

SIERRA BUSINESS COUNCIL

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AUG 30 2012

ENVIRONMENTAL COORDINATION SERVICES

August 30, 2012

To: The Placer County Planning Commission
Re: Cabin Creek Biomass Facility

To the Members of the Placer County Planning Commission:

Please accept these comments regarding the DEIR for the proposed Cabin Creek Biomass Facility. Sierra Business Council has reviewed the DEIR for the proposed Cabin Creek Biomass Facility and offers the following comments in support of the project and offers the following recommendations for mitigation that may minimize conflicts with adjacent jurisdictions:

Sierra Business Council is supportive of the public-private partnership formed to promote the Cabin Creek biomass project and sees the project and the partnership as a means to promote improved forest health in our region. Improved forest health will likely result in reduced risk of wildfire, therefore reducing potential negative impacts to air quality and regional economic activities. In addition to the economic and health-related benefits of improving forest health and reducing the risk of wildfire, Sierra Business Council also sees improved habitat for species endemic to our area as an important benefit of improved forest management in our region. We are also supportive of this project and its ability to create and maintain year-round employment for some of our region's residents. Sierra Business Council is also supportive of the proposed facility and site for its use of an existing logistical network and for its placement outside a scenic corridor and outside high density residential areas.

11-1

While overall Sierra Business Council is supportive of this proposal, we do recommend the following additional mitigation:

- Sierra Business Council recognizes the enduring proactive efforts of the Town of Truckee to improve air quality and comply with federal air quality standards, especially regarding PM 2.5 emissions. Because the Town of Truckee is threatened with non-compliance in part due to particulates from the Interstate 80, idling rail cars and other sources of particulates not originating in the Town of Truckee, and because the Town has gone to extraordinary lengths to assure its compliance with federal air quality standards, and because the Cabin Creek Biomass Facility proposed has the potential to emit particulates, some portion of which will likely be carried on air currents into the Town of Truckee, Sierra Business Council recommends a requirement that operation of the facility be tied to assuring regular monitoring located at an appropriate location within the Town of Truckee.

11-2

Printed on 100% post-consumer waste

- Should air quality emissions from the biomass facility impact the Town of Truckee’s ability to meet federal compliance standards, Sierra Business Council recommends a flexible facility management plan that would allow hours or days of operation at the biomass facility to match hours or days when emissions are less likely to negatively impact the Town of Truckee and its ability to reach attainment of federal air quality standards.
- While Sierra Business Council feels it likely that PM10 emissions from the gasification biomass facility are not likely to impact the Town of Truckee’s air quality, it is our understanding there are no longer air quality monitoring devices within the Town of Truckee which measure the presence of PM 10 emissions. The Sierra Business Council recommends that operators of this facility work closely with the Town of Truckee to assure an adequate air quality baseline has been established and, should the Town of Truckee request installation of PM10 emission monitors within its boundaries, that the project partners comply with the request to assist in establishing a baseline for PM10 emissions prior to start of operations at the facility.
- The Cabin Creek Biomass Facility is proposed with an expected 40-year span of service. Sierra Business Council recommends a secession strategy, or reclamation strategy, for that time at which the biomass facility is no longer operational in order to avoid the blight often associated with industrial facilities that have run their course.
- Sierra Business Council understands state mandates require annual net emitters of more than 25,000 metric tons of carbon dioxide to report emissions to the State. The Cabin Creek Biomass Facility has the potential to contribute to Placer County’s overall carbon emissions, and in the event those emission exceed 25,000 metric tons annually, may require mitigation within the California Cap and Trade program. The project also has the potential to reduce net carbon emissions should future law credit local governments with reductions due to forest management practices. Sierra Business Council requests a review of the benefits of this project in consideration of the County’s potential need to report carbon dioxide emissions to the State along with associated costs in the hope that a determination can still be made that the benefits of the Cabin Creek Biomass Facility will offset the impacts of exceeding 25,000 metric tons of carbon dioxide in Placer County.
- Should Placer County be required to apply mitigation measures to offset impacts of this proposed project to reduce carbon emissions or in the course of its carbon emission management program, Sierra Business Council recommends that those mitigations be focused locally (as opposed to Cap and Trade eligible projects that have no local mitigating effects).
- Lastly, Sierra Business Council recognizes that the end-product of the biomass gasification process, biochar, may provide benefits beyond carbon capture that include sediment source control, heavy metal capture and as a beneficial soil amendment, yet further study needs to be conducted to assure these benefits and to assess potential negative impacts of biochar application. For this reason, Sierra Business Council recommends that operations of this biomass facility in part fund further implementation study of biochar application as a soil amendment, method of capturing heavy metals, means of improving infiltration and as a sediment source control measure. Sierra Business Council recommends retention of the facility’s biochar byproduct within the local region for its carbon capture potential but recommends also that should future study reveal unforeseen negative impacts of biochar application in our region, a flexible

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management plan should be adopted to mitigate negative impacts and to dispose of the byproduct with the least possible impacts to our region.

11-7
Cont'd

Sierra Business Council appreciates the opportunity to comment on this project. Our organization is supportive of biomass as an alternative fuel source with the potential to help stabilize local energy supplies, create local jobs, reduce the risk of catastrophic wildfire and reduce the need for open-air combustion of forest fuels. We are adamant, however, that new biomass facilities such as this proposed project provide net positive impact to the communities in which they are situated. We believe this project and the gasification method proposed, when adapted with the mitigation recommended, will result in net positive impact to the community, both in the near and long-term. With the mitigation proposed, we support this project. Thank you.

