

**Final
Program Environmental Impact Report
Landfill Strategic Plan for Glenn County,
California**

Prepared for:

Glenn County Planning and Public Works Agency
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February 2009

ICF Jones & Stokes. 2009. *Program Environmental Impact Report: Landfill Strategic Plan for Glenn County, California*. Final. February. (ICF J&S 05426.05.) Sacramento, CA. Prepared for the Glenn County Planning and Public Works Agency.

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Acronyms and Abbreviations

ADC	alternate daily cover
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CIWMB County	California Integrated Waste Management Board Glenn County
EIR	environmental impact report
GCLF	Glenn County Landfill
IS	initial study
LFG	landfill gas
MMRP	mitigation monitoring and reporting program
MRF	material recovery facility
MSW	municipal solid waste
OPR	Governor's Office of Planning and Research
PEIR the proposed program	program environmental impact report implementation of the <i>Landfill Strategic Plan for Glenn County, California</i>

Purpose of This Document

This document, together with the draft program environmental impact report (PEIR) for the implementation of the *Landfill Strategic Plan for Glenn County, California* (the proposed program) that was circulated in December 2008 and January 2009, constitutes the final PEIR for the proposed program. The information presented in this document has been provided in accordance with the requirements of the California Environmental Quality Act (CEQA) Guidelines and includes the chapters listed below.

- Chapter 1, “Introduction,” discusses the purpose of this document, the public review process, requirements under CEQA, and the uses of this document.
- Chapter 2, “Text Changes to Draft PEIR,” contains a discussion of any changes needed to the text of the draft PEIR in response to comments received during the public review period for the draft PEIR.
- Chapter 3, “Comments on Draft PEIR and Responses to Comments,” contains comments received during the public review period for the draft PEIR and the responses by Glenn County (County) to those comments.
- Chapter 4, “Mitigation Monitoring and Reporting Program,” contains the mitigation monitoring and reporting program (MMRP) for the proposed program.

Public Review Process

The draft PEIR was distributed to various public agencies, citizen groups, and interested individuals for a 45-day public review period, from December 10, 2008, through January 23, 2009. The draft PEIR was circulated to state agencies for review through the State Clearinghouse of the Governor’s Office of Planning and Research. Copies of the draft PEIR were available for public review during normal business hours at the Glenn County Planning and Public Works Agency office. During the review period, written comments were received from members of the public and agencies.

CEQA Requirements

As the lead agency under CEQA, the County must provide each public agency that commented on the draft PEIR with a copy of its responses to comments at least 10 days before certifying the final PEIR.

Use of This Document

A final PEIR allows the public and public agencies to review revisions to the draft PEIR; comments on the draft PEIR; responses to comments; and other components of the PEIR, such as the MMRP, before approval of the program. This final PEIR, including the draft PEIR incorporated by reference, will serve as the environmental document used by the County when considering approval of the proposed program.

After completing the final PEIR and before approving the program, the lead agency must make the following three certifications (State CEQA Guidelines Section 15090).

- The final PEIR has been completed in compliance with CEQA.
- The final PEIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the final PEIR before approving the program.
- The final PEIR reflects the lead agency's independent judgment and analysis.

In addition, if a PEIR that has been certified for a program identifies one or more significant environmental impacts, the lead agency must adopt findings of fact (State CEQA Guidelines Section 15091[a]) in connection with approval of the program. For each significant impact, the lead agency must make one of the following findings.

- Changes or alterations that avoid or substantially lessen the significant environmental effect as identified in the PEIR have been required in or incorporated into the program.
- Such changes or alterations are the responsibility and within the jurisdiction of another public agency, not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or program alternatives identified in the final PEIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. In addition, the lead agency must adopt, in conjunction with the findings,

a program for reporting or monitoring the changes that it has either required in the program or made a condition of approval to avoid or substantially lessen impacts (State CEQA Guidelines Section 15091[d]). These measures must be fully enforceable through permit conditions, agreements, or other measures. This is the MMRP, described above.

In addition, when a lead agency approves a program that would result in significant and unavoidable impacts that are disclosed in the final PEIR, the agency must state in writing its reasons for supporting the approved action (State CEQA Guidelines Section 15093[b]). This statement of overriding considerations must be supported by substantial information in the record, including the final PEIR. Because the proposed program would result in significant and unavoidable impacts, the County is required to adopt a statement of overriding considerations if it approves the program. The statement of overriding considerations is not a substitute for the findings of fact described above.

The certifications, findings of fact, and statement of overriding considerations are included in a separate findings document that will accompany the County's staff report if and when the County approves the proposed program. The draft PEIR (incorporated by reference), final PEIR, findings of fact, and statement of overriding considerations are submitted to the County for consideration of the proposed program.

Chapter 2

Text Changes to Draft PEIR

This chapter would contain any changes to the draft PEIR chapters and would show the reader via strikethrough and underline where text had been changed. However, there were no comments on the draft PEIR that warranted changes in the original text within the draft PEIR. Therefore, this chapter contains no changes.

Chapter 3

Comments on Draft PEIR and Responses to Comments

As described in Chapter 1, the draft PEIR was circulated for review and comment by the public and other interested parties, by agencies that commented on the initial study (IS) and notice of preparation of the PEIR, and by surrounding jurisdictions. Comment letters on the draft PEIR were received from individuals and agencies. The letters received are listed in Table 3-1, and copies of the letters, with each individual comment marked and numbered, are provided in this chapter.

As stated in State CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise environmental issues must be provided with responses. This chapter contains the County's responses to comments received on the draft PEIR. Reasoned, factual responses have been provided for all comments received, focusing specifically on the environmental issues raised. In general, the responses provide explanation or amplification of information contained in the draft PEIR. Comments that are outside the scope of CEQA review will be forwarded to the decision-makers for consideration as part of the project's approval process. Those comments are answered with a general response.

The comment letters and comments within each letter are numbered consecutively. For example, Letter 1 is the first letter, and Comment 1-1 is the first comment in Letter 1. Revisions made to the draft PEIR in response to comments are identified as text to be deleted (~~strike through~~) or text to be added (underline). All text changes are also indicated in Chapter 2.

Table 3-1. Comments Received on the Draft PEIR

Letter	Date	Commenter	Address
1	December 29, 2008	California Department of Transportation	703 B Street Marysville, CA 95901-9011
2	January 23, 2009	California Integrated Waster Management Board	1001 I Street Sacramento, CA 95814
3	January 26, 2009	California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	1400 10th Street Sacramento, CA 95812

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
P. O. BOX 911
MARYSVILLE, CA 95901-0911
PHONE (530) 741-4025
FAX (530) 741-5346
TTY (530) 741-4509



*Flex your power!
Be energy efficient!*

Letter 1

December 29, 2008

Glenn County Planning and Public Works Agency
P. O. Box 1070
125 South Murdock Avenue
Willows, CA 95988

Dear Mr. Murphy:

Thank you for the opportunity to review and comment on the program Draft Environmental Impact Report for the Landfill Strategic Plan for Glenn County (SCH# 2007122062). We have the following comments in regards to the CEQA document.

Transportation/Traffic

Once a final alternative option is chosen, a project Environmental Impact Report (EIR) will need to be completed. It is important that the EIR adequately address all potential significant impacts upon the State Highway System. A Traffic Impact Study (TIS) needs to be completed as part of the EIR, and should address Interstate 5 (I-5). The TIS should consider traffic impacts to ramps, ramp intersections and mainline segment. We recommend that the TIS be based on the "Guide for the Preparation of Traffic Impact Studies", updated December 2002, which can be downloaded at:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>.

We would like to meet with the County to review the scope of the TIS before the Study begins.

1-1

Please provide our office with copies of any further actions regarding this project. If you have any questions regarding these comments, please contact Cindy Saya, Glenn County IGR Coordinator, at (530) 741-7136.

1-2

Sincerely,

SUKHVINDER (SUE) TAKHAR
Chief, Office of Transportation Planning - North

RECEIVED

JAN 05 2008

P & PWA

"Caltrans improves mobility across California"

Responses to Comment Letter 1—California Department of Transportation

Response to Comment 1-1

The commenter states that once the County chooses a final option, a project-level environmental impact report (EIR) will need to be prepared to address all potential environmental impacts on the state highway system.

As stated in Chapter 1 of the draft PEIR, “Summary,” the preparation of the draft PEIR for the *Landfill Strategic Plan for Glenn County, California* does not relieve the County of the responsibility of complying with the requirements of CEQA once an alternative within the strategic plan is selected and carried forward as an individual project. The County will prepare a project-level EIR for the option that will be carried forward as an individual project. All traffic-related impacts will be identified and discussed within the future EIR.

Response to Comment 1-2

The commenter states that the California Department of Transportation (Caltrans) would like to be provided with any further communication regarding the proposed program.

Comment noted. Caltrans will be included on the distribution list for any future actions associated with this program.



CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



ARNOLD SCHWARZENEGGER
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025
(916) 341-6000 • WWW.CIWMB.CA.GOV

Letter 2

MARGO REID BROWN
CHAIR
MBROWN@CIWMB.CA.GOV
(916) 341-6051

January 23, 2009

SHEILA JAMES KUEHL
SKUEHL@CIWMB.CA.GOV
(916) 341-6039

Mr. Randy Murphy
Glenn County Planning and Public Works Agency
P.O. Box 1070
Willows, California 95988

JOHN LAIRD
JLAIRD@CIWMB.CA.GOV
(916) 341-6010

Subject: State Clearinghouse (SCH) No. 2007122062 – Draft Program Environmental Impact Report (PEIR) for the *Glenn County Landfill (GCLF) Strategic Plan* for landfill expansion and three other potential future operations for handling, processing, disposing, and/or transporting municipal solid waste (MSW) at the GCLF that may require the issuance of revised Solid Waste Facility Permit No. 11-AA-0001, Glenn County.

CAROLE MIGDEN
CMIGDEN@CIWMB.CA.GOV
(916) 341-6024

Dear Mr. Murphy:

Staff of the California Integrated Waste Management Board (CIWMB or Board) has reviewed the draft PEIR cited above and offer the following project description quotations from the draft PEIR for Board staff's future reference, followed by comments on the *GCLF Strategic Plan*.

