

## Exhibit C

### McCourtney Road Transfer Station Renovation Project

#### Initial Study/Mitigated Negative Declaration

#### Comments Received and Responses

February 10, 2021

Comments on the McCourtney Road Transfer Station Renovation Project Initial Study/Mitigation Negative Declaration were received from the following agencies and individuals during the public review period that ended on January 10, 2021:

The table below indicates the correspondence number, author and agency (as applicable), and date of the correspondence.

Written Comments Received on the Initial Study/Mitigation Negative Declaration		
Correspondence #	Commenter	Date
1	Kevin Yount, Branch Chief, California Department of Transportation	Jan. 5, 2021
2	Kate Whitney, Environmental Scientist, CalRecycle, Department of Resources Recycling and Recovery	Jan. 12, 2021
3	Greg Hendricks, Environmental Scientist, Central Valley Regional Water Quality Control Board	Jan. 12, 2021
4	Sara Lyon, Nevada County Environmental Health Department	Jan. 7, 2021
5	Sam Longmire, Northern Sierra Air Quality Management District	Jan. 8, 2021
6	Eric Jorgensen	Jan. 10, 2021
7	Mardi Naythons	Jan. 5, 2021
8	Don Rivenes and Shirley Freriks, NCCAN--WasteNot	Jan. 10, 2021

Comment summaries and responses are provided below for each comment letter. The comment summaries identify the letter number, author, agency (if relevant), and sequentially numbered comment responses that correspond to the letter number. The original comment letters with comment numbering along the right margin are attached at the end of this document.

#### **1 Kevin Yount, Branch Chief, California Department of Transportation**

- 1.1 Comment summary: The commenter states that the proposed site development will increase traffic to the project facility and will increase VMT. The commenter further states that because the proposed developments are within the site, no induced traffic is expected and the development would not be anticipated to cause any significant traffic impacts on SR 49 or SR 20 in the future.

Response: These comments are consistent with the conclusions of the Initial Study.

- 1.2 Comment summary: The commenter requests that updated trip generation numbers be provided.

Response: Please see the project's trip generation information in Appendix A attached.

**2 Kate Whitney, Environmental Scientist, CalRecycle, Department of Resources Recycling and Recovery**

- 2.1 Comment summary: The commenter states that Mitigation Measure AIR-5 does not specify which agency is responsible for its implementation and monitoring.

Response: The County will be responsible for implementing the mitigation measures identified in the Initial Study. In addition, the County and Northern Sierra Air Quality Management District (NSAQMD) will jointly be responsible for monitoring this mitigation measure, as specified in the project's Mitigation Monitoring and Reporting Program. The County's commitment to monitoring odors at the site through the use of an Odor Impact Minimization Plan would not constitute the issuance or use of new powers.

- 2.2 Comment summary: The commenter requested clarification of the area for receipt and handling of solid waste.

Response: The project requires a phasing of the construction such that some activities will need to be relocated during construction. In particular, the green waste and C&D waste receipt and transfer activities are scheduled to be temporarily located to the existing truck trailer parking lot as described in section 2.4.1 of the Initial Study. This area is located east of the two surface impoundments and outside of the currently permitted area.

- 2.3 Comment summary: The commenter states the green waste tonnage should be based on the same 359 operating days as the MND as opposed to 365 days per year noted in the Initial Study.

Response: Comment noted. The calculations will be revised accordingly but it does not significantly change the basis of the design of the proposed project.

- 2.4 Comment summary: The commenter states the tonnage limit (65 tpd) for chip and grinding activity was removed from the SWFP in 2020.

Response: This MND includes this former operation and provides for the tonnage of several materials including the former 65 tpd chip and grind operation pursuant to the

approved parameters described in the former IS/MND. The County would seek a new solid waste facility permit that includes this operation prior to implementation.

- 2.5 Comment summary: The commenter states the C&D tonnage should be based on the same 359 operating days as the MND as opposed to 260 days per year noted in the Initial Study.

Response: Comment noted. The calculations will be revised accordingly but it does not significantly change the basis of the design of the proposed project.

- 2.6 Comment summary: The commenter requests the areas shown on Table 2 to be checked.

Response: Comment noted. The calculations have been checked and will be confirmed as part of the application for a new solid waste facility permit.

- 2.7 Comment summary: The commenter states that the material types used throughout the document should be expressed in the same units, as tons per day, and that the permitted maximums for daily tonnages should be categorized by waste type rather than activity.

Response: The Initial Study incorrectly references 65 tons per hour on page 2-17 when discussing the tonnage capacity of the chipping and grinding operation. The correct reference is 65 tons per day. In all other instances, the tons per day unit is correctly identified in the Initial Study when referencing material tonnages.

Regarding clarification of the quantities of waste per material type, the County intends to secure a Solid Waste Facility Permit with a single maximum, aggregated permit limit of 1,610 tons per day. This aggregated permit limit is intended to provide the operational flexibility necessary to adapt to changes in the waste stream over the project's life span. The aggregated permit limit is based on the following waste material type assumptions:

The new Transfer Station would be sized to receive, store and loadout up to 890 tons per day of MSW and recyclables. This consists of 690 tons per day of MSW and 200 tons per day of commercially collected mixed recyclables. The existing PRA would be repurposed to receive organic materials (a combination of food, food soiled paper and food/yard wastes) and would be sized to receive, store and loadout 370 tons per day. After the removal of the existing entrance scales, scale house, and administration trailer, the outdoor, paved area available for yard waste and C&D materials would be sized to receive, store and loadout 220 tons per day of C&D materials and 110 tons per day of yard waste material. The chipping and grinding operation would be relocated to the out-door yard waste area, which is sized to receive, process and loadout 65 tons per day. The existing metals area is sized to receive and load-out 20 tons per day. These areas and associated tons with each

material may be increased or decreased with changes in design or operational configurations.

The table below identifies the design capacity of each area. This table is not intended to be used to establish individual material type tonnage limits.

<b>Facility</b>	<b>Material to be Received</b>	<b>Design Quantity (tons per day)</b>
New Transfer Station	Commercial and Self Haul Waste (MSW)	690
New Transfer Station	Commercially collected recyclables	200
Indoor Organics Transfer (repurposed PRA)	Food waste and co-collected food/yard waste	370
Outdoor Yard Waste and chipping and grinding area	Yard Waste (including 65 tons per day of chipping and grinding)	110
Outdoor C&D Waste area	C&D Waste	220
Metal Tipping Pad	Metal, appliances and other recyclables	20
<b>Total</b>		<b>1,610</b>

Comment summary: The commenter states that a definition of organic materials should be provided.

Response: As referenced on page 3-15 of the Initial Study, organic materials received at the repurposed PRA would include those that are required to be diverted from the waste stream, as defined by SB 1383 and AB 1826.

Comment summary: The commenter requests that the recyclable materials accepted at the Transfer Station be defined.

Response: The recyclable materials accepted at the Transfer Station would include those defined by Exhibit 1 of the County's Franchise Agreement with Waste Management, as approved by Nevada County Board of Supervisors Resolution 19-360, which includes the following:

Aluminum cans - empty	Newspaper
Mixed Plastics 1-7	Mail
Paper bags (colored or white)	Uncoated paperboard (ex. cereal boxes; food and snack boxes)
	Uncoated printing, writing and office paper
Steel and tin cans – (should be empty)	Old corrugated containers/cardboard (uncoated)
Glass food and beverage containers – brown, clear, or green – (should be empty)	Magazines, glossy inserts and pamphlets

Comment summary: The commenter states that wastes received at the Household Hazardous Waste facility and buy-back area should not be counted towards the daily permitted maximum tonnage at the Transfer Station.

Response: The County agrees with the commenters statement and does not intended to count waste received at the Household Hazardous Waste facility and buy-back area as contributing towards the daily permitted maximum tonnage at the Transfer Station.

- 2.8 Comment summary: The commenter states the chipping and grinding activity should be separate from the C&D processing activity.

Response: Comment noted: The proposed project will secure a new solid waste facility permit which will include chipping and grinding tonnage separate from the C&D processing activity.

- 2.9 Comment summary: The commenter requests clarification regarding whether the new transfer station will be permitted as an enclosed or open building.

Response: The new transfer station will be permitted as an open building, as it will not be fully enclosed.

- 2.10 The commenter requests clarification regarding whether self-hauled food waste materials will be accepted at the repurposed PRA.

Response: The repurposed PRA building will accept food waste from both commercial and self-hauled sources.

