Partial Recirculation – Administrative Draft Environmental Impact Report

Jess Ranch Compost Facility, Conditional Use Permit, PLN2015-00087

Alameda County

224 West Winton Avenue
Hayward, California 94544

September 2020

Contents

Tables

1 Introduction

1.1 Background

On November 24, 2019, Alameda County released the Draft Environmental Impact Report for the Jess Ranch Composting Facility Project (Draft EIR). The Draft EIR evaluated the environmental impacts associated with the construction and operation of the proposed composting facility. The Draft EIR public review period ended on January 12, 2020. A number of comments were received during the public review period that will be addressed in the Final EIR. Among the comments received on the Draft EIR was one from the Alameda County Waste Management Authority (ACWMA), which stated, “In our opinion this is inadequate, and we request that in the final EIR, the analysis of alternatives include an alternative for a facility that processes a significantly lower throughput.” Based on this comment, the County feels that it is appropriate that the Draft EIR be amended to analyze a reduced-size project and recirculate it for public comments.

1.2 Draft EIR Partial Recirculation

In accordance with Public Resources Code Section 21092.1 and State California Environmental Quality Act (CEQA) Guidelines Section 15088.5, Alameda County is recirculating portions of the Jess Ranch Composting Facility Project Draft EIR (Recirculated Draft EIR) in response to new information.

CEQA Guidelines Section 15088.5 sets forth the legal standards and principles governing the recirculation of Draft EIRs. Subdivision (a) of that provision states that recirculation of an EIR should occur if:

> … significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term ‘information’ can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project …

Alameda County is recirculating the document to provide the public with a meaningful opportunity to comment on the additional information. The recirculation is “partial” (meaning that only chapters or portions of the prior Draft EIR with new information have been revised and reissued) rather than “full” (meaning that the entire document has been revised and reissued).

Recirculation of an EIR requires notice pursuant to CEQA Guidelines Section 15087, and consultation pursuant to Section 15086 [see State CEQA Guidelines, Section 15088.5, subd.(d)].

1.3 Recirculated Draft EIR Process

The Recirculated Draft EIR will be subject to review and comment by the public, as well as all responsible agencies and other interested parties, agencies, and organizations for a period of 45 days. Comments on the Recirculated Draft EIR should be submitted to:

Damien Curry, Senior Planner
Alameda County Planning Department
224 West Winton Ave.
Hayward, California 94544
(510) 670-6684

The Recirculated Draft EIR is available for public review at the County's office, identified above, between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.

Subdivision (f)(2) of Section 15088.5 describes the specific procedural and noticing requirements associated with the partial recirculation of the Draft EIR:

> When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised DEIR or by an attachment to the revised DEIR.

Therefore, pursuant to CEQA, commenters are asked to limit their comments to the revised sections of the Draft EIR. As limited to the topics of the recirculation, Alameda County will respond in writing to significant environmental points raised by the reviewers in their comments on the Recirculated Draft EIR. The comments and responses will be included in the Final EIR. The Final EIR shall consist of the Draft EIR, the Recirculated Draft EIR, comments received on both the Draft EIR and Recirculated Draft EIR, and the responses to those comments. After a public hearing on the project, the lead agency decision-making body (that is, the Alameda County Planning Commission) will review the Final EIR and any public testimony and decide whether to certify the Final EIR and whether to approve or deny the project.

1.4 Summary of Revisions to Draft EIR

The State CEQA Guidelines state that "[w]hen recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR" [see CEQA Guidelines, Section 15088.5, subd. (g)]. The revisions to the Draft EIR include a detailed analysis of the Alternatives section of the document. These revisions are introduced in Chapter 2 of this Recirculated Draft EIR and are provided as Chapter 4, to follow the document numbering convention of the Draft EIR.

The Executive Summary, Introduction, and Section 1.2.2, *Summary of Alternatives*, of the Draft EIR will be updated to include reference to this new alternative for the Final EIR; no other changes will be incorporated. No other changes would be made to the following chapters of the Draft EIR: Chapter 2, *Project Description*, Chapter 3, *Environmental Setting and Impact Analysis*, and Chapter 5, *CEQA Required Assessment Conclusions*. Therefore, these sections have not been reproduced in this Recirculated Draft EIR.

1.5 Alternatives Included in the Draft EIR

The County considered alternatives to the Proposed Project evaluated in the Draft EIR, including the use of alternate composting technologies for processing and disposal of organic material. The alternatives analyzed for the Proposed Project focus on reducing or avoiding identified significant environmental impacts. In addition to the Proposed Project, the County evaluated the No Project Alternative and an enclosed In-Building Composting Alternative. These are further described in Sections 4.2.1 and 4.2.2, respectively, of this Recirculated Draft EIR.

2 Recirculation Draft EIR

Changes have been made to the Alternatives chapter (Chapter 4) of the Draft EIR to address the comments made by ACWMA. A more detailed discussion of potential alternatives to the Proposed Project, including discussion of the Reduced Project Size Alternative, is included in this recirculation document—replacing the Alternatives chapter of the Draft EIR. The amended Alternatives chapter is shown below as Chapter 4 to be consistent with the Draft EIR.

4 Alternatives (Recirculated)

This chapter describes the CEQA Guidelines for addressing project alternatives, presents an analysis of alternatives to the Proposed Project, discusses the evaluation of potential impacts on environmental resources, and presents the environmentally superior alternative.

4.1 Introduction and Summary of Alternatives Analysis

This chapter consists of three main sections. The first section consists of this introduction and the background to the alternatives analysis. The second section discusses the three revised alternatives to the Proposed Project. These alternatives include Alternative 1 (No Project Alternative), Alternative 2 (In-Building Composting Alternative), and Alternative 3 (Reduced Project Size Alternative). A reduced project size alternative was suggested by ACWMA to potentially reduce the Proposed Project's adverse impacts. Therefore, it has been included in this analysis. The second section also evaluates the alternatives with regard to potential impacts on environmental resources. The third section presents the environmentally superior alternative.

4.1.1 CEQA Guidelines Regarding Alternatives

The State CEQA Guidelines give extensive direction on identifying and evaluating alternatives to a proposed project (Section 15126.6) in an EIR. The purpose of having alternatives in an EIR is to identify ways to lessen or avoid the significant effects. The alternatives should be reasonable and feasible and should reflect a range of possibilities. Although the alternatives do not have to meet every goal and objective set for the proposed project, they should "feasibly attain most of the basic objectives of the project."