ROSALIE MULÉ
RMULE@CIWMB.CA.GOV
(916) 341-6016

PROPOSED CONCEPTUAL PROJECT DESCRIPTION

Following is the specific proposal in the *GCLF Strategic Plan* draft PEIR (in quotations):

GARY PETERSEN
GPETERSEN@CIWMB.CA.GOV
(916) 341-6035

Glenn County Landfill Strategic Plan (Plan)

“The Plan was prepared for Glenn County (County) and consists of four options for the continuation of MSW disposal services provided by the GCLF Facility. The goal of the Plan is to determine long-term options for solid waste disposal within the County. The County has developed the Plan to guide future operations at the GCLF. The proposed program involves implementing one of the four options of the Plan. For the purposes of the California Environmental Quality Act (CEQA) compliance, those four options are described in this PEIR as program alternatives.



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The County, through its Planning and Public Works Agency, strives to provide to businesses and residents long-term solid-waste disposal services and recycling that are cost-effective and environmentally sound. The overall objectives of the proposed program are to implement a plan for the GCLF that would allow the County to continue providing environmentally sound and cost-effective solid-waste disposal services for GCLF customers within Glenn County.”

Location and Study Area

“The GCLF is located at the western terminus of County Road 33, approximately 5 miles west of Interstate 5 (I-5) and the unincorporated town of Artois, about 80 miles north of Sacramento. Access to the site is provided solely by County Road 33 from the Artois/County Road 33 interchange on I-5.

The existing GCLF site, consisting of approximately 193 acres, is located primarily in Section 35 of Township 21 North, Range 4 West, Mount Diablo Base and Meridian, Assessor’s Parcel No. 24-220-016. A small portion of the existing GCLF is located on the eastern limit of Section 34, Assessor’s Parcel No. 24-220-005.

The County first leased the GCLF site in July 1971. The County signed a 50-year lease, and GCLF operations began in 1972. Of the 193 acres, approximately 87 are used for waste disposal. In the 36 years since operations began, the GCLF has provided refuse disposal for private citizens, commercial entities, and franchise refuse collectors in Glenn County. However, the need for refuse disposal has increased gradually since the opening of the GCLF.”

PROGRAM ALTERNATIVES

Landfill Strategic Plan Options

“As mentioned above, the four options of the Plan are being analyzed in this draft PEIR as program alternatives under CEQA. The words “option” and “alternative” may be used interchangeably.”

Option 1—GCLF Expansion

“Option 1 would increase landfill capacity at the GCLF and allow the GCLF to continue to serve the waste-disposal needs of Glenn County. This would include the development of both Phase A (vertical expansion) and Phase B (horizontal expansion) of the GCLF. The current active landfill, Phase A, is an unlined waste management unit (WMU). Prior to Phase A expansion, a separation liner would be placed over the proposed vertical expansion area. This option assumes that the County would purchase a 500-foot buffer around the landfill; in addition to providing a buffer from open space areas, it would accommodate remediation installations and ancillary facilities needed in the future.

The Plan discusses three scenarios for Option 1. The first (base case) would be to serve only Glenn County. The second would include importing waste to reduce the unit cost of the GCLF operations. The third would include a GCLF expansion to serve only Glenn County waste and a

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basic unloading material recovery facility (MRF) building located at the GCLF, also to serve waste and recyclables only from Glenn County. The third scenario assumes that the MRF building would be required in the future, to help boost recycling efforts by recovering materials from the tipping floor. The three scenarios for Option 1 would not result in significantly different environmental effects. It is assumed that the waste stream to the landfill would increase slightly if wastes were accepted from outside the County and would slow slightly with recovery of materials at a MRF, but landfill operations and expansion would be similar. The major differences would be economic. The analysis contained in the EIR focuses on the first scenario, which includes serving Glenn County only.

The landfill expansion under Option 1 would increase the height of the existing landfill area, identified as Phase A, and add a lined expansion area with landfill modules and related facilities to the area identified as Phase B (currently not used for landfilling). This expansion would increase the total GCLF capacity from 1.2 million tons to 8.9 million tons. The maximum elevation of the landfill (over Phase A) would be 422 feet above mean sea level (MSL) at closure.

The purchase of the 500-foot buffer area proposed for the GCLF expansion would include additional portions of Section 35 (Assessor's Parcel No. 24-220-016) and portions of Section 26 (Assessor's Parcel No. 24-220-023), Section 27 (Assessor's Parcel No. 24-220-001), and Section 34 (Assessor's Parcel No. 24-220-005). The buffer property includes approximately 156 acres."

Option 2—Development of a Transfer Station

"This option involves closing the GCLF, constructing a transfer station at the site, and using an out-of-county landfill for disposal. The transfer station also would function as a basic MRF, allowing the recovery of materials with a loader from the tipping floor. This option also would provide the flexibility to expand the building and add materials recovery equipment and labor, at additional cost, if needed in the future. The Plan did not analyze off-site locations for a transfer station, because the GCLF site is conveniently located near the center of waste generation for the County and already is used for solid-waste management activities.

Option 2 assumes that landfill operation would not continue into the Phase B area and therefore would allow for ample space to construct a 2.8-acre facility composed of a tipping floor, a load-out lane, an expansion area, ancillary areas, and scales. It also assumes the County would purchase the 500-foot buffer and install the remediation and ancillary facilities needed to comply with permit requirements. It is assumed that floor recovery activities at the proposed transfer station facility would result in only a limited amount of additional diversion at the facility over the current level at the GCLF."

Option 3—Waste-to-Energy/Conversion Technology

"Option 3 involves waste-to-energy (WTE) /conversion technologies (CTs). This option includes a comparison of various WTE/CTs and assumes that an anaerobic digestion CT facility at the GCLF site would be the most suitable technology based on the service requirements of the County waste stream. It is noted that all of these technologies, including anaerobic digestion, are

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relatively unproved for application to MSW at this time. However, despite the present lack of concrete data for CTs using MSW, California communities are moving to embrace new technologies. These technologies may become more applicable in the near future. These technologies may include the possibility of using residuals left from a composting operation, for example. Landfilling and materials separation play vital roles in each of the technologies associated with WTE/CT.

The anaerobic digestion WTE/CT would use an unloading building for the front end of the CT facility, similar to the transfer station concept outlined in Option 2. Additional building space, preprocessing equipment and labor would need to be added to remove inorganic and unsuitable materials from the waste stream to be sent to a digester. Based on the current waste stream at the GCLF, digester equipment would be added to process the organic portion of waste (roughly estimated at 50% of the total waste stream). Because of the remote location of the GCLF site, it is assumed that the methane gas recovered from the digester would be used to fuel a plant. The gas recovery facility, co-located with the digester, would produce electricity for use on the site. The compost produced from anaerobic digesters would be used on the site for beneficial uses, such as mulch and landfill cover erosion control, or sold, if a market exists. Materials unsuitable for introduction into the digester would be transferred to out-of-county landfills for disposal.

As with Options 1 and 2, this option would include the purchase of a 500-foot buffer and installation of remediation and ancillary facilities in this zone as required by permit conditions.”

Option 4—No Project

“For Option 4, this report includes a discussion of the activities for the management of solid waste if the County were to not select one of the other options mentioned above. At some point in the near future, the County would have to close the GCLF. In this case, it is assumed that the County would not provide a disposal facility to replace the GCLF and collection haulers and self-haul public users would have to travel to disposal facilities outside the County for this service. Eventually, the County would have to implement the closure plan for the existing landfill in compliance with its permit requirements. The site would have to be covered, graded to final contours and monitored for gas and leachate migration.

As with the other options, Option 4 would include the purchase of a 500-foot buffer and installation of remediation and ancillary facilities in this zone as required by permit conditions.”

Existing Land Uses

The proposed projects includes an amendment of the County Zoning Code to establish a Public Lands zone district for intensive use of non-recreation, non-habitat areas, and rezoning of the landfill site and a 500-foot buffer area in the zone district thus established. The General Plan designation for the landfill is Public Facilities. The existing General Plan designates the land area that would be included in the buffer area as Intensive Agriculture, with 40-acre minimum parcel size. The proposed project includes an amendment of the General Plan to designate areas acquired as part of the implementation of the 500-foot buffer area as “Public Facilities.” With

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these amendments, the proposed project would be consistent with the applicable zoning and General Plan.

Adjacent land uses to the GCLF are primarily Agricultural Preserve, 80 acres minimum (AP-80) in the form of grazing land to the north, west and south; Farmland Security Zone, 72 acres minimum (FS-80) to the east; Exclusive Agricultural, 32 acres minimum (AE-40) to the south and southeast. The nearest residential neighbors are located more than 5,000 feet northeast and southeast of the GCLF facility’s boundary. Approximately 1,800 feet west of the western boundary of the property is a seasonally occupied shepherder’s residence. The Tehama-Colusa Canal borders the landfill site on the east; no buffer area would be established on this border of the landfill.

BOARD STAFF COMMENTS

Future Environmental Review

Page 2-3 in the draft PEIR states that:

“This PEIR is the first tier of environmental documents prepared; it would later be augmented, if required, by second-tier environmental documents when additional details for those specific transportation projects are developed during the engineering design process. Specific alternatives included in the program would be reevaluated when they are proposed for implementation. Planning for each specific project, from one of the program options, would involve refining project information to indicate the type of project to be implemented, location of the project, and a description of actions to be taken throughout project implementation.

Subsequent environmental documents would incorporate by reference appropriate information from this PEIR regarding secondary impacts, cumulative impacts, broad alternatives, and other relevant factors. Subsequent environmental documents would focus solely on site-specific issues that have not been considered in this PEIR. If a specific project were later found to have impacts that were not examined in this PEIR, additional CEQA review would be required. If the County finds that implementation of a specific project would have no new impacts and that no new mitigation measures would be required or that the project would be considered exempt, that activity would require no additional CEQA review.”