- 2.11 Comment summary: The commenter states that the project should clarify the amount of time materials will remain on site before being removed.

Responses: Consistent with the requirements of CCR Title 14, Section 17410.1, all solid waste, including food and organic materials, will be removed from the facility within 48 hours of receipt.

- 2.12 Comment summary: The commenter requests clarification regarding whether the proposed transfer station will be fully enclosed or open.

Response: Please see Response to Comment 2.9 above.

**3 Greg Hendricks, Environmental Scientist, Central Valley Regional Water Quality Control Board**

- 3.1 Comment summary: The commenter describes the regulatory background for the Central Valley Regional Water Quality Control Board's Basin Plan and the Board's Antidegradation Policy (State Water Board Resolution 68-16). The commenter further describes the Antidegradation Implementation Policy contained in the Basin Plan and states that an antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements permitting process.

Response: The proposed project will comply with these permitting requirements as well as all other applicable permitting requirements prior to project construction and operation.

- 3.2 Comment summary: The commenter states that the environmental review document should evaluate potential impacts to both surface and groundwater quality.

Response: For a discussion of the project's impacts on surface and groundwater, the commenter is referred to the Hydrology and Water Quality section of the Initial Study. As stated in this section, project construction would be expected to increase site erosion, which could degrade local water quality. Construction could also result in spills of fluids or fuels from construction vehicles that could degrade water quality. Mitigation Measure HYD-1 is included in the Initial Study to minimize these potential water quality impacts.

- 3.3 Comment summary: The commenter describes additional permitting requirements that may be applicable to the proposed project.

Response: The proposed project will comply with all applicable permitting requirements prior to project construction and operation.

**4 Sara Lyon, Nevada County Environmental Health Department**

- 4.1 Comment summary: The commenter states that the existing PRA building does not have plumbing and is not planning to have plumbing installed as a part of the renovation project. Further the commenter asks how the misting and related odor neutralizing activities will be implemented.

Response: Comments noted. The County will comply with state and local building codes when repurposing the existing PRA building to serve as food waste receipt and transfer activities as well as all other applicable permitting requirements prior to project construction and operation.

- 4.2 Comment summary: The commenter questions the timing of the removal of food waste to prevent food waste from becoming a nuisance. Further, the commenter states the removal of food waste will need to be occur within 48 hours of receipt.

Response: Per the updated solid waste facility permit application to be submitted, the proposed project will comply with the requirement to remove food waste within 48 hours of receipt.

- 4.3 Comment summary: The commenter states that the McCourtney Road Transfer Station permit revision of June 4, 2020 allowed for three units to be absorbed into one under the Large Transfer Station permit that allowed for up to 350 tons per day of all materials and the removal of specific limits for both C&D and green waste.

Response: The County agrees. The County will pursue a new solid waste facility permit with an increase in the maximum daily tonnage limit for all material types prior to project construction and operation.

- 4.4 Comment summary: The water system at the site will meet the requirements of a Non-Transient Non-Community Small Domestic Public Water System and will be permitted as such, as requested by the commenter.

Response: The County will provide a water system that will meet the requirements of a Non-Transient Non-Community Small Domestic Public Water System.

- 4.5 Comment summary: The commenter provides clarification regarding the facility's existing operating hours.

Response: This comment is noted. No additional response is necessary.

- 4.6 Comment summary: The commenter requests that the calculation for the chipping and grinding operation be provided that justifies receipt, processing and loadout at 65 tons per hour.

Response: The Initial Study incorrectly references 65 tons per hour on page 2-17 when discussing the tonnage capacity of the chipping and grinding operation. The correct reference is 65 tons per day. In all other instances, the tons per day unit is correctly identified in the Initial Study when referencing material tonnages.

- 4.7 Comment summary: The commenter requested calculations for the design quantity of the yard waste/C&D chipping and grinding and metal tipping pad. The commenter also requested clarification of the chipping and grinding operation sized at 65 tons per day vs. 65 tons per hour.

Response: The calculations to support each of the functions noted will be included in a new Transfer and Processing Report submittal to secure a new Solid Waste Facility Permit. Also, the commenter is correct that the chipping and grinding operation is sized at 65 tons per day not tons per hour.

- 4.8 Comment summary: The commenter clarifies the holding time for materials received at the site. Consistent with CCR 14, Section 17410, solid waste received at the site will be removed within 48 hours.

Response: Please see Response to Comment 4.2 above.

- 4.9 Comment summary: The commenter states the water system shall demonstrate that it has sufficient capacity in both source and storage for the proposed operation.

Response: The County will provide a water system that will meet the requirements of a Non-Transient Non-Community Small Domestic Public Water System and will ensure that the system has sufficient source and storage capacity for the proposed operation prior to project construction.

- 4.10 Comment summary: The commenter identifies the project approval requirements including specifically the post closure land use requirements associated with the project being located adjacent to the landfill.

Response: The proposed project will comply with all applicable permit requirements prior to project construction and operation.



- 4.11 Comment summary: The commenter states that the operator will be required to file an application for revision of the existing solid waste facilities permit with the enforcement agency.

Response: The proposed project will comply with all applicable permit requirements including an application for revision of the existing solid waste facility permit prior to project construction and operation.

- 4.12 Comment summary: The commenter states that the operator must apply for and obtain a permit for the storage of hazardous materials and the generation of hazardous wastes from the Nevada County Department of Environmental Health. The commenter also identifies additional permit requirements that would be applicable to the proposed project.

Response: The proposed project will comply with all applicable permit requirements prior to project construction and operation.

## **5 Sam Longmire, Northern Sierra Air Quality Management District**

- 5.1 Comment summary: The commenter states that the proposed project will result in an overall air quality benefit. The commenter further approves the Dust Control Plan in Mitigation Measure AIR-2.

Response: This comment is noted. No further response is necessary.

- 5.2 Comment summary: The commenter states that Mitigation Measure AIR-1 may not satisfy the statewide diesel Airborne Toxic Control Measures but that no change to the mitigation measure is needed.

Response: This comment is noted. No further response is necessary.

## **6 Eric Jorgensen**

- 6.1 Comment summary: The commenter stated that the proposed project traffic and tonnage projections are based on 50% growth. Later in the letter the commenter correlates the 50% growth to the assumption of this increase occurring in 10-years.

Response: The traffic increases are based on a 30-year planning horizon (2050), not a 10-year horizon. See Response to Comment 1.1 (Appendix A) for the basis of the traffic growth.

Comment summary: The commenter also states that the proposed project does not address increasing recycling and requests clarification of how the County intends to meet the state mandated diversion requirements.

Response: The new PRA has been designed to accommodate both commercial recycling and MSW (trash) and can accommodate growth and/or changes in material streams. The commenter raises concerns regarding County recycling policy and /or programs, which are outside of the scope of the proposed project and Initial Study.

- 6.2 Comment summary: The commenter states the carbon impacts could be reduced if the County were to require all residents to recycle, close the recycle buy back center, fund satellite green waste collector centers where chipping can reduce mileage, and install roof top solar on both PRA buildings.

Response: The commenter suggests several specific waste management policies and projects outside of the scope of the Initial Study.

- 6.3 Comment summary: The commenter states that written questions and statements were provided at the NCSTW Commission.

Response: These comments were addressed in the meeting and noted.

- 6.4 Comment summary: The commenter states that public involvement and discussion regarding the proposed project has been minimal.

Response: The County provided the following opportunities for public involvement: the County hosted two public meetings with notices mailed to 327 recipients, of which 296 were surrounding neighbors and 31 were regulatory agencies or public entities. The County also presented at the Solid and Hazardous waste Commission, which is a publicly noticed meeting. The County Circulated the Initial Study for a 30day period and publicly noticed that document beyond County and State standards. All meeting material and project information was posted on the project webpage. Additionally, staff has provided regular updates about this project at all Solid and Hazardous Waste Commission meetings and the County Board of Supervisors during the bidding and procurement process for the design and environmental phase of the project. Additionally, throughout the public outreach process, the County has issued several press releases on the County's social media outlets and the weekly CEO newsletter. County staff have also discussed the

proposed project on radio station KNCO and the Nevada Union during the public outreach period.

- 6.5 Comment summary: The commenter states that the project proposes no alternative solutions for reducing traffic and associated carbon release.

