Addendum to the Final Mitigated Negative Declaration for the Escondido Disposal Inc. Master Plan Project

Project Case #PHG 15-0010; ENV 15-0005
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TABLE OF CONTENTS

TABLE OF CONTENTS
(cont.)

FIGURES

TABLES

APPENDICES

A. Introduction

On June 19, 2015, the City of Escondido Planning Commission adopted a Mitigated Negative Declaration (MND) and Mitigation Monitoring Program for the Escondido Disposal Inc. Master Plan (previous project) (PHG 15-0010; ENV 15-0005), referred to herein as the EDI Master Plan MND or MND. The EDI Master Plan MND evaluated the impacts associated with the proposed expansion of an existing transfer station to accommodate additional sorting and improve recovery of recyclable material in order to increase diversion of waste from landfills. The previous project was planned to be constructed in four phases, in which Phase 4 included the demolition of the existing baling and bale storage area and EDI office building and construction of a 30,037-square-foot anaerobic digester (AD) facility. The analysis identified several mitigation measures to address and mitigate potentially significant impacts to less than significant levels. The adopted EDI Master Plan MND is included as Appendix A.

Phases 1 and 3 of the previous project were implemented. Phases 2 and 4 have not been implemented, which included plans to renovate an existing tipping floor and mixed materials recovery facility (MRF) building, demolish existing bale storage and office space, and construct an AD facility and employee space/education center. The AD facility was originally designed to accommodate a capacity of 31,200 tons of organic waste per year. Since this time, it has been determined that operation of the AD facility generates larger quantities of organics suitable for anaerobic digestion than what was anticipated, and planned improvements to waste separation processes to support state and local long-term solid waste diversion goals, such as advanced anaerobic digestion technology, are anticipated to result in increased quantities of organics suitable for anaerobic digestion. As such, it has been determined that increased AD facility capacity at this location is necessary. The City, as Lead Agency, and Escondido Disposal Inc. (EDI) are proposing the EDI Transfer Station/MRF Expansion Master Plan AD Facility Expansion (project), which would expand the allowable permitted capacity of the AD facility to accommodate an increase in organic waste that is available for anaerobic digestion.

In accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this addendum addresses the potential environmental impacts associated with increasing AD facility capacity to 237,250 tons per year (650 tons per day),and provides an evaluation of potential environmental impacts in relation to the original project evaluated in the adopted MND for the previous project. The addendum is an informational document intended to be used in the planning and decision making process as provided for under Section 15164 of the CEQA Guidelines. The addendum does not recommend approval or denial of the proposed modification to the project. The conclusion of this addendum is that the proposed changes to the project will neither result in new significant impacts nor substantially increase the severity of previously disclosed impacts beyond those already identified in the previously adopted MND. Thus, a subsequent MND need not be prepared.

B. Statutory Background

The City of Escondido is the CEQA lead agency responsible for the project. Under CEQA, an addendum to a certified Environmental Impact Report (EIR) or a Negative Declaration may be prepared if minor technical changes or additions to the proposed project are required or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR [or MND] have occurred (CEQA Guidelines § 15164[b]). An addendum is appropriate if the project changes or modifications do not result in any new significant impacts or a substantial increase in the severity of previously identified significant impacts. The addendum need not be circulated for public review (CEQA Guidelines §15164[c]); however, an addendum is to be considered along by the decision-making body prior to making a decision on the project (CEQA Guidelines § 15164[d]).

This MND addendum demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the MND remain substantively unchanged by the revised project description detailed herein and supports the finding that the proposed project does not raise any new issues and does not exceed the level of impacts identified in the previous MND. Further, rather than only focusing on the characterization of whether the project is "new" or "old," the City has also evaluated the previous environmental document to determine if it retains any relevance in light of the proposed changes, and if any major revisions to the document are required due to the involvement of new, previously unstudied significant environmental effects. The subsequent review provisions of CEQA are designed to ensure that an agency proposing changes to a previously approved project explores environmental impacts not considered in the original environmental document. This assumes that some of the environmental impacts of the modified project are considered in the original environmental document, such that the original document retains relevance to the decision-making process. If it is wholly irrelevant, then it is only logical that the agency starts over from the beginning. The City has determined that project changes will not require major revisions to the initial environmental document. Accordingly, recirculation of the MND for public review is not necessary pursuant to Section 15164 of the CEQA Guidelines. Therefore, a decision was made by the City of Escondido not to prepare a subsequent Negative Declaration pursuant to Section 15162 of the CEQA guidelines. To support this decision, the following discussion describes the proposed project modifications and the associated environmental analysis.

