may substantially reduce environmental effects (PRC Section 21003.1, subd. (b)).

This RTC provides detailed responses to comments on the IS/ND that were received by the County by the end of the public review period on November 13, 2015. Comments received after November 13, 2015 may be taken under consideration by the County.

This RTC contains individual responses to each written and oral comment received by the County during the public review period for the IS/ND. The County's responses describe the disposition of environmental issues raised by the comments. Comments on topics that are not significant impacts of the project on the environemnt are not part of CEQA review. The Alameda County Community Development Agency and the Project applicant's consultants have provided a good-faith effort to respond in detail to all significant environmental issues raised by each comment.

2. IS/ND Certification Process and Project Approval

In accordance with the requirements of CEQA Guidelines section 15073, subdivision (e), any public agency who commented on the IS/ND must be notified in writing of any public hearing to be held for the project for which the document is prepared. The decision making body shall adopt the proposed negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration reflects the lead agency's independent judgement and analysis The information and analysis in the IS/ND and the public comments received, informs the County's ultimate decision, but the County is not bound by it. The County must respond to each significant effect identified in the IS/ND by making findings supporting the County's decision.

3. List of Commenters on Initial Study/Negative Declaration

The list of persons, organizations, and public agencies commenting on the IS/ND is included below. The list appears in Table 3-1 List of Persons and Organizations Commenting on the IS/ND. Full comments and responses are provided in Section 2.0, Comments and Responses.

B. COMMENTS AND RESPONSES

This section contains all comment letters received on the IS/ND. Following each comment letter is the County's response to that letter. This RTC contains a list of all commenters in Table 1, List of Persons and Organizations Commenting on the IS/ND, below. Author codes have been assigned to each comment in order to cross-reference comments and responses.

Following the list, each letter is reproduced in its entirety, with a vertical line and a corresponding number on the right margin designating each of the comments made in the letter. The response following each letter addresses each comment from the letter in numerical order. Text changes made to the IS/ND in response to comments appear in Section 3.0, Revisions to the IS/ND.

TABLE 1
LIST OF PERSONS AND ORGANIZATIONS COMMENTING ON THE IS/ND

Commenter	Date Comment Received	Author Code
STATE		
California Department of Resources Recycling and Recovery	11/6/2015	CalRecycle
LOCAL		
Alameda County Fire Marshall	10/13/2015	Fire Marshall
StopWaste	10/26/2015	StopWaste
City of Livermore	11/13/2015	Livermore

1. Federal

No comments on the project were received from Federal agencies or Tribes.

2. State

California Department of Resources Recycling and Recovery Comment Letter

Author Code: CalRecycle

California Environmental Protection Agency Edmund G. Brown Jr., Governor

CalRecycle DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027
P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

RECEIVED
NOV 0 6 2015
STATE CLEARING HOUSE

November 6, 2015

Mr. Damien Curry
Alameda County Community Development Agency
224 West Winton Avenue Room 111
Hayward, CA 94544

Subject: **SCH No. 2015102026** –Draft Initial Study/Negative Declaration for Vision Recycling Greenville Road Compost Facility – Alameda County

Dear Mr. Curry:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process. 1

PROJECT DESCRIPTION

The proposed project, Vision Recycling Greenville Road Compost Facility, is located at 30 Greenville Road, Livermore, CA 94551. The approximately 3.47 acre project site is located in unincorporated eastern Alameda County, east of the City of Livermore and south of the Interstate 580 freeway. The proposed project site is located on a portion of APN 099B-5685-006-00, which is accessed via an unnamed private road that crosses APN 099B-5700-002-09 and APN 099B-5685-007-0; all currently owned by Mills Ranch or the County of Alameda. The site is currently zoned for Agricultural (A), which allows for composting facilities as a conditional use. The project site is located in the eastern portion of the Livermore Valley, in an unincorporated area of Alameda County. Surrounding land uses are primarily grassy, rolling open space to the north, south, east, and west of the property. Directly to the north, concrete road dividers are stored in an open area. Further to the northwest are an existing chip and grind facility and several construction company offices with outdoor storage equipment. The nearest residence is the lessor, on the adjacent 125-acre Mills Ranch property. 2

The proposed project would allow for aerated static pile composting to take place near Greenville Road and Las Positas Road in Livermore, CA 94551. 3

The project would generate approximately 406 offsite truck trips annually for purposes such as taking finished compost to customers or to Vision Recycling facilities in other areas. An estimated 156 vehicle trips per year will occur to haul chipped, ground green material from Vision Recycling's existing chip and grind facility to the proposed project site to be completed, but these truck trips would occur on an existing internal access road between the chip and grind facility and the proposed project area, and would not entail travel on public roads. 4

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft IS/ND, in addition to the specific location noted. 5

ORIGINAL PRINTED ON 100 % POST-CONSUMER CONTENT, PROCESSED CHLORINE FREE PAPER

NOC/Draft IS/ND for Vision Recycling Greenville Road Compost Facility
November 6, 2015
Page 2 of 3

Comments for the Draft IS/ND are summarized in the table below:

Chapter/Section	Page and Location	Comment	
Notice of Completion (NOC) and Environmental Document Transmittal	Top of Page, Project Title	The project title on the NOC is Vision Recycling. The document prepared for Alameda County Community Development Agency is titled Vision Recycling Greenville Road Compost Facility. Is the name of the proposed project Vision Recycling or Vision Recycling Greenville Road Compost Facility?	6
A.4.	Center of page 5, Project Location and Description	Please provide a detailed description of the proposed project including proposed days and hours of operation, maximum daily tonnage, site capacity, and feedstocks to be received. Any potential impacts associated with the parameters above should be analyzed in the document.	7
B.1.	Bottom of page 8, Materials and Receiving	Is the reference to residual in this sentence, "The facility will be designed to process residual material from the nearby existing Vision Recycling chip and grind facility", refereeing to the finished chipped product? Please clarify and/or explain, and refer to all feedstocks for the proposed compost operation as feedstocks, not residual material.	8
B.8	Top of page 10, Nuisance Control	The correct "CCR" citation is "14" not "22."	9
Figure 3	Figure 3	Figure 3 notes, "Aerated Static Pile Active Compost Area Green Waste Only." Will the site compost Green Material only? The project description on page 5 does not provide the types of feedstocks to be received, but indicates that the existing chip and grind facility would provide feedstock for the proposed project, which are wood and green material. Please provide a list of all feedstocks to be received at the proposed site.	10

Solid Waste Regulatory Oversight 11

The County of Alameda Environmental Health Department (as the Local Enforcement Agency (LEA) for Alameda County) and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities including permitting and inspections. Please contact the LEA at 510.567.6730 to discuss the regulatory requirements for the proposed project.

CONCLUSION 12

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

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. 13

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body. 14

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

Sincerely,

Patrick Snider, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Virginia Rosales, Supervisor
Permitting & Assistance Branch – South Unit

Maria Mendoza – Alameda County LEA

Response to Comments from California Department of Resources Recycling and Recovery

Response to CalRecycle-1

Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-2

Comment provides a brief review of the project description. Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-3

Comment provides a brief review of the project description. Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-4

Comment provides a brief review of the project description. Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-5

Comment identifies the location of CalRecycle's comments in their letter as well as a request to address the comment in the updated IS/ND in the specific location noted. Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-6

The project title on the Notice of Completion (NOC) was an abbreviated version of the full project name. The full project name is Vision Recycling Greenville Road Compost Facility.

Response to CalRecycle-7

The proposed project operational hours are between 6:30 a.m. and 5:00 p.m. Monday through Saturday and closed on Sundays (Page 9). The facility will have a maximum of 2,400 cubic yards of material in the Phase One pile at one time, a maximum of 2,400 cubic yards of material in the Phase Two pile at one time, and a maximum of 2,400 cubic yards of material in the finished compost storage pile at one time. The expected tonnage of material imported to the facility is approximately 6,000 tons/year, with a maximum of 12,000 tons. The feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel from the existing nearby chip and grind facility. The updated IS/ND reflects this information.

Response to CalRecycle-8

The term "residual" in the IS/ND refers to the finished chipped product (green material feedstock). The updated IS/ND reflects this information.

Response to CalRecycle-9

The updated IS/ND reflects the correct CCR. The correct CCR is 14 CCR § 17868.3, subd. (b)(4).

Response to CalRecycle-10

Please see "*Response to Calrecycle-7*". Figure 3 has been updated to reflect the proposed project's acceptance of "green material" only.

Response to CalRecycle-11

In accordance with the Alameda County East County Area Plan (ECAP), the facility is defined as a Solid Waste Facility. Therefore, oversight of the proposed project is provided by the County of Alameda Health Department, as the Local Enforcement Agency (LEA). The project applicant will contact the LEA for the proposed project.

Response to CalRecycle-12

Comment does not address any significant environmental effects of the project (or any other aspects of the project), therefore, no response is necessary.

Response to CalRecycle-13

Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to CalRecycle-14

Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

3. Local

Alameda County Fire Marshall Comment Email

Author Code: Fire Marshall

Kevin Grove

From: Curry, Damien, CDA <damien.curry@acgov.org>
Sent: Wednesday, October 14, 2015 9:02 AM
To: Kevin Grove; Kevin Grove
Cc: Erik Ringelberg; Erik Ringelberg
Subject: FW: PLN2014-00021

Some comments from Fire Marshal. The closet unit assumed closest.

From: Terra, Bonnie, ACFD
Sent: Tuesday, October 13, 2015 10:58 PM
To: Curry, Damien, CDA
Subject: Re: PLN2014-00021

Good Evening Damien,

I recommend several changes. One I would change the language indicating that the current site complies with fire conditions. We do not know for sure if they are or are not. As such, I would just indicate that the existing site is governed by existing fire conditions. The other thing that needs to be changed is the responding fire department station. ACFD no longer has a Station 8 on College Ave. Station 8 crews are now inside the lab property. Furthermore, resources in the valley now respond based on AVL. That means the closet unit responds and that includes Livermore Pleasanton resources. 1

I hope this information is helpful.