Board staff has concerns about the lead agency’s statement cited above because it does not identify which “Options” would require subsequent CEQA analysis. The specific statement of concern is from page 2-3 of the draft PEIR says that: “If the County finds that implementation of a specific project would have no new impacts and that no new mitigation measures would be required or that the project would be considered exempt, that activity would require no additional CEQA review.” Board staff would have difficulty permitting Options 1 and 2, and possibly Option 3, if more information regarding landfill design and operations (e.g. ‘footprint’ acreage for Phase B, landfill height for Phase B; total acreage for Phases A and B; maximum depth of excavation for Phase B; estimated closure date for the landfill, yearly percentage increase in peak throughput tonnage, a site plan for the landfill and ancillary facilities (to scale), and hours of operation); and regarding the construction and operation of a MRF (e.g. MRF design and

2-1

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operations, site plan for the MRF (to scale); yearly percentage increase in peak throughput tonnage, and hours of operation) were not disclosed and analyzed in an environmental document (e.g. Subsequent EIR) to implement Options 1 and 2. 2-1
cont'd

The *GCLF Strategic Plan* draft PEIR only addresses Option 1 for Phase A and B capacity, landfill height for Phase A (not Phase B), and side slopes design (3:1); and Option 2 for acreage of a MRF within the Phase B area. The regulatory authority germane to the CIWMB's permitting process requires that all aspects of the landfill and/or MRF design and operations be identified in a CEQA document for permitting purposes. 2-2

The CIWMB is a responsible agency that has a legal responsibility for also carrying out or approving a project. A responsible agency must actively participate in the lead agency's CEQA process, review the lead agency's environmental document, and use that document when making a decision on the project proposal (Public Resources Code Section 21069, Title 14 California Code of Regulations (CCR) Sections 15096 and 15381). A responsible agency is required to rely on the lead agency's environmental document in acting on whatever aspect of the proposed project that requires its approval, but must prepare and issue its own findings regarding the project as proposed (14 CCR §15096). A responsible agency generally must consider the lead agency's CEQA document legally adequate, subject to narrow exceptions (Public Resources Code Section 21167.3 and 14 CCR §§15052 and 15096). In certain cases, a responsible agency may take over a 'lead agency role' if the lead agency's document is not adequate for its use (14 CCR §15052). 2-3

An environmental document is intended to focus on potentially significant environmental impacts and information that is germane to the CIWMB's regulatory authority over current and future operations at the GCLF. Board staff has independently determined that the *GCLF Strategic Plan* draft PEIR is solely intended to address information that is strictly for the decision-making body of the lead agency to determine a course of action on which of the four "Options" to choose. If Options 1 or 2 are chosen for future implementation at the GCLF, Board staff would require more specific information on the project(s) which may have the potential to significantly impact human health and safety and on the environment. Board staff has independently determined that the project proposal and environmental analysis in the draft PEIR is insufficient for the CIWMB's permitting process for Options 1 and 2. A subsequent environmental document (ED) must address a specific entitlement that requires a permit action from the CIWMB (e.g. revision to SWFP No.11-AA-0001). 2-4

The following comments are to be applied toward the specific project proposal under Options 1 and 2 if one is chosen for consideration of approval and future compliance with CEQA thereafter.

Option 1: Lateral and Vertical Expansion of the Waste Disposal 'Footprint'

Please explain why Option 1 is the preferred option for analysis in the draft PEIR? One of the three scenarios for Option 1 includes a MRF, which is addressed in Option 2 and does not have the same level of analysis as Option 1. Page 3-2 through 3-3 in the draft PEIR states that "The three scenarios for Option 1 would not result in significantly different environmental effects." 2-5

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What evidence substantiates this conclusion? Page 3-3 in the draft PEIR states that “It is assumed that the waste stream to the landfill would increase slightly if wastes were accepted from outside the County and would slow slightly with recovery of materials at a MRF...”. What evidence substantiates that the County would not import significant amounts of MSW from out-of-County sources, that would increase the waste stream to the GCLF significantly?

2-5
 cont'd

Option 1 would increase the landfill’s capacity to allow the GCLF to continue to serve the waste-disposal needs of Glenn County. This would include development of both Phase A (vertical expansion) and B (horizontal expansion) of the GCLF. The current active landfill (Phase A) is an unlined facility. Prior to Phase A expansion, a separate liner would be placed over the proposed vertical expansion area. Describe in detail the excavation of Phase B and type and placement of the liner system. What is the approximate separation between the landfill bottom liner and the distance to the perched and subterranean aquifers/groundwater tables? How will the leachate collection and removal system (LCRS) be designed for Phase B? Please include a schematic drawing of the proposed locations of the LCRS piping.

2-6

Increase in Final Fill Elevation

Please provide a detailed description of the proposed increase in maximum landfill elevation (Phases A and B). Describe the final elevation, slopes and contours of the landfill, and if the final height will be the highest the landfill will be at any point of the project, or if the proposed height will be the maximum height after the landfill is closed and capped. Please include a contour map (final grading plan), to scale, for both Phase A and Phase B WMUs.

2-7

Describe in detail the fill plan for the proposed vertical expansion of the GCLF. Exactly what areas of the landfill expansion will be directly over buried refuse which does not have the benefit of a liner system and/or a leachate collection and removal system (LCRS)? What is the potential for accelerated leachate production and migration due to the overburden weight of the vertical expansion in Phase A? Also, how will the additional overburden of waste materials affect the LCRS’s ability to manage leachate, if applicable?

2-8

Expanded Landfill Gas (LFG) Management and Utilization System

Please provide a detailed description of proposed LFG monitoring and collection systems’ design and operation, and method of determining the location of the LFG collectors. Has LFG been detected beyond the boundary of the landfill? What is the estimated LFG volume that the LFG collection system requires? What are the safety provisions that will be in place to deal with the possibility of system failure? Please include relative information on the environmental effects of proposed systems for use and management of landfill gas, proposed operating methods and limits, and all solid waste non-disposal operations to be conducted within the area of the LFG system.

2-9

Ancillary Operations

Please describe what ancillary facilities (e.g. equipment/operations/structures) are proposed to be located within the 156-acre 500 foot buffer area? A biological survey of the buffer area should

2-10

GCLF Strategic Plan PEIR
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be conducted prior to circulation of a subsequent environmental document for the project proposal. If equipment, operations, and/or structures are located on or near buried landfill refuse, those areas should be identified together with the requirements to assure that there won't be any impacts associated with the migration of LFG? | 2-10
 cont'd

What provisions are will be located at the GCLF Facility to prevent project related impacts from litter, odor, dust, glare, and vectors? | 2-11

Exactly how much of each type of recyclable material is proposed for storage at the GCLF and where will these materials be located on site? What is the exact size of each proposed storage area? Where is the exact location of each proposed storage area? Which proposed operations and storage of materials areas are to be covered? Which materials being processed and/or stored may potentially come in contact with storm water? | 2-12

Importation of Soil Materials for Daily, Intermediate, and/or Final Cover

Soil materials have been excavated from the Phase B landfill 'footprint'; were these soil materials used for construction and/or daily or intermediate cover for the Phase A WMU, or were they stockpiled for use in the construction of the Phase B landfill WMU? If soils are necessary in the construction and/or daily operation of the GCLF and are not available on site, then the subsequent environmental document should state the estimated amount of soil needed and analyze the impacts associated with transporting the soil materials from an off-site source. On-site storage of any imported soil materials should discuss where the soil will be stockpiled on site and the maximum height the soil piles can maintain without slippage or collapsing. | 2-13

If an alternative daily cover (ADC) material is to be used for daily and/or intermediate cover, please analyze the proposal for its storage, handling, and use at the GCLF facility. A demonstration project for ADC would be required before ADC approval for use at the GCLF Facility. | 2-14

Option 2: Development of a Transfer Station (TS)/MRF

Page 3-4 through 3-5 states that "Option 2 assumes that landfill operation would not continue into the Phase B area and therefore would allow for ample space to construct a 2.8-acre facility composed of a tipping floor, a load-out lane, an expansion area, ancillary areas, and scales. It also assumes the County would purchase the 500-foot buffer and install the remediation and ancillary facilities needed to comply with permit requirements." What information substantiates the assumption "...that landfill operation would not continue into the Phase B area..."? Page 3-4 through 3-5 also states that "It also assumes the County would purchase the 500-foot buffer and install the remediation and ancillary facilities needed to comply with permit requirements." What public agency's permit requirements does this statement refer to? | 2-15

Development of a TS/MRF would require specific analysis of the design and operation of the facility in a subsequent environmental document. Aspects of the TS/MRF that should be discussed in the subsequent environmental document includes: the size of the building, the location of the tipping floor within the building, the entrance and exit locations to and from | 2-16

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the building, the proposed peak daily tonnage of TS/MRF and associated peak daily vehicle traffic to and from the TS/MRF, the hours of public access and operations of the facility, all mechanized equipment within the TS/MRF, a site plan (to scale) of the TS/MRF and all ancillary facilities associated with the TS/MRF (e.g. storage areas, gate house location, household hazardous waste identification and storage, etc.).

2-16
 cont'd

Option 3: Waste-to-Energy/Conversion Technologies (WTEs/CTs)

Option 3 in the draft PEIR on page 1-4 states that: "It is noted that all of these technologies, including anaerobic digestion are relatively unproved for application to MSW at this time." Since this technology is currently in the research and development stage for consideration, the CIWMB has received and considered new technologies for WTEs and CTs to be researched and developed in California. At such time that WTE or CT technologies are considered to be feasibly implemented at the GCLF, it is recommended that the project proponent contact the appropriate Board staff for review, consultation, and consideration. Information on the Board's Strategic Directive – 9: *Research and Development of Technology* can be accessed at the following Internet link: <http://www.ciwmb.ca.gov/boardinfo/strategicplan/2007/SD09.htm>.

2-17

REGULATIONS which MAY AFFECT ASPECTS of the PROJECT PROPOSAL

Wood Waste, Construction and Demolition and Inert Debris

Storing and processing of construction and demolition wastes may be subject to the Construction and Demolition and Inert Debris Transfer/Processing regulations in 14 CCR §§17380 - 17386. Please see the following Internet link to the regulations: <http://www.ciwmb.ca.gov/Regulations/Title14/ch3a59a.htm>.