The Guidelines specifically require consideration of a No Project Alternative. The purpose of including a No Project Alternative is to allow decision-makers to compare the impacts of approving the project with impacts of not approving a project. The Guidelines specifically advise that No Project is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment" [Section 15126.6(e)(3)(B)].

In addition to No Project, the Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that "would avoid or substantially lessen any of the significant effects of the project" [Section 15126.6(f)]. Factors that may be taken into account in considering the feasibility of an alternative include "… site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries … and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site …" [Section 15126.6(f)(1)].

CEQA does not require that all possible alternatives be evaluated, only that "a range of feasible alternatives" be discussed so as to encourage both meaningful public participation and informed decision making. In selecting alternatives to be evaluated, consideration may be given to their potential for reducing significant unavoidable impacts, reducing significant impacts that are mitigated by the project to less-than-significant levels, and further reducing less-than-significant impacts.

Section 15126(d) of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant environmental effects of the project. The "rule of reason" governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to allow a reasoned choice by the decision makers. Alternatives should, if feasible, avoid or substantially lessen the significant effects of the proposed project identified in the EIR. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.

As defined by Section 21061.1 of the CEQA Guidelines, "feasible" means an alternative is capable of being accomplished by the project applicant in a successful manner within a reasonable period of time, taking into consideration economic, environmental, social, and technological factors. In determining the feasibility of an alternative, the EIR evaluation must consider several factors including site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project applicant can reasonably acquire, control, or otherwise have access to an alternative site. In the case of a private applicant, the applicant does not have the power of eminent domain and cannot use that authority to acquire the property of others for its intended use. As such, CEQA does not require that an EIR evaluate and study potential off-site alternatives not owned or controlled by the applicant. In addition, if an alternative would cause one or more significant effects, over and beyond those associated with the proposed project after mitigation is applied, those significant effects must be discussed, but in less detail than the project's effects.

This alternatives analysis has been developed using the guidance of the CEQA Statute and the CEQA Guidelines.

4.2 Alternatives Analysis

The County considered alternatives to the Proposed Project evaluated in the Draft EIR, including the use of alternate composting technologies for processing and reuse of organic material. The analysis provided in Chapter 3 of the Draft EIR identifies a variety of impacts associated with the Proposed Project. Many of the impacts would be less than significant and some would be considered significant, but would be mitigated or avoided by specific aspects of the Proposed Project.

Responses to the initial Draft EIR circulated by the County identified concerns about possible impacts on air quality and dust, odors, project size, noise, traffic impacts, night lighting, protected species, birds and vectors, effects on groundwater, security concerns on the Contra Costa Water District parcel, and effects on sensitive residential land uses.

The comments provided on the Draft EIR informed the development of the alternatives evaluated below.

The alternatives analyzed for the Proposed Project focus on reducing or avoiding identified significant environmental impacts. This chapter identifies three alternatives to the Proposed Project, including the No Project Alternative, and analyzes the environmental effects associated with these alternatives as compared with those that would occur with development of the Proposed Project. The alternatives discussed and evaluated in this chapter are the No Project Alternative, In-Building Composting Alternative, and Reduced Project Size Alternative.

4.2.1 No Project Alternative

CEQA mandates that an EIR include an evaluation of a No Project Alternative to allow decision makers and the public to compare the impacts of approving a proposed project with the impacts of not doing so. The No Project Alternative in this case assumes that the Jess Ranch Composting Facility Project would not be developed at the Project site. Current land uses at the Project site, as described in Chapter 2, *Project Description*, of the Draft EIR would continue. The Project site would likely remain undeveloped because of its Large Parcel Agricultural zoning.

As described in Chapter 2 of the Draft EIR, organic materials that would be received at a composting facility primarily consist of greenwaste, foodwaste, and biosolids, but may also include untreated scrap wood, natural fiber products, non-recyclable paper waste, and inert material, such as sediment, gypsum, wood ash, and clean construction debris. Composting is the only practical and cost-effective processing method available to convert these waste materials into value-added products that can be returned to the community.

Under the No Project Alternative, an additional in-county composting facility would not be developed, but the other elements of the County's waste reduction and diversion programs would continue. However, it is likely that the long-range goal of 75 percent and greater diversion (County General Plan) could not be met in the absence of an additional in-county composting facility. Additionally, targets under Senate Bill 1383 to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025 would likely not be met without the establishment of new composting facilities. While a few other in-county composting facilities are available in the Project area, only one accepts agricultural waste and foodwastes, and none accept biosolids. Many compostable materials would, therefore, continue to be processed by out-of-county facilities, which would require longer hauling distances and greater traffic impacts, and would export a local waste problem to distant communities. Furthermore, exporting compostable organics out-of-county would preclude the assurance of a long-term, cost-effective, reliable in-county facility.

Under the No Project Alternative, there would be no land use impacts near the Project site. However, transporting organic waste out of the County for processing would likely cause land use impacts in the recipient jurisdictions, which would have the burden of siting and permitting new and/or expanded composting facilities to accommodate organics originating in Alameda County. Further, site-specific impacts identified in

Chapter 3 of the Draft EIR, such as visual effects relating to views from nearby roadways, increases in ozone precursor and particulate pollutants, increases in non-volatile organic compounds, exposure of members of the public to objectionable odors, loss of habitat and impacts on special-status species, potential disturbance to cultural resources, exposure of compost facility workers and end users to chemical contaminants and bioaerosols, and minor increases in traffic on local roadways would not occur under the No Project Alternative.

4.2.2 In-Building Composting Alternative

The In-Building Composting Alternative assumes development of a compost facility at the Project site, but rather than composting organic materials in conventional windrows or aerobic static piles (ASPs) outside through the entire composting process, all composting processes would be conducted in an enclosed structure.

Enclosed processes use a forced aeration and/or mechanical agitation to control conditions and promote rapid composting. Aeration may be accomplished through either negative or positive methods, as described in further detail below.

Negatively aerated processes generally use biofilters to remove odorous compounds through biological means. Biofilters are constructed over an air plenum or perforated pipes and consist of finished compost, wood chips, and/or other media that promotes bacterial growth. Air is pulled from beneath the compost pile using large blowers and conveyed to a series of perforated pipes located under the biofilter. The biofilter is located outside the building.

Positive air systems use a waterproof breathable fabric cover or biocover that is placed over the compost piles. The fabric cover material contains microscopic pores that prevent odorous molecules and water from passing through, trapping odors beneath the cover. Another air control method for positive aeration involves placing a biocover, consisting of a layer of finished compost or other material, on top of the compost windrow to form a biofilter to reduce odors.