11-8


Anne Grogan
Manager of Development
Sierra Business Council

**Letter 11
Response**

**Sierra Business Council
Anne Grogan, Manager of Development
August 30, 2012**

- 11-1 The comment of support for the benefits of the project is noted. The Placer County Planning Commission will consider this comment at the time it considers project approval.
- 11-2 The commenter expresses concern about whether particulate emission generated by the proposed biomass facility would contribute to PM_{2.5} concentrations in Truckee. The commenter also suggests that the facility be required to operate an air quality monitoring station at an appropriate location in Truckee. See the responses to comments 5-2, 5-3, and 8-3.
- 11-3 The commenter recommends a flexible facility management plan that would allow the biomass facility to operate at times (i.e., days or hours) when its emissions are less likely to negatively impact the Town of Truckee and its ability to attain national ambient air quality standards. As explained in the responses to comments 5-2 and 8-3, it is not anticipated that emissions from the biomass facility would contribute substantially to exceedences of ambient air quality standards for PM_{2.5} in Truckee. Also refer to the response to comment 5-2 for a summary of how PM₁₀ and PM_{2.5} emissions generated by the proposed biomass facility were evaluated in the Draft EIR. While no significant air emission impacts were identified, the Placer County Planning Commission will consider the commenter's recommendation for a management plan at the time it considers project approval.
- 11-4 The commenter states that it is her understanding that there are no longer any monitoring devices within the Town of Truckee that measure ambient PM₁₀ concentrations. In response to this comment, it indeed appears that PM₁₀ concentrations are no longer being monitored in the Town of Truckee. According to the Air Quality Data Statistics published by the California Air Resources Board at <http://www.arb.ca.gov/adam>, PM_{2.5} concentrations have been monitored at the Truckee Fire Station since 1999 and PM₁₀ was monitored at the same site through 2006.
- The commenter recommends that the operator of the biomass facility work closely with the Town of Truckee to identify an adequate air quality baseline prior to operations and install PM₁₀ monitors if the Town requests them. Refer to the responses to comments 5-2, 5-3, and 8-3.
- 11-5 The commenter notes that the proposed plant's expected service life-span is 40 years and recommends a reclamation strategy be put in place to address closure once the plant is no longer operational.
- It is not customary for Placer County to require closure plans for development projects, including industrial projects. It is expected that if the proposed facility were closed and no longer operational, Placer County or the private operator would identify alternate uses for the facility. If those proposed uses would result in substantial alterations to the site (physical or operational), separate and independent environmental review of those activities would occur consistent with Placer County requirements. It is too speculative at this time to identify alternate uses or other decommissioning activities that would occur in the future.
- 11-6 The commenter states that the biomass facility would have the potential to contribute to a net increase in Placer County's overall GHG emissions. This comment is supported by the analysis under Impact 10-1, which begins on page 10-13 of the Draft EIR. The net change in GHG

emissions associated with operation of the proposed biomass facility is summarized in Table 10-3 on page 10-14 of the Draft EIR.

The commenter states that the biomass facility may be required to report its GHG emissions to the State if it emits more than 25,000 metric tons (MT) of carbon dioxide equivalent per year (CO₂e). The commenter is correct that the biomass facility may generate more than 25,000 MT CO₂e/year. However, the State's reporting threshold is 10,000 MT CO₂e/year. As shown in Table 10-3 of the Draft EIR, operation of the biomass facility, when considered as a stand-alone stationary source, could emit up to 26,526 MT CO₂e/year. The commenter is correct that the biomass facility is projected to be required to report its GHG emissions to the State under the Mandatory Reporting Requirement program that is part of the implementation of AB 32 because it would exceed the reporting thresholds of 10,000 MT CO₂e/year and electricity generating capacity of 1 MW.

The commenter states that the biomass facility would "require (GHG) mitigation within the Cap and Trade program." The biomass facility would have no (i.e., zero) obligation to hold GHG compliance allowances to meet the State Cap and Trade program requirements. The biomass facility would strictly limit fuels to biomass wastes that are the byproduct of forest management projects that meet all federal, State, and local forest practice laws and regulations. This type of biomass fuel is considered carbon neutral and does not require compliance obligations under the Cap and Trade program. Specifically, Cap and Trade Regulation Section 95852.2(a) specifies that biomass emissions do not have a GHG compliance obligation if the biomass is tree trimmings or wood wastes harvested for the purpose of forest fire fuel reduction or forest stand improvement, or under an approved timber management plan or other locally or nationally approved plan. Further, the biomass facility would be considered a renewable energy project – and as such, power generated by the project would carry Renewable Energy Credits that represent the GHG benefits from avoided/displaced fossil fuels.

The commenter requests a review of the GHG benefits and disbenefits of the proposed biomass facility. The commenter also recommends that any mitigation or GHG offsets are required of the proposed biomass facility "be focused locally (as opposed to Cap and Trade eligible projects that have no local mitigating effects." The net change in GHG emissions associated with the proposed biomass facility is analyzed under Impact 10-1, which begins on page 10-13 of the Draft EIR. Table 10-3 on page 10-14 of the Draft EIR provides a summary of the operational emissions, support emissions (e.g., equipment, truck trips, electricity consumption), and avoided emissions associated with the proposed biomass facility. Based on this analysis, the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs in the electricity sector and it would not generate levels of GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the project's contribution of GHGs would not be cumulatively considerable and no mitigation is required.

11-7

The commenter recommends that the biomass operation be used to fund studies of beneficial uses of biochar and possible negative effects of biochar applications. The commenter further recommends that the facility's biochar byproduct be retained within the local region.

There is already a considerable amount of research available on biochar that address: its history, practical applications, research and guidelines for appropriate use of biochar related to effectiveness, sustainability, and protection and enhancement of the environment. A variety of

educational and nonprofit institutions are conducting research on biochar including the following:

- ▲ University of California at Davis Environmental Soil Chemistry Lab (<http://parikh.lawr.ucdavis.edu/Research.html>),
- ▲ Cornell University, Department of Crop and Soil Sciences (<http://www.css.cornell.edu/faculty/lehmann/research/biochar/biocharmain.html>),
- ▲ the International Biochar Initiative (<http://www.biochar-international.org/research/education>), and
- ▲ the UK Biochar Research Centre (<http://biochar.org.uk>).

It is clear from the magnitude of information and research available about biochar that a requirement for additional research into impacts of local use of biochar to be attached to the proposed Cabin Creek Biomass Facility would be both unnecessary and an undue burden on the owner/operator of the facility. At the present time, the ultimate fate and feasibility of reuse of biochar in the region is unknown. Therefore, for purposes of the technical analyses included in the Draft EIR (e.g., air quality, transportation), it is assumed that all biochar would be hauled to Lockwood Regional Landfill in Nevada for disposal.

11-8

The commenter expresses appreciation for the opportunity to comment on the project, and notes that the SBC is generally supportive of biomass as an alternative energy source in the region. However, the SBC is adamant that biomass facilities such as the proposed project provide a net benefit to the communities in which they are situated. The SBC's recommended mitigation measures would result in positive impacts to the community.

As explained above and in the responses to comments 5-2, 5-3, and 8-3, it is not anticipated that emissions from the biomass facility would contribute substantially to exceedences of ambient air quality standards in Truckee, nor would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs in the electricity sector and it would not generate levels of GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, no additional mitigation measures are required other than those described in the Draft EIR.