2-18

Acceptance, Processing and/or Storage of Organic Materials

Board staff requests that mitigation in the draft EIR include that all wood waste, green waste, and food waste accepted at the GCLF should not have a moisture content greater than 50 percent, and that these organic wastes be handled/processed in a manner so as to not exceed 122 degrees Fahrenheit (° F). Organic waste exceeding 122° F will begin to undergo microbial digestion, and is considered a composting facility under Title 14, CCR, Chapter 3.1 "Composting Operations Regulatory Requirements".

2-19

GCLF Operations, Location, Construction and Monitoring

Please be aware of the following regulations which apply to the project proposal:
 Title 27, CCR, § 21190 – **Postclosure Land Use:**

- (a) Proposed postclosure land uses shall be designed and maintained to:
- (3) prevent landfill gas explosions.
- (g) All on site construction within 1,000 feet of the boundary of any disposal area shall be designed and constructed in accordance with the following, or in accordance with an equivalent design which will prevent gas migration into the building, unless an exemption has been issued:

2-20

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- (1) a geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade;
- (2) a permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab;
- (3) a geotextile filter shall be utilized to prevent the introduction of fines into the permeable layer;
- (4) perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging;
- (5) the venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system;
- (6) automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected; and
- (7) periodic methane gas monitoring shall be conducted inside all buildings and underground utilities in accordance with Article 6, of Subchapter 4 of this chapter (§ 20920 et seq.).

You may contact Scott Walker of the Remediation, Closure, and Technical Services Branch at (916) 341-6319, or e-mail at swalker@ciwmb.ca.gov for technical assistance.

Title 14, CCR, §17410.1. Solid Waste Removal

- (a) All solid wastes shall be removed at the following frequencies or at an alternate frequency approved by the Enforcement Agency (EA), in order to prevent the propagation or attraction of flies, rodents or other vectors:
 - (1) operations shall remove solid wastes accepted at the site within 7 days from the date of receipt;
 - (2) facilities shall remove solid waste accepted at the site within 48 hours from the time of receipt.

2-20
 cont'd

Title 14, CCR, §17407.5. Hazardous, Liquid, and Special Wastes

- (a) An operation or facility shall not intentionally accept or store hazardous wastes, including batteries, oil, paint, and special wastes, unless it has been approved to handle the particular waste by the appropriate regulatory agencies. Such approvals shall be placed in the operating record.
- (b) At operations and facilities where unauthorized hazardous wastes are discovered, control measures as are necessary to protect public health, safety and the environment, such as elimination or control of dusts, fumes, mists, vapors or gases shall be taken prior to isolation or removal from the operation or facility,
- (c) Liquid wastes and biosolids shall not be accepted or stored at an operation or facility unless the operator has written approval to accept such wastes from the appropriate agencies and the EA. The LEA shall authorize acceptance of these wastes only if the operation, facility, and the transfer vehicles are properly equipped to handle such wastes in a manner to protect public health, safety, and the environment.

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Mitigation Reporting or Monitoring Program (MRMP)

As required by PRC §21081.6, the lead agency should submit a MRMP at the time of local certification of the EIR. This program should identify the environmental impacts associated with the proposed project, identify mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations are successful, and specify a monitoring/tracking mechanism. PRC §21080(c)(2) requires that mitigation measures "...avoid the effects or mitigate the effects to the point where clearly no significant effects on the environment would occur." The MRMP is required to be completed as a condition of project approval. PRC §21081.6(b) requires that "A public agency shall provide the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." The MRMP should also clearly indicate the agencies or private entities designated to enforce each mitigation measures in the EIR and that they have reviewed the MRMP and agreed that they have the authority and means to accomplish the designated enforcement responsibilities.

2-21

CONCLUSION

Following is a URL that contains detailed CEQA information germane to landfills, composting facilities/operations, and MRF design and operations for those seeking a SWFP from the CIWMB. You can access the complete checklist of information over the Internet at: <http://www.ciwmb.ca.gov/PermitToolbox/CheckItems/CEQA/default.htm#Guidelines> .

2-22

Board staff requests copies of and consultation on any subsequent or revised environmental documents. The proposed final PEIR and any subsequent or revised draft EIRs should be circulated through the State Clearinghouse as required in Section 15205(a) of the CEQA Guidelines. In accordance with PRC §21092.5, Board staff requests that the CIWMB be noticed of the date, time and location of any public hearings regarding the project proposal at least ten days in advance.

2-23

Thank you for the opportunity to comment on this project in the early planning stages. Board staff are available for any planned scoping meetings, workshops or other public meetings upon your written request at least ten days in advance.

If you have any questions regarding these comments, please contact me at (916) 341-6327, facsimile at (916) 319-7213, or e-mail me at jloane@ciwmb.ca.gov

Sincerely,

Original Signed by:

John Loane, Integrated Waste Management Specialist (IWMS)
Assistance and Permits Branch - North
Permitting and LEA Support Division
Waste Compliance and Mitigation Program
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

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cc: State Clearinghouse
Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812-3044

Sue O'Leary, Supervisor
Assistance and Permits Branch - North
Permitting and LEA Support Division
Waste Compliance and Mitigation Program
California Integrated Waste Management Board

Nevin Yeates, IWMS
Assistance and Permits Branch - North
Permitting and LEA Support Division
Waste Compliance and Mitigation Program
California Integrated Waste Management Board

John Wells, LEA
Health Services Department
240 N Villa Avenue
Willows, CA 95988

Health Services Department
257 N Villa Avenue
Willows, CA 95988

Responses to Comment Letter 2—California Integrated Waste Management Board

Response to Comment 2-1

The commenter states that the California Integrated Waste Management Board (CIWMB) will have difficulty permitting some of the proposed options without additional project information. Specifically, the CIWMB is concerned about the following statement within the draft PEIR: “If the County finds that implementation of a specific project would have no new impacts and that no new mitigation measures would be required and that the project would be considered exempt, that activity would require no additional CEQA review.” The commenter is specifically concerned with the potential for permitting activities within each of the options within the strategic plan, once a proposed project is identified.

Chapter 1, of the draft PEIR, “Summary,” outlines the purpose of the draft PEIR. Page 1-1 states, “This EIR also identifies measures that would reduce or avoid significant environmental impacts resulting from the Project. As a Program EIR, the preparation of this document does not relieve Glenn County from the responsibility of complying with the requirements of CEQA once an alternative within the Strategic Plan is selected and carried forward as an individual project. As previously mentioned, CEQA requires individual projects to prepare a more precise, project-level analysis. The lead agency responsible for reviewing these projects shall determine the level of CEQA review needed.”

Response to Comment 2-2

The commenter notes that additional information about future projects at the Glenn County Landfill (GCLF) would need to be identified within a CEQA document for the permitting process.

The draft PEIR is a program-level CEQA document. Following the identification of a preferred option for future implementation, a complete project-level CEQA review and environmental document will be prepared. This will include all aspects of the proposed project information germane to the CIWMB permitting process.

Response to Comment 2-3

The commenter states that as a responsible agency, the CIWMB must actively participate in the lead agency’s CEQA process and consideration of a CEQA document. In some cases, a responsible agency may take over the lead agency role if the CEQA document is not adequate for its use.

Comment noted.

Response to Comment 2-4

The commenter states that the draft PEIR is strictly a program-level document intended for the sole purpose of assisting the County in selecting a preferred option from the *Landfill Strategic Plan for Glenn County, California* and that once a preferred option is chosen, a subsequent environmental document must be prepared in accordance with the CIWMB permitting process.

Once a preferred option is identified, the County will prepare a project-level environmental document that will include analysis of potential environmental impacts and details necessary for making a sound decision on the specific project.

Response to Comment 2-5

The commenter would like clarification as to why Option 1 is identified in the draft PEIR as the preferred option and requests substantiation for this conclusion. The commenter would like further evidence supporting the statement that the County would not import significant amounts of municipal solid waste (MSW) from out-of-county sources, should the importing of MSW be identified for future use at the GCLF.

Analysis within the draft PEIR of the proposed options for future use of the GCLF was conducted on a program level. Identification of the environmentally superior option was limited to information that was available within the *Landfill Strategic Plan for Glenn County, California*. Project-specific details that will be developed later may answer the specific questions related to the potential importing of MSW to Glenn County. However, given the program-level analysis results presented within the draft PEIR, Option 1 presented the least potential for environmental impacts, particularly as Options 2 and 3 would have potential impacts on air quality and climate change. There is currently no evidence that a significant increase in waste stream would occur if the County opened the GCLF to haulers from outside Glenn County.

Response to Comment 2-6

The commenter would like specific information and schematic drawings detailing the future expansion of the Phase A facility at the GCLF under Option 1.

This is a project-level issue and would be discussed in the future project-level environmental document that would be undertaken and circulated by the County

should Option 1 be selected as the proposed option for future use within Glenn County.

Response to Comment 2-7

The commenter would like specific information and schematic drawings detailing the proposed increase in maximum elevation for Phases A and B at the existing GCLF, including grading maps.

This is a project-level issue and will be discussed in the future project-level environmental document that will be undertaken and circulated by the County.

Response to Comment 2-8

The commenter would like specific information detailing the proposed future fill plan for vertical expansion at the GCLF, including plans for leachate management, liner systems, and a leachate collection and removal system.

This is a project-level issue and will be discussed in the future project-level environmental document that will be undertaken and circulated by the County.

Response to Comment 2-9

The commenter would like a detailed description of the GCLF landfill gas (LFG) monitoring and collection systems' design and operation, as well as the method of determining the location of the LFG collectors. The commenter would like information on the history of LFG detection at the GCLF.

As outlined in Chapter 3 of the draft PEIR, "Program Description," the County would acquire buffer property and install new groundwater monitoring wells and new LFG monitoring wells in accordance with an approved evaluation monitoring work plan. LFG probes would be installed at the property boundary.

Past detection of LFG in probes within the GCLF triggered the proposal within the strategic plan that monitoring wells be placed within the buffer area, once acquired, to determine containment of LFG within the GCLF. Specific placement and location of any future LFG monitoring wells will be determined during project design through coordination and permitting with the CIWMB.

Response to Comment 2-10

The commenter would like to know what facilities would be placed within the buffer area, if acquired.

If acquired, groundwater monitoring wells placed at or near the outer perimeter of the buffer zone. At present, there are no plans to bring grid power to either the buffer zone or to the older portion of the landfill. While power will be necessary to operate a gas extraction system, the County is still exploring the viability of developing local alternative energy sources for power at the landfill.