Indoor composting facilities still have to rely on outdoor biofilters similar to those used in traditional ASP windrows to control emissions and odors, only significantly larger. A biofilter large enough to control emissions and odors from an enclosed facility would require approximately 3 acres. Biofilters also require a significant amount of water, which would require up to 100,000 gallons per day for the enclosed facility.

The odor impacts from a composting facility, whether it is in an enclosed building or located outside, is directly related to the efficiencies of the operation, best management practices, and odor control technologies in place. The Proposed Project would use an ASP system technology with either negative or positive aeration with a biofilter, micro-porous fabric covers, or a finished compost layer placed over the active windrows. In addition, the facility would operate in compliance with State Minimum Standards set forth in Title 14 of the California Code of Regulations for composting operations. Based on CalReycle studies, all of these methods, if operating properly, can reduce emissions by over 90 percent. As stated previously, enclosing the facility would not significantly reduce odors and emissions for the Project.

To enclose all of the composting operations at the proposed composting site, a building would need to be over 10 acres in size, or 500,000 square feet. Alameda County's East County Area Plan (ECAP), serves as the General Plan for the eastern portion of the unincorporated County. The project site is designated under the ECAP as Large Parcel Agriculture (LPA), which restricts building intensity on agricultural parcels. Non-residential development is restricted to a floor area ratio (FAR) of 0.01 of parcel square footage, which for the subject 123.19 acre parcel would be about 54,000 square feet. Therefore, a building large enough to enclose the Proposed Project would not be permittable because of restrictions in the County's general plan. Under the Proposed Project, the buildings at the site would total approximately 20,000 square feet, well below the county restrictions. Proposed buildings at the site would consist of the process/mixing buildings, maintenance building, potential portable modular office and administration buildings (depending on the office and administration building option chosen), and scale house. Under the In-Building Composting Alternative, the receipt and handling of organic feedstock would require similar physical and mechanical handling systems as the Proposed Project, and thus site-specific impacts at and near the Project site would still occur. Such impacts would include: visual effects relating to views from nearby roadways, increases in ozone precursor and particulate pollutants, increases in non-volatile organic compounds, potential exposure of members of the public to objectionable odors, loss of habitat and impacts on special-status species, potential disturbance to cultural resources, exposure of compost facility workers and end users to chemical contaminants and bioaerosols, and increases in traffic on local roadways.

The In-Building Composting Alternative would result in similar impacts on the aesthetic quality of the area and views from local roadways, cultural resources, loss of habitat and special-status species, potential exposure of the public to objectionable odors, the exposure of compost facility workers and end users to chemical contaminants and bioaerosols, and increases in traffic on local roadways. Given that construction of the In-Building Alternative would require substantially more space than the Proposed Project, and thus greater land disturbance during construction activities, impacts on geology and soils, cultural resources, and biological resources would likely result in greater and more widespread impacts when compared with the Proposed Project.

In addition, while technically feasible, composting in a building has proven to be expensive and, as discussed, would not provide significantly more protection against nuisance issues than other state-of-the-art outdoor ASP system technologies. The Project proponent has received a bid for an enclosed processing facility at the proposed site that would process approximately 150,000 tons per year. The bid was for the first phase of the Project, and the bid price was approximately $30 million, not including site improvement costs. The total cost for the first phase of the project would exceed $40 million and the total cost for the project at build-out would exceed $70 million.

The best example of a large-scale indoor composting facility in California is the Inland Empire Regional Composting Authority facility located in Rancho Cucamonga, California. It was constructed as a joint project between the Inland Empire Utilities Agency and County Sanitation Districts of Los Angeles County. The facility is located in a former Ikea furniture building and has a 3-acre outdoor biofilter to control odors. The facility has a capacity of 210,000 tons per year, and is 410,000 square feet in size. According to

published reports, the initial cost estimate for the facility was $30 million and final cost of the facility exceeded $80 million.

In summary, the In-Building Alternative was eliminated from consideration because of space requirements, increased impacts to certain resources, lack of protection against air quality and odor impacts, and a high projected cost estimate. Construction of the alternative facilities would be infeasible due to sizing restrictions imposed by County zoning restrictions. As discussed, the space requirements for this alternative could also result in increased ground disturbance and thus greater impacts on geology and soils, cultural resources, and biological resources compared with the Proposed Project. In addition, this option would require greater water use for the biofilters and would, therefore, result in greater impacts on water resources. Finally, composting in a building has proven to be expensive, would not lessen significant impacts on air quality, and would not provide significantly more protection against odor issues or impacts on other resources, such as aesthetics, compared with other state-of-the-art outdoor ASP system technologies.

4.2.3 Reduced Project Size Alternative

The Reduced Project Size Alternative assumes that the project would process an average of 500 tons per day of organic waste, instead of the 1,000 tons per day project analyzed in the DEIR. This reduced-size project would be located in the same property with a reduced-size site footprint. Consistent with the Proposed Project, the Reduced Project Size Alternative would accept primarily green materials, food materials, and biosolids, but may also receive untreated scrap wood, natural fiber products, non-recyclable paper waste, and inert material, such as sediment, gypsum, wood ash, and clean construction debris. Non-hazardous liquid wastes may also be accepted to be used as moisture conditioning in the piles to aid in efficient composting and minimize nuisance conditions.

Construction of the Reduced Project Size Alternative would occur as was described for Phase 1 of the Proposed Project; however, the Reduced Project Size Alternative would not progress into Phase 2 (full build-out) as is described for the Proposed Project in the Construction section of the Draft EIR. Construction details as they pertain to Phase 1 activities, including construction schedule, construction methods and equipment, site preparation and staging, are included in Section 2.2.4, *Construction of the Proposed Project*, of the Draft EIR. While some impacts on resources would be less under the Reduced Project Size Alterative, this alternative is not consistent with the Project need and objectives of assisting the County and surrounding counties in meaningfully meeting their future diversion goals. As described in Section 2.1 of the Draft EIR, the County has set a goal to reduce waste by 75 percent throughout the County by diverting the waste stream up to 1,000 tons per day. Currently, a major portion of Alameda County's composting feedstock is being transported out of the County to composting facilities**.**

As shown in the Alameda County 2015–2023 Housing Element of the General Plan, the Association of Bay Area Governments projects a 9.4 percent growth in population for Alameda County from 2020 to 2030, and an additional 9.8 percent from 2030 to 2040. Similarly, the Association of Bay Area Governments projects 22 percent growth in Contra

Costa County from 2020 to 2040 and more than 26 percent growth in the same period for Santa Clara County (http://projections.planbayarea.org/). Therefore, Alameda County may not be able to rely as heavily on diverting waste to composting facilities in surrounding counties because many of these counties have steep growth projections and waste diversion goals of their own, in accordance with the California Integrated Waste Management Act (Assembly Bill 939). The Act requires cities and counties to adopt and implement waste diversion programs for source reduction, recycling, and composting. The Reduced Project Size Alternative would help the County to meet some of its immediate waste diversion goals; however, it would not support growth in the region, as would the Proposed Project, which could accommodate two times more compost per year at some future time when Phase 2 would be implemented based on County need.