Response: The County performed a site analysis study in 2012 and concluded the McCourtney Road site was the preferable site for this use. The County also explored a variety of site development options in 2016 and selected a preferred site development plan, which was developed into the proposed project. Although outside of the scope of this project or the findings of the proposed IS/MND, the County is also evaluating additional projects, partnerships and funding opportunities to expand green waste and organics material collection within the community.

Comment summary: The commenter questions the necessity of increasing the traffic and tonnage by 50% in 10 years.

Response: See Responses to Comments 1.1 and 6.1 above and Appendix A attached. The design period for the proposed project is 2050. Based on the data collected between 2015 and 2019, the 50% increase in traffic and tonnage reflect a 30-year planning period.

- 6.6 Comment summary: The commenter requests the basis of the vehicle carbon release for the proposed project and requests how carbon emissions will be mitigated.

Response: For a discussion of carbon emissions anticipated from project development, the commenter is referred to the discussion of greenhouse gas emissions commencing on page 3-39 of the Initial Study. For a discussion of the air quality mitigation measures, the commenter is referred to the discussion of air quality impacts commencing on page 3-8 of the Initial Study.

- 6.7 Comment summary: The commenter recommends the county close the Buy Back recycle facility, pass an ordinance requiring all households to use waste and recycle curbside carts where service roads are feasible, establish 3 to 6 dispersed green waste sites around the county to reduce traffic, invest in site leases and chipping equipment and to collaborate with the Fire Safe Council.

Response: The commenter suggests several specific waste management policies and projects outside of the scope of the Initial Study.

## **7 Mardi Naythons**

- 7.1 Comment summary: The commenter raises concerns about groundwater contamination.

Response: The project facility has very robust regulatory oversight and ongoing water quality monitoring protocols. All project improvements will be designed to comply with these strict standards and regulatory requirements. The enclosure of the waste receiving building is expected to result in a net improvement in site water quality by reducing exposure of the waste to stormwater. Finally, the commenter is directed to the Hydrology/Water Quality discussion within the Initial Study (Section 3.10).

- 7.2 Comment summary: The commenter raises concerns regarding project traffic on South Ponderosa Road.

Response: The primary access to the project site is McCourtney Road. South Ponderosa Road is a privately maintained roadway and its use by citizens who live in the area is not within the scope of this project. However, the proposed project is expected to reduce traffic wait times and improve traffic flow on the project site, which is anticipated to reduce delays and potentially associated illegal dumping. Any trespassers or illegal dumping that does occur on South Ponderosa Road should be reported to the Sheriff's Department. Commenter is directed to the Transportation discussion within the Initial Study (Section 3.17).

## **8 Don Rivenes and Shirley Freriks, NCCAN--WasteNot**

- 8.1 Comment summary: The commenter states the population of Nevada County has increased approximately 6.5% over the past 20 years and questions how a 50% increase is needed.

Response: See Responses to Comments 1.1 and 6.1 above and Appendix A attached.

- 8.2 Comment summary: The commenter states that they would like to see the project design include actions beyond those envisioned in the proposed renovations including satellite locations.

Response: Comments noted. The commenter raises concerns regarding County policy and/or programs which are outside of the scope of the proposed project and Initial Study. Although outside of the scope of this project or the findings of the proposed IS/MND, the County is also evaluating additional projects, partnerships and funding opportunities to expand green waste and organics material collection within the community.

- 8.3 Comment summary: The commenter recommends funding strategies that the County and Waste Management should implement and suggests that the County set aside some funds for demonstration projects.

Response: Solid Waste Parcel Charge and WM funds have been earmarked for this project. The provision of funding for additional strategies or demonstration projects is outside of the scope of the proposed project and Initial Study.

- 8.4 Comment summary: The commenter recommends specific policies that should be implemented by the County, raises concerns regarding the level of County staffing for solid waste management, and suggests that more staffing be provided. The commenter further suggests that parcel tax money could be used to support solid waste management services.

Response: The policy recommendations suggested by the commenter are outside of the scope of the proposed project and Initial Study.

- 8.5 Comment summary: The commenter summarizes their concerns,

Response: Please see the Responses to Comments provided above.

## Appendix A Summary of Traffic Analysis

### Traffic Analysis

#### Average Daily Traffic

Based on the 2015 data, the 2016 Basis of Design showed a breakdown provided by Waste Management (WM) for the average number of vehicles using the site per day. This distribution is shown in **Table 2-3**, compared to 2019 data where available. The 2019 data provided by WM did not include HHW and Recycling or employees, vendors and visitors. Excluding those categories and assuming a 5-day week, the data showed an average of 502 vehicles passing through the scales each day (inbound and outbound), which is an 8% increase from the 2015 data average of 466 vehicles for similar categories.

**Table 2-1. Summary of Historic Daily Average Vehicles from WM**

Peak Day Vehicle Count	2015 Vehicle Count <sup>a</sup>	2019 Vehicle Count <sup>b</sup>
Inbound Refuse Collection Vehicles	20	26
Inbound Self-Haul Refuse Vehicles	317	325
Inbound Vehicles to C&D Area	64	49
Inbound Vehicles to Green Waste Area	51	85
<b>Total Paying (Scale Transaction) Inbound Vehicles</b>	<b>452</b>	<b>485</b>
Outbound Refuse Transfer Trucks	7	17
Outbound C&D Transfer Trucks	3	
Outbound Green Waste Transfer Trucks	1	
Outbound HHW and Recycling Transfer Trucks (CRV, Tires, Metal, Commingle) <sup>a</sup>	3	
<b>Total Outbound Vehicles</b>	<b>14</b>	<b>17</b>
Inbound Vehicles to HHW and Recycling Loop (CRV, Express Drop Off, Metal, Commingle) <sup>e</sup>	204	Not Available
Employee Vehicles (estimated)	25	Not Available
Vendors and Visitors (estimated)	3	Not Available
<b>Total Other Non-Scaled Vehicles</b>	<b>232</b>	

<sup>a</sup> Source: Email from Sharon Simpson of Waste Management to David Garcia of Nevada County, March 8, 2016.

<sup>b</sup> Source: Scale records sent via email from Gilberto Pineda of Waste Management to Tim Raibley of HDR, October 29, 2019. Assumes an average of 5 days per week operations for each category.

<sup>c</sup> 2019 refuse collection vehicles includes the WM scale record categories of MSW-Franchise and Bulky.

<sup>d</sup> 2019 self-haul refuse vehicles includes the WM scale record categories of MSW+Recycling and MSW-Residential.

<sup>e</sup> 2015 Recycle vehicle count based on combined MRTS and previous Recycle Works Operations and assumed to include HHW.

The County performed traffic counts at the MRTS in February 2016 for five consecutive days when the MRTS was open to the public and observed the total number of vehicles using the site each day ranged from 673 to 772. This was in line with the daily average of 698 vehicles provided

by WM for 2015. Although no specific traffic counts were performed in 2019, the data shows the entrance traffic arrival rates for weekends throughout the summer months to be in the 700 vehicles per day range.

### Peak Hour Traffic

The peak day for vehicle traffic typically occurs on a weekend day when little to no commercial vehicles are using the site. Based on the 2015 data, the 2016 BOD assumed 137 vehicles use the site during the peak hour for traffic. This includes self-haul refuse, commercial refuse, self-haul recycling, green waste, C&D, and transfer vehicles. Separate data was not provided for vehicles using the HHW drop-off. For modeling purposes, the HHW vehicle data is assumed to be included in the recycling area vehicles.

Based on the 2019 data, nearly 1,100 vehicles used the site during the peak day, which was Sunday, July 7, 2019. During the busiest hour of that day, the total peak hour arrival rate was approximately 125 vehicles. This includes a peak rate of nearly 900 vehicles per day, and 100 vehicles per peak hour for users that cross the entrance scale (self-haul refuse, green, C&D, commercial, loadout). The peak rate for vehicles at the recycling loop was 93 vehicles per day, with an estimated 13 vehicles per hour during the peak hour. The peak rate at the HHW drop off area was 88 vehicles per day, or an estimated 12 vehicles per hour during the peak hour. The breakdown provided by WM for the number of vehicles by material type for the peak day is shown in **Table 2-4**. Combined, the peak hour is estimated to have approximately 125 vehicles using the site; this is slightly less than estimated by the 2016 BOD.

