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May 22, 2020

Mr. Harry Mavrogenes
Director
San Benito County Resource Management Agency
2301 Technology Parkway
Hollister, CA 95023

RE: John Smith Road Landfill Soil Stockpile Project Initial Study/Negative Declaration – Evaluation of Proposed Accelerated Soil Depletion

Dear Mr. Mavrogenes:

Douglas Environmental prepared the John Smith Road Landfill Soil Stockpile Project Initial Study/Negative Declaration for San Benito County, which was released for a 20-day public review on May 1, 2020. The Initial Study evaluated the environmental impacts associated with temporarily stockpiling approximately 300,000 cubic yards of native soils on approximately 11 acres of grazing land located outside of the permitted boundary of the John Smith Road Landfill. The source of the soil is from the excavation of a waste disposal module within the permitted landfill boundary, which is an already approved activity at the landfill. The stockpiled soil would be used as a source for daily and intermediate landfill cover until it is depleted. The Initial Study assumed that soil depletion would occur over a period of approximately 15 years.

Subsequent to the release of the Initial Study, the landfill operator (Waste Solutions Group of San Benito, LLC) stated in a May 15, 2020 letter to Ray Espinosa, San Benito County Administrative Officer, that the soil stockpile is expected to be constructed in 2020 and the soil would be used at the landfill over the following four years rather than the 15 years evaluated in the Initial Study. The landfill operator agreed in the May 15, 2020 letter that if all of the stockpiled soil is not used over that four-year period, the remaining unused soil would be graded to blend into the surrounding landscape and then the exposed soil would be hydro-seeded.

Douglas Environmental evaluated the proposed change in the duration of soil use within the soil stockpile to determine if any of the Initial Study impact conclusions would change. The following provides a summary of this evaluation for the key resource topics evaluated in the Initial Study that could be affected by the proposed accelerated soil stockpile depletion.

Aesthetics

The aesthetic analysis concluded that the construction of the proposed soil stockpile would alter the site's existing visual character due to its visibility from John Smith Road. However, the analysis concluded that the visual changes would not be significant because they would be consistent with the continual changes in surface elevations that occur at the adjacent landfill, the number of travelers on John Smith Road who

would observe the change would be quite limited, and the stockpile would not be permanent, as it would be depleted over approximately a 15-year timeframe. With the soil stockpile depletion occurring over a four-year period rather than over 15 years, the aesthetic impacts identified in the Initial Study would be slightly reduced because the project site would be more quickly restored to its existing topography and associated visual condition. Therefore, no change in the Initial Study's aesthetic impact conclusions would occur with implementation of the accelerated soil depletion.

Air Quality

The Initial Study's air quality analysis evaluated the worst-case criteria air pollutants that would be generated by relocating the approximately 300,000 cubic yards of soil in a single construction season. Based on the modeled construction air emissions, as represented in Table 2 of the Initial Study, the worst-case condition would not exceed the Monterey Bay Air Resources District's significance thresholds for construction emissions.

The Initial Study assumed that construction vehicle emissions and particulate matter (dust) generation associated with the use of the soil stockpile over approximately 15 years would not exceed the peak daily emissions that would occur during soil stockpile construction because of the smaller volumes of soil that would be moved on a daily basis. In effect, approximately 20,000 cubic yards of soil would be used from the soil stockpile annually when a 15-year depletion rate is assumed versus the 300,000 cubic yards that would be moved during initial construction. With the soil stockpile depletion occurring over a four-year period rather than over 15 years, approximately 75,000 cubic yards of material would be used annually. This represents just 25 percent of the soil moved during the initial construction. Therefore, the accelerated soil depletion would not increase the peak daily criteria air pollutant emission estimates included in the Initial Study.

The air quality analysis further concluded that the generation of diesel particulate matter emissions from construction vehicles associated with project implementation would not expose sensitive receptors to substantial pollutant concentrations due to the temporary construction period and lack of sensitive receptors within close proximity to the site. The accelerated soil depletion would not be expected to increase the total number of truck or heavy equipment trips when compared to the 15-year depletion timeframe and no increase in the exposure of sensitive receptors to pollutant concentrations would be expected. Therefore, no change in the Initial Study's air quality impact conclusions would occur with implementation of the accelerated soil depletion.