In addition, the Bay Area produces approximately 160,000 dry tons of biosolids annually. There are currently no composting facilities in the Bay Area that can use biosolids as a feedstock. Again, the Reduced Project Size Alternative would be able to accommodate the immediate need for processing of biosolids, but would likely be unable to meet the needs of the County and other communities in the Bay Area under projected growth projections discussed above.

The section below provides an evaluation of impacts by resource from implementation of the Reduced Project Size Alternative as compared with the Proposed Project.

Evaluation by Resource

Aesthetics

The Reduced Project Size Alternative would not significantly reduce the impacts identified in Section 3.3 of the Draft EIR. Consistent with the Proposed Project, this alternative would be located on undeveloped grassland. The site is surrounded by vacant properties, a conservation easement, and Interstate 580 and scattered rural residences farther out. While the Project footprint would be reduced, this alternative would also involve the introduction of composting operations and associated structures, which would change the visual quality of the area. The largest and most prominent feature of the composting facility would be the structure used for mixing operations, which would still be required for the Reduced Project Size Alternative. This alternative would also involve nighttime operation, which would result in nighttime glare that could be visible to motorists and some nearby residences. The Project as proposed (1,000 tons per day) would have a less than significant impact on aesthetics with the mitigation measures incorporated. The same mitigation would be required for the Reduced Project Size Alternative to reduce impacts to a less than significant level.

Air Quality and Greenhouse Gases

Section 3.4 of the Draft EIR analyzed air quality, odors, and greenhouse gases that would be generated at the proposed composting facility. According to the air modeling and projected emissions generated at the site, the Proposed Project (1,000 tons per day) would have significant unavoidable impacts on air quality. Table 2.2-2 of the Draft EIR lists the construction equipment required for each phase of the Project. The table shows that the equipment needed only for Phase 1 of construction (Reduced Project Size

Alternative) would not differ substantially from the equipment needed for both Phases 1 and 2 (full build-out Proposed Project). However, the duration of equipment usage under the Proposed Project would be approximately 4 months longer. This would result in decreased total emissions under the Reduced Project Size Alternative, but peak daily emissions would not change. Further, the decrease in emissions from the Reduced Project Size Alternative would not be substantial enough that it would reduce impacts to a less than significant level. According to the Bay Area Air Quality Management District engineering report calculations for composting facilities, the Proposed Project would exceed significance levels if the Project exceeded 40 tons per day. Therefore, impacts on air quality would remain significant and unavoidable under this alternative.

During operations, a 50 percent reduction in material would result in a similar reduction in air quality and greenhouse gas emissions. However, given the large exceedance of the Bay Area Air Quality Management District thresholds for the full site, the impacts during operations would remain significant and unavoidable for this alternative.

Biological Resources

Section 3.5 of the Draft EIR identifies potential special-status species and sensitive habitats at the Project site. The Proposed Project would affect both special-status species and their sensitive habitats. A number of special-status species occur in the Project area, as described in Section 3.5 of the Draft EIR. Much of the Project area is located on annual grassland and ruderal/developed areas, which are not considered to be natural communities of special concern; however, annual grassland may provide potential habitat for special-status species. In addition, the Project area contains aquatic resources, which are considered sensitive natural communities.

The Proposed Project would result in a less-than-significant impact on biological resources with mitigation incorporated. The Proposed Project is located on 30 acres of land, while the Reduced Project Size Alternative would occur on only 20 acres of land. This 10-acre reduction under the Reduced Project Size Alternative would be on land assessed to not contain sensitive biological resources. As a result, there would be no change in potential impacts on biological resources under the Reduced Project Size Alternative and the same mitigation discussed in Section 3.5 would be required to reduce impacts on biological resources to a less than significant level.

Cultural Resources

Section 3.6 of the Draft EIR identifies the cultural resources research and field assessment of the Proposed Project site. Based on the research and field survey assessments, it was determined that implementation of the Proposed Project would not result in the disturbance of eligible or significant cultural resources. No cultural resources were identified within the Proposed Project's area of potential effects. Nonetheless, while unlikely, buried or previously unidentified cultural resources could exist. As such, mitigation measures are included in this section in the event that any cultural resources are discovered on the site during construction or composting operations. The Reduced Project Size Alternative would result in a smaller Project footprint (20 acres as opposed to 30 acres for Proposed Project). However, the limited potential for adverse impacts resulting from the discovery of previously unidentified cultural resources would remain

the same. With applied mitigation, impacts under the Reduced Project Size Alternative would remain as less than significant with mitigation incorporated.

Energy

Section 3.7 of the Draft EIR discusses potential impacts of the Proposed Project related to energy use and concludes that the Project would have a less than significant impact. Under the Reduced Project Size Alternative, the alternative Project would use approximately 40 percent less energy than the Proposed Project. However, while a larger composting facility may require more energy use for site operations, a larger facility is also capable of reducing a greater quantity of methane emissions. Composting reduces methane emissions from organic waste currently stockpiled or sent to a landfill. Additionally, composting practices that maximize aerobic conditions, such as the Proposed Project, are the most effective in reducing greenhouse gas emissions (Government of Western Australia 2018). Therefore, a smaller composting facility, such as the Reduced Project Size Alternative, would not yield as many beneficial environmental impacts as related to the reduction in methane and greenhouse gas emissions. Both the Proposed Project and the Reduced Project Size Alternative would have less than significant impacts on energy resources.