Sincerely,
Bonnie Terra
Division Chief/Fire Marshal

Sent from my iPhone

On Oct 13, 2015, at 3:45 PM, Curry, Damien, CDA <damien.curry@acgov.org> wrote:

> Greetings – attached is the Initial Study and Negative Declaration for the project located off 30 Greenville Road in Livermore. Please let me know if you need a hard copy. FYI Grading and Land Development have already responded to the referral requests without comment. thanks
>
> Damien Curry
> Alameda County Planning
> (510) 670-6684
> damien.curry@acgov.org
>
> CONFIDENTIALITY NOTICE: This e-mail message including attachments, if any, is intended only for the person(s) or entity(ies) to which it is addressed and may contain confidential and /or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Response to Comments from Alameda County Fire Marshall

Response to Fire Marshall-1

The updated IS/ND reflects that the existing site is governed by existing fire conditions, Station 8 on College Ave. is no longer active, and that fire response will be based on Automatic Vehicle Locators (AVL).

StopWaste Comment Email

Author Code: StopWaste

*Note: Comments are numbered as received by date.

Kevin Grove

From: Curry, Damien, CDA <damien.curry@acgov.org>
Sent: Wednesday, October 28, 2015 11:04 AM
To: Kevin Grove; 'krove@bskinc.com'
Cc: Erik Ringelberg; Erik Ringelberg
Subject: FW: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

From: Debra Kaufman [mailto:dkaufman@stopwaste.org]
Sent: Wednesday, October 28, 2015 10:36 AM
To: Curry, Damien, CDA
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Ok. Thanks Damien. In that case, the regulatory section should include a sentence that says that the applicant must apply to the Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan for a composting facility. Additionally, the applicant should meet any applicable water resources control board general water discharge requirements for composting operations that were recently promulgated. Thanks. 6

From: Curry, Damien, CDA [mailto:damien.curry@acgov.org]
Sent: Wednesday, October 28, 2015 10:21 AM
To: Debra Kaufman
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Thank you Debra – no, there is an operating chip and grind facility. The proposal is to operate a compost facility, using material from the chip and grind facility.
Damien Curry
Alameda County Planning

From: Debra Kaufman [mailto:dkaufman@stopwaste.org]
Sent: Wednesday, October 28, 2015 10:04 AM
To: Curry, Damien, CDA
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Thanks Damien for the clarification. It sounds like they are planning on a chip and grind facility, not a compost facility, as excerpted from Page 6 below. 3

Based on that, I think the facility should be referred to as Vision Recycling Chip and Grind facility rather than Vision Recycling Compost facility since different permit levels are required for each.
If the facility is going to be permitted as a compost facility or if they need a solid waste facility permit then the regulatory setting section should add a sentence that says the operator will also apply to the Alameda County Waste Management Authority for a conformance finding with the Countywide Integrated Waste Management Plan. (If they 4

1

meet the requirements for a chip and grind facility, under the EA notification level or registration tier, and they do not meet the threshold for a solid waste facility permit, then they do not need to apply for a ColWMP conformance finding). 4

Thanks for the opportunity to review.

Debra

From page 6 of the Initial Study:

Regulatory Setting
In addition to the Alameda County Planning Department requirements for a Conditional Use Permit (CUP), regulatory oversight of chipping and grinding facilities is provided by CalRecycle (formerly the California Integrated Waste Agency) and the Local Enforcement Agency (LEA), Alameda County Environmental Health. Vision Recycling will also be subject to Bay Area Air Quality Management District (BAAQMD) requirements as described in the air quality discussion, and will meet Alameda County Fire Department and Alameda County Mosquito Control District requirements.
CalRecycle will require that the Project applicant meet requirements for a chipping and grinding facility, apply for and maintain permit conditions, and be inspected annually or more often. Chipping and Grinding is defined in the California Codes and Regulations (CCR), Title 14, Natural Resources--Division 7, CIWMB, Chapter 3.1., Compostable Materials Handling Operations and Facilities Regulatory Requirements, as follows:
Section 17852. Definitions.
(a) For the purposes of this Chapter: (10) "Chipping and Grinding Operations and Facilities" means an operation or facility, that does not produce compost, that mechanically reduces the size or otherwise engages in the handling, of compostable material and:
(A) The site does the following:
1. The site handles only material, excluding manure, allowed at a green material composting operation or facility as set forth in section 17852(a)(22); and
2. Each load of green material is removed from the site within 48 hours of receipt. The LEA may allow a site to keep green material on-site for up to 7 days if the LEA determines that the additional time does not increase the potential for violations of this Chapter.
(B) If the site fails to meet the definition of green material because it exceeds the contamination limits in section 17852(a)(21), the site shall be regulated as set forth in the Transfer/Processing Regulatory requirements (commencing at section 17400).
(C) If the site fails to meet the definition of this section because the green material remains onsite for a longer period of time than allowed, then the site shall be regulated as a compostable material handling operation or facility, as set forth in this Chapter. 5

From: Curry, Damien, CDA [mailto:damien.curry@acgov.org]
Sent: Wednesday, October 28, 2015 9:05 AM
To: Curry, Damien, CDA; Debra Kaufman
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Sorry the last bit was cut off – 'k-rail storage' is what I meant to say

Damien Curry
Alameda County Planning
(510) 670-6684
damien.curry@acgov.org

2

From: Curry, Damien, CDA
Sent: Wednesday, October 28, 2015 9:04 AM
To: 'Debra Kaufman'
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