Response to Comment 2-11

The commenter would like specific information detailing the proposed future plans to prevent project-related impacts from litter, odor, dust, glare, and vectors.

This is a project-level issue and will be discussed in the future project-level environmental document that will be undertaken and circulated by the County.

Response to Comment 2-12

The commenter would like specific information concerning the storage of recyclable material on site, such as the size and location of the storage area, and which materials would be processed and how.

This is a project-level issue and will be discussed in the future project-level environmental document that will be undertaken and circulated by the County.

Response to Comment 2-13

The commenter would like specific information concerning the use of soil materials for daily or intermediate cover, such as how much is required and what the plans are for future importing of soil from off-site sources, if necessary .

At present, soil used for daily cover is excavated from within the current GCLF footprint. It is anticipated that this will remain the case once an option is selected for future use of the GCLF. However, if it becomes necessary to import soil for cover from an off-site location, this will be addressed in the future project-level environmental document prepared for the project option selected by the County.

Response to Comment 2-14

The commenter states that if alternate daily cover (ADC) material is to be used for daily or intermediate cover, it must be properly handled at the GCLF. A demonstration project for ADC would be required before ADC was approved for use at the GCLF.

Comment noted. This requirement will be incorporated into future project design and permitting at the GCLF.

Response to Comment 2-15

The commenter would like to know why Option 2 assumes that landfill operation would not continue into the Phase B area.

The assumption that there would be no filling of the Phase A area under Option 2 is due to the fact that closure of GCLF is proposed under this option. This option involves the closure of the GCLF and construction of a transfer station to serve as a material recovery facility (MRF). Under this option, the use of Phase B would not be necessary.

Response to Comment 2-16

The commenter notes that development of a transfer station and MRF will require analysis of the design and operation of the facility—including all aspects of the facility, such as location, measurements, tonnage, and ancillary facilities—in an environmental document.

Comment noted. If Option 2 is selected, this analysis will be included in the project-level environmental document.

Response to Comment 2-17

The commenter notes that the County should coordinate with the CIWMB for future design and development of Option 3, Waste-to-Energy/Conversion Technology, for review, consultation, and consideration.

Comment noted. This requirement will be incorporated into future project design and permitting at the GCLF should the County select Option 3 for future implementation.

Response to Comment 2-18

The commenter notes that the storing and processing of construction and demolition waste may be subject to the Code of Federal Regulations.

Comment noted.

Response to Comment 2-19

The commenter requested that additional mitigation related to wood, green, and food waste be added to the draft PEIR with specific requirements.

Specific requirements for handling and disposal or recycling of wood, green, and food waste will be included in a subsequent CEQA document, once a specific project is selected and described in detail.

Response to Comment 2-20

The commenter listed specific regulations that would relate to all future projects at the GCLF.

Comment noted. The County will consider these regulations during the design, permitting, and implementation of the selected option for future solid waste services at the GCLF.

Response to Comment 2-21

The commenter stated that the lead agency should submit an MMRP at the time of certification of the draft PEIR.

Comment noted. See Chapter 4 of this final PEIR, which outlines the MMRP for the PEIR.

Response to Comment 2-22

The commenter identified resources for CEQA information related to landfills, composting facilities/operations, and MRF design and operations..

Comment noted.

Response to Comment 2-23

The commenter requests that the CIWMB be included on the distribution list for subsequent environmental documents. The commenter stated that along with the Governor's Office of Planning and Research (OPR), the CIWMB should be notified of the date, time, and location of any public hearings regarding project proposal at least 10 days in advance.

Comment noted. The County will comply with all CEQA and CIWMB guidelines and regulations throughout the environmental and permitting process for upcoming projects.



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

RECEIVED

JAN 29 2009

P & PWA



CYNTHIA BRYANT
DIRECTOR

January 26, 2009

Letter 3

Randy Murphy
Glenn County Planning and Public Works Agency
P.O. Box 1070
125 South Murdock Avenue
Willows, CA 95988

Subject: Glenn County Landfill Strategic Plan EIR
SCH#: 2007122062

Dear Randy Murphy:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 23, 2009, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

3-1

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

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

3-2

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007122062
Project Title Glenn County Landfill Strategic Plan EIR
Lead Agency Glenn County

Type EIR Draft EIR
Description The County has developed a Landfill Strategic Plan to guide future operations at the Glenn County Landfill site.

Lead Agency Contact

Name Randy Murphy
Agency Glenn County Planning and Public Works Agency
Phone (530) 934-6541 **Fax**
email
Address P.O. Box 1070
 125 South Murdock Avenue
City Willows **State** CA **Zip** 95988

Project Location

County Glenn
City Willows
Region
Lat / Long
Cross Streets Interstate 5 and County Road 33
Parcel No. 24-220-016
Township 29 **Range** 4 **Section** 35 **Base** MDB&M

Proximity to:

Highways I-5
Airports
Railways
Waterways
Schools
Land Use AE-80; Exclusive Agriculture

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Solid Waste; Traffic/Circulation; Vegetation; Water Quality

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 2; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Integrated Waste Management Board; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 12/10/2008 **Start of Review** 12/10/2008 **End of Review** 01/23/2009

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

Responses to Comment Letter 3—California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit, January 26, 2009

Response to Comment 3-1

The commenter notes that the reviewing period has closed, and the letter outlines project information and reviewing agencies for which the State Clearinghouse forwarded the document for review. No response is required in this PEIR.

Response to Comment 3-2

The commenter noted that the County has complied with the draft environmental document reviewing process under CEQA for this project.

Chapter 4

Mitigation Monitoring and Reporting Program

Purpose of and Need for Monitoring

In compliance with CEQA, a PEIR has been prepared for the proposed program. The PEIR identified potentially significant impacts in the resource areas listed below, along with mitigation measures to reduce those impacts.

Mitigation measures are identified in the PEIR to address significant impacts pertaining to the following resource areas:

- air quality;
- biological resources;
- cultural resources;
- geology, soils, and paleontology; and
- hydrology and water quality.

CEQA requires that a lead agency adopt an MMRP for the measures the agency has proposed to avoid or mitigate significant environmental effects (State CEQA Guidelines Section 15097). The purpose of the MMRP is to ensure that the mitigation measures identified in the PEIR are implemented and to identify who is responsible for their implementation.

Table 4-1 identifies the mitigation measures for the proposed program, the parties responsible for implementing and monitoring the measures, the timing of each measure, and a summary of the actions necessary to implement and monitor each measure.

Mitigation Monitoring and Reporting Program

The MMRP has been prepared for the proposed program in accordance with Public Resources Code (PRC) Section 21081.6, which specifies that when a public agency makes findings required by paragraph (1) of subdivision (a) of

Section 21081, it “shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” PRC Section 21081.6 further specifies that the MMRP “ensure compliance during project implementation.”

This MMRP is intended to ensure the effective implementation of mitigation measures that are within the County’s authority to implement, including monitoring where identified, throughout all phases of development and operation of the proposed program.

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
Air Quality				
Mitigation Measure AIR-1: Implement Measures to Limit Construction Emissions of Fugitive Dust	Prior to project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify prior to commencement of construction
<p>To control the generation of construction-related fugitive dust emissions, the program applicant shall require the construction contractor to implement measures to control fugitive dust measures below GCAPCD Section 85 and Section 86 particulate matter and dust requirements. Such measures may include, but are not limited to:</p>				
<ul style="list-style-type: none"> ■ All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover ■ All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. ■ All on-site access roads shall have a posted speed limit. ■ All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. ■ When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. ■ Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. ■ Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. 				

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure AIR-2: Implement Measures to Reduce Construction Emissions</p> <ul style="list-style-type: none"> ■ The program applicant shall require the construction contractor to implement measures to reduce construction-related emissions. Such measures include those listed below. ■ Limit the area subject to excavation, grading, and other construction activity at one time. ■ Limit the hours of operation of heavy duty equipment or the amount of equipment in use. ■ Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). ■ Require that all diesel engines be shut off when not in use to reduce emissions from idling. ■ Implement activity management (e.g., rescheduling activities to reduce short-term impacts). ■ During the smog season (May through October), lengthen the construction period to minimize the number of vehicles and equipment operating at the same time. ■ Off-road trucks should be equipped with on-road engines when possible. ■ Minimize the obstruction of traffic on adjacent roadways. ■ Power construction equipment with diesel engines fueled by alternative diesel fuel blends or ultra low sulfur diesel (ULSD). Only fuels that have been certified by the ARB should be used. The ARB has verified specific alternative diesel fuel blends for NO_x and PM emission reduction. The applicant should also use ARB certified alternative fueled (compressed natural gas (CNG), liquid propane gas (LPG), electric motors, or other ARB certified off-road technologies] engines in construction equipment where practicable. ■ Use construction equipment that meets the current off-road engine emission standard (as certified by the ARB) or re-powered with an engine 	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to commencement of construction and during construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>that meets this standard. Tier I, Tier II, and Tier III engines have significantly less NO_x and PM emissions compared with uncontrolled engines</p>				
Biological Resources				
Mitigation Measure BIO-1: Document Special-Status Plant Populations in the Study Area	Prior to project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify prior to commencement of construction
<ul style="list-style-type: none"> <li data-bbox="130 578 961 976">■ As a first step toward mitigation, the County will retain qualified botanists to survey the study area to document the presence of special-status plants before project implementation. The botanists will conduct a floristic survey that follows the CNPS Botanical Survey Guidelines (California Native Plant Society 2001:38–40) in areas that are relatively undisturbed or have a moderate to high potential to support special-status plants. All species observed will be identified to the level necessary to determine whether they qualify as special-status plants or are plant species with unusual or significant range extensions. The guidelines also require that field surveys be conducted when special-status plants that could occur in the area are evident and identifiable, generally during the blooming period. To account for different special-status plant identification periods, one or more series of field surveys may be required in spring and summer. <li data-bbox="130 1000 961 1182">■ Special-status plant populations identified during the field surveys will be mapped and documented as part of the public record. This mitigation measure does not, by itself, mitigate for the potential loss of special status plant species. The County will implement Mitigation Measure BIO-2 (described below) in conjunction with this measure to avoid or minimize significant impacts on special-status plants. 				
Mitigation Measure BIO-2: Avoid or Compensate for Impacts on Special-Status Plant Populations by Redesigning the Program or Implementing a Compensation Measure	Prior to project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify implementation of measures during final project design, prior to construction
<ul style="list-style-type: none"> <li data-bbox="130 1325 961 1386">■ The County will implement the following measures to avoid and minimize impacts on special-status plants: <li data-bbox="130 1406 961 1463">■ If one or more special-status plants are identified in the study area during preconstruction surveys, the County will redesign or modify the program 				