Geology and Seismicity

Section 3.8 of the Draft EIR identifies the geologic environment of the Proposed Project based on geologic reports and topographic and geologic maps. The section assesses potential impacts that could result from rupture of a known local fault, strong ground shaking, liquefaction, landslides, soil erosion, and unstable soils. The Draft EIR concluded that impacts related to geology and seismicity would be less than significant with mitigation incorporated. Both the Proposed Project and Reduced Project Size Alternative are located at the same site in the Bay Area where strong ground shaking is possible in the event of an earthquake. Given the relatively low-intensity uses proposed on the Project site, the potential for substantial building damage or injuries to workers would be low. During construction, clearing, grubbing, and grading activities would remove ground cover and could result in increased erosion or make soils susceptible to shrink-swell potential. Erosion impacts under the Proposed Project would be less than significant. The Reduced Project Size Alternative would result in less ground disturbance, and therefore fewer impacts on erosion and loss of top soil; however, impacts would remain less than significant. Impacts from shrink-swell potential, landsliding, and paleontological resources would all result in less than significant impacts with mitigation incorporated under the Proposed Project. The Reduced Project Size Alternative would result in similar impacts given that the same structures would be installed under this alternative and the same ground-disturbing activities would be required, albeit on a smaller project footprint. Mitigation measures outlined in Section 3.8 of the Draft EIR would be required under the Reduced Project Size Alternative to reduce impacts on geology and soils to a less than significant level.

Hazards and Human Health

Section 3.9 of the Draft EIR addresses potential hazards associated with the construction and operation of the Proposed Project. The hazards assessment presented in the section summarizes the Proposed Project's operations, with a focus on the potential hazards associated with the waste stream, and evaluates the risk of human exposure to these hazards. This section also addresses fire risks associated with the Project site. During construction of both the Proposed Project and the Reduced Project Size Alternative, a limited number of miscellaneous hazardous substances (such as petroleum-based products/fluids, solvents, and oils) would be employed at the project and staging areas. Hazardous materials such as fuel, lubricants, antifreeze, and pesticides for vector control would also be used, stored, and disposed of during operation. It is likely that the Reduced Project Size Alternative would require fewer quantities of these hazardous substances. However, with best management practices and mitigation incorporated, impacts would be less than significant for both the Reduced Project Size Alternative and Proposed Project. The Proposed Project and the Reduced Project Size Alternative would expose composting facility workers and end users of compost to chemical contaminants and/or pathogens potentially present in compost feedstock, not dependent on the size of the facility. Vectors and fire hazards would also be common to both the Proposed Project and Reduced Project Size Alternative. Under the Proposed Project, impacts on hazards and human health would be less than significant with mitigation incorporated. Impacts would not differ substantially under the Reduced Project Size Alternative.

Hydrology and Water Quality

Section 3.10 of the Draft EIR provides the hydrologic and water quality environment of the Project site and assesses potential impacts from grading, drainage alteration, and potential exposure of compost materials to runoff and leaching that could result from implementation of the Proposed Project. Degradation of water quality could result from grading, earth moving, roadway evacuation, and facility construction. All of these activities are common to both the Proposed Project and the Reduced Project Size Alternative and could result in stormwater discharges of suspended solids and other pollutants into local drainage channels from the Project construction site. However, the Reduced Project Size Alternative would reduce grading by approximately 33 percent at the site, which could reduce the amount of stormwater runoff at the site. The potential for chemical releases from construction equipment and materials is also a concern at construction sites and can potentially contaminate surface waters if spills or leaks occur. During operations, the primary sources of wastewater generated by the Proposed Project and Reduced Project Size Alternative would be leachate from the composting piles. Under the Reduced Project Size Alternative, there would be fewer composting piles and, therefore, reduced contaminated wastewater impacts during operation. Impacts under the Proposed Project and the Reduced Project Size Alternative would be less than significant with mitigation incorporated. Similar to the Proposed Project, the implementation of a detailed Stormwater Pollution Prevention Plan would be required to minimize potential adverse water quality impacts associated with this alternative. The Proposed Project would not substantially degrade water quality during operations, alter

the existing drainage pattern of the site, or substantially decrease groundwater supplies or interfere with groundwater recharge. These impacts would all be less than significant under the Proposed Project. The volume of water needed for the composting process depends on the raw materials as well as the climate. As such, the Reduced Project Size Alternative would require less water and could result in fewer impacts on groundwater supplies. This difference, however, would be negligible.

Land Use and Agriculture

Section 3.11of the Draft EIR describes the potential impacts on land use and agricultural resources resulting from implementation of the Proposed Project. Impacts on land use under the Proposed Project would be less than significant. The Project area is located on land designated as Large Parcel Agriculture, as defined by the East County Area Plan, and Agricultural (A-District) zoning as defined by Title 17 Zoning Ordinance of the Alameda County Code of Ordinances. The Proposed Project would be consistent with existing zoning because it would be considered a waste management facility as well as an agricultural processing facility. The Proposed Project is also a conditionally allowed use within the A-District by Alameda County, although it is a composting facility. These land uses also apply to the Reduced Project Size Alternative. The Proposed Project would require a partial cancellation (20 acres) of the Williamson Act Contract currently on the property. The property owner submitted a Notice of Cancellation of the contract in 2014. The Reduced Project Size Alternative would still require a partial cancellation of 10 acres of contracted land. The land use compatibility impacts of this alternative would not differ substantially from those anticipated with the Proposed Project.

Noise

Section 3.12 of the Draft EIR includes a description of ambient noise conditions, a summary of applicable regulations, and an analysis of potential short-term construction and long-term operation noise impacts of the Proposed Project. An Environmental Noise Assessment was conducted for the Proposed Project and is included in Appendix F of the Draft EIR (Charles M. Salter Associates Inc. 2015). Under the Reduced Project Size Alternative, noise and vibration would be generated from Phase 1 construction activities, including use and transport of materials and construction equipment, site preparation and earthwork, and installation of facilities (see Section 2.2.4 of the Draft EIR for Phase 1 activities). Most of the construction grading operations would occur at more than 2,500 feet from the nearest residence under both the Proposed Project and Reduced Project Size Alternative. Table 2.2-2 in the Draft EIR includes a list of types of major construction equipment needed for each phase of the Project. The table shows that the equipment needed only for Phase 1 of construction would not differ substantially from the equipment needed for both Phases 1 and 2. However, the duration of equipment use under Phase 2 (full build-out) would be approximately 4 months longer.