**Table 2-2. Summary of Peak Hour Vehicles, Sunday, July 7, 2019**

Vehicle Type	Peak Vehicles per Hour
Refuse + Recycling	7
Bulky	1
C&D	8
Refuse - Residential	63
Refuse - Franchise	0
Green Waste - Residential	21
Green Waste - Franchise	0
Tires	0
Inbound Vehicles to Recycling Loop (CRV / Express Drop Off / Metal / Commingle)	13
HHW	12
<b>Total Vehicles Per Day</b>	<b>125</b>

Source: Scale records sent via email from Gilberto Pineda of Waste Management to Tim Raibley of HDR, October 29, 2019. Recycling and HHW peaks are estimated from the peak daily totals, as no hourly breakdown was available.

## Growth Projections

The MRTS renovation, including the new TS building, is planned to provide as much room for growth as possible given the limitations of the site. In order to estimate how much growth could be accommodated and how many years the facility would operate before growth pushed its limits, HDR reviewed a variety of sources for growth projections.

At the request of the County, the 2016 BOD planned for future population growth and the corresponding increases in tonnage and traffic at the MRTS using the same procedure used in recent work done by the Nevada County Transportation Commission (NCTC). This was based on Department of Transportation (Caltrans) growth projections developed using generally accepted methodologies, and past projections were found to have been reasonably close to actual population growth in Nevada County.<sup>1</sup> At the time, Caltrans forecasted that the population of Nevada County would be 98,634 in 2015 and grow to 112,316 in 2040.<sup>2</sup> This translates to growth of approximately 14% over the course of 25 years, averaging approximately 0.5% to 0.6% growth per year.

For this Report, HDR reviewed the updated population projections from Caltrans, and found that the estimated growth rate had been revised to be much lower for that same time period. Caltrans now forecasts that the population of Nevada County was 98,211 in 2015 and will grow to 100,657 in 2040 (2.5% total, averaging 0.1% growth per year).<sup>3</sup>

HDR also compared the Caltrans estimates to the recommended regional growth projections for population from the Sacramento Area Council of Governments (SACOG), whose members include El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties as well as the 22 cities within those counties. SACOG recommended a population growth rate of 1.28% annually from 2010 to 2035 for the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) update.<sup>4</sup> For the 2020 MTP/SCS Update, this was revised to recommend an average annual population growth rate of 0.95% for 2016 to 2040.<sup>5</sup>

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<sup>1</sup> Parsons Brinckerhoff. "Review of Land Use Assumptions and NCTC Traffic Model." August 3, 2015.

<sup>2</sup> *California County-Level Economic Forecast 2015-2040*. Prepared by The California Economic Forecast, for the Economic Analysis Branch of the Office of State Planning at the California Department of Transportation. September 2015.

<sup>3</sup> Caltrans. 2019 County-Level Economic Forecast: Nevada County Economic Forecast. Accessed April 14, 2020. Available at <<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/socioeconomic-forecasts/2019-pdf/nevadafinal.pdf>>

<sup>4</sup> SACOG Board of Directors. "MTP/SCS: Regional Growth Projections." December 6, 2013. Accessed April 23, 2020. Available at <[https://www.sacog.org/sites/main/files/file-attachments/12a-growth\\_1.pdf](https://www.sacog.org/sites/main/files/file-attachments/12a-growth_1.pdf)>

<sup>5</sup> SACOG Board of Directors. "2020 Metropolitan Transportation Plan (MTP)/ Sustainable Communities Strategy (SCS) Update: Policy Framework and Regional Growth Projections." December 14, 2017. Accessed April 23, 2020. Available at <[https://www.sacog.org/sites/main/files/file-attachments/18.1-mtpscs\\_framework.pdf](https://www.sacog.org/sites/main/files/file-attachments/18.1-mtpscs_framework.pdf)>



## Increased Utilization of MRTS

The projected growth of the community is not well documented and could vary from very little growth to a low/modest growth rate. As the planning horizon for this facility is 25 or more years, the need to plan for the higher growth rate to accommodate future use and avoid repeating the current condition of an undersized facility seems most prudent. The new TS and new entrance and scale facilities are expected to be able to accommodate an estimated 50% increase in use, both in materials processed and in traffic on site. Using the highest population growth estimate discussed above (1.28% annually), the new facility will run into size limitations in just under 40 years. If the community grows at a lower growth rate, the facility capacity could be seen as being extended to a longer period of time.

An increase of 50% results in the future vehicle counts shown in **Table 3-1**. The 2019 peak hour data was used, as it is consistent with the 2015 data for all categories shown. The projections were used in evaluating the use of the renovations to MRTS. Please note that self-haul recycling and HHW vehicles are not included in the model, as those areas will not require passing through the scales, and the receiving areas are arranged by WM and not part of the renovations covered in this Report.

**Table 3-3. Peak Hour Vehicle Counts for Current and Future Operations at PRA**

Vehicle Type	2019 Operations	Future Operations (+50%)
Self-Haul refuse vehicles	70	105
Commercial Refuse Vehicles	1	2
Vehicles to Green Waste area	21	32
Vehicles to C&D Area	8	12
Transfer Truck (Total, All Services)	1	2
<b>Total Vehicles</b>	<b>101<sup>a</sup></b>	<b>153</b>

Note: Scale records sent via email from Gilberto Pineda of Waste Management to Tim Raibley of HDR, October 29, 2019. Peak traffic taken from Sunday, July 7, 2019, with one transfer truck added to account for the typical transfer vehicle traffic on Sundays. 2019 self-haul refuse vehicles include the WM scale record categories of MSW+Recycling and MSW-Residential. 2019 commercial refuse vehicles includes the WM scale record categories of MSW-Franchise and Bulky.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3

703 B STREET

MARYSVILLE, CA 95901

PHONE (530) 513-0584

TTY 711

[www.dot.ca.gov/dist3](http://www.dot.ca.gov/dist3)*Making Conservation  
a California Way of Life*

January 5, 2021

GTS# 03-NEV-2020-00189

SCH 2020120228

David A. Garcia, Jr.  
Solid Waste Program Manager  
Nevada County Department of Public Works  
950 Maidu Ave  
Nevada City, CA 95959

**McCourtney Road Transfer Station Renovation Project**

Dear David A. Garcia, Jr:

Thank you for including the California Department of Transportation (Caltrans) in the Initial Consultation review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The proposed project of several facility and operational changes, including the expansion of the site entrance road, installation of new scale facilities, construction of an approximately 48,000 square foot transfer station building, conversion of the Public Receiving Area building, installation of approximately 170,000 square feet of new or repaved asphalt surfaces, the expansion and temporary use of a trailer/bin storage area for green/yard waste and construction/demolition receiving and transfer operations and expansion of the facility's permitted hours of operation, tonnage limits and vehicle limit is requesting comment on a submitted Mitigated Negative Declaration. The following feedback is based on the provided Notice of Intent to Adopt a Mitigate Negative Declaration and the information provided on the project website, [mccourtnevtransferstation.com](http://mccourtnevtransferstation.com).

### ***Transportation Planning – Forecasting and Modeling***

The proposed site developments will increase the traffic to the project facility and thus more VMT leading to the site. But as the developments are within the site, no induced traffic is expected. The development is not anticipated to cause any significant traffic impact on SR 49 and SR 20 in the future.

**1.1**

### ***Traffic Operations – Highway Operations***

The existing Project Facility will increase in size, but there was not enough information to determine the impacts to the State Facilities. The Project Facility is not located near the State Highway, which may not make a significant impact, but this cannot be determined without knowing the increase in trip generations. Please provide updated trip generation numbers to be reviewed.

**1.2**

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Colin Fredrickson, by phone (530) 741-4527 or via email to [colin.fredrickson@dot.ca.gov](mailto:colin.fredrickson@dot.ca.gov).

Sincerely,



KEVIN YOUNT, Branch Chief  
Office of Transportation Planning  
Regional Planning Branch—East



January 12, 2021

Mr. David A. Garcia, Jr.  
Solid Waste Program Manager  
Nevada County Department of Public Works  
950 Maidu Avenue  
Nevada City, CA 95959

**Subject: SCH No. 2020120228** –Initial Study/Mitigated Negative Declaration for  
McCourtney Road Transfer Station Renovation Project – Nevada County

Dear Mr. David A. Garcia, Jr.:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

### **PROJECT DESCRIPTION**

The County of Nevada, acting as Lead Agency, has prepared and circulated a Notice of Completion (NOC) of an Initial Study/Mitigated Negative Declaration (IS/MND) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed McCourtney Road Transfer Station Renovation Project is located at 14741 Wolf Mountain Road, approximately five miles southwest of Grass Valley in unincorporated Nevada County. The primary site entrance is from Wolf Mountain Road from McCourtney Road. The project site is approximately seven acres. The site is located within a rural area of unincorporated Nevada County that contains low-density, large-lot residences. The closed McCourtney Road Landfill is located adjacent and directly south of the project site.