This is not quite the same site as the Biofuels #1 or #2 sites. Rather, a permitted chip and grind facility operated by Vision partially occupies the first previous Biofuels site (subtracting some portion of a parcel owned by Alameda County) The compost facility is proposed for an area near the chip and grind facility. If you look on the aerial, it will show as a storage area for

Damien Curry
Alameda County Planning
(510) 670-6684
damien.curry@acgov.org

k-rails

From: Debra Kaufman [mailto:dkaufman@stopwaste.org]
Sent: Tuesday, October 27, 2015 5:01 PM
To: Curry, Damien, CDA
Cc: Suen, Wing, Env. Health; Gary Wolff
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Hi Damien,

Thanks for forwarding. It looks like this will be a EA notification tier CDI facility, but I didn't see an estimate of incoming tons to be able to confirm that. I'm cc-ing Wing Suen at the LEA to see if she concurs with that. Do you know what the estimated incoming tonnages per day are? If it falls within the EA regulatory tier, then we wouldn't need to include the facility in our Countywide Integrated Waste Management Plan, but if it falls into the medium volume CDI category, we would. 1

Also, I notice that the site is the same location as the Biofuels system that got a cease and desist order on May 1, 2015 for violations of their requirements re: materials stored on site. Is Vision recycling taking over the former bio fuels site or co-locating? And if they are taking over the site, are they remediating and fixing the biofuel problems on site? Thanks 2

Debra Kaufman

From: Gary Wolff
Sent: Monday, October 26, 2015 4:50 PM
To: Curry, Damien, CDA

3

Cc: Debra Kaufman
Subject: RE: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Thanks Damien.

By copy of this to Debra Kaufman, I'm asking her to coordinate and send review comments from our staff. She is our lead for planning issues. Please send notice of the public hearing to her.

Debra, the comment deadline on the neg dec appears to be November 13th.

Thanks everyone.

Gary

From: Curry, Damien, CDA [mailto:damien.curry@acgov.org]
Sent: Monday, October 26, 2015 3:42 PM
To: Gary Wolff
Subject: Initial Study for Vision Recycling Compost Facility, 30 Greenville Rd, Livermore PLN2014-00021

Gary,
For StopWaste's information and input as the waste management authority in Alameda County, attached is the Initial Study for the above mentioned project. It can also be found at the bottom of the page http://www.acgov.org/cda/planning/landuseprojects/currentprojects.htm thanks

Damien Curry
Alameda County Planning
(510) 670-6684
damien.curry@acgov.org

4

Response to Comments from StopWaste

Response to StopWaste-1

Please see "*Response to CalRecycle-7*". The facility requires an EA Notification under the Central Local Enforcement Agency (LEA) Tiered Regulatory Placement chart (CalRecycle, 2012). Therefore, the project applicant is required to apply to the Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan. The applicant shall notify the enforcement agency of its intent to operate in writing prior to commencing operations. This written notification shall include the filing requirements stated in Title 14, Section 18103.1. The Project Description has been updated to reflect this information.

Response to StopWaste-2

The proposed compost facility is not the same site as the Biofuels #1 or #2 sites. The Biofuels #1 and #2 site was due north of the existing chip and grind facility. The existing chip and grind facility operated by Vision Recycling partially occupies the first previous Biofuels site. The proposed compost facility is proposed for an area to the southeast of the existing chip and grind facility.

Response to StopWaste-3

Please see "*Response to StopWaste-2*".

Response to StopWaste-4

Please see "*Response to StopWaste-1 and Response to StopWaste-2*".

Response to StopWaste-5

Comment does not address any significant environmental effects of the project (or any other aspects of the project), and so no response is necessary.

Response to StopWaste-6

Please see "*Response to StopWaste-1*".

The facility is defined as a Tier I facility by the State Water Resources Control Board, as defined by the proposed Project's green material feedstocks. In accordance with General Order WQ 2015-0121-DWQ, "new composting operations that proposed to begin operating after adoption of this General Order, are required to seek coverage by submitting a complete NOI, including the appropriate filing fee (Cal. Code Regs., tit. 23 § 2200), and a technical report including, but not limited to, information requested in Attachment D to the Regional Water Board. The NOI, filing fee and technical report must be submitted within one year of adoption of the General Order. The technical report shall include a proposed schedule for full compliance and must be as short as practicable but may not exceed 6 years from the date of the NOI" (SWRCB 2015, p. 8). Therefore, following approval of the proposed Project, the project applicant will apply for coverage under Order WQ 2015-0121-DWQ "General Waste Discharge Requirements for Composting Operations." The Project Description has been updated to reflect this information.

