



February 22, 2019

Ms. Shirlee Herrington
 Environmental Coordination Services
 Placer County Community Development Resource Agency
 3091 County Center Drive
 Auburn, CA 95603

Subject: Review of Draft Environmental Impact Report for the Sunset Area Plan - Placer Ranch Specific Plan

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Sunset Area Plan (SAP) and Placer Ranch Specific Plan (PRSP) Project. The District has the following comments on the Project’s DEIR for your consideration. Our comments focus on two areas of which the District has expertise; air emissions and odor. First we have some recommendations relating to GHG and criteria pollutants. Then, we will address odor impacts.

1. Table 4.7-2 and Table 4.7-3 of the DEIR should be consistent with the modeling results shown in Appendix K. The following tables are from Appendix K summarizing the total unmitigated and mitigated operational Greenhouse Gas (GHG) emissions from the SAP Area and the PRSP Project at full buildout¹.

PRSP Operation - Unmitigated

Source	Emissions
Area	7,797
Energy	35,933
Mobile	147,988
Waste	7,109
Water	2,177
Total	201,004

SAP Operation - Unmitigated

Source	Emissions
Area	934
Energy	81,219
Mobile	282,392
Waste	10,469
Water	2,926
Total	377,940

PRSP Operation - Mitigated

Source	Emissions
Area	5,185
Energy	33,948
Mobile	147,988
Waste	7,109
Water	1,760
Total	195,990

SAP Operation - Mitigated

Source	Emissions
Area	26
Energy	46,112
Mobile	282,392
Waste	10,469
Water	2,346
Total	341,345

¹ Appendix K “Air Quality and Greenhouse Gas Emissions Modeling Results” page 3.

The total unmitigated GHG emissions from the SAP Area in Table 4.7-2 should be 377,940 MTCO₂e/year and total mitigated GHG emissions from the SAP and PRSP Areas in Table 4.7-3 should be 341,345 and 195,990 MTCO₂e/year, respectively. In addition, Mitigation Measure 4.7-2b proposes to pay an offset fee to compensate for the project's GHG emissions in excess of 1,100 MTCO₂e/year. Therefore, the correct GHG emission offsets for the SAP and PRSP Project should be 340,245 (341,345 - 1,100 = 340,245) MTCO₂e/year and 194,890 (195,990 - 1,100 = 194,890) MTCO₂e/year, respectively. Furthermore, notwithstanding the comments below in Item 2, the offset fee should be re-calculated based on the same formula used in Mitigation Measure 4.3-3c for the ROG and NO_x Off-site mitigation fee calculation².

The followings are suggested corrections for Mitigation Measure 4.7-2b:

The net SAP area would generate ~~373,896~~ 341,345 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 340,245 MTCO₂e/year for a period of one year. Based on the current average rate of \$12 per metric ton of CO₂e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~\$5,120,190~~ \$4,082,940 (equivalent to ~~\$0.66~~ \$0.55 per square foot for nonresidential and ~~\$954~~ \$327 per residential unit).

PRSP would generate ~~195,014~~ 195,990 MTCO₂e/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 MTCO₂e/year, or ~~27.14~~ 27.27 MTCO₂e/year for each residential unit in the PRSP area. The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~\$1,706,730~~ \$2,338,680 (equivalent to ~~\$955~~ \$327 per residential unit).

2. Mitigation Measure 4.7-2b proposes the purchase of carbon offsets to mitigate the operational GHG emissions from the SAP and PRSP Areas. The measure also includes a mitigation fee calculation based on the current average rate of \$12 MTCO₂e. The rate used to calculate the mitigation fee could be underestimated -- according to the EIR's statement "*At the time this EIR was written, the average rate ranges from \$8 to \$35 per metric ton of CO₂e.*" Since the buildout of the SAP and PRSP Project is expected to occur over 80 years or more, the collective mitigation fee paid by the project applicants could not sufficiently satisfy the required GHG emission reduction if the future rate would be more than \$12 per metric ton. For this reason, Mitigation Measure 4.7-2b shall identify the required GHG reduction (MTCO₂e) for each nonresidential and residential unit instead of a mitigation fee per unit and to require that the project applicant satisfy the emission reduction requirement at the time of recordation of each final map.

² Mitigation Measure 4.3-3c determines the off-site mitigation fee based on a total of 7,146 residential units proposed by the PRSP and a total of 7,289,000 square foot non-residential development and 320 residential units proposed by the SAP, DEIR page 4.3-39

Mitigation Measure 4.7-2b should explicitly indicate that the project applicant can satisfy the measure by 1) purchasing sufficient local or California-only carbon credits through the accredited carbon credit registries, 2) investing in a local GHG reduction project/program which complies with the approved protocols from the CAPCOA GHG Rx program or CARB's Cap-and-Trade Offset protocols, or 3) paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map. If the mitigation fee is chosen, the District recommends that the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices³ for GHG allowances at the time of the final map recordation.