Biological and Cultural Resources

For biological and cultural resources, the Initial Study concluded that the construction of the soil stockpile would not result in significant environmental impacts associated with disturbance within and adjacent to the approximately 11-acre project site. The project footprint would not change with implementation of the accelerated soil depletion. Therefore, no change in the Initial Study's biological or cultural resource impact conclusions would occur with implementation of the accelerated soil depletion.

Geology and Soils

The analysis of geologic and soils impacts concluded that based on the design of the soil stockpile, including the installation of benches, drainage features, and erosion control measures, impacts associated with ground failure, liquefaction, landslides and erosion would not be considered significant. Because the accelerated soil depletion would more quickly reduce the size and scale of the soil stockpile when compared to the 15-year depletion period, the potential for the soil stockpile to be exposed to geology and soil impacts would be slightly reduced. Therefore, no change in the Initial Study's geology and soil impact conclusions would occur with implementation of the accelerated soil depletion.

Greenhouse Gas Emissions

The analysis of greenhouse gas (GHG) emission impacts concluded that the proposed project would generate a total of approximately 220 metric tons of CO_2e during the three-month construction period and similar levels of CO_2e emissions would be anticipated over the operational life of the soil stockpile. These GHG emission levels were identified as being substantially below the thresholds typically used by the Monterey Bay Air Resources District of 10,000 metric tons/year of CO_2e. Implementation of the accelerated soil depletion would result in the same volume of material movement. The only difference would be that the GHG emissions would be generated within a shorter timeframe. Because the accelerated soil depletion would not be expected to measurably change the project's GHG emissions when compared to the 15-year depletion period, the Monterey Bay Air Resources District's significance threshold would not be exceeded. Therefore, no change in the Initial Study's GHG impact conclusions would occur with implementation of the accelerated soil depletion.

Hydrology and Water Quality

The analysis of hydrology and water quality impacts concluded that with implementation of the project's Erosion Control Plan as well as a storm water pollution prevention plan (SWPPP) and associated best managements practices (BMPs), the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The implementation of the accelerated soil depletion would accelerate the removal of the soil stockpile when compared to the 15-year soil depletion. Therefore, the timeframe during which the soil stockpile would be exposed to erosive forces would be diminished. As a result, no change in the Initial Study's hydrology and water impact conclusions would occur with implementation of the accelerated soil depletion.

Noise

The analysis of noise impacts concluded that the worst-case noise impacts would occur during the initial soil stockpile construction and these construction noise impacts would be considered less than significant. The analysis also concluded that following construction, the soil stockpile would be accessed on a daily basis to provide daily soil cover of waste materials during landfill module filling operations. However, the daily cover soil demand would be very limited, only requiring between one and two trips per day between the soil stockpile and the landfill working face. The noise generated from these trips would be negligible and would be consistent with other permitted operations at the site.

With implementation of the accelerated soil depletion, these daily trips would be increased to as many as eight trips per day between the soil stockpile and the landfill working face. However, this would represent less than one trip per hour and the noise generated from these trips would be consistent with other permitted operations at the site. Therefore, the accelerated soil depletion would not be expected to measurably change the project's noise impacts when compared to the 15-year depletion period. As a result, no change in the Initial Study's noise impact conclusions would occur with implementation of the accelerated soil depletion.

Conclusions

Implementation of the accelerated soil depletion, as proposed by the landfill operator, would have the same or very similar impacts as the 15-year soil depletion evaluated in the Initial Study. Based on this understanding and the analysis presented in this letter, no changes in the Initial Study's impact conclusions would occur with implementation of the accelerated soil depletion and no changes are necessary to the Initial Study/Negative Declaration.

If you have any questions regarding this evaluation, please do not hesitate to call.

Sincerely,

Douglas Brown
Principal