City of Livermore Comment Letter

Author Code: Livermore

LIVERMORE
CALIFORNIA

November 13, 2015

Damien Curry
Alameda County Planning Department
224 West Winton Avenue, Room 111
Hayward, CA 94544

RE: Conditional Use Permit PLN2014-00021, Vision Recycling Compost Facility

Dear Mr. Curry:

Thank you for sending the City of Livermore the Initial Study/Negative Declaration for the Vision Recycling Greenville Road Compost Facility proposed to be located at 30 Greenville Road. City staff have based the following comment on our review of the Initial Study/ Negative Declaration sent by your office and received on October 15, 2015, that included a project description and conceptual site plan prepared by the applicant. The City understands the Alameda County Planning staff have concluded that the project will not have a significant effect upon the environment. 1

Based on the City's knowledge of the existing conditions, it is our position that the proposed circulation is not sufficient and results in potential impacts to traffic safety. Both Greenville and Las Positas Roads are major streets with signalization at Las Positas Road. However, a traffic signal does not control the driveway approach of the proposed project. Based on field observations by the City in 2012, existing uses utilizing the Greenville driveway generate sufficient traffic to constitute concerns regarding the existing driveway and intersection. The City is aware of vehicles coming out of the project site's driveway into the intersection are making illegal left-hand turns. The existing "Right-turn Only" signs posted at the driveway is insufficient and violations are resulting in safety concerns. The Initial Study contains trip generation estimates to the site associated with the proposed project. Since this project will affect the entire intersection of Greenville and Las Positas Roads, the City recommends a higher level of traffic control, such as signalization, for this driveway approach to the existing intersection. 2

Please continue to inform the City regarding the status of this application and please send the City any other CEQA related notices and documents. If you have any questions, please call me at (925) 960-4475 or email me at aaross@cityoflivermore.net. 3

Sincerely,

Andy Ross, Assistant Planner

cc: Carlo Sendaydiego, Transportation Engineer
Paul Spence, Planning Manager

City Hall 1052 South Livermore Avenue - Livermore, CA 94550 www.cityoflivermore.net

Response to City of Livermore

Response to Livermore-1

This comment does not address any significant environmental effects of the project, and so no response is necessary.

Response to Livermore-2

As stated on page 60 of the IS/ND, "the proposed Project does not entail the hiring of new or additional employees, and employees inspecting the compost project and turning piles would use an existing access road on the facility grounds. The Project would not generate any new employee traffic on public roadways. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions, and so no new traffic would be generated from deliveries to the chip and grind facility. The transport of green material feedstocks from the existing chip and grind facility to the proposed compost facility would generate an estimated 156 internal truck trips per year. These trips would be between the existing chip and grind facility and the proposed compost facility and would not enter public roadways. Approximately 406 off-site weekday truck trips per year, approximately 1.6 per weekday, would be generated for the purposes such as taking finished compost to customers or to Vision facilities in other areas (BSK 2015d, p. 3). Weekend off-site trips would be minimal (BSK 2015d, p. 3). The proposed project's contribution of approximately 1.6 vehicle trips were weekday to local roadways is not a sufficient amount to create Level of Service deficiencies, or significantly impact local roadways" (IS/ND page 60).

The City of Livermore (City) does not identify the number or types of vehicles exiting the project driveway and making illegal left-hand turns compared to vehicles exiting the project driveway and obeying the right turn only signage. Therefore, insufficient evidence is available to support the relation to the proposed project creating a traffic safety concern due to illegal left-hand turns onto Greenville Road over the baseline conditions.

As stated in the Alameda County Planning Department Staff Report from the Alameda County Community Development Agency Hearing on February 4, 2013, the Alameda County Public Works Agency commented that "while the driveway exit should be signalized, the upgrade of the intersection to include this feature would typically be provided when changes are made to the intersection itself. The current proposal will not affect the layout or boundaries of this intersection. The City has made attempts to provide directional signage for traffic exiting the roadway, however, such signage might benefit from improved visibility. In the absence of signalization facing the driveway exit, the prominent "RIGHT TURN ONLY" signage directed toward the exit could assist with compliance. Consideration was given toward placement of "RIGHT TURN ONLY" signage on the subject property; however placement of such on the westernmost portion (closest to the public right of way) of land owned by the property owner would still be 150 feet from the roadway, and would likely lend more confusion than clarity. The applicant could work to advise clients of this requirement. Additionally, the property owners can be required to communicate the requirements to their other lessors."

"On January 29 the City recommended the consideration of certain driveway improvements such as a raised "pork chop island" purposed to preclude existing traffic from completing any maneuver but a right hand turn. While consideration of this or other improvement could enhance public safety, placing a condition on the subject application's approval that will effect physical changes to terrain or configuration of fixtures

on a parcel not under consideration, without the involvement of the owner of said property, could be problematic."

The above stated signage currently exists prior to exiting onto Greenville Road. No evidence of vehicle citations or observations have been presented to evaluate the adequacy of the "RIGHT TURN ONLY" signage at the intersection. Additionally, the observations made by the City of Livermore in 2012 are outdated and do not accurately reflect the existing conditions, including those at the existing chip and grind facility. The closure of the Biofuels #1 and #2 sites have lowered vehicle traffic on Greenville Rd. Therefore, the effect on traffic and circulation in response to the City of Livermore's comment remains less than significant.

4. Individual and Private Organization Comments

No comments on the project were received from individuals or from private organizations.

C. REVISIONS TO THE IS/ND

This section presents the changes that have been made to the IS/ND text as a result of comments received on the IS/ND. Only minor technical changes or additions have been made. The text has been revised predominately to clarify technical language into more understandable terms, and to cross-reference details between sections. These changes and additions to the IS/ND do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in section 15073.5 of the CEQA Guidelines.