2.4.5 INDIVIDUALS/BUSINESSES

12

From: [Jesse Boeri](#)
To: [Placer County Environmental Coordination Services;](#)
Subject: Biomass plant
Date: Friday, August 31, 2012 1:20:02 PM

Staff,
 After reading the latest proposal I wish to inquire as to the verbiage changes regarding the source of the material to be utilized. Originally this material was stated to be Forest Service origination. I am confused by the change to "*such as U. S. Forest Service [USFS] fuels reduction sites*" this seems vague. Am I to believe that the proposal now includes local community material as well. Please correct me if I am wrong, local material is currently being trucked to other locations in the state for similar uses. I dialed Gerry Hass as instructed by the Placer County email notification for more information but received a message to the extent that this line has not been setup yet. As you may have deduced, I feel that a perhaps larger project with a combined USFS and local community material feeding this proposed plant would better suit our community's interests. I look forward to hearing from someone regarding what I can do to help with this proposed project. Thank you,
 Jesse Boeri

12-1

**BOERI DESIGN
 ARCHITECTURE AND PLANNING**

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**Letter 12
Response****Jesse Boeri, Boeri Design Architecture and Planning
August 31, 2012**

12-1

The commenter asks if the source of the biomass material has been broadened to include material from local communities. The commenter is supportive of the broader source of materials and believes it would be beneficial to the community. The sources of woody biomass fuel are described in Section 3.4.3 of the Draft EIR. In addition to material obtained from National Forest System lands, material from defensible space practices in local communities conducted by local fire districts would also be used. The comment of support for the project is noted. The Placer County Planning Commission will consider this comment at the time it considers project approval.

13



September 10, 2012

Maywan Krach
 Placer County Community Development Resource Agency
 Environmental Coordination Services
 3091 County Center Drive, Suite 190
 Auburn, CA 95603

Subject: Cabin Creek Biomass Project DEIR Noise Analysis

Dear Ms. Krach:

The noise and vibration consulting firm of j.c. brennan & associates, inc. is providing a review and comments with regards to the noise and vibration analysis conducted for the Cabin Creek Biomass Project DEIR.

1. The EIR consulting firm of Ascent Environmental conducted the noise and vibration analysis for the project site. The ambient noise environment is described as follows: *The existing noise environment in the project area is primarily influenced by transportation noise from vehicle traffic on the roadway system (i.e., Cabin Creek Road). Other noise sources that contribute to the existing noise environment include existing activities on the Eastern Regional MRF and Transfer Station site.* However, ambient noise measurements were only conducted at one noise measurement location, which includes directly adjacent to the project site. No noise measurements were conducted off-site at the nearest residence along S.R. 89. The nearest off-site residence is not primarily affected by noise from Cabin Creek Road. In fact, a visit to the project site indicates that the primary noise source at the noise monitoring location is not Cabin Creek Road traffic, but is primarily dominated by operations of the MRF and Transfer Station. In addition, large equipment traversing the service road from the disposal and waste chipping site located to the north and east also is a major contributor the noise environment.

13-1

The California Energy Commission states noise analyses for energy facilities should conduct the following when evaluating existing land uses and conducting background noise measurements:

- (A) *A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either*

13-2

- construction or operation, there is a potential increase of 5 dB(A) or more over existing background levels. 13-2
Cont'd
- (B) A description of the ambient noise levels at those sites identifies under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L10, L50, and L90 values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively shall also be reported in units of dB(A). 13-3
2. The Methods and Assumptions discussion indicates that: "the assessment of long-term operational noise impacts was based upon reconnaissance data, existing documentation, reference noise emission levels, and standard attenuation rates for modeling techniques. As stated above, reference levels are noise emissions for specific equipment or activity types that are well documented and the usage thereof common practice in the field of acoustics". However at no place in the document does the analysis describe the reference noise levels, or where they came from, or what standard attenuation rates were used. Previously in the EIR, there is a discussion on similar facilities in the area, including Yolo County. A common practice is to go to a similar facility, and conduct noise measurements of the activities, and equipment, so that reasonable assumptions can be made for noise emission data. This would include a table in the document which describes the equipment noise measurement data collected at the site, distances from the noise sources and characteristics of the noise emission data. 13-4
3. Under Impact 11-1 (Short-term Construction Noise Impacts), the analysis uses a statement that seems to prevail throughout the document. The statement is as follows: - accounting for typical useage factors of individual pieces of equipment and activity types along with typical attenuation rates" At no point in the analysis does it provide what the typical useage factors are, or what pieces of equipment are assumed, what the activity types are, what pieces of equipment are assumed, and what the attenuation rates are. The analysis goes on to provide a predicted noise level at 50 feet, and at the caretaker residence. It is not possible to follow the logic in calculating the predicted noise impacts. 13-5
4. Page 11-17 provides a discussion on the Fuel-Delivery impacts. Once again the last sentence states that: Based on reference noise values such activities could result in noise levels of 60 dBA Leq and 85 dBA Lmax, at a distance of 50 feet. 13-6

<p>The analysis needs to provide what the reference noise values used in the analysis are.</p>	<p>13-6 Cont'd</p>
<p>5. Page 11-17 provides a discussion on On-Site Fuel Handling and Storage. The comment is the same as provided in Comment 4 above. There is no way for the reader to determine how the impact was derived.</p>	<p>13-7</p>
<p>6. Page 11-17 provides a discussion on the Mechanical Equipment associated with the Biomass Facility. By far, this is the most glaring inadequate discussion of potential noise impacts in the document. This analysis of a complex facility with numerous potential noise sources, is a two sentence analysis as follows: <i>As discussed in the project description, other mechanical equipment onsite would include two internal combustion engines, a transformer, water pumps a fuel dryer, fuel conveyor system, and exhaust fans. Based on reference noise values and accounting for typical usage factors of individual pieces of equipment and activity types, such activities could result in noise levels of approximately 74 dB Leq at a distance of 50 feet from the center of the project site. The operation of this stationary mechanical equipment would not be limited to the less noise-sensitive daytime hours.</i></p>	<p>13-8</p>
<p>The California Energy Commission would require the following for evaluating the noise impacts associated with an energy facility:</p>	<p>13-9</p>
<p><i>(C) A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.</i></p>	<p>13-9</p>
<p><i>(D) An estimate of the project noise levels, during both construction and operation, at residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.</i></p>	<p>13-10</p>
<p>Our experience in evaluating these types of projects indicates that the equipment associated with the project will include transformer units, combustion turbines, a cooling tower, combustion turbine generators, exhaust stacks, cooling pumps, a gas compressor station. In addition, there may be a heat recovery steam generator (HRSG) associated with the project. Many of these pieces of equipment may be located inside of buildings, but those buildings require ventilation openings. Unless noise reduction features are included in the design, a simple building will not necessarily reduce the overall noise levels. Once again, noise measurement data could have been collected at other representative sites to quantify potential noise impacts. There is no practical analysis to determine noise impacts at the nearest residences, particularly during the noise-sensitive hours. A noise analysis should include modeling using a three dimensional model such as CadnaA. These models include noise source information including frequency data as inputs to the model. The model assigns noise source heights for each noise source and</p>	<p>13-10</p>

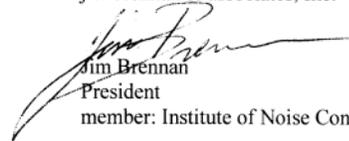
develops noise contours which include topographical shielding, atmospheric conditions including wind, and locations of noise-sensitive receivers.