The composting facility operation equipment listed in Table 3.12-3 of the Draft EIR would be required for both the Reduced Project Size Alternative and the Proposed Project. Therefore, the reduction in material handled under the Reduced Project Size Alternative would have a negligible effect on the noise and vibration analysis. The Draft EIR concluded that the Project would have a less than significant impact with no mitigation

measures required. The noise and vibration levels generated from the area associated with the Reduced Project Size Alternative would also remain less than significant

Public Services and Utilities

Section 3.13 of the Draft EIR discusses impacts related to public services and utilities, including water, wastewater, solid waste, electricity, natural gas, telecommunications, police and fire protection, schools, parks, and libraries. The Draft EIR concludes that the Project would have a less than significant impact on public services and utilities. The Proposed Project would involve approximately 12 employees and 5 visitors per day. The Reduced Project Size Alternative would require approximately the same number of workers during construction, and the same number of visitors and about half the number of workers during operation. With a decrease of only 6 employees, the Reduced Project Size Alternative would not substantially change the employee population such that it would result in an increase or decrease in the demand on public services.

The Reduced Project Size Alternative would likely require less water during composting operations, and produce less wastewater and solid waste. Similar to the Proposed Project, there would be a less than significant impact on these resources under the Reduced Project Size Alternative. Both the Proposed Project and the Reduced Project Size Alternative would be constructed entirely on a field zoned for agricultural purposes, where electric power, natural gas, and telecommunications facilities are not present. As a result, none would be affected by the Proposed Project or the Reduced Project Size Alternative.

Transportation and Circulation

Section 3.14 of the Draft EIR presents the current transportation network and regulatory setting and summarizes the effects on the existing and future expected circulation system that would result from the Proposed Project. As discussed in Section 3.14.3 of the Draft EIR, it is anticipated that the Proposed Project would generate 170 truck, 24 employee, and 10 visitor daily trips, for a total of 204 daily trips. The Draft EIR concludes that the Project would have a less than significant impact on transportation with mitigation incorporated. The Reduced Project Size Alternative would require approximately the same number of workers during construction and about half of the number of employees during operations (that is, six). It would be expected that the Reduced Project Size Alternative would generate about half of the truck trips as the Proposed Project, given the limitation in capacity. Additionally, both the Proposed Project and the Reduced Project Size Alternative assume that there would be no truck deliveries during peak congestion periods, minimizing impacts on congestion in the Project area during peak hours. The construction season for the Reduced Project Size Alternative would be 4 months shorter than the Proposed Project. Fewer Project-related trucks and vehicles would be on the roads during that 4-month construction period. During operations, the Proposed Project was found to have less than significant impacts on level of service and vehicle miles traveled. For all CEQA thresholds analyzed, the Proposed Project was found to have less than significant impacts. As such, impacts from the Reduced Project Size Alternative, albeit with less truck trips, would not reduce the level

of impact for the Proposed Project because impacts were already determined to be less than significant.

Tribal Cultural Resources

Section 3.15 of the Draft EIR is related to the cultural resources section (Section 3.6 of the Draft EIR) and discusses impacts on cultural resources directly related to Native American tribal cultures that populated the area where the Proposed Project is located. The distinction for tribal cultural resources is that they are described as a site, feature, place, cultural landscape geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe. Cultural resources are generally considered as archaeological or paleontological resources that are typically beneath the surface of the ground and are discovered or uncovered through disturbance of the site. The potential tribal cultural resources impacts associated with the Proposed Project were identified and discussed in the Draft EIR.

Information in this section of the Draft EIR was based on information provided in an archaeological survey report prepared by Peak and Associates (2016) for the Proposed Project and was included in Appendix E of the Draft EIR. The Draft EIR concluded that impacts on tribal cultural resources would be less than significant with mitigation incorporated. Impacts from the Proposed Project were found to potentially affect unknown archaeological resources, including Native American artifacts and human remains. These artifacts, sites, and remains may also be, by extension, considered tribal cultural resources. Mitigation was proposed to reduce the potential for impact to less than significant. The Reduced Project Size Alternative would result in 33 percent less land being disturbed from construction of the reduced-size facility and, correspondingly, the risk of finding unidentified artifacts, sites, and remains. However, with mitigation incorporated, adverse impacts on cultural resources would not be anticipated with either alternative.

Conclusion

This recirculation document was developed in response to ACWMA's comment during public review of the Proposed Project, that the alternatives analysis in the Final EIR should include an alternative for a facility that produces a reduced throughput. As a result, this document provides an analysis for the Reduced Project Size Alternative, which has a throughput of 500 tons per day, compared with 1,000 tons per day of throughput under the Proposed Project.

The Reduced Project Size Alternative would involve a smaller footprint of disturbance, a shorter construction season, and smaller operations, which could result in less impacts on various resources compared with the Proposed Project. However, the evaluation of impacts by resource area showed that while some conditions improved under the Reduced Project Size Alternative, no changes in impact determinations would occur when compared with the Proposed Project. The improvements under the Reduced Project Size Alternative would in many cases be negligible, would not be great enough to reduce significant and unavoidable impacts, or would not eliminate the need for mitigation. All mitigation that would be required under the Proposed Project would also

be required for the Reduced Project Size Alternative to reduce impacts to a less than significant level.

One of the primary objectives of the Project, as discussed in Section 2.1.4 of the Draft EIR, is to support the County of Alameda in meeting its 75-percent goal for waste reduction countywide by diverting from the waste stream up to 1,000 tons per day of organic materials. The Reduced Project Size Alternative would fail to meet this objective because the daily throughput would be half of what is required. The Project is also needed to help other jurisdictions and counties meet their individual diversion goals; facilitate and secure a long-term, in-county organics processing facility available to government agencies; and meet the state, local, and regional composting requirements of recent legislation. Currently, a major portion of Alameda County's composting feedstock is being transported out of county to composting facilities, and approximately 35 percent of remaining potential organic composting feedstock is currently disposed of in Alameda County landfills. A composting facility that processes only 500 tons per day of organic materials would not meaningfully and effectively address future County needs, and would not be able to accommodate organics from surrounding counties, while also securing long-term operations.

Table 4-1 provides a comparison of alternatives, and Table 4-2 provides a list of biological resources mitigation measures.