The proposed project would include: the expansion of the site entrance road and installation of new scale facilities, construction of an approximately 48,000 square foot transfer station building, installation of approximately 170,000 square feet of new or repaved asphalt surfaces, increases in the permitted hours of operation and daily waste acceptance limits, increase in the permitted vehicle limit, and other operational changes.

Proposed project operations consist of the transfer and processing of MSW, recyclables, metals, organic materials, green materials (yard waste), and construction and demolition (C&D) materials. Operations would occur Monday through Sunday, seven days per week. The new hours of operation would be 7:00 a.m. to 5:30 p.m. for material receiving, material processing on-site, material transfer off-site, public material receiving, special events and visitors. The facility would continue to be closed on New Year's Day, Fourth of July, Veterans Day, Thanksgiving Day, and Christmas. The proposed project includes increasing the current permit limit from 350 tons per day (TPD) to 1,675 TPD and increasing the daily traffic limit from 1,090 vehicles per day to 1,658 vehicles per day.

## **COMMENTS**

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the IS/MND, in addition to the specific location noted.

Comments for the IS/MND are summarized in the table below:

<b>Chapter/Section</b>	<b>Page and Location</b>	<b>Comment</b>
IS/MND  Mitigation Measures	Page 3 and 3-16  Mitigation Measures  AIR-5	<p>"The County shall develop and implement an Odor Impact Minimization Plan (OIMP) prior to repurposing the PRA as an organics building..."</p> <p>This mitigation measure does not specify which agency is responsible for its implementation and monitoring.</p> <p>Regulatory authority of odors from Transfer Stations fall under the jurisdiction of the air district. An OIMP as defined in Title 14 of the California Code of Regulations is only applicable to Compostable Material Handling Facilities and Operations. An OIMP as described in the manner above is not applicable to the transfer/processing regulatory tier nor is it enforceable by the Local Enforcement Agency.</p> <p>Furthermore, CEQA Guidelines Section 15040(b) states the CEQA does not grant</p>

**2.1**

Chapter/Section	Page and Location	Comment
		an agency new powers independent of the powers granted to the agency by other laws.
IS/MND 1.3 Project Location	Bottom of page 1-1	<p>The current Solid Waste Facilities Permit (SWFP) to operate indicates a facility area of seven acres, however the MND project description states the property is 142.</p> <p>Will there be an increase to the area for receipt and handling of solid waste beyond the currently permitted 7 acres? It is unclear from the project description.</p>
IS/MND 2.2.4 Green Waste	Bottom of page 2-2	<p>“The majority of the green waste is received over seven days per week, or 365 days per year.”</p> <p>Other sections of the MND calculate average tonnages based on 359 operating days. Calculations used for tonnage limitations should be consistent in the number of operating days.</p>
IS/MND 2.2.4 Green Waste	Top of page 2-3	<p>“The existing permit allows a chip and grinding activity of up to 65 tons per day. Chipping and grinding is conducted sporadically depending upon need. Although this operation is not currently being used, it has historically been conducted and is a permitted use that is assumed to be part of the baseline site conditions.”</p> <p>This tonnage limit for green waste was removed from the SWFP in 2020.</p>

**2.2**

**2.3**

**2.4**

Chapter/Section	Page and Location	Comment
IS/MND  2.2.5 Construction and Demolition Waste Area	Top of page 2-3	<p>“The majority of the C&amp;D waste is received over five days per week, or 260 days per year.”</p> <p>Other sections of the MND calculate average tonnages based on 359 operating days. Calculations used for tonnage limitations should be consistent in the number of operating days</p>
IS/MND  Tables 1 & 2	Page 2-9	<p>“These features, when combined with the necessary vehicle maneuvering areas, sum to the minimum facility design criteria identified in Table 2.”</p> <p>The total area of transfer station listed in Table 1 is 32,390 square feet. Table 2 lists the total maneuvering area as 23,474 (10,320 + 13,154) square feet. The total square footage in Table 2 is 46,024 square feet. Please ensure the total square footage for Table 2 is correct.</p>
IS/MND  2.5.2 Proposed Operations	Middle of page 2-17	<p>“The new Transfer Station would be sized to receive, store and loadout up to 890 tons per day of MSW and recyclables. The existing PRA would be repurposed to receive organic materials and would be sized to receive, store and loadout 370 tons per day. After the removal of the existing entrance scales, scale house, and administration trailer, the outdoor, paved area available for yard waste and C&amp;D materials would be sized to receive, store and loadout 330 tons per day. The chipping and grinding operation would be relocated to the outdoor area, which is sized to receive, process and loadout 65 tons per hour. The existing metals area is sized to receive and load-out 20 tons per day.”</p>

**2.5**

**2.6**

**2.7**

Chapter/Section	Page and Location	Comment
		<p>Please consider redefining each of the material types and estimated tonnages by waste type throughout the MND.</p> <ul style="list-style-type: none"> <li>• Tonnage estimates for each material type should be expressed in the same units (tons per day). Calculations for these tonnages should also be included in the new Transfer Processing Report.</li> <li>• Permitted maximums for daily tonnages should be categorized by waste type rather than by activity. For example, green material (yard waste) and construction and demolition (C&amp;D) materials should be categorized separately. Wastes that will be received in the chipping and grinding area should be included in the green material tonnages.</li> <li>• Please define organic materials. Green materials, yard waste/trimmings, and food materials can all be considered organic, compostable materials. Please confirm if the repurposed PRA is only to accept food materials.</li> <li>• Please define recyclable materials which will be accepted at the transfer station. Wastes received at the Household Hazardous Waste Facility and buy-back area should not be counted towards the daily permitted maximum tonnage at the transfer station.</li> </ul>



Chapter/Section	Page and Location	Comment
IS/MND  Table 4	Top of page 2-18	<p>The chipping and grinding activity should be separate from the C&amp;D processing activity.</p> <p>See previous comments about estimating tonnages by waste type rather than activity.</p>
IS/MND  3.3 Air Quality, Discussion (d)	Middle of page 3-15	<p>“Moving the acceptance of municipal solid waste into an enclosed building is expected to substantially reduce the odor generated from the handling of this waste in the site’s current open-sided PRA.”</p> <p>Other sections of the MND described the new transfer station as not being fully enclosed. Please confirm if the new transfer station building will be fully enclosed or open.</p>
IS/MND  3.3 Air Quality, Discussion (d)	Middle of page 3-15	<p>“The repurposed PRA would receive food waste and other organic from commercial vehicles to assist in compliance with SB 1383 and AB 1886. Self-haul customers may also participate in the food diversion program in the future.”</p> <p>For clarification, does this mean that no self-haul of food materials would occur at this time? It is recommended that it not be specified whether food material arrives via self-haul or commercial vehicle. .</p>
IS/MND  3.3 Air Quality, Discussion (d)	Bottom of page 3-15	<p>“Also, because the materials would be removed from the site within 24 to 72 hours, there would be a limited opportunity for waste decomposition to occur on the site, which is a primary generator of odors.”</p>

**2.8**

**2.9**

**2.10**

**2.11**

Chapter/Section	Page and Location	Comment
		Pursuant to CCR Title 14, Section 17410.1, all solid waste, including food and organic materials should be removed from the facility within 48 hours of receipt.
IS/MND  3.9 Hazards and Hazardous Materials, Discussion (b)	Middle of page 3-44	Other sections of the MND described the new transfer station as being fully enclosed. Please confirm if the new transfer station building will be fully enclosed.

**2.12**

### **Solid Waste Regulatory Oversight**

The Nevada County Department of Environmental Health is the Local Enforcement Agency (LEA) for Nevada County and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at 530.265.1469 to discuss the regulatory requirements for the proposed project.

### **CONCLUSION**

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 916.341.6477 or by e-mail at [kate.whitney@calrecycle.ca.gov](mailto:kate.whitney@calrecycle.ca.gov).