13-10
Cont'd

If you or any other County staff have questions, please contact me at (530) 823-0960.

Respectfully submitted,

j.c. brennan & associates, Inc.



Jim Brennan
President
member: Institute of Noise Control Engineering

**Letter 13
Response****Jim Brennan, President, J.C. Brennan & Associates
September 10, 2012**

13-1

The commenter states that no noise monitoring was conducted at the sensitive receptors along State Route (SR) 89. This is correct. Ambient noise levels were measured near the closest sensitive receptor, 775 feet from where the biomass facility would be located.

As stated on page 11-5 of the Draft EIR, the caretaker residence that would not be removed as part of the project is located approximately 775 feet northwest of the 3.7-acre area where the biomass facility would be located. Also on the same page, the Draft EIR discloses the residences located approximately 1,500 feet to the east, across SR 89 and on the west side of the Truckee River. A long-term noise measurement was taken near the entrance of the project site and nearby the existing temporary caretaker residences located to the north and south of Cabin Creek Road (see Exhibit 11-1) (see page 11-5). The object of the measurement was to characterize ambient sound levels at the closest sensitive receptor to the proposed location for the biomass facility. The residences along SR 89 are more distant and topographically separated from the site with intervening heavily vegetated land that acts as a natural sound barrier and, therefore, less likely to be affected by noise associated with project-related construction and operation. More specifically, noise levels generally are reduced by 3 decibels (dB) with a doubling of distance from the source and therefore reported noise levels in the analysis would be further reduced at off-site receptors due to distance, topography, and vegetation separating the project site from those residences. Also, the existing dominant noise source at the off-site sensitive receptors is due to traffic along SR 89, which is predominantly a function of the volume of traffic using the roadway and modeled existing traffic noise levels are shown in Table 11-4 on page 11-8 of the Draft EIR. The ambient noise environment at the off-site sensitive receptors along SR 89 would not change in comparison to existing conditions with implementation of the project. Traffic noise along SR 89 would continue to be the dominant noise source for those residences.

The commenter also asserts that the primary noise sources in the project area were not described accurately. With regards to the description of the existing noise environment, the commenter asserts that the dominant noise sources at the project site are related to activities at the MRF and Transfer Station and large equipment traversing the service road on the project site. In Chapter 11, Noise, the Draft EIR described all of the noise sources as observed at the time the noise monitoring was conducted and are based on field observations and the ambient noise measurement, which occurred at a time when the MRF and Transfer Station was in full operation and included the inert and wood waste operations in the northern part of the site referenced in this comment.

13-2

The commenter states that the noise analysis conducted did not follow specific criteria required by the California Energy Commission (CEC)—specifically, a land use map showing sensitive receptors in the project vicinity was not included in the Draft EIR. The CEC has specific requirements listed in Appendix B of CEC-140-2007-003 that a noise analysis must comply with in order to obtain a Power Plant Certification. These regulations, however, apply to power plants larger than 50 MW. The proposed project is a 2 MW biomass facility and is not required to obtain Power Plant Certification from the CEC. Nonetheless, Exhibit 11-1 in Chapter 11, Noise, displays the project area and existing sensitive receptors in the project vicinity. Also, the CEC is not the lead agency for the proposed project.

- 13-3 The commenter provides the CEC requirements to be included in a noise analysis for power plant certification regarding the description of the existing ambient noise levels and ambient noise measurements. As described above in the response to comment 13-2, these regulations do not apply to the proposed project. Nonetheless, Section 11.1, Environmental Setting, of the Draft EIR includes a description of the atmospheric conditions at the time of the measurement, a summary of existing ambient noise level measurements (Table 11-3 and Exhibit 11-2), and generally characterizes all of the noise sources based on field observations and the measurements conducted.
- 13-4 The commenter states that reference noise levels and attenuation rates used for the noise modeling are not described in the Draft EIR. Reference noise levels for typical construction equipment are provided in Table 11-9. Reference vibration levels for typical construction equipment are provided in Table 11-10. Noise levels for all stationary noise sources that would be operated by the proposed project are discussed under Impact 11-3. Reference noise level data, and the sources of these data, are provided in Appendix E of the Draft EIR. The attenuation rates used to estimate noise levels are based on the Federal Transit Association Transit Noise and Vibration Impact Assessment, as indicated in Appendix E. All assumptions and modeling methods are cited and included in Appendix E.
- The commenter also states that a noise measurement should have been conducted at a similar facility so that reasonable assumptions could be developed as the basis for the noise analyses. The EIR consultant considered this approach but, in consultation with Placer County and its technical consultants, was unable to identify another existing facility of similar capacity using gasification technology and forest-sourced biomass feed stock that would be representative of the proposed facility. Other facilities that use biomass material are either smaller or much larger than the proposed facility. Also, many of the other biomass facilities use a direct combustion technology.
- The commenter mentions a 25 MW facility that utilizes an internal combustion system (not a gasification system) in Yolo County; however this is not comparable to the proposed project because of its size and the technology used. The stationary equipment used at a facility of this size, or other larger facilities, would not be representative of the proposed project and, therefore, a measurement at another facility would not have been relevant to this analysis.
- 13-5 The commenter states that Impact 11-1 does not disclose the usage factors for construction equipment, describe construction activities or construction equipment that would be used, and does not indicate what standard attenuation rates were used. However, page 11-15 explicitly describes what construction activities would occur and what equipment would be used. Table 11-9 includes reference noise levels for typical construction equipment. Reference noise levels and the sources of these noise levels are included in Appendix E of the Draft EIR. Attenuation rates were based on the Federal Transit Association Transit Noise and Vibration Impact Assessment, which is also indicated in Appendix E of the Draft EIR. Usage factors for construction equipment are also indicated in Appendix E.
- 13-6 The commenter states that the discussion of noise associated with fuel deliveries does not disclose the reference noise levels used in the analysis. See the response to comment 13-4.