Table 4-1. Summary Comparison of Alternatives

Alternatives	Proposed Project	No Project Alternative	Reduced Project Size Alternative
Does alternative meet Project objectives?	Yes	No	No
Aesthetics			
Impact AES-1: Permanent alteration of the visual character and quality of the Proposed Project area	LTSM	NI	LTSM
Mitigation Measure AES-1: Provide visual screening of Project facilities.	X	—	X
Impact AES-2: Introduction of new sources of light and glare at the site	LTSM	NI	LTSM
Mitigation Measure AES-2: Reduce light and glare effects.	X	—	X
Air Quality and Greenhouse Gases			
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan	SU	NI	SU
Impact AQ-2: Violate any air quality standard or contribute significantly to an existing or projected air quality violation	LTSM	NI	LTSM
Mitigation Measure AQ-1: Implement BAAQMD's Basic Construction Mitigation Measures.	X	—	X
Mitigation Measure AQ-2: Use Tier 2 or better equipment.	X	—	X
Mitigation Measure AQ-3: Composting control measures.	X	—	X
Impact AQ-3: Result in a cumulative net increase of any nonattainment pollutant (including releasing emissions that exceed quantitative thresholds for ozone precursors)	SU	NI	SU
Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations	LTS	NI	LTS
Impact AQ-5: Create objectionable odors affecting a substantial number of people	LTS	NI	LTS
Impact AQ-6: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	LTS	NI	LTS
Impact AQ-7: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs	LTS	NI	LTS

Alternatives	Proposed Project	No Project Alternative	Reduced Project Size Alternative
Biological Resources			
Impact BIO-1: Impacts on candidate, sensitive, or special-status species.	LTSM	NI	LTSM
Mitigation Measures BIO-1 to BIO-36 (see Table 4-2)	X	—	X
Impact BIO-2: Impacts on riparian, aquatic or wetland habitat, or other sensitive natural community.	LTSM	NI	LTSM
Mitigation Measures BIO-1 to BIO-36 (see Table 4-2)	X	—	X
Mitigation Measure BIO-36: Provide mitigation for permanent impacts on sensitive communities at a minimum 1:1 ratio.	X	—	X
Impact BIO-3: Impacts on state and/or federally protected wetlands.	LTSM	NI	LTSM
Mitigation Measures BIO-1 to BIO-36 (see Table 4-2)	X	—	X
Impact BIO-4: Impacts on wildlife movement.	NI	NI	NI
Impact BIO-5: Conflict with local policies and ordinances.	NI	NI	NI
Impact BIO-6: Conflict with conservation plans.	NI	NI	NI
Cultural Resources			
Impact CR-1: Cause a substantial adverse change in the significance of a historical or archaeological resource.	LTSM	NI	LTSM
Mitigation Measure CR-1: Halt construction activities if any cultural materials are discovered.	X	—	X
Impact CR-2: Disturb human remains.	LTSM	NI	LTSM
Mitigation Measure CR-2: Halt construction activities if any human remains are discovered.	X	—	X
Energy			
Impact ENRG-1: Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation.	LTS	NI	LTS

Alternatives	Proposed Project	No Project Alternative	Reduced Project Size Alternative
Impact ENRG-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	NI	LTS
Geology and Seismicity			
Impact GEO-1: Structures, facilities, and workers could be subject to seismic hazards.	LTS	NI	LTS
Impact GEO-2: Project construction activities could result in soil erosion or loss of top soil.	LTS	NI	LTS
Impact GEO-3: Structures and facilities could be subject to damage related to shrink-swell potential and/or settlements of site soils.	LTSM	NI	LTSM
Mitigation Measure GEO-1: Perform geotechnical investigation and reporting.	X	—	X
Impact GEO-4: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTSM	NI	LTSM
Mitigation Measure GEO-2: Follow the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts on Paleontological Resources.	X	—	X
Impact GEO-5: Damage to structures, pavements, and/or utilities at the compost facility site if cut and fill slopes fail, resulting in landsliding.	LTSM	NI	LTSM
Mitigation Measure GEO-3: Perform geotechnical investigation for slope stability.	X	—	X
Hazards and Human Health			
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction and operation.	LTS	NI	LTS
Impact HAZ-2: Construction and operation of the Proposed Project could 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.	LTS	NI	LTS
Impact HAZ-3: Composting facility workers and end users of compost could be exposed to chemical contaminants and/or pathogens potentially present in compost feedstocks.	LTSM	NI	LTS
Mitigation Measure HAZ-1: Prepare and implement screening, monitoring, testing, and training procedures.	X	—	X

Alternatives	Proposed Project	No Project Alternative	Reduced Project Size Alternative
Impact HAZ-4: Composting facility workers could suffer health effects as a result of exposure to bioaerosols.	LTSM	NI	LTSM
Mitigation Measure HAZ-2: Provide worker training and protective equipment.	X	—	X
Impact HAZ-5: Composting operations may attract vectors, which may pose a health risk to facility workers and the general public.	LTSM	NI	LTSM
Mitigation Measure HAZ-3: Prepare a Vector Control Plan.	X	—	X
Impact HAZ-6: Composting operations may expose workers, residents, and structures to increased fire hazards.	LTS	NI	LTS
Hydrology and Water Quality			
Impact HWQ-1: Degradation of water quality during construction and operation.	LTSM	NI	LTSM
Mitigation Measure HWQ-1: Prepare and implement a SWPPP.	X	—	X
Impact HWQ-2: Degradation of groundwater quality during operation.	LTS	NI	LTS
Impact HWQ-3: Alteration of the existing drainage pattern of the site.	LTS	NI	LTS
Impact HWQ-4: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge.	LTS	NI	LTS
Land Use and Agriculture			
Impact LU-1: Conflict with existing zoning for agricultural use, or a Williamson Act contract.	LTS	NI	LTS
Impact LU-2: Conversion of farmland to non-agricultural use.	LTS	NI	LTS
Noise			
Impact NO-1: Substantial temporary or periodic increase in ambient noise levels in the project vicinity during construction.	LTS	NI	LTS
Impact NO-2: Substantial permanent increase in ambient noise levels in the project vicinity due to operations at the compost facility.	LTS	NI	LTS
Impact NO-3: Substantial permanent increase in ambient noise levels in the project vicinity due to traffic volume associated with the project.	LTS	NI	LTS

Alternatives	Proposed Project	No Project Alternative	Reduced Project Size Alternative
Impact NO-4: Generation of excessive groundborne vibration or groundborne noise levels.	LTS	NI	LTS
Public Services and Utilities			
Impact PSU-1: Increase demand for police and fire protection and emergency medical services.	LTS	NI	LTS
Impact PSU-2: Require a sufficient water supply to serve the Project site.	LTS	NI	LTS
Impact PSU-3: Generate wastewater requiring treatment.	LTS	NI	LTS
Impact PSU-4: Generate stormwater drainage requiring the construction of drainage facilities.	LTS	NI	LTS
Impact PSU-5: Generate solid waste requiring landfill disposal.	LTS	NI	LTS
Impact PSU-6: Require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.	LTS	NI	LTS
Transportation and Circulation			
Impact TRANS-1: Increase in traffic on local roadways during construction.	LTS	NI	LTS
Impact TRANS-2: Increase in traffic on local roadways during operation.	LTS	NI	LTS
Tribal Cultural Resources			
Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource.	LTSM	NI	LTSM
Mitigation Measure TCR-1: Implement Mitigation Measures CR-1 and CR-2.	X	_	X

Notes: NI = no impact; LTS = less than significant; LTSM = less than significant with mitigation incorporated; SU = significant and unavoidable
The In-Building Composting Alternative is not included in this table because it was eliminated from consideration due to infeasibility of construction resulting from sizing requirements that would not meet County zoning restrictions, much higher cost, and increased impacts on various resources. See Section 4.2.2 for discussion.