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>to avoid indirect or direct impacts on special-status plants; and</p> <ul style="list-style-type: none"> ■ If complete avoidance is not feasible, the County will minimize the impact where possible and compensate for the unavoidable loss of area occupied by special-status plants by implementing a compensation measure (e.g., purchasing and protecting another population or purchasing mitigation credits). 				
<p>Mitigation Measure BIO-3: Conduct Mandatory Contractor/Worker Awareness Training for Construction Personnel</p> <p>Before any work occurs in the study area, including grading, a qualified biologist will conduct mandatory contractor/worker awareness training for construction personnel. The awareness training will be provided to all construction personnel to brief them on the need to avoid impacts on sensitive biological resources (e.g., special-status plants and seasonal wetlands and swales) and special-status wildlife (i.e., vernal pool brachiopods, western spadefoot toad, burrowing owl, American badger, and active nests of migratory birds and raptors) and the penalties for not complying with biological mitigation requirements. If new construction personnel are added to the program, the contractor will ensure that the personnel receive the mandatory training before starting work.</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to construction through signature of participants</p>
<p>Mitigation Measure BIO-4: Install Construction Barrier Fencing to Protect Sensitive Biological Resources Adjacent to the Construction Zone</p> <p>The construction specifications will require that the County or its contractor retain a qualified biologist to identify environmentally sensitive areas that are to be avoided during construction. Sensitive communities adjacent to the directly affected area required for construction, including staging and access, will be fenced off to avoid disturbance in these areas.</p> <p>Before construction, the contractor will work with the program engineer and a resource specialist to identify the locations for the barrier fencing and will place stakes around the sensitive resource sites to indicate these locations. The protected area will be designated an environmentally sensitive area and will be clearly identified on the construction specifications. The fencing will be installed at least 20 feet from the environmentally sensitive area and will be in place before construction activities are initiated. The fencing will be</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to commencement of project construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>maintained throughout the duration of the construction period. The following paragraph will be included in the construction specifications:</p> <ul style="list-style-type: none"> ■ The contractor’s attention is directed to the areas designated “environmentally sensitive areas.” These areas are protected, and no entry by the contractor for any purpose will be allowed unless specifically authorized in writing by the program proponent. The contractor will take measures to ensure that the contractor’s forces do not enter or disturb these areas, including giving written notice to employees and subcontractors. ■ Temporary fences around the environmentally sensitive areas will be installed as the first order of work. Temporary fences will be furnished, constructed, maintained, and removed as shown on the plans, as specified in the special provisions, and as directed by the program engineer. The fencing will be commercial-quality woven polypropylene, orange in color, and at least 4 feet high (Tensor Polygrid or equivalent). The fencing will be tightly strung on posts with a maximum 10-foot spacing. 				
<p>Mitigation Measure BIO-5: Retain a Biological Monitor</p> <p>The County will retain qualified biologists to monitor construction activities adjacent to environmentally sensitive areas (i.e., sensitive biological resources). The biologists will assist the construction crew, as needed, to comply with all program implementation restrictions and guidelines. In addition, the biologists will be responsible for ensuring that the County or its contractor maintains the staked and flagged perimeters of the construction area and staging areas adjacent to sensitive biological resources.</p>	<p>During project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Review measures during final map improvement plan check and during individual home plan check</p>
<p>Mitigation Measure BIO-6: Avoid and Minimize Impacts on Sensitive Biological Resources by Redesigning the Proposed Project to the Maximum Extent Feasible</p> <p>Prior to finalizing the project design, the County will conduct a formal delineation of waters of the United States, including wetlands, in accordance with the USACE’s guidelines (Environmental Laboratory 1987; U.S. Army Corps of Engineers 2006). If waters of the United States are present, the County will revise the project area to avoid affecting waters of the United States to the extent possible.</p>	<p>During project design</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to issuing grading permits</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure BIO-7: Compensate for a Loss of Wetlands and Other Waters</p> <p>If the implementation would involve fill or discharge into wetlands and other waters of the United States after redesigning the proposed project, the County will obtain and comply with the applicable federal and state permit conditions, including minimizing the construction disturbance area in wetlands, prohibiting the storage of materials or placement of fill in adjacent wetlands, implementing erosion control measures, and implementing a wetland mitigation plan. A Section 401 water quality certification from the RWQCB will be required also. Additionally, the County will identify the extent of the intermittent stream in the buffer area that is within the jurisdiction of the DFG for the purpose of obtaining a Section 1602 streambed alteration agreement if construction activities will occur in the stream channel. All conditions that are attached to the state and federal permits would be implemented as part of the project. The conditions would be clearly identified in the construction plans and specifications and monitored during and after construction to ensure compliance.</p> <p>The project proponent will compensate for permanent impacts on wetlands and waters to ensure no net loss of wetland habitat functions and values. The compensation will be provided at a minimum ratio of 2:1 (2 acres restored or created for every 1 acre filled), but final compensation ratios will be based on site-specific information and determined through coordination with state and federal agencies as part of the permitting process for the project. Compensation may be a combination of on-site restoration and creation, off-site restoration, and mitigation credits. The County will retain an environmental consultant with the appropriate design/engineering experience (e.g., restoration ecologist, hydrologic engineer, or landscape architect) as needed to evaluate the study area and determine if on-site habitat wetland restoration/creation is feasible.</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure BIO-8: Avoid the Dispersal of Invasive Plants into Uninfested Areas</p> <p>To avoid the introduction or spread of invasive plants into uninfested areas, the County will incorporate the following measures into construction project plans and specifications:</p> <ul style="list-style-type: none"> ■ use certified, weed-free, imported erosion-control materials (or rice straw in upland areas); ■ coordinate with the Glenn County agricultural commissioner and land management agencies to ensure that the appropriate BMPs are implemented; ■ educate construction supervisors and managers about weed identification and the importance of controlling and preventing the spread of invasive plants; ■ clean equipment at designated wash stations after leaving invasive plant infestation areas; and ■ include the invasive plant avoidance measures in contract documents and ensure that they are implemented by the program contractor. 	<p>Prior to and during project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify during project construction</p>
<p>Mitigation Measure BIO-9: Avoid Habitat for Vernal Pool Branchiopods</p> <p>During project-level evaluation, the County will retain a qualified biologist to determine whether direct impacts on the seasonal wetlands/swales can be avoided. In addition, the biologist will examine the topography and hydrology of the area to determine whether indirect impacts on the wetlands/swales will occur during or after project construction. The biologist should look at an area of at least 250 feet from the project boundaries for determining indirect impacts. If possible, the County will avoid direct and indirect impacts on any habitats that may support listed vernal pool branchiopods, by establishing a buffer zone for each feature and implementing erosion control measures as necessary. The sizes of buffer zones would be determined in consultation with the USFWS. Where avoidance is not possible, Mitigation Measures BIO-10 and BIO-11 will be implemented</p>	<p>During project design and construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify during construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure BIO-10: Conduct Protocol-Level Surveys for Listed Vernal Pool Branchiopods</p> <p>Impacts on vernal pool branchiopod habitat should be minimized to the greatest extent possible. If it is not possible to avoid vernal pool branchiopod habitat (both directly and indirectly), a qualified biologist with a 10(a)(1)(A) permit for vernal pool branchiopods will complete protocol-level surveys to determine whether any listed species are present in the habitats that will be affected. If a listed species is found, Mitigation Measure BIO-11 will be required.</p> <p>Alternately, the County may choose to assume that relevant water bodies are occupied by listed vernal pool branchiopods.</p>	<p>During environmental clearance for individual project</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to environmental clearance for individual project</p>
<p>Mitigation Measure BIO-11: Compensate for Impacts on Listed Vernal Pool Branchiopods</p> <p>If listed vernal pool branchiopods are found during protocol level surveys in habitats that will be directly or indirectly affected by the program, the County will compensate for these impacts by preserving and creating additional habitat for these species using USFWS-approved compensation ratios as described below.</p> <p>The County will preserve suitable habitat at a ratio of 2:1 (2 acres preserved for every 1 acre of habitat directly or indirectly affected) at a USFWS-approved mitigation bank, or at a ratio of 3:1 at a USFWS-approved non-bank site (conservation area). In addition, the County will create suitable habitat at a ratio of 1:1 (1 acre created for every acre lost) at a USFWS-approved mitigation bank, or at a ratio of 2:1 at a USFWS-approved non-bank site. In lieu of preserving and creating habitat, the County may be able to pay a specified amount into a USFWS-approved species fund to support habitat preservation and restoration for these species.</p> <p>Final compensation requirements and mitigation ratios for the project will be determined through consultation with the USFWS. The exact cost to purchase preservation and creation credits for program-related impacts will be determined at the time of purchase. Mitigation credits will be purchased, or a conservation area and management plan will be established, prior to any ground-disturbing activities, including grading, in the program area.</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to project construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure BIO-12: Conduct Surveys and Avoid or Compensate for the Loss of Habitat for Western Spadefoot Toad</p> <p>Seasonal wetlands/swales that could be directly or indirectly affected by the program will be surveyed during late winter and early spring by a qualified biologist for the presence of western spadefoot toads. If protocol surveys for listed vernal pool branchiopods (Mitigation Measure 10) are conducted, the biologists can survey for western spadefoot toads concurrent with these surveys. If this species is found to occur, the County should avoid the occupied habitat. Where avoidance is not possible, impacts should be minimized to the great extent possible. To compensate for the loss of habitat, the County will prepare and implement a plan to preserve existing habitat on site or construct breeding habitat, or restore degraded habitat, and monitor the created or restored habitat. The preservation and monitoring plan will be prepared prior to any ground-disturbing activities, including grading, in the program area.</p>	<p>As required by the California Department of Fish and Game and prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior completion of environmental process</p>
<p>Mitigation Measure BIO-13: Compensate for the Loss of Swainson’s Hawk Foraging Habitat</p> <p>If the construction of program facilities results in the removal of suitable foraging habitat for Swainson’s hawks, then the impacts will be mitigated by providing off-site habitat management lands as described in the <i>DFG Staff Report Regarding Mitigation for Impacts to Swainson’s Hawks in the Central Valley of California</i> (California Department of Fish and Game 1994).</p> <p>The final acreage of off-site management lands to be provided would depend on the distance between the program area and the nearest active nest site. Prior to the grading of any site with potential foraging habitat, surveys should be conducted during the breeding season, or the CNDDDB should be consulted to determine the nearest active nest. The 1994 DFG staff report states:</p> <p>Projects within 1-mile of an active nest tree shall provide:</p> <ul style="list-style-type: none"> ■ One acre of Habitat Management (HM) land (at least 10% of the HM land requirements shall be met by fee title acquisition or a conservation easement allowing for the active management of the habitat, with the remaining 90% of the HM lands protected by a conservation easement 	<p>Prior to construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to project construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>[acceptable to the Department] on agricultural lands or other suitable habitats that provide foraging habitat for Swainson’s hawk) for each acre of development authorized (1:1 ratio); or</p> <ul style="list-style-type: none"> ■ One-half acre of HM land (all of the HM land requirements shall be met by fee title acquisition or a conservation easement [acceptable to the Department] which allows for the active management of the habitat for prey production on the HM lands) for each acre of development authorized (0.5:1 ratio). ■ Projects within 5 miles of an active nest tree but greater than 1 mile from the nest tree shall provide 0.75 acre of HM land for each acre of urban development authorized (0.75: 1 ratio). All HM lands protected under this requirement may be protected through fee title acquisition or conservation easement (acceptable to the department) on agricultural lands or other suitable habitats that provide foraging habitat for Swainson's hawks. ■ Projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree shall provide 0.5 acre of HM land for each acre of urban development authorized (0.5: 1 ratio). All HM lands protected under this requirement may be protected through fee title acquisition or conservation easement (acceptable to the Department) on agricultural lands or other suitable habitats that provide foraging habitat for Swainson’s hawks. <p>Management Authorization holders/ project sponsors shall provide for the long-term management of the HM lands by funding a management endowment (the interest on which shall be used for managing the HM lands) at the rate of \$400 per HM acre (adjusted annually for inflation and varying interest rates).</p>				
<p>Mitigation Measure BIO-14: Conduct Preconstruction Surveys for Western Burrowing Owl</p> <p>The DFG’s <i>Staff Report on Burrowing Owl Mitigation</i> (California Department of Fish and Game 1995) recommends that preconstruction surveys be conducted to locate active burrowing owl burrows in the construction work area and within a 250-foot-wide buffer zone around the construction area. The County will retain a qualified biologist to conduct</p>	<p>As required by the</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to completion of environmental process</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>preconstruction surveys for active burrows according to the DFG’s guidelines. The preconstruction surveys will include a breeding season survey (between April 15 and July 15) and wintering season survey (between December 1 and January 31). If no burrowing owls or sign (e.g., feathers, white wash, and prey remains) are detected, no further mitigation is required. If burrowing owls or their sign are found, Mitigation Measures BIO-15 and 16 will be implemented.</p>				
<p>Mitigation Measure BIO-15: Avoid and Minimize Impacts on Western Burrowing Owl</p> <p>The County will avoid loss or disturbance of western burrowing owls and their burrows to the maximum extent possible. No burrowing owls will be disturbed during the nesting season (February 1 through August 31). A 250-foot buffer, within which no new activity would be permissible, will be maintained between program activities and nesting burrowing owls. The nesting owls will be monitored periodically by a qualified biologist to ensure that nesting activities are not being disrupted. This protected area will remain in effect until August 31, or at the DFG’s discretion and based upon monitoring evidence, until the young owls are foraging independently. If accidental take (disturbance, injury, or death of owls) occurs, the DFG will be notified immediately.</p> <p>If avoidance is not possible, eviction of owls outside the nesting season may be permitted pending an evaluation of eviction plans and receipt of formal written approval from the DFG authorizing the eviction. The guidelines require that one-way doors be installed at least 48 hours before construction at all active burrows that exist within the construction area so that the burrows are not occupied during construction activities. The one-way doors will be installed at that time to ensure that the owls can get out of the burrows and cannot get back in. The guidelines also require the enhancement of unsuitable burrows (enlarged or cleared of debris) or the installation of two artificial burrows for each occupied burrow that is removed. Artificial burrows will be constructed prior the installation of one-way doors.</p>	<p>During project design</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to and during project construction</p>
<p>Mitigation Measure BIO-16: Compensate for a Loss of Western Burrowing Owl Habitat</p> <p>Loss of foraging habitat or burrow habitat will be compensated by acquiring</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works</p>	<p>Verify prior to project construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>and permanently protecting habitat for each pair or unpaired resident bird at a location approved by the DFG. Habitat management lands comprising existing burrowing owl foraging and breeding habitat will be acquired and preserved. An area of 6.5 acres (2.6 hectares) (the amount of land found to be necessary to sustain a pair or an individual owl) should be secured for each pair of owls, or for an individual in the case of an odd number of birds. As part of an agreement with the DFG, the program applicant should secure the performance of its mitigation duties by providing the DFG with security in the form of funds that would:</p> <ul style="list-style-type: none"> ■ allow for the acquisition or preservation of 6.5 acres (2.6 hectares) of habitat management lands; ■ provide initial protection and enhancement activities on the habitat management lands, potentially including such measures as fencing, trash cleanup, artificial burrow creation, grazing or mowing, and any habitat restoration deemed necessary by the DFG; ■ establish an endowment for the long-term management of the habitat management lands; and ■ reimburse the DFG for reasonable expenses incurred as a result of the approval and implementation of this agreement 			Agency	
<p>Mitigation Measure BIO-17: Avoid Construction during the Nesting Season of Migratory Birds or Conduct Preconstruction Survey for Nesting Birds</p> <p>To avoid disturbing any active ground-, tree-, or shrub-nesting migratory birds, construction activities should be conducted during the non-breeding season (generally between September 1 and February 28). If construction activities cannot be avoided during the nesting season (generally between March 1 and August 30), a preconstruction survey will be conducted by a qualified biologist to determine whether there are active nests on the site. The survey will include a search of all trees and shrubs, as well as the ground, for ground-nesting birds. The survey should be conducted no more than 30 days prior to construction. If the biologist determines that the area surveyed does not contain any active nests, then construction activities can commence without any further mitigation.</p>	During project design and construction	Glenn County	Glenn County Planning and Public Works Agency	Verify prior to and during project construction