- 13-7 The commenter states that the discussion of noise associated with on-site fuel handling and storage does not disclose the reference noise levels used in the analysis. See the response to comment 13-4.
- 13-8 The commenter asserts that the discussion of stationary equipment noise on page 11-17 is inadequate because of its brevity, but offers no specific details as to why it is inadequate. See the response to comment 13-4 for a discussion of reference noise levels and details of the analyses. Detailed noise calculations, reference noise levels for each piece of stationary mechanical equipment, attenuation calculations, Community Noise Equivalent Level (CNEL) calculations, and combined noise levels, with all appropriate reference sources are all provided in Appendix E of the Draft EIR. No further response is necessary.
- 13-9 The commenter states that the CEC requires a description of major noise sources, including the range of noise levels and the tonal and frequency characteristics of the noise emitted. As described in the responses to comments 13-2 and 13-3, the CEC has specific requirements listed in Appendix B of CEC-140-2007-003 that a noise analysis must comply with in order to obtain a Power Plant Certification. These regulations, however, apply to power plants larger than 50 MW. The proposed project is a 2 MW biomass facility and is not required to obtain Power Plant Certification from the CEC. Nonetheless, Impacts 11-1 through 11-4 discuss all potential noise sources associated with the proposed project.
- 13-10 The commenter references CEC regulations and states that the noise analysis should include an estimate of noise levels during construction and operation at hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project. As described in the response to comment 13-9, CEC's regulations do not apply to the proposed project. Nonetheless, Impact 11-1 evaluates short-term construction noise. Impact 11-2 evaluates short-term construction related vibration. Impact 11-3 evaluates all operational stationary noise sources and Impact 11-4 evaluates traffic noise associated with operations at the Cabin Creek Biomass Facility. Noise impacts were evaluated at the nearest resident which is the only sensitive receptor within the area impacted by the proposed project.
- The commenter also restates that another noise measurement could have been taken at another facility. Regarding this statement, see the response to comment 13-4. No further response is necessary.
- The commenter also asserts that a three dimensional model such as CadnaA should have been used but does not substantiate this assertion. The analysis conducted complies with all federal, state, and local requirements which do not require the use of such modeling software. The analysis uses approved and widely accepted noise modeling techniques. The commenter also suggests the types of noise-generating equipment that would be operated at the biomass facility. Noise impacts from the stationary-noise sources operated at the proposed biomass facility were analyzed under Impact 11-3, beginning on page 11-17 of the Draft EIR. This analysis estimated the combined resultant noise level at the nearest sensitive receptor, the caretaker residence located approximately 775 feet away, from all noise generating equipment and activities associated with project operation. All calculations used to support this analysis are provided in Appendix E of the Draft EIR. The types of noise-generating equipment included in this analysis were based on information provided in the project description, by the project engineers, and manufacturer specifications.

14

From: [Steve](#)
To: [Placer County Environmental Coordination Services;](#)
Subject: Questions about Biomass Project at cabin creek
Date: Sunday, September 02, 2012 4:32:50 PM

Hello,

I am a 22 year local from the Truckee Tahoe area and a happy home owner in Truckee. I do have a few questions and concerns and also some comments. First I think this is a good direction to deal with the huge amount of dead fuel in are forests, the current way of burning piles in the fall after the first rains of the year have come, is a huge polluter, and ruins some of the best condition in Tahoe for getting out and using the trails. The smoke from these fires regularly files Tahoe and Truckee with smoke and ruins the air. So a better plan in needed in my view.

14-1

Some of my question about the Cabin Creek Project are first the transporting of the wood from around the area. How much can one big truck care to the facility and how much fuel is being burned by the trucks to get the fuel to the site, how much diesel particulate does this add to are air, what does this do to are roads as far as truck traffic and ware and tare to the road way?

Another concern of mine is the constant flow of particulates coming from cabin creek. This area around cabin creek is a regularly used backcountry skiing and mountain bike area, will we be breathing constant particulates deep into are lungs as we exercise and play in are own back yard?

To sum it up I think this is a good plan to deal with the dangerous amount of dead wood, but will it come out even if the pollution from the trucks and the constant flow of particulates out of the plant, and the amount of diesel being burned in the trucks to get the fuel from all around Lake Tahoe and Truckee to the site. And what does this do to are air quality on a year round basis, this is a big sporting area for many people and I worry about particulates in the air when we are breathing deep and hard. Thank you for taking my comments and questions into account and also for working on a solution to the amount of dead wood in are forests and they huge fire danger it presents. Steve Kerby

14-2

**Letter 14
Response****Steve Kerby
September 2, 2012**

14-1

The commenter states that he is generally supportive of the project because it would reduce slash pile burning. The commenter asks questions about transportation of the wood: (1) how much can a truck carry and how much fuel is being consumed by the trucks; and (2) how much diesel particulate does this add to the air and what does this do to area roads?

Section 3.4.4 (page 3-15) of the Draft EIR describes the capacity and type of truck, and estimated number of truck trips per day associated with the proposed project as follows: "The Applicant has evaluated a variety of truck types that could haul materials to the site. Each BDT of wood chips is approximately equivalent to 200 cubic feet or 7.41 cubic yards....All biomass material would be hauled out of the forests in chip vans, which have a capacity of 12.5 BDT or 93 cubic yards and forest material would only be recovered from locations that are accessible by chip vans using existing roads. Based on the volume of material required to fuel the facility and the number of days that material could be delivered, it is estimated that up to 1,360 truckloads would be delivered per year or a maximum of 22 truck loads per day." Table 8-7 on page 8-13 of the Draft EIR provides additional detail delivery truck trip generation associated with the project. Trucks used for hauling would not exceed weight limits established by the California Vehicle Code (CVC Weight Sections 35550-35558), and as such would not create unique wear on area roadways.

Impact 9-2, beginning on page 9-18 of the Draft EIR analyzes long-term operational emissions of air pollutants, including particulate matter, some of which is derived from diesel exhaust associated with truck hauling. The analysis concludes that operational emission of particulate matter (PM₁₀) would be less than the applicable air district thresholds. Additionally, it is not anticipated that project operations would result in concentrations of small diameter particulate matter (PM_{2.5}) that would violate or substantially contribute to a violation of the ambient air quality standards for PM_{2.5}. Also, the total maximum daily emissions of PM₁₀, PM_{2.5}, and other criteria area pollutants and precursors would not occur at any single location due to the dispersed nature of associated truck trips and chipping activity.