Sincerely,

Kate Whitney, Environmental Scientist  
Permitting & Assistance Branch – North Unit  
Waste Permitting, Compliance & Mitigation Division  
1001 I Street, Sacramento, CA 95814 | P.O. Box 4025, Sacramento, CA 95812  
[www.CalRecycle.ca.gov](http://www.CalRecycle.ca.gov) | (916) 322-4027

CalRecycle

cc: Patrick Snider, Supervisor  
Permitting & Assistance Branch – Central Branch, North Unit

Sara Lyon, REHS  
Nevada County Department of Environmental Health—LEA

## Central Valley Regional Water Quality Control Board

12 January 2021

David Garcia  
Nevada County  
950 Maidu Avenue  
Nevada City, CA 95959

### **COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, MCCOURTNEY ROAD TRANSFER STATION RENOVATION PROJECT, SCH#2020120228, NEVADA COUNTY**

Pursuant to the State Clearinghouse's 11 December 2020 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the McCourtney Road Transfer Station Renovation Project, located in Nevada County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_2018\\_05.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

**3.2**

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

**3.3**

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality/certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4709 or [Greg.Hendricks@waterboards.ca.gov](mailto:Greg.Hendricks@waterboards.ca.gov).



Greg Hendricks  
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento





# COUNTY OF NEVADA COMMUNITY DEVELOPMENT AGENCY

Mali LaGoe, Acting Agency Director

## ENVIRONMENTAL HEALTH DEPARTMENT

Amy Irani, REHS, Director

950 MAIDU AVENUE  
NEVADA CITY, CA 95959

PH: (530) 265-1222  
FAX: (530) 265-9853

<http://mynevadacounty.com>

TO: David Garcia, Solid Waste Program Manager, Public Works Department

FROM: Sara Lyon, REHS, Environmental Health Department

VIA: Amy Irani, Director, Environmental Health Department

SITUS: 14741 Wolf Mountain Road, Grass Valley (APN 025-120-012)

RE: McCourtney Road Transfer Station Renovation Project - Notice of Intent to Adopt a Mitigated Negative Declaration

DATE: January 7, 2021

CC: CalRecycle; NCDEH

### **PROJECT DESCRIPTION**

The McCourtney Road Transfer Station provides solid waste and recycling transfer services for the communities of Grass Valley, Nevada City, and the unincorporated areas of western Nevada County, California. The proposed project includes several facility and operational changes at the Transfer Station including the expansion of the site entrance road and installation of new scale facilities, construction of an approximately 48,000 square foot transfer station building, conversion of the existing Public Receiving Area building to serve as the organics receiving and transfer building, installation of approximately 170,000 square feet of new or repaved asphalt surfaces, the importation of fill material, the expansion and temporary use of a trailer/bin storage area for green/yard waste and construction/demolition receiving and transfer operations, construction of a permanent green/yard waste and construction/demolition receiving and transfer operations area, and expansion of the facility's permitted hours of operation, tonnage limits and vehicle limit. The proposed project would employ a phased construction approach to allow current operations to continue throughout the construction process.

### **BACKGROUND**

The site has the following Environmental Health permits:

- Local Enforcement Agency (LEA) - McCourtney Road Landfill (SWIS No. 29-AA-0001); McCourtney Road Transfer Station (SWIS No. 29-AA-0010)
- Certified Unified Program Agency (CUPA) - Household Hazardous Waste Collection Center; Hazardous Waste Generator Program; Hazardous Material Business Plan Program
- Local Primacy Agency (LPA) – Non-Transient Non-Community Small Public Water System (permit pending)

## **COMMENTS**

### **Page 3 Mitigation Measure AIR-5**

It is the LEA's understanding the Public Receiving Area (PRA) does not have plumbing and will not have plumbing added during the renovation project. How will the proposed mitigation of applying odor neutralizing compounds via application of a commercial misting system be implemented?

**4.1**

### **Page 3 Mitigation Measure AIR-5**

Is it feasible that the food waste will be removed at the end of each day? If this is not feasible what will be the plan so that it doesn't become a nuisance? California Code of Regulations (CCR), Title 14, Section 17410 states that solid waste is to be removed in 48 hours of receipt, as McCourtney Road Transfer Station is currently permitted as a "facility" vs. an "operation". The requirements for how the organics would be stored would need to be included in the Transfer Processing Report (TPR) and the Odor Impact Minimization Plan (OIMP).

**4.2**

Note, page 3-16, states that all food waste will be removed from the transfer station within 48 hours of receipt versus at the end of each day as stated in this section.

### **Page 2-3, 2.2.4 Green Waste**

The permit revision for the McCourtney Transfer Station, approved on June 4, 2020, allowed for the three units to be absorbed into one under Large Transfer Station. This then allowed for 350 tpd of all materials and the removal of specific limits for both C&D or green waste. If the 65 tpd is to be referenced please site the 2004 Initial Study document and not the current permit to avoid any confusion.

**4.3**

### **Page 2-12, Expanded Domestic Water Supply System**

The water system shall meet the requirements of a Non-Transient Non-Community Small Domestic Public Water System and shall be permitted as such.

**4.4**

### **Page 2-15, 2.5.1 Existing Operations**

The current permit allows for receipt of waste for public customers from 8:00 am – 3:30 pm Wednesday through Sunday. For all other material receiving for operator and contractor staff the facility is permitted from 8:00 am – 5:30 pm, seven days a week. The facility is not currently permitted to hold special events from 8:00 am – 3:30 pm, Wednesday through Sunday.

**4.5**

### **Page 2-17, 2.5.2 Proposed Operations**

Show the calculations that the chipping and grinding operation is "sized to receive, process and loadout 65 tons per hour."

**4.6**

### **Page 2-18, 2.5.2 Proposed Operations, Table 4**

Show the calculations for the design quantity for the yard waste/C&D; chipping and grinding; and metal tipping pad. Note, that this section says the chipping and grinding operation is sized at 65 tons per day vs. 65 tons per hour as noted in the above comment.

**4.7**

### **Page 3-15, Mitigation Measure AIR-4**

14CCR, Section 17410 states that solid waste is to be removed from a facility within 48 hours. Holding the materials for 72 hours, as described, would not be allowed.

**4.8**

### **Page 3-16, Mitigation Measure AIR-5**

It is the LEA's understanding the Public Receiving Area (PRA) does not have plumbing and will not have plumbing added during the renovation project. How will the proposed mitigation of applying odor neutralizing compounds via application of a commercial misting system be implemented?

**4.9**

Page 3-71, Utilities and Service Systems Discussion b

The water system shall demonstrate that it has sufficient capacity in both source and storage for the proposed operation.

**PROJECT APPROVAL REQUIREMENTS:**

CalRecycle Post Closure Branch, LEA, Regional Water Quality Control Board (RWQCB) include any other agencies that have jurisdiction

As the transfer station shares the boundary with the landfill postclosure the site is subject to the postclosure land use requirements primarily contained in 27CCR, Section 21190. Submit a postclosure land use proposal describing the project and what the potential impacts are and include the landfill gas venting system design (e.g., final cover, drainage, gas and ground water monitoring wells, etc.), and the intended mitigation measures and or re-designs. Upon acceptance of the proposal by the regulatory agencies, the closure and/or postclosure maintenance plans, as necessary, would be revised to reflect the proposal and mitigation. The plan(s) revision would need to be approved by the regulatory agencies prior to implementation. The level of plan(s) revision will depend upon the level of potential impact and the necessary mitigations. If the final cover is not being impacted, usually only the postclosure maintenance plan would need to be revised to reflect any changes in postclosure maintenance (e.g., relocation of monitoring wells, addition of building in the gas monitoring program, etc.). The proposal should be submitted as soon as possible, so that any necessary modifications due to agency review could be evaluated in the CEQA document if deemed necessary.

**4.10**

CalRecycle, LEA, include any other agencies that have jurisdiction

Pursuant to Public Resources Code (PRC), Section 44004, the operator shall file an application for revision of the existing solid waste facilities permit with the enforcement agency. The application shall be filed at least 180 days in advance of the date when the proposed modification is to take place. Timelines for this process can be found here:

<https://www.calrecycle.ca.gov/swfacilities/Permitting/Permittype/FullPermit/LEAProcess>

**4.11**

Nevada County Environmental Health

- Despite the existence of permitted hazardous materials at this site, the applicant and/or facility operator must adhere to all applicable codes and regulations regarding the storage of hazardous materials and the generation of hazardous wastes set forth in California Health and Safety Code Section 25500 – 25519 and 25100 – 25258.2 including the electronic reporting requirement to the California Environmental Reporting System (CERS). The applicant and/or facility operator must apply for and obtain a permit for the storage of hazardous materials and the generation of hazardous wastes from the Nevada County Department of Environmental Health (NCDEH), Certified Unified Program Agency (CUPA). The applicant and/or facility operator shall secure and annually renew the permit for this facility within 30 days of becoming subject to applicable regulations. Routine compliance inspections, conducted by NCDEH inspectors, will occur at the facility once every three years. Compliance inspections are typically unannounced inspections during regular business hours: Monday – Friday, 8:00am – 5:00pm.