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>If active raptor nests or other migratory bird nests are located on or adjacent to the program site during the preconstruction survey, and construction must occur during the breeding season, construction will not occur within 500 feet of an active nest until the young have fledged, as determined by a qualified biologist, or until the program applicant receives written authorization from the DFG to proceed.</p> <p>Mitigation Measure BIO-18: Conduct Preconstruction Surveys for American Badger</p> <p>Two weeks prior to the onset of work activities (including equipment mobilization) a qualified biologist will perform a visual survey for signs of American badger at potential burrows in the construction area. Occupied or potential burrows identified within the program boundaries will be temporarily fenced and avoided. Potential dens that cannot be avoided and that show no signs of use by American badgers can be excavated and collapsed by hand to preclude subsequent use. If a burrow is determined to be occupied, the DFG will be contacted immediately for direction.</p>				
Cultural Resources				
<p>Mitigation Measure CR-1: Stop Work in Case of Discovery of Unanticipated Cultural Resources</p> <p>If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or human bone, are inadvertently discovered during ground-disturbing activities associated with program construction or operation, work will stop within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the County and other appropriate agencies.</p>	During project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify during project construction
<p>Mitigation Measure CR-2: Develop and Implement a Plan to Address the Discovery of Human Remains</p> <p>If human remains of Native American origin are discovered during program construction, it will be necessary to comply with state laws concerning the disposition of Native American burials, which fall under the jurisdiction of the NAHC of California (PRC 5097). If any human remains are discovered or recognized in any location other than a designated cemetery, there will be</p>	Prior to project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify prior to project construction

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>no further excavation or disturbance of the sites or any nearby area reasonably suspected to overlie adjacent human remains until the County coroner is contacted per PRC 7050.5. The County coroner will determine whether an investigation of the cause of death is required and whether the remains are of Native American origin. If the human remains are determined to be of Native American origin, the coroner must contact the NAHC.</p> <p>If the remains are determined to be of Native American origin:</p> <ul style="list-style-type: none"> ■ the descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work for the treatment or disposition of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC 5097.98; or ■ the NAHC has been unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the NAHC. <p>According to the California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100); disturbance of Native American cemeteries is a felony (Section 7052).</p>				
<p>Hydrology and Water Quality</p> <p>Mitigation Measure HYD-1: Implement a Stormwater Pollution Prevention Program</p> <p><i>Glenn County General Plan</i> Policy PSP-43 is to support ongoing regulatory and compliance efforts at the federal and state level for the protection of water quality. Conforming to this requirement would ensure that constructed-related activities would not affect water quality. In addition, complying with the NPDES Construction General Permit would involve preparation of a SWPPP. The SWPPP would require specific BMPs which would be tailored to the proposed program. Examples of BMPs that would be included in the SWPPP are listed below.</p> <ul style="list-style-type: none"> ■ To help minimize the amount of pollutants entering the storm drain system, paved program roadways and parking areas will be cleaned 	During project construction	Glenn County	Glenn County Planning and Public Works Agency	Verify prior to and during project construction