14-2

The commenter expresses concern about the particulate emissions that would be generated by the biomass facility. See response to comment 5-2 regarding emissions of PM₁₀ and PM_{2.5} associated with construction and operation of the biomass facility.

The commenter also asks what the net change in emissions would be given that the proposed project would result in less open burning but more truck activity along with operation of the plant. As shown in Table 9-7 of the Draft EIR, operation of the biomass facility would generate up to 14.4 lb/day of PM₁₀ and up to 14.4 lb/day of PM_{2.5}. Assuming the plant operates at full capacity 365 days per year, it would emit approximately 2.6 tons/year of PM₁₀ and 2.6 tons/year of PM_{2.5}. Estimated levels of avoided emissions of PM₁₀ and PM_{2.5} associated with the open burning of forest-sourced biomass are provided in Table 9-8 on page 9-21. As shown in Table 9-8, approximately 167 tons of PM₁₀, and 142 tons of PM_{2.5} would be avoided annually. Based on these values, operation of the biomass facility would result in a net decrease of 164 ton/year of PM₁₀ and a net decrease of 139 ton/year of PM_{2.5} and an overall beneficial effect to ambient air quality in the region.



From: [Larry Lawrence](#)
To: [Maywan Krach;](#)
Subject: Comments for Draft EIR for Cabin Creek Biomass Facility Project
Date: Sunday, September 02, 2012 9:21:31 AM
Attachments: [image003.png](#)
[Biomass.pdf](#)

Hello:

I attended the public hearing last Thursday and feel that I would like to hear why this project needs to go into the Tahoe Basin Area. Please see attached article in the Wall Street Journal. I am a property owner of multiple properties in Olympic Valley and Martis Camp do not wish to have the county supervisors approve a project which will cause year around releases into the air. Please research this article and the article referred to the previous month and then let me know what you think.

15-1

Larry



Roland C. "Larry" Lawrence
 P.O. Box 2365 Olympic Valley, Ca. 96146
 Ph: 530.583.1529 Fax:530.583.2509

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<http://www.LawrenceRealty.com>
<http://www.LuxurySkiEstates.com>

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Friday August 17th, 2012

THE WALL STREET JOURNAL.

U.S. NEWS

Massachusetts Tightens Rules on Biomass Plants

By JUSTIN SCHECK

Massachusetts is expected to disqualify many wood-fired power plants from certain green-energy programs, starting Friday, because of concerns about their emissions.

Many U.S. biomass facilities, which burn wood and other plant matter to generate electricity, have received grants and other state and federal benefits aimed at encouraging alternative energy sources.

The new rules seek to ensure that biomass plants produce less net greenhouse gas than plants that burn fossil fuels.

Biomass, like solar, hydroelectric and wind power, has long been considered by many government agencies to be renewable, based on the fact that wood can be regrown. But there has been debate over some biomass plants because of their emission of smoke and other pollutants.

The Massachusetts Department of Energy Resources plans to implement the new regulations Friday, said Krista Selmi, a spokeswoman for the department. The new rules would no longer treat biomass plants as "greener" than plants burning fossil fuels if they don't achieve new efficiency standards. Massachusetts would be the first state to take this step.

The state plans to exclude plants with efficiency rates of

less than 50%—that is, plants that turn less than half of the energy created from burning into electricity—from the renewable-energy certificate program. Many biomass plants now turn only about 25% of the energy released by burning into electricity. The wood used in these plants comes from logging and mill waste, and also, in some cases, from whole trees.

The long-debated rules are a setback for the biomass-power industry, which relies on federal and state subsidies and beneficial power-purchasing rules to operate profitably, according to the Biomass Power Association.

As many as 20 plants in New England and New York state that can sell power in Massachusetts could be affected by the new rules, which will require them to boost their efficiency if they want to claim state renewable-energy credits, says Bob Cleaves, president of the Biomass Power Association, a trade group. Mr. Cleaves says none of the currently operating biomass plants in New England would qualify as renewable under the new rules, and some might have to close.

The new rules are a result of a study Massachusetts commissioned in 2009 from the Manomet Center for Conservation Sciences, a Maine nonprofit that promotes sustainable environmental policy. Manomet concluded in 2010 that in the short

term, most New England biomass plants were no more efficient than coal-burning plants, in terms of net greenhouse gas emissions per megawatt of electricity produced.

Roughly three-fourths of the potential energy in the wood is "lost right through the smokestack," said John Gunn, who co-authored the Manomet study.

The study sparked an outcry from power and timber producers, who questioned its science and argued that new efficiency requirements could make it impractical to burn wood waste.

Many biomass plants have already been struggling to make money. In some cases, plants have been fined for environmental reasons. The Wall Street Journal reported last month that 85 of the 107 U.S. biomass plants in operation in January 2012 have been cited for pollution violations over the past five years.

In other cases, low power rates forced some to temporarily stop production. Gallop Power in Greenville, Maine, which qualifies under Massachusetts's current renewable-energy rules, went offline last year, said plant manager Paul Anderson, in part because of low prices for its power. Prices have since gone up, but the plant, which filed for bankruptcy protection in June, remains offline now that it will no longer qualify for those credits, Mr. Anderson said.

U.S. WATCH



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**Letter 15
Response****Larry Lawrence, Lawrence Realty
September 2, 2012**

15-1

The commenter states he attended the public hearing and wants to know why the project has to go in the Tahoe Basin Area. The commenter is concerned about the year round releases of air emissions associated with the project. The comment letter also includes an article from the Wall Street Journal regarding rules for biomass plants in the state of Massachusetts.

With regard to the project location, the Cabin Creek site is located outside of the Tahoe Basin near the Town of Truckee. The facility was sited in an area that is located in close proximity to the source of the woody biomass material, which would be areas within the Tahoe Basin.

The Wall Street Journal article that the commenter cites refers to a recent State of Massachusetts rule that would require biomass power plants to achieve greater than 50% efficiency to be considered as renewable. The rule was based on a study from the Manomet Center for Conservation Sciences (Manomet Study) which concluded that “in the short term, most biomass plants in New England were no more efficient than coal-burning in terms of greenhouse gas emissions”.