**4.12**

- Obtain a permit for additional septic/pump tank(s) to be installed for effluent from restrooms and outbuildings going into the leachate tank farm.
- A Non-Transient Non-community Small Domestic Public Water System permit shall be required for the Expanded Domestic Water Supply System.

**From:** Sam Longmire <[saml@myairdistrict.com](mailto:saml@myairdistrict.com)>  
**Sent:** Friday, January 8, 2021 12:16 PM  
**To:** David Garcia <[David.Garcia@co.nevada.ca.us](mailto:David.Garcia@co.nevada.ca.us)>  
**Cc:** Gretchen Bennitt <[gretchenb@myairdistrict.com](mailto:gretchenb@myairdistrict.com)>  
**Subject:** McCourtney Road Transfer Station Renovation

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Garcia:

The Northern Sierra Air Quality Management District has reviewed the Initial Study/Mitigated Negative Declaration for a proposed renovation of the McCourtney Road Transfer Station facilities located at 14741 Wolf Mountain Road.

The NSAQMD anticipates that by reducing vehicle wait times, paving currently unpaved driving areas and generally increasing efficiency at the Transfer Station, the project will result in an overall air quality benefit.

**5.1**

The NSAQMD hereby approves the Dust Control Plan in Mitigation Measure AIR-2 pursuant to NSAQMD Rule 226 (Dust Control).

Note that the specification in Mitigation Measure AIR-1 of off-road equipment meeting Tier 2 emission standards may not satisfy the statewide diesel Airborne Toxic Control Measures, which may be found at <https://ww3.arb.ca.gov/diesel/diesel.htm>. However, since AIR-1 continues to read, "... all off-road equipment must meet all applicable state and federal requirements" no change to the phrasing is necessary.

**5.2**

Otherwise, the NSAQMD has no comment.

Please contact me with any questions.

Sincerely,

Sam Longmire, APCS

--

NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT  
 Sam Longmire, MSES  
 Air Pollution Control Specialist  
 Phone: (530) 274-9360 x506

**Title: McCourtney Road Transfer  
Station Renovation Project ---  
Comments**

**From: Eric Jorgensen**

**January 10, 2021**

**Project Description**

**Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.**

WasteNot is not opposed to the construction of a new PRA as it is needed for management of the County's refuse and recycle resource streams along with new food mandates. That said, the proposal is based on traffic and tonnage projections of 50% growth that are difficult to substantiate and bring into question the proposed size of new construction. The plan also fails to identify "refuse" stream sorting for diverting recyclables. The county's 27% diversion rate indicates current diversion is mediocre. What is the County plan for refuse diversion to meet increasing State CalRecycle mandates? Where does diversion fit into this construction and transfer facility planning?

**6.1**

The proposed renovation is driven by traffic analysis without assessment of carbon impacts and planning alternatives. The facility is labeled a Transfer Station, but the impacts are largely residential trips averaging 28 miles round trip. Traffic and carbon impacts can be reduced and mitigated by 1) a County ordinance requiring all residents to recycle thus further reducing landfill refuse stream residential hauling and quantity, 2) Closing the recycle buy back center. (Buy back is a broken statewide recycle program. This sole remaining county site creates traffic and carbon release outweighing benefit. If funding is corrected by the State, sites would be localized.), 3) Funding satellite green waste collection center where chipping can reduce

**6.2**

volume and mileage associated with trips to the MTS, and 4) Installing roof top solar on both Public Resource Area buildings to provide an off set to carbon emissions. No options were proposed, considered nor analyzed.

**If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.**

WasteNot members (4) attended the Fall 2000 meeting of the NCSTW Commission. We presented written questions and statements largely focused on the issue of carbon, traffic, and recycling. We asked for a baseline carbon analysis of traffic.

**6.3**

WasteNot held a town hall meeting in January 2000 with 125 attendees focused on presentations by county and Waste Management staff. No mention of the proposed MTS Plan was made. County staff and WM employees were on KNCO radio for one hour in March 2000. No mention of MRTS Plans. WasteNot members were not informed, nor did members see information, in this covid times, of two September public zoom meetings on the plan until after the fact. The report provides no data on public meeting attendance numbers. Public involvement and discussion were minimal.

**6.4**

**If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.**

The proposed project is largely based on traffic and tonnage analysis. The scope of the project projects a 50% increase in both traffic and tonnage over the next 10 years, proposes building a facility to accommodate this traffic and tonnage and yet ignores analysis of traffic increase and carbon impacts. The planning process proposed no alternative solutions for reducing traffic and associated carbon release. It was verbally offered that the new facility would reduce waiting and thus engine idle time.

**6.5**

**Analysis**

WasteNot accepts the Negative Declaration on the facility itself as it is confined to the existing property, which is well studied. A new covered facility is needed, and we understand the airport/Loma Rica recycle collection operation will now be transferred to this new facility. But the size is based on traffic and tonnage estimates of a 50% increase in 10 years, an increase which population, traffic and CalRecycle data bring into question.

All self-haul refuse is currently dumped in the PRA pit along with garbage truck refuse and transferred to landfills. How has the tonnage changed over the past 20 years? What is the projection for the future causing a 50% increase? Below are Nevada County tonnage figures.

## **Nevada County**

(Table does not include Truckee. Only GV, NC & Unincorporated)

### **CalRecycle Report: Disposal Export By County and Jurisdictions**

<https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Origin/CountywideDetail>

DRS = Disposal Reporting System tracking quantities by County

Year	tons Disposal	tons Export	tons DAC	tons AIC	tons total
1995	7045	39437	205	0	46482
2000	17347	36026	83	0	53456
2002	22299	37080	85	0	59464
2008	56198	492	4265	0	60955
2012	32713	1048	3072	0	36833
2013	4404	49932	2088	0	56424
2015	7740	46528	835	550	55653
2016	4181	52018	714	0	56913
2017	19781	48191	864	0	68836
2018	6124	47687	1056	0	54867
2019	8938	52541	88	0	61567

Average Haul 2008 through 2019, eliminating 2012, equals

Disposal= Catch all to alternate sites, class 2 (contaminated), demolition, etc

Export= Tons exported to Lockwood Regional Landfill, Nevada

DAC = ADC?? Alternate Daily Cover, non soil, for temp landfill cover

AIC= Alternative Intermediate Cover, non soil, used for landfill cover. Often wood demolition. Credit.

**Average tonnage for the past 10 years is 59,300.  
(2012 is deleted as unexplained information.)**



The refuse tonnage figures points to a flat rate of increase over the past 10 years thus perhaps warranting a 10% increase over the next 10 years. Where are the tonnage increases in the report? Tonnage is in C&D and Green Waste, both of which are planned for continued operation outside of any PRA building. So where is the 50% increase projected for this building coming from? Some of the tonnage is to accommodate the Loma Rica recycle stream shifting to MTS.

There is a fire/fuels urgency for county public works to use parcel tax funds to establish satellite facilities for green waste diversion. Purchase or lease, these dispersed locations are needed to accumulate green plant volume and chip it into haul tonnage. The MRST is relatively isolated and expensive. One pickup truck load is \$30-40 dollars and an average 28-mile RT. Not cost effective for the volume required to address fire fuels reduction. This cost and distance inhibit large quantities of loose green plant material hauling and constrains fire fuels options which threaten the community. Again, green waste tonnage is not in the PRA building so why 50% increase in building size?