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>regularly using street sweeping equipment. Additionally, litter and debris that may accumulate on the program site will be regularly collected and properly disposed of. These measures will be carried out at least monthly if construction occurs during the rainy season (October–April).</p> <ul style="list-style-type: none"> ■ Dry detention basins, which are typically dry except after a major rainstorm when they temporarily fill with stormwater, will be created and designed to decrease runoff during storm events, prevent flooding, and allow for off-peak discharge. Basin features will include maintenance schedules for the periodic removal of sedimentation, excessive vegetation, and debris that may clog basin inlets and outlets. ■ Grass buffer strips, high-infiltration substrates, and grassy swales will be used where feasible throughout the program site to reduce runoff, serve as biofilters, and provide initial stormwater treatment. This type of treatment will apply particularly to parking lots. ■ Physical devices would be placed at outlets of pipes and channels to reduce the velocity or the energy of exiting water. Outlet protection helps to prevent scour and minimize the potential for downstream erosion by reducing the velocity or energy of concentrated stormwater flows. ■ The County would conduct inspections following the construction to ensure that all identified BMPs had been properly installed. The program would adopt a regular maintenance and monitoring schedule to ensure that these BMPs function properly during project operations. If necessary, the County would require that additional BMPs be designed and implemented if those originally constructed do not achieve the identified performance standard. 	<p>During project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify during project construction</p>
<p>Mitigation Measure HYD-2: Implement a Spill Prevention and Control Program</p> <p>As part of requiring compliance with the NPDES Construction General Permit, the County requires that project contractors develop and implement a spill prevention and control program to minimize the potential for, and impacts from, spills of hazardous, toxic, or petroleum substances during all construction activities. The NPDES Construction General Permit requires the spill prevention and control program. The program will be completed before any construction activities begin.</p>				

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>The County will review and approve the spill prevention and control program before the onset of construction activities. The County or the contractors will inspect the construction area routinely to verify that the measures specified in the spill prevention and control program are properly implemented and maintained. The County will notify contractors immediately if there is a noncompliance issue and will require compliance.</p> <p>The federal reportable spill quantity for petroleum products, as defined in 40 CFR 110, is any oil spill that:</p> <ul style="list-style-type: none"> ■ violates applicable water quality standards, ■ causes a film or sheen upon or discoloration of the water surface or adjoining shoreline, or ■ causes a sludge or emulsion to be deposited beneath the surface of the water or adjoining shorelines. <p>If a spill is reportable, the contractor will notify the County’s fire department and the state DTSC, which has a spill response and cleanup ordinance to govern emergency spill response. A written description of reportable releases must be submitted to the Central Valley RWQCB and the DTSC. This submittal must include a description of the release, including the type of material and an estimate of the amount spilled, the date of the release, an explanation of why the spill occurred, and a description of the steps taken to prevent and control future releases. The releases would be documented on a spill report form.</p>				

Geology and Soils

<p>Mitigation Measure GEO-1: Implement Recommendations of Site-Specific Geotechnical Investigation Prepared by State-Licensed Personnel</p> <p>As part of the program design process, the program proponent will retain qualified (state-licensed) professionals to conduct a site-specific geotechnical investigation consistent with all applicable standards of professional engineering geologic/geotechnical practice. The purpose of the investigations will be to provide a geologic basis for the development of appropriate program design. Investigations will address bedrock and</p>	<p>During project constructioproject design and environmental clearance</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to completion of environmental clearance</p>
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Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Quaternary geology; geologic structure, including primary and secondary seismic hazards as defined by the State of California; soils; slope stability; the previous history of excavation and fill placement; earthwork recommendations; and any other topics identified by the County, design engineer(s), geotechnical engineer, or program engineering geologist as relevant. The results of the study will be presented to the County in the form of an engineering geology/geotechnical report. The County will be responsible for ensuring that the recommendations and requirements of the site-specific geotechnical investigation are correctly implemented by the applicant.</p>	<p>Prior to and during project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to and during project construction</p>
<p>Mitigation Measure GEO-2: Prepare and Implement a Stormwater Pollution Prevention Plan and Comply with State Landfill Operation Requirements</p> <p>In order to comply with the requirements of applicable permits under the NPDES program, the general contractor(s) selected for program implementation would be required to prepare and implement a SWPPP. The SWPPP would be developed for compliance with federal and state water quality regulations as enforced by the RWQCB and would include specific BMPs and measures to control erosion and sedimentation. With the BMPs under the SWPPP in place, and RWQCB oversight, impacts related to potential accelerated erosion during construction of new GCLF cells are expected to be less than significant.</p> <p>During operation, the GCLF is required by 27 CCR 20366[c] to be equipped with runoff diversion and drainage facilities capable of accommodating the anticipated drainage volume and flow rates on the GCLF under specific precipitation scenarios; types of measures identified for “judicious use” to meet this requirement include energy dissipaters and slope protection. Sheet flow (overland) runoff is to be “efficiently” diverted into the GCLF’s drainage and collection facilities. CCR 20366[c] also requires the discharger to maintain the system—e.g., by removing accumulated sediment from detention basins—so that it continues to operate at its design capacity. Through the implementation of these erosion control measures, impacts due to potential accelerated erosion during GCLF operation are expected to be less than significant. No mitigation is required.</p> <p>Once the GCLF’s capacity to accept waste is exhausted, it would be closed pursuant to stipulations in 27 CCR. There would be some potential for</p>				

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>accelerated erosion as a result of cut and fill activities to establish the GCLF’s final cover, but this should be effectively addressed by standard BMPs incorporated into the County’s operating procedures. However, accelerated erosion—and corollary impacts such as slope degradation, removal of needed landfill cover, and water quality impairment—also could result if the final cover were improperly designed or implemented.</p> <p>To address this type of issue, 27 CCR 21090 provides stringent requirements for landfill closure, including specifics regarding the design and construction of final cover. Specifically, final fill (cover) slopes may be no steeper than 3:1 (horizontal: vertical) unless they are designed consistently with a slope stability analysis prepared by a qualified (state-licensed) engineering/geotechnical professional. In addition, final cover fill must comprise a foundation layer, a low-hydraulic-conductivity layer, and an overlying erosion-resistant layer or approved engineered equivalent. If these components are not present, a comparable design must be provided that would continue to isolate the waste in the GCLF from surface waters (27 CCR 21090 [a][1–3]). While these requirements primarily address the ongoing protection of water quality, they also provide a degree of protection against accelerated erosion and cover degradation. GCLF final cover must be constructed consistently with a final drainage plan prepared by an appropriately state-licensed professional. The purpose of the drainage plan is to ensure that the final cover of closed landfills (including waste piles and surface impoundments closed as landfills) is designed, graded, and maintained to prevent both ponding and soil erosion. Deviation from the drainage specifications in 27 CCR 21090 requires approval by the RWQCB.</p> <p>Finally, GCLF closure requires the development of a post-closure maintenance plan that provides for monitoring and maintenance of the GCLF cover’s integrity, including periodic leak searches and the identification of other problems, any needed repairs to the cover, and maintenance of vegetation on the site (27 CCR 21090 [b][1][A]).</p> <p>Compliance with the closure design and maintenance requirements set forth in 27 CCR 21090 is expected to ensure that impacts related to erosion of GCLF final cover are reduced to less-than-significant levels. No mitigation is required.</p>				

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<p>Mitigation Measure GEO-3: Conduct Site-Specific Evaluation of Paleontological Sensitivity and Potential for Impacts</p> <p>The County will ensure that the program site’s paleontological sensitivity is assessed in a report prepared by a state-licensed geologist (California Professional Geologist) or a qualified professional paleontologist. The paleontological evaluation may be included as a portion of the site-specific geotechnical investigation or may be presented as a separate report. If the paleontological evaluation determines that any of the geologic units that would be affected by program construction meets the Society of Vertebrate Paleontology’s criteria for high sensitivity for paleontological resources, Mitigation Measures GEO-4, GEO-5, and GEO-6 will be implemented also. Mitigation Measure GEO-7 will be implemented regardless of the site’s identified sensitivity (that is, even if the site is identified as having low sensitivity for paleontological resources).</p>	<p>During project environmental clearance</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to project construction</p>
<p>Mitigation Measure GEO-4: Conduct Preconstruction Survey, Salvage, and Protection</p> <p>Before site preparation (including vegetation clearing) and program earthwork begin, the County will retain a qualified professional paleontologist as defined by the Society of Vertebrate Paleontology’s Conformable Impact Mitigation Guidelines Committee (1995) to conduct a surface survey and salvage operation. The goal of the operation will be to ensure that paleontological materials exposed at the surface are recovered and properly prepared and curated or are protected from damage using exclusion fencing or other appropriate means. Protection will be designed and installed in consultation with the County and the program engineering consultant, to ensure that it is appropriate and effective but does not unduly impede construction activities.</p>	<p>Prior to project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to project construction</p>
<p>Mitigation Measure GEO-5: Retain a Qualified Professional Paleontologist to Monitor during Ground-Disturbing Activities</p> <p>The County will retain a qualified professional paleontologist as defined by the Society of Vertebrate Paleontology’s Conformable Impact Mitigation Guidelines Committee (1995) to monitor during any activities with the potential to disturb substrate units identified as highly sensitive for paleontological resources.</p>	<p>During project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify during project construction</p>

Description of Measure	Timing	Implementing Party	Monitoring Party	Monitoring Actions
<p>Mitigation Measure GEO-6: Retain a Qualified Professional Paleontologist to Develop a Process for Removing, Processing, and Storing Paleontological Resources</p>	<p>During project design and environmental clearance</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify prior to project construction</p>
<p>The paleontologist retained by the County will develop a process for removing, processing, and storing paleontological resources recovered during operation of the GCLF in accordance with the Society of Vertebrate Paleontology’s Conformable Impact Mitigation Guidelines Committee (1995) and the CIMWB recommendations.</p>				
<p>Mitigation Measure GEO 7: Stop Work if Vertebrate Remains Are Encountered during Construction</p>	<p>During project construction</p>	<p>Glenn County</p>	<p>Glenn County Planning and Public Works Agency</p>	<p>Verify during project construction</p>
<p>If vertebrate fossils are discovered during construction, all work on the site will stop immediately until a qualified professional paleontologist as defined by the Society of Vertebrate Paleontology’s Conformable Impact Mitigation Guidelines Committee (1995) can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include the preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and also may include the preparation of a report for publication describing the finds. The County will be responsible for ensuring that the recommendations of the paleontological monitor regarding treatment and reporting are implemented.</p>				