1. Revisions to IS/ND

On page 5 of the IS/ND, the text has been revised to clarify green material and the type of feedstock:

1. **Project Location and Description**
   Vision Recycling proposes to operate a compost facility at 30 Greenville Road in Livermore, California, 94551. The approximately 3.47 acre (151,200-square foot) project site is located in unincorporated eastern Alameda County (County), east of the City of Livermore and south of the Interstate 580 (I-580) freeway. The Project site is located on a portion of APN 099B-5685-006-00, which is accessed via an unnamed private road that crosses APN 099B-5700-002-09 and APN 099B-5685-007-00; all currently owned by Mills Ranch or the County. Vision Recycling, the applicant, currently operates a chip and grind facility for wood and "green material" near the proposed project site. In this case, green material is defined as "yard trimmings, untreated wood wastes, natural fiber products, and construction and demolition wood waste" (14 CCR § 17852 subd. (a)(21)). ~~This~~ The existing chip and grind facility would provide green material feedstock consisting of wood chips, mulches, soil amendment, and co-generation fuel for the proposed project. An existing access road between this other facility and the proposed site traverses the same parcel, with a small portion crossing the neighboring parcel to the east, with APN 099B-5685-005.

On page 7 and 8 of the IS/ND, the text has been revised to clarify the type of feedstock:

- Solid waste and food waste will not enter the site. The only material entering the site will be ~~compost~~ green material feedstock~~, which consists of residual material~~ from the existing chip and grind facility. This green material feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel. Any solid waste incidentally generated at the existing chip and grind site is limited to small amounts of non-green materials inadvertently brought to the facility, which are separated from wood materials prior to chipping, and subsequently transported to a licensed Alameda County landfill. In the event solid waste or food waste was inadvertently brought to or generated at the proposed compost facility, it would be removed by the compost facility employee and transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard container.

On page 8 of the IS/ND, the text has been revised to clarify the project's status as an EA Notification level facility and its requirements:

The facility requires an EA Notification under the Central Local Enforcement Agency (LEA) Tiered Regulatory Placement chart (CalRecycle, 2012). Therefore, the project applicant will apply to the

Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan. The applicant shall notify the Enforcement Agency of its intent to operate in writing prior to commencing operations. This written notification shall include the filing requirements stated in Title 14, Section 18103.1.

On page 8 and 9 of the IS/ND, the text has been revised to clarify the type of facility as defined by the State Water Resources Control Board, and defined coverage under General Order WQ 2015-0121-DWQ:

Furthermore, the facility is defined as a Tier I facility by the State Water Resources Control Board, as defined by the proposed Project's green material feedstock. In accordance with General Order WQ 2015-0121-DWQ, "new composting operations that proposed to begin operating after adoption of this General Order, are required to seek coverage by submitting a complete NOI, including the appropriate filing fee (Cal. Code Regs., tit. 23 § 2200), and a technical report including, but not limited to, information requested in Attachment D to the Regional Water Board. The NOI, filing fee and technical report must be submitted within one year of adoption of the General Order. The technical report shall include a proposed schedule for full compliance and must be as short as practicable but may not exceed 6 years from the date of the NOI" (SWRCB 2015, p. 8). Therefore, following approval of the proposed Project, the project applicant will apply for coverage under Order WQ 2015-0121-DWQ "General Waste Discharge Requirements for Composting Operations."

On page 9 of the IS/ND, the text has been revised to clarify the hours of operation, the type of feedstock received, and the estimated tonnage of material:

1. **Materials and Receiving**
   The facility operational hours are between 6:30 a.m. and 5:00 p.m. Monday through Saturday and closed on Sunday. The facility will be designed to process ~~residual~~ green material from the nearby existing Vision Recycling chip and grind facility. This green material feedstock consists of woods chips, mulches, soil amendment, and co-generation fuel. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions. Yard waste will be received and processed at the chip and grind facility. The processed material would be transported to the proposed compost facility and stored for one to three days in the facility receiving and processing area, which would use a maximum footprint of 100 feet by 20 feet (see **Figure 3** Project Area Plan). There would be no more than 600 cubic yards of material stored in the receiving and processing area at any particular time. The expected tonnage of green material imported to the facility is approximately 6,000 tons/year, with a maximum facility capacity of 12,000 tons.

On page 10 of the IS/ND, the text has been revised for clarification:

1. **Anticipated Vehicle Traffic**
   Anticipated vehicular traffic on public roadways would be limited to truck trips to move finished compost out of the facility via Greenville Road. The project would generate approximately 406 offsite truck trips annually for the purpose of ~~purposes such as~~ taking finished compost to customers or to Vision facilities in other areas.

On page 10 of the IS/ND, the text has been revised to clarify the type of feedstock received:

An estimated 156 vehicle trips per year will occur to haul chipped, ground green ~~waste~~ material from the existing chip and grind facility to the proposed project site to be composted, but these trips would occur on an existing internal access road between the chip and grind facility and the proposed project area, and would not entail travel on public roads. Employee trips to inspect and move piles would also take place on the existing internal access road and would not entail use of public roadways. No retail activity will occur on the proposed compost facility site, and the project will not require the hiring of new employees.