The Manomet Study results are not applicable to the Cabin Creek Biomass Facility operations. The Manomet Study considers biomass that is harvested solely for the purpose of use as fuel. Alternatively, the proposed Cabin Creek Biomass Facility would not use any biomass which is harvested for the purpose of fuel. Instead, the facility would only use woody biomass material that is a byproduct of forest fuel hazardous reduction and thinning activities which are conducted for the purpose of forest and ecological sustainability and health. The facility would use biomass wastes from forest management activities critically necessary due to the high wildfire risk and heavy fuel load from decades of fire suppression in the semi-arid Sierra Nevada Tahoe region forests. These forest conditions and management objectives in the forested landscapes around the proposed facility are entirely different than those in Massachusetts, which is the basis of Manomet Study. Biomass used by the facility would be a waste product that would be generated independently from, and in spite of, any potential fuel value. Biomass wastes that the facility would use would have been open pile burned in the vicinity of the site of generation, which is the common and necessary practice in the region, absent a biomass plant option.

The Wall Street Journal article also reports that “85 of the 107 U.S. biomass plants in operation have been cited for pollution violations over the past five years,” and refers to an earlier article of July 24, titled “Wood Fired Plants Generate Violations,” which discusses violations at some biomass plants in the U.S. The operating history and experience of these plants has no relationship to the proposed biomass facility, and provides no relevant indication as to the anticipated operation of the facility. There is very little in common between the proposed facility and biomass facilities discussed in the article. In particular, the biomass facilities discussed in the article are examples of units built in the 1980s, and which have distinctively different biomass fuel feedstocks (urban wood wastes, and allegedly, building debris and plastics and rubber), design and controls (steam fired boilers), and scale (order of magnitude larger).

16

From: [Eric Perlman](#)
To: [Placer County Environmental Coordination Services;](#)
Subject: yes
Date: Monday, July 30, 2012 8:58:14 PM

I vote yes to a biomass plant. Make sure that you have room to expand it to 4 or even 6 megawatts if the forests need that much material removed.

1. Thin the biomass fire hazard.
2. Generate local renewable energy.
3. Create long-term high-tech and low-tech local employment.

Thank you,
Eric Perlman,
Truckee

16-1

**Letter 16
Response****Eric Perlman
July 30, 2012**

16-1

The commenter is supportive of the biomass project and recommends that provisions are made for expansion of the generation capacity of the plant to 4 or even 6 megawatts. See the summary notes for comment PH-1 from the public hearing on August 30, 2012 regarding future expansion of the proposed biomass facility. The comment of support for the benefits of the project is noted. The Placer County Planning Commission will consider this comment at the time it considers project approval.

From: [Shearer, Steve](#)
To: [Placer County Environmental Coordination Services;](#)
[Brett Storey;](#)
cc: robynk@caterkelly.com; [Boyles, Michael J.;](#)
Subject: Placer County (Co-Gen) introduction to Butler Mfg.
Date: Tuesday, August 21, 2012 9:23:31 AM
Attachments: [LightBrochure.pdf](#)

17

Good Day Ms. Krach and Mr. Storey,

It is with interest that I noted Placer County is currently developing plans for a new biomass-fired cogeneration facility planned for the Truckee area. My name is Steve Shearer and I represent Butler Manufacturing™ with corporate accounts within the western states. Butler Manufacturing™, a division of BlueScope Buildings North America, Inc., is the industry leader for engineered building systems and the delivery of related construction services.

Construction services are addressed through a network of over 1,200 affiliated Butler Builders® in North America and abroad. We are pleased to be represented in your project area by Carter-Kelly, Inc in Placerville. Our Butler Builders provide local construction expertise while delivering enhanced value and efficiencies by utilizing Butler building systems for the structural, roof and wall requirements. Our individualized design approach to specific project criteria and facility development needs also allows us to encompass a wide variety of conventional wall materials if desired.

For your review, I have included in my e-mail a digital copy of a brochure titled "Open to a World of Possibility" which addresses our value proposition from an overview perspective. As demonstrated by the projects noted, our building capabilities extend from small simple structures to large complex industrial facilities and hangars. Our reputation is based on performance and exceeding our clients' expectations on diverse facility needs. Butler's MR-24 standing seam roof, with over 2 billion square feet in place, is one of the hallmarks of the value we have provided to building owners. I hope you will have an interest in learning more about Butler, our products and services and visit our web site: www.butlermfg.com.

We would like to learn more about your facility development process and our opportunities to address your building needs. My contact information

17-1

is listed below. I have taken the liberty to copy Robyn Kelly of Carter Kelly on my e-mail. Robyn can be reached at 530-621-0950. Also copied is Michael Boyles, our Butler area manager for Northern California. We await your response and look forward to further information about your new facility. Carter-Kelly will contact you directly in the near future as well. Thank you for your consideration.

17-1
Cont'd

Regards,
Steve Shearer

Steven J. Shearer
Senior Global Corporate Accounts Manager
Butler Manufacturing
A Division of BlueScope Steel
1540 Genessee St. Kansas City, MO 64102, USA
E-Mail: sjshearer@butlermfg.com
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**Letter 17
Response** **Steven Shearer, Butler Manufacturing
August 21, 2012**

- 17-1 The commenter provides information to the County regarding construction services offered by Butler Manufacturing. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.

From: [Michael Theroux](#)
To: [Placer County Environmental Coordination Services](#);
cc: [Robert Miller](#);
Subject: Notice of Media Coverage
Date: Saturday, August 11, 2012 10:28:38 PM

Maywan Krach, DEIR Project Manager
 Placer County Community Development Resource Agency,
 Environmental Coordination Services,

Robert Miller, Placer County Public Information Office

We are pleased to have provided media coverage for the release of the Placer County DEIR on the Cabin Creek Biomass Facility. See: <http://www.terutalk.com/August-2012.html#0811-1>. This item circulates broadly in our next free e-newsletter due out early Monday; please review, and contact me directly with any questions or clarifications.

Teru Talk web service www.terutalk.com is focused on the clean conversion of waste and biomass to energy, fuels and other commodities. We have built a detailed profile for tracking Placer County's efforts. Please add us to your media advisory list for receipt of future press releases related to our industrial sector and to this project in particular.

Michael Theroux, Editor
 PO Box 7751
 Auburn, CA 95604-7751
 530-823-7300; cell: 530-613-1712
 email: mtheroux@terutalk.com
 Web Service: www.terutalk.com
 Corporate Site: www.jdmt.net
 Skype: michael_theroux; Twitter: @TeruTalk

18-1

Letter 18
Response **Michael Theroux, Editor, Teru Talk**
August 11, 2012

18-1

The commenter requests to be added to the County's media advisory list related to the biomass energy industrial sector. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.