## Traffic and Air Pollution.

### Historic Daily Counts

3

Peak Day Vehicle Count	2015 Vehicle Count <sup>a</sup>	2019 Vehicle Count <sup>b</sup>
Inbound Refuse Collection Vehicles <sup>c</sup>	20	26
Inbound Self-Haul Refuse Vehicles <sup>d</sup>	317	325
Inbound Vehicles to C&D Area	64	49
Inbound Vehicles to Green Waste Area	51	85
<b>Total Paying (Scale Transaction) Inbound Vehicles</b>	<b>452</b>	<b>485</b>
Outbound Refuse Transfer Trucks	7	17
Outbound C&D Transfer Trucks	3	
Outbound Green Waste Transfer Trucks	1	
Outbound HHW and Recycling Transfer Trucks (CRV, Tires, Metal, Commingle) <sup>e</sup>	3	
<b>Total Outbound Vehicles</b>	<b>14</b>	<b>17</b>
Inbound Vehicles to HHW and Recycling Loop (CRV, Express Drop Off, Metal, Commingle) <sup>e</sup>	204	Not Available
Employee Vehicles (estimated)	25	Not Available

The 2015 refuse average daily vehicles (minus collection) count of 432 vehicles vs. 459 vehicles is a 6% increase in 5 years. This excludes the recycle payment and hazard waste loop. The landfill refuse traffic proposed for the new building increased by 2 ½ percent. Why is the report projecting a 50% increase in PRA capacity requirement in 10 years? This vehicle figure correlates with the County Export Report indicating that the PRA is oversized. Since the big increase is in green waste, a jump of 66%, this certainly points to a critical issue, poorly addressed in the larger county wide fire resiliency crisis. The green waste traffic currently does not go over the scale, but it is increasing in volume. Green waste certainly is a critical issue to county residents and requires parallel planning to proactively address it. This plan does not address County green waste effectively nor pro-actively.

### **Carbon Release**

Date for 2015 resident vehicle carbon release of 636 vehicles/day @ 28 miles (average RT Wildwood, GV, NC and Bear River H.S.) x 50 weeks x 20 mpg = **2226 Tons of Carbon**

What is 2019 figure for total residential vehicle carbon release? What is the 50% traffic carbon projection? How is carbon mitigated?

**6.6**

### **Summary**

Recommendation: Close the Buy Back recycle facility. Reopen when viable State financial structure is available to establish in local shopping areas.

Recommendation: County ordinance requiring all households to use waste and recycle curbside carts where service roads are feasible.

Recommendation: Establish 3-6 dispersed Green Waste sites around the county. Make it a 10-mile round trip instead of 28 average. Green waste is a key driver of traffic and can be localized thus greatly increasing volumes. Invest in site leases and chipping equipment. Use our property taxes wisely. Build management collaboration with Fire Safe Council.

**6.7**

Recommendation: Establish a green waste composting property owned by county and leased to private operator.

Recommendation: Establish solar on new and old PRA building roof tops at the MTS to mitigate for carbon.

Thank you for this opportunity to comment.

Eric Jorgensen

Nevada City, CA

**From:** Mardi Naythons <[mardinaythons@gmail.com](mailto:mardinaythons@gmail.com)>  
**Sent:** Tuesday, January 5, 2021 5:22 PM  
**To:** David Garcia <[David.Garcia@co.nevada.ca.us](mailto:David.Garcia@co.nevada.ca.us)>  
**Subject:** Comment

**CAUTION:** This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mr. Garcia,

I understand that the expansion of the transfer station is important and necessary.

As a neighbor located on South Ponderosa, I am always concerned about the ground water and trust that you are doing everything possible to make sure that toxins don't enter the water table - specifically our well.

**7.1**

I also have concerns about the traffic on our road which is presently not maintained by the county. We get a significant stream of traffic going to the transfer station, especially on the weekends. Is there a possible solution to this issue? We try to maintain the road, but it is a dusty mess, especially on the weekends.

**7.2**

Martha Naythons  
15450 S Ponderosa Way

NCCAN--WasteNOT comments on The MRTS Renovation Project  
January 10, 2021

We commend the County for their proposed modernization of the existing MRST to better serve the community. Solid waste is a pressing problem that impacts the quality of life in our County. The comments we offer in this letter speak to the renovation as a golden opportunity to formulate a long-term solid waste strategy consistent with California objectives to reduce and reuse waste and reduce greenhouse gas emissions. These improvements also dovetail nicely with the Board of Supervisor's goal for resiliency.

The MRTS design envisions the accommodation of a major increase in solid waste. The County briefing stated the new facility is sized to receive and process 125,000 tons per year or a 50% increase over the 85,000 tons (7,102 tons per month) now processed. Over the last 20 years, the population of Nevada County has increased from 92,000 in 2000 to 98,000 in 2020 (about a 6.5% increase). How did the county decide that a 50% capacity increase was needed when county population increases have been virtually flat for the last few years? While our hope is that waste will decrease, we do understand that some waste streams may increase. Thus, the following comments are offered on the County plans on recycling, green waste and self-haulers.

**8.1**

Nevada County proposes to spend a considerable amount of public tax revenue for the MRTS renovation, and the benefits cited are mainly reduced traffic and congestion at the MRTS site. Since the County identifies green waste and recycling waste as streams with the biggest increases, we would like to see the design include actions beyond those envisioned in the proposed renovation.

**8.2**

In the big picture, the County has major problems with wildfires and this is likely the greatest threat to everyone who lives here. Vegetation removal for fire suppression is crucial for improved safety, and in fact, this is probably the one area where an increase in waste is highly desirable. The briefing states that we have 773 tons of green waste and the volume is growing rapidly. But residents now have limited disposal choices—pay for green bins (only adequate for small properties), burn piles (dangerous and polluting), hauling to MRTS (additional cost and increased traffic and emissions).

If the renovation to the MRTS makes hauling green waste more attractive to residents, self-hauler traffic to the MRTS will likely increase contrary to the county's objective to decrease traffic. In this regard, we highly recommend establishing satellite locations with free or low-cost fees as soon as possible to encourage continued vegetation clean up, self-hauling and chipping/composting.

While Fire Safe has been a terrific partner in collecting and reusing green waste, the County should provide ongoing funds or resources to support their efforts. And perhaps WM could

**8.3**

provide FREE green waste bins for residential use or for Firewise Communities, to accelerate vegetation removal. Similarly, the Habitat for Humanity ReStore should receive some ongoing financial support for their services in picking up and selling household items and construction materials thus diverting these items from the waste stream.

While we appreciate the desire of the County to build a facility to meet needs of the future, we also think that some funds ought to be set aside for demonstration projects such as in-vessel composting, satellite drop off locations for waste (including food waste) that WM could pick up as for any other customer, and recycling buy-back locations. We realize these waste areas are either in a state of flux, or relatively new services, so experimentation seems appropriate so that the most practical approaches are chosen for wider application. The recently formed Organic Waste Subcommittee is an example of an excellent point of departure to get the community involved in solutions for the tough area of mandated reduction and separation of organic waste by 2022.

Recycling is incredibly difficult matter these days in regard to education, compliance and market shortages. And CalRecycle is working hard to find alternatives. At the least, County policy should require residents to recycle, do load checks of self-haulers or audits of trash cans to assure compliance and take action on violations. We assume that one of the reasons for a larger PRA is to accommodate loads that include items that could have been recycled. We believe that charging a higher rate for mixed in recycling is an insufficient disincentive. Recology in San Francisco has a 1-2-3 step process of asking the residents to “do it right” and if not, they are fined. It makes sense to us to conduct residential cart use analysis to model and plan for increased compliance and efficiency.

**8.4**

Finally, we are very concerned that current County staff solid waste resources are stressed to the point that there is inadequate time for analysis, planning, R & D and community collaboration. While Waste Management does offer some help, their main business is hauling. The City of Truckee (population 13,000) has 3 staff devoted to solid waste while Western Nevada County (population around 82,000) has one employee. Truckee’s website, *Keep Truckee Green* is an excellent resource. Currently Nevada County relies largely on the Waste Management website, which is a national website and not always directly linked to the needs, actions and priorities of Western Nevada County. However, we applaud Waste Management’s effort to begin initiatives like the recent Facebook page to help our citizens more directly.

It seems the urgency and importance of solid waste management would demand more staff attention and could help the County identify best practices from other counties to apply in NC. More staff could also help to work with local organizations to do public/private initiatives. This type of community collaboration is crucial going forward. Perhaps the parcel tax money could be used to fund another staff position or at least a contracted position to provide assistance and education on using the MRTS efficiently.

In conclusion, NCCAN-WasteNot is concerned about minimizing the adverse effects of greenhouse gas emissions from the transport of waste, providing satellite options that deliver more service options and reduced traffic at the MRTS, and probably most important, support ongoing services that promote vegetation management in the county to achieve a more fire safe community.

Thank you for the opportunity to comment on the MRTS renovation which is so important for our community's future health and safety, and for responding.

Don Rivenes - NC-Climate Action Now

Shirley Freriks – WasteNOT!! Team