Mitigation Measure 4.7-2b also requires that the GHG reduction achieved through an offset or through the purchase of carbon credits must meet several criteria. However, the measure does not establish the mechanism to identify and monitor how the purchased carbon credits satisfy the criteria and how the measure should be implemented by the project applicant. The District recommends that the measure include the identification of individuals or agencies responsible for monitoring and verifying when the mitigation measure is implemented.

3. Impact 4.10-2 states that the proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the Western Regional Sanitary Landfill (WRSL) from 1 mile (5,280 feet) to 2,000 feet for residential development, or 1,000 feet with the approval of a specific plan, master plan, or development agreement. According to the review of the existing odor complaint data from residents beyond the current 1 mile buffer, the DEIR concludes that the proposed SAP and PRSP Project would have potentially significant impacts on the WRSL.

The DEIR's Appendix J includes two odor studies from SCS Engineers: *Review of Odor Management at WRSL* (November 9, 2017) and *Evaluation of Incremental Odor Increase from WRSL* (September 27, 2018). The first study reviewed the existing odor complaint data with landfill odor control practices during that time frame, and confirmed that the proposed SAP and PRSP Project would result in additional odor complaints because of the project allowing development within the existing 1-mile buffer zone.

The second study conducted a further analysis on the incremental increase in odor emissions and odor impacts that would result from implementation of the SAP and PRSP Project. The report estimated that the incremental odor emissions from the buildout of the proposed SAP and PRSP Project would represent 16 percent of the odor emissions generated at WRSL in 2018 and 8 percent of the odor emissions generated at WRSL in 2058. Additionally, this SCS study also investigated the incremental odor impacts corresponding to the proposed SAP and

³ CARB Cap-and-Trade Program compliance instrument auction information <https://www.arb.ca.gov/cc/capandtrade/auction/auction.htm>

PRSP Project. However the results were not explicitly discussed in the DEIR.

The study modeled future odor impacts based on odor emissions, receptor locations to the WRSL, and meteorological conditions taken in June. The results presented as the number of exceedances to a threshold, in dilutions to threshold (DT). The red box drawing on SCS’ table shows the locations within the 1-mile buffer zone and the associated number of odor exceedances of 5 DT, 8 DT, and 10 DT. According to the analysis, odor is frequently considered to be offensive when it exceeds 8 DT. The following table4 is from SCS’ second study showing modeled odor impacts in 2058 (the time of the WRSL’s expected closure) with or without the implementation of the SAP and PRSP Project.

Table 7. Future Odor Impacts

Location	Upscaled Impact in 2058			Upscaled Impact Minus Project			Increase in Exceedance from Project		
	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT
WRSL parking lot	434	566	1059	375	505	938	59	61	121
Closest regional commercial	73	102	178	59	93	164	14	9	14
Mid North boundary of future Sac State	14	40	113	9	28	96	5	12	17
Roundabout at entry to future Sac State	1	7	13	0	3	9	1	4	4
Closest medium density residential	1	1	9	0	1	7	1	0	2
Closest low density residential	0	1	7	0	0	6	0	1	1
William Hughes Park	0	0	5	0	0	4	0	0	1
Leopard Davis Park	0	0	5	0	0	3	0	0	2
Verrasona and Vignolia	0	0	5	0	0	4	0	0	1
Closest high density residential	0	1	4	0	0	4	0	1	0
Greywood Circle	0	0	4	0	0	3	0	0	1
Woodcreek Oaks Safeway	0	0	3	0	0	3	0	0	0
Rainbow Trout	0	0	2	0	0	2	0	0	0
Veterans Park	0	0	2	0	0	2	0	0	0
Settlers Ridge	0	0	2	0	0	2	0	0	0
Dugan Park	0	0	2	0	0	2	0	0	0
Amoruso	0	0	2	0	0	2	0	0	0
Fiddymment Farm Elementary	0	0	2	0	0	2	0	0	0
Mel Hamel Park	0	0	2	0	0	1	0	0	1

The red box on above table shows the locations of future development created by the SAP and PRSP Project, within 1-mile buffer zone. According to the number of exceedances under the “Upscaled Impact Minus Project” column, the total number of odor impacts exceeding 8 DT are 193, all which occur in the new SAP and PRSP Areas. The total number of exceedances

for the rest of the locations located outside of the 1-mile buffer zone is 0. This analysis is based on the month of June, which is not a peak month for odor complaints – the majority of odor complaints come in the winter and spring months.