Table 4-2. Mitigation for Biological Resources

Biological Resources Mitigation Measures
Mitigation Measure BIO-1: Conduct pre-construction surveys and implement avoidance and minimization measures for special-status plant species.
Mitigation Measure BIO-2: Conduct environmental tailboard trainings.
Mitigation Measure BIO-3: Obligate all contractors to comply with East Alameda County Conservation Strategy Avoidance and Minimization Measures.
Mitigation Measure BIO-4: Hire a qualified biological monitor to remain on site during all construction activities in or adjacent to habitat for special-status species.
Mitigation Measure BIO-5: Delineate construction area to prevent encroachment of construction personnel and equipment outside of the construction area.
Mitigation Measure BIO-6: Prevent nighttime construction.
Mitigation Measure BIO-7: Restrict grading to the minimum area necessary and limit grading to the dry season.
Mitigation Measure BIO-8: Prevent earth-moving activities in riparian areas within 24 hours of predicted storms or after major storms.
Mitigation Measure BIO-9: Store and inspect pipes, culverts, and similar materials greater than 4 inches in diameter to prevent covered wildlife species from using these as temporary refuges.
Mitigation Measure BIO-11: Remove all vegetation that obscures the observation of wildlife movement prior to the initiation of grading.
Mitigation Measure BIO-12: Place all trash and debris from work area in containers with secure lids.
Mitigation Measure BIO-13: Stockpile material in order to avoid effects to covered species.
Mitigation Measure BIO-14: Cover excavated holes and trenches deeper than 6 inches at the end of each workday with plywood or similar materials.
Mitigation Measure BIO-15: Prevent trash dumping, firearms, open fires, hunting, and pets at or near work sites.
Mitigation Measure BIO-16: Park vehicles on pavement, existing roads, and previously disturbed areas.
Mitigation Measure BIO-17: Minimize off-road vehicle travel.
Mitigation Measure BIO-18: Set speed limit on unpaved roads, within natural land-cover types, or during off-road travel.
Mitigation Measure BIO-19: Prohibit refueling of vehicles within 100 feet of a wetland, stream, or other waterway.
Mitigation Measure BIO-20: Wash vehicles only at approved areas, outside of job sites.
Mitigation Measure BIO-21: Discourage the introduction and establishment of invasive plant species.

Biological Resources Mitigation Measures
Mitigation Measure BIO-22: Revegetate Project site with an appropriate assemblage of native riparian wetland and upland vegetation.
Mitigation Measure BIO-23: Translocation of special-status species.
Mitigation Measure BIO-24: Hire a qualified botanist to perform focused surveys to determine the presence/absence of special-status plant species in the Project area.
Mitigation Measure BIO-25: Avoid state listed, federally listed, and/or California Native Plant Society List 1 or List 2 plant species found within 100 feet of the Project area.
Mitigation Measure BIO-26: Hire a qualified biologist to survey the work site immediately prior to construction activities.
Mitigation Measure BIO-27: Use bare hands to capture California red-legged frog, California tiger salamander, California glossy snake, and/or San Joaquin coachwhip.
Mitigation Measure BIO-28: Hire a qualified biologist to stake and flag an exclusion zone prior to ground-disturbing activities if these activities would occur within the typical dispersal distance and/or within 500 feet of suitable aquatic habitat for California red-legged frogs and California tiger salamanders.
Mitigation Measure BIO-29: Provide mitigation for permanent impacts on California red-legged frog and California tiger salamander habitat at a minimum 3:1 ratio.
Mitigation Measure BIO-30: Hire a qualified biologist to conduct preconstruction surveys to identify active migratory bird and/or raptor nests if construction activities would occur during the migratory bird nesting season.
Mitigation Measure BIO-31: Conduct work outside of nesting season if an active nest is identified near a proposed work area.
Mitigation Measure BIO-32: Hire a qualified biologist to determine whether active dens for San Joaquin kit fox and/or American badger occur within 500 feet of the proposed work areas.
Mitigation Measure BIO-33: Avoid disturbance and destruction to dens.
Mitigation Measure BIO-34: Implement exclusion zones following current U.S. Fish and Wildlife Service procedures or the latest Service procedures available at the time.
Mitigation Measure BIO-35: Provide mitigation for permanent impacts on San Joaquin kit fox habitat at a minimum 3:1 ratio.
Mitigation Measure BIO-36: Provide mitigation for permanent impacts on sensitive communities at a minimum 1:1 ratio.

4.3 Environmentally Superior Alternative

The No Project Alternative is considered the environmentally superior alternative because impacts associated with development of the Proposed Project would not occur. Impacts identified for the Proposed Project that would not occur with the No Project Alternative include: visual effects relating to views from nearby roadways, increases in ozone precursor and particulate pollutants, increases in non-volatile organic compounds, potential exposure of members of the public to objectionable odors, loss of habitat and impacts on special-status species, potential disturbance to cultural resources, exposure of compost facility workers and end users to chemical contaminants and bioaerosols, and increases in traffic on local roadways. However, CEQA Guidelines Section 15126.6(e)(2) also states: "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The No Project Alternative does not meet the Project's purpose and need, and is not consistent with the State's organic waste reduction goals under Senate Bill 1383 or with County waste diversion goals that call for the siting of up to two in-county composting facilities to facilitate the minimal goal of 75-percent diversion of waste products. Therefore, the No Project Alternative is not consistent with adopted plans and policies. The In-Building Composting Alternative was found to be infeasible due to building development restrictions and a substantially greater cost. The Reduced Project Size Alternative and the Proposed Project result in the same findings of significance for all resources evaluated and would require the same mitigation measures; however, the Reduced Project Size Alternative, as discussed above, does not meet the Project purpose or objectives for the long term. Therefore, the environmentally superior alternative would be the Proposed Project.