On page 10 of the IS/ND, the text has been revised to clarify the California Code of Regulations Title:

1. **Nuisance Control**
   - Odors – The composting method used by the facility's Phase 1 pile would be an aerated static pile composting process. This process would bring the pile to a high internal temperature, which significantly reduces odors that would otherwise be created by cooler, slower decomposition. As required by the California Code of Regulations, the temperature within the Phase 1 pile will be maintained at a temperature of at least 131 degrees Fahrenheit for a pathogen reduction period of three days, and the pile would be covered with 6 to 12 inches of insulating material (~~22~~ 14 CCR § 17868.3, subd. (b)(4)). This level and length of heating will result in rapid composting and effectively kill off odor-producing bacteria. Additionally, the forced aeration system will maintain oxygen levels in the pile, preventing anaerobic conditions that can produce objectionable odors. Material in the Phase II file would be fully broken down and so would not create offensive odors.

On page 15 of the IS/ND, the text has been revised to clarify the type of feedstock received:

Description of project:

The proposed project is a composting facility that designed to process ~~residual~~ green ~~and wood~~ material feedstock from the existing chip and grind facility located nearby. This green material feedstock consists of wood chips, mulches, soil amendment, and co-generation fuel.

On page 19 of the IS/ND, in the Setting, the text has been revised to identify the type of feedstock received:

I-580 is located approximately 0.6 miles to the north of the project site. I-580 is designated as a scenic corridor per Alameda County's Scenic Route Element (County of Alameda 1966). The project would be located on a vacant site located near the existing chip and grind facility, which would provide green material feedstock consisting of wood chips, mulches, soil amendment, and co-generation fuel for the project's compost production. The project area is disturbed and has already ~~have~~ been graded for its prior use for equipment storage.

On page 46 and 47 of the IS/ND, the text has been revised to clarify the type of facility as defined by the State Water Resources Control Board, and defined coverage under General Order WQ 2015-0121-DWQ:

Furthermore, the facility is defined as a Tier I facility by the State Water Resources Control Board, as defined by the proposed Project's green material feedstock. In accordance with General Order WQ 2015-0121-DWQ, "new composting operations that proposed to begin operating after adoption of this General Order, are required to seek coverage by submitting a complete NOI, including the appropriate

filing fee (Cal. Code Regs., tit. 23 § 2200), and a technical report including, but not limited to, information requested in Attachment D to the Regional Water Board. The NOI, filing fee and technical report must be submitted within one year of adoption of the General Order. The technical report shall include a proposed schedule for full compliance and must be as short as practicable but may not exceed 6 years from the date of the NOI" (SWRCB 2015, p. 8). Therefore, following approval of the proposed Project, the project applicant will apply for coverage under Order WQ 2015-0121-DWQ "General Waste Discharge Requirements for Composting Operations." The potential impact on water quality is considered to be ***less than significant***.

On page 49 of the IS/ND, the text has been revised to clarify the project's status as an EA Notification level facility and its requirements:

Setting:

The County General Plan sets goals and policies for Alameda County and designates its General Plan Land Use categories. In 2000, County voters passed a County-wide initiative known as "Measure D." The voter-approved initiative is intended to "preserve and enhance agriculture and agricultural lands, and to protect the natural qualities, the wildlife habitats, the watersheds and the beautiful open spaces of Alameda County from excessive, badly located and harmful development" (Alameda County 2000, p. ii). Measure D revised the County Urban Growth Boundary and amended the ECAP. The project area is located on a site within this ECAP area and has a Large Parcel Agriculture land use designation (Alameda County 2000, Land Use Diagram). As indicated above, the project area is zoned "A" (Agricultural), which allows for composting facilities as a conditional use (Alameda County 2014a, section 17.06.035). The facility requires an EA Notification under the Central Local Enforcement Agency (LEA) Tiered Regulatory Placement chart (CalRecycle, 2012). Therefore, the project applicant will apply to the Alameda County Waste Management Authority for a finding of conformance with the Countywide Integrated Waste Management Plan. The applicant shall notify the Enforcement Agency of its intent to operate in writing prior to commencing operations. This written notification shall include the filing requirements stated in Title 14, Section 18103.1.

On page 50 of the IS/ND, the text has been revised to clarify the type of feedstock received:

General Plan Policies: The ECAP policies relevant to the proposed project are provided below. The project adheres to the ECAP policy direction by reducing solid waste with a facility that provides environmentally-safe transformation of chipped, ground green ~~waste~~ material to compost in a large-parcel agricultural area, while meeting the required criteria for an agricultural support service use within a Large Parcel Agriculture area.

On pages 54 of the IS/ND, the text has been revised to clarify the type of feedstock received by the facility:

Construction of the compost facility would generate temporary noise at the site. Operational noise would be would be associated with operation of the blowers for forced aeration of the Phase 1 compost pile. Approximately 3 vehicle trips per weekday would occur to perform daily pile inspections and deliver ~~compost~~ green material feedstock and/or remove finished compost. Weekend traffic to the compost facility would be minimal. Given these minimal noise sources, the existing industrial and

open space land uses, the absence of sensitive receptors in the area, and the rapid, logarithmic fall-off in sound levels over long distances, ***no impact*** would occur related to construction or operational noise.