According to the increase from **0** to **193** odor impact exceedances in the month of June in 2058, the SCS study clearly indicate that reducing the 1-mile buffer zone around the WRSL would substantially increase odor impacts with the implementation of the SAP and PRSP Project by placing people in much closer proximity to the WRSL -- even without consideration of any additional project-generated odors and in a month with very low odor complaints based on the current odor complaint history.

Furthermore, it can be reasonably interpreted that the SAP and PRSP Project would be expected to result in a more significant increase in odor impacts during the peak winter and spring months, again because of the project's proposal to reduce the 1-mile buffer zone to the WRSL.

The DEIR points to several studies regarding implementation of on-site odor controls at landfill sites within California to remediate odor complaints. However, the DEIR states that these measures will not be considered because they are beyond the jurisdiction of Placer County. The DEIR's impact discussion acknowledges an increase in future odor complaints created by the SAP and PRSP Project due to land use incompatibility. It goes on to acknowledge that this will place pressure or legal actions on the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL. Accordingly, the DEIR proposes to place the burden of mitigating the odor complaints to the public, enforcement agencies (such as the District), WPWMA, and the courts, rather than the project components in order to mitigate the land use incompatibility created by the approval of the SAP and PRSP Project. The odor problem will be exacerbated by new residential development from the SAP and PRSP Project that are closer to the landfill site; development which previously would have been prohibited by the one-mile buffer zone required by the County's General Plan Policy.

The DEIR states that one option for the WPWMA may be to increase the solid waste service fee for all service areas (those areas of Placer County west of the city limits of Colfax which includes passing the increased solid waste service fees to the public) to cover future expenditure requirements for odor control and mitigation at the WRSL. These expenditures may include implementing additional odor control measures, paying litigation costs, transporting solid waste to the other landfill sites, such as the Ostrom Road Landfill site located in Yuba County (which has a current public environmental document for a proposal to receive solid waste from the Bay Area), or relocating the WRSL facility to another area. These potential scenarios would likely have very significant economic impact on WRSL

operations, as well as the jurisdictions within Western Placer County, including the cities of Lincoln, Roseville, and Rocklin.

As the DEIR states, the WPWMA is working on its Waste Action Plan to address future WRSL operational needs. The plan will identify operational options and analyze the options based on a variety of factors, including economics and odor impacts. Placer County is a member of the WPWMA's Board of Directors who oversees the operation of the WRSL. The District strongly recommends that the County, as the lead agency under CEQA and a WPWMA Board member, requires the project applicant to commit to working with the WPWMA to develop an odor mitigation plan as a mitigation measure. The potential plan shall identify additional effective and proactive on-site mitigation measures with necessary financial assistance, through the WPWMA Waste Action Plan process, to reduce undesirable odor impacts resulting from the proposed project's land use conflicts. The following are some suggested actions to be included in the proposed plan as mitigation for reducing odor impacts:

- Increase the capture efficiency of landfill gas through use of more vertical and horizontal wells and stronger blower fan and trace gas evaluation testing.
- Enhanced cover of landfill areas using tarps, thicker layers of cover, permeable membrane, "Enviro" cover, "Posishell" cover, "closure" turf, compacting soil, and/or "enhanced" material such as vegetation, compost, green waste.
- Improved leachate management.
- Improved compost management using state of the art aeration methods.

The District can work with the County and WPWMA to monitor implementation of the mitigation measures.

4. The DEIR Section 4.13 addresses the potential impacts of the project on public services, including fire protection and emergency services, law enforcement, school, parks and recreation facilities, and library services. The DEIR Impacts 4.3-6 and 4.10-2 all conclude that the proposed SAP and PRSP Project will result in significantly incremental increases of odor emissions and odor impacts to both the existing community as well as to the new development, and a corresponding increase in complaints that the District must investigate and resolve. Thus, this section should discuss the District's role in providing public services and identify mitigation measures for our increased need for resources to deal with odor complaints -- such as direct funding support to offset the costs for these additional services if the proposed project is approved.

Although the District is not identified by the DEIR for public service analysis, the District is a

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public agency, as defined by California Health and Safety Code⁵. We are responsible for addressing public nuisance, including odors resulting from the discharge of air emissions from any source⁶. As we discuss in the previous comment, the buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility. Additional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL.

Providing the public with these services, including responding to an increased number of public nuisance complaints over a broader area, odor enforcement activities, and potential litigation for violations, will place a significant financial burden on the District. Without funding support, these costs may be passed on as per capita fees to jurisdictions served by the District, through permit fees upon Placer County businesses, or as fees to be paid by WRSL that will be passed on to the public through increased solid waste service fees. The District is willing to work with the County to identify necessary resources to provide services in responding to an increased number of odor complaints resulting from the buildout of the SAP and PRSP Project.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2325 or ychang@placer.ca.gov.

Sincerely,



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⁵ California Health and Safety Code §40000

⁶ California Health and safety Code §41700