From: swesley@mpbiomass.com
To: [Maywan Krach;](#)
Subject: We Might Be Able To Help You!
Date: Tuesday, September 04, 2012 9:13:39 AM

19

MP Biomass can provide a Zero Emissions System from our technology partners in Italy. We are the "exclusive manufacturers representative," for a technology that can take any pollutant and eliminate it, and create three renewable energy sources from the flue gases, MSW, sludge, coal ash, fly ash, CO2, sewage, animal waste, medical waste, lawn and tree debris, and petroleum, oil, lubricant waste streams and even old tires. Notice we stated we collect CO2? We can collect and reform that CO2 to renewable energy in great abundance that we will guarantee a ROI in 5 years or less.

This technology has an international patent and we are proud to offer this technology to any corporations, municipalities, or organizations that might have a background or need in environment, construction, engineering, energy, or similar fields. Yes, we can capture Carbon Emissions from coal plants and any other manufacturer for that matter. We capture 100% of any pollutant and reform it.

Because we can support this manufacturer and assist in eliminating pollution in any country, state, or territory, with ZERO EMISSIONS! Our international patented system was first put into place in 2003. Feel free to visit our website: www.mpbiomass.com If you are not interested, we say, no problem here, we already have many all over the world who are! A favorite group of mine once said, "So often times it happens, we all live our life in chains, and yet we never even know we have the key!" -Eagles, Already Gone.

Respectfully,

Scott W. Wesley
Principle
MP BioMass
www.mpbiomass.com
Direct: 480-290-9601



19-1

Letter 19
Response **Scott Wesley, MP Biomass**
September 4, 2012

19-1

The commenter provides information to the County about emissions control technology available from MP Biomass. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.

20

Maywan Krach

From: Matt Woodward [mwoodward@tntindustrial.com]
Sent: Tuesday, August 21, 2012 9:50 AM
To: Placer County Environmental Coordination Services
Cc: 'randy'
Subject: Project: CA 120722 Biomass - Fired Cogen Facility.
Attachments: image001.png; image002.jpg

Ms. Krach,

We are very interested in this project and would like to get on the approved contractors list. If you could send us any information or application on this matter , that would be great!

20-1

Have a great day!

Regards,

Matt Woodward



*Project Supervisor / Estimator
Mechanical Division*

*3600 51st Ave.
Sacramento, Ca. 95823
Office: 916-395-8400
Fax: 916-395-8429
Cell: 916-803-6852*



**Letter 20
Response** **Matt Woodward, Industrial Contractors
August 21, 2012**

20-1

The commenter requests to be added to the County's approved contractors list. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.

2.4.6 PUBLIC HEARINGS

**Placer County Planning Commission
Public Hearing Notes on the Cabin Creek Biomass Facility Draft EIR**



August 30, 2012
1:09 PM – 1:45 PM

Gerry Haas, Senior Planner, provided an overview of project details and purpose of today’s meeting.

Comment By	Comment Summary	Staff Response Provided at Meeting (where applicable)
<i>Planning Commission – Clarifying Questions</i>		
Larry Sevison	<p>Is there power lines to the site?</p> <p>Would the plant utilize the material already being generated at the site?</p> <p>Could you easily incrementally increase the size of the facility?</p>	<p>Yes, existing lines can take power from the site.</p> <p>No. Only during wintertime some material from the site may be used. Project is designed to take material that is otherwise being burned.</p> <p>The transmission line is constrained. If greater than 2 MW, the transmission line would need to be upgraded and there are known environmental constraints (e.g., cultural resources) to upgrading the line.</p>
<i>Public Comments</i>		
Al Bolf, Retired SMUD employee	<p>Identified role in study for I-80 to electrify that corridor.</p> <p>The biomass plant should be located adjacent to a sewage plant. Some of the CO₂ emissions from the biomass plant could be used to accelerate the growth of algae produced in the sewage effluent to create biodiesel.</p> <p>Re: transportation costs. Around the time of World War II, the Germans developed a wood gas system that pelletized wood. Wood pellets would be burned with a controlled amount of oxygen in boilers on vehicles. They built 600,000 4.5 ton trucks with this technology. A similar application</p>	NA

PH-1

PH-2

Comment By	Comment Summary	Staff Response Provided at Meeting (where applicable)
	<p>for the project would solve the transportation cost, because you could make your own fuel. Checked with a local welder “Black Bart” welding facility in Nevada City that indicated they could make a similar system – the system would require a particulate filter. Would reduce fuel cost by creating the fuel for transportation.</p> <p>Advocates putting two things together. Referenced “The Race for What’s Left” by Emerald Clar.</p> <p>Described the electric rail link he is working on with the Chinese government – would cut the cost of hauling material to the plant. Could transfer biomass material to the site in hoppers.</p> <p>Provided information on biomass successes globally.</p> <p>Discussed the importance of the fuels work in the Basin in diversifying the forest denuded by logging.</p> <p>Experience with nuclear, fossil-fueled, geothermal, and other types of power plants.</p>	
Anne Grogen, Sierra Business Council	<p>With mitigation, the Sierra Business Council (SBC) supports the project. Specifically, SBC supports the following:</p> <ol style="list-style-type: none"> 1. Biomass as an alternative energy source 2. Diversifying sources of energy in our region 3. Job creation in our region, especially year round jobs 4. Strongly supports the forest health initiatives that this project supports 5. Forest fuels and open burning reduction will have health benefits and reduce risk of catastrophic wildfire, and resultant economic benefits <p>Read into the record the recommended mitigations measures in the comment letter from SBC dated August 30, 2012.</p>	NA
1:45 PM: HEARING CLOSED		

PH-2
Cont'd

PH-3

PH-4

Response PH	Placer County Planning Commission Public Hearing, August 30, 2012
PH-1	Placer County Planning Commission members asked clarifying questions of staff. All questions were answered at the public hearing and the responses are summarized in the table above.
PH-2	The commenter suggests co-locating the facility adjacent to a sewage treatment plant, transportation fuel options, and potential future rail opportunities for biomass material transport. The comment does not raise any issues regarding the environmental analysis in the Draft EIR. Consistent with the requirements of CEQA, no further response is required.
PH-3	The comment of support for the benefits of the project is noted. The Placer County Planning Commission will consider this comment at the time it considers project approval.
PH-4	See responses to comments 11-2 through 11-7.

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