On page 58 of the IS/ND, the text has been revised to reflect the nearest Fire Station to the proposed Project, as well as identify Fire Resource response, and the existing facility fire conditions:

Fire protection in the project area is provided by Alameda County Fire Department (ACFD). The nearest station is ~~Station 8 located in Livermore at 1617 College Avenue, approximately six miles west of the project site. Another ACFD station,~~ Station 20, ~~is~~ located south of the project at 7000 East Avenue, in building 323 on the Lawrence Livermore National Laboratory site, Livermore, California. Fire protection resources response is based on Automatic Vehicle Locator (AVL) in Livermore Valley. Therefore, the closest unit, including Livermore and Pleasanton resources, responds based on their location. ~~The nearby existing chip and grind facility with conditions of approval of the ACFD established through a memo from ACFD to the County dated June 11, 2012. The proposed project as described would comply with many of the same conditions.~~ ~~In addition,~~ The project will be designed to adhere to its own set of conditions of approval established by AFCD, described above in the project description (AFCD 2014). The project would not create demand for fire protection services that would result in the need for new or physically altered fire protection facilities.

On page 62 of the IS/ND, the text has been revised to clarify the type of feedstock received by the facility and the trips between the existing chip and grind facility and the proposed project:

The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions, and so no new traffic would be generated from deliveries to the chip and grind facility. ~~Compost~~ Green material feedstock for the proposed project would come only from the nearby existing chip and grind operation. The transport of this feedstock would generate an estimated 156 internal truck trips per year (BSK 2015d, p. 2). These trips would be internal to the Vision Recycling facility site using an existing access road on the facility grounds, and so they would not impact Greenville Road or I-580 (BSK 2015d, p. 2). Approximately 406 off-site weekday truck trips per year, approximately 1.6 per weekday, would be generated for purposes such as taking finished compost to customers or to Vision facilities in other areas (BSK 2015d, p. 3). Weekend off-site trips would be minimal (BSK 2015d, p. 3). The proposed project's contribution of approximately 1.6 vehicle trips per weekday to local roadways is not a sufficient amount to create Level of Service (LOS) deficiencies, or significantly impact local roadways. Therefore, the project's impact would be ***less than significant***.

On page 66 of the IS/ND, the text has been revised to clarify the type of feedstock received by the facility:

Solid waste and food waste will not enter the site. The only material entering the site will be ~~compost~~ green material feedstock, which consists of ~~residual material from the existing wood and~~ green material from the existing chip and grind facility. This green material consists of wood chips, mulches, soil amendment, and co-generation fuel. Any solid waste incidentally generated at the existing chip and grind site is limited to small amounts of non-green materials inadvertently brought to the facility, which are separated from wood materials prior to chipping, and subsequently transported to a licensed Alameda County landfill. In the event solid waste or food waste was inadvertently brought to or generated at the proposed compost facility, it would be removed by the compost facility employee and

transported to the nearby existing chip and grind facility, where it would be disposed of in the chip and grind facility's standard 65 gallon container. The Project would comply with all federal, state and local statutes and regulations related to solid waste. Additionally, the proposed project would supports local activities required to comply with local, state, and federal regulations associated with the reduction, diversion, and recycling of waste and diversion of waste from landfills. For example, the Alameda County Community Climate Action Plan includes a goal to "encourage participation in recycling and composting throughout the community" (Alameda County 2014b, p. 9). The proposed project would provide infrastructure to achieve this goal. The project would result in ***no impact*** to waste disposal law violations, waste handling, regulations or landfill capacity.

2. REVISIONS TO IS/ND TECHNICAL APPENDICES

Portions of the IS/ND Appendix D, Traffic Analysis, have been revised in response to the comments received.

On page 2 and 3 of the IS/ND, Appendix D, Proposed Vision Recycling Compost Facility Traffic Analysis Technical Memorandum, the text has been revised to clarify the type of feedstock received by the facility:

Operational Traffic

Operational vehicle trips on public roadways from the proposed project would come from deliveries of finished compost to customers and facilities. The existing chip and grind facility already receives ~~green waste~~ wood and green ~~feedstock~~ material and would grind it for green material ~~compost~~ feedstock for the proposed project. The green material feedstock received by the proposed project from the existing chip and grind facility consists of wood chips, mulches, soil amendment, and co-generation fuel. The development of the proposed compost facility would not result in any additional material processing at the existing chip and grind facility compared to existing conditions, and so no new traffic would be generated from deliveries to the chip and grind facility. Once processed, this green material feedstock would be transferred to the proposed project to undergo the composting process. Once complete, the finished compost would be delivered to one of four possible locations. These locations include delivery back to the Livermore Chip and Grind Facility (156 annual internal trips not using public roads), delivery to Vision Recycling's Newark Facility (approximately 26 miles away), to customers on the Northern San Francisco Peninsula (approximately 51 miles away), or to a biomass facility in Stockton (approximately 37 miles away). Vision Recycling has provided details of estimated truck traffic trips for the proposed project. Table 1 presents the estimated truck traffic trips on public roadways anticipated to be generated by the project.

D. REFERENCES

CalRecycle. 2012. California Department of Resources Recycling and Recovery, Local Enforcement Agency Central: Tiered Regulatory Placement Chart. Last updated December 6, 2012. Web accessed 11/18/2015. http://www.calrecycle.ca.gov/LEA/Regs/Tiered/TierChart.htm

SWRCB. 2015. State Water Resources Control Board Order WQ 2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations. August 4, 2015.