C. Summary of Original Project Description

The EDI Master Plan Project proposed to expand the footprint of the existing transfer station to accommodate additional sorting and improve recovery of recyclable material in order to increase diversion of waste from landfills, as required by state regulations. The project did not propose any increase in permitted daily or annual throughput allowances. The regional location of the project site is shown in Figure 1. The project site on an aerial photograph is shown on Figure 2. The previous project was to be constructed in four phases, as described below:

- Phase 1 involved the demolition of approximately 40,520 square feet of the former Golfcraft manufacturing plant building, the renovation and reconfiguration of the original manufacturing building, construction of on-site circulation improvements, installation of new scales at the W. Mission Avenue and W. Washington Avenue access points, and construction of a maintenance canopy.

- Phase 2 involved the renovation of the existing transfer station including the existing mixed MRF line and tipping area. The existing mixed tipping area was expanded to 36,798 square feet and the mixed MRF line area was expanded to 43,150 square feet. The existing Household Hazardous Waste (HHW) canopy remained on-site and unchanged.

- Phase 3 involved the renovation of the former Golfcraft office building and reconfiguration of part of the manufacturing plant to provide 10,372 square feet of office space. The existing EDI offices were relocated to the former Golfcraft office building.

- Phase 4 included the demolition of the existing baling and bale storage area and EDI office building and construction of a 30,037-square-foot AD facility.

Subsequent to approval of the EDI Master Plan MND, Phase 1 and Phase 3 were completed. In total, the previous project provided for a total of 216,476 square feet of transfer station/MRF building area. The AD facility was determined to be a key component of the previous project, as it would assist in meeting the state's waste diversion goals as well as support efforts of the state to reduce greenhouse gas (GHG) emissions. The EDI Master Plan Project Site Plan is shown in Figure 3.

The Solid Waste Facility Permits (SWFP) for Escondido Resource Recovery (ERR) & SANCO Services (which are issued by the San Diego County Department of Environmental Health (DEH) in its role as the Local Enforcement Agency [LEA]) would be ultimately combined into one through this project. Combining the SANCO existing permitted maximum throughput of 723 tons per day and the ERR maximum throughput of 2,500 tons per day would result in a total of 3,223 tons per day maximum throughput for the combined permit.

The AD facility was originally designed to process up to 31,200 tons of food waste and green waste per year. The processed waste was and is being converted into biogas (a gaseous product generated by the degradation of organic matter under anaerobic conditions). The biogas, a renewable energy source, is cleaned and converted into biogenic compressed natural gas (CNG) to be used in the generation of power or for fueling vehicles. The undigested waste material (digestate) left over from the AD process would be reduced 30 percent by volume and would be compostable.

The previous project proposed to utilize the biogas from the AD facility for one of two scenarios: (1) natural gas from the AD facility would be used to fuel a fleet of 40 to 50 CNG collection vehicles, or (2) natural gas from the AD facility would be used to generate approximately 5.0 gigawatt hours (GWh) of electricity per year.

The EDI Master Plan MND found potentially significant impacts would occur to biological resources (raptors and nesting birds), cultural resources (archeological resources and paleontological resources), and hazards and hazardous materials (transport, use, or disposal of hazardous materials). Mitigation measures were incorporated that would reduce all impacts to less than significant.

D. Project Revisions

The revised project incorporates two main changes:

- Expand the capacity of the AD facility to increase capacity for processing organic waste without increasing the permitted solid waste throughput

- Change how the natural gas produced from the AD facility would be used. Under the revised project, natural gas would be supplied directly into the utility gas pipeline system, rather than to fuel 40 to 50 CNG collection vehicles or generate 5.0 GWh of electricity as original described in the MND.

The AD facility was originally designed with a capacity of 31,200 tons of organic waste per year. Since opening and operation of the facility, it was found that operations generate larger quantities of organics suitable for anaerobic digestion than was anticipated. Therefore, the project proposes to expand the capacity of the AD facility to increase capacity for processing organic waste from 31,200 tons of organic waste per year to a maximum of 237,250 tons of organic waste per year (650 tons per day).

The original MND and solid waste facility permit authorized the facility to accept a maximum of 3,223 tons of municipal solid waste per day. This permitted maximum tonnage would not change with the proposed project revisions; rather existing volumes of organic material would be diverted toward anaerobic digestion. Increasing the capacity of the AD facility would involve installing additional anaerobic digestion equipment (digestion vessels) to provide additional processing capacity.

The revised project would combine the originally proposed Phase 2 and Phase 4 work, as described in the EDI Master Plan MND. Revisions proposed include renovating the mixed MRF facility into an AD receiving and processing building. The revised project would renovate the mixed tipping and transfer station, would demolish the existing bale storage area and office space, and build the AD area and employee area and education center, consistent with the proposed uses in the EDI Master Plan Project. Overall square footage of these individual uses would change under the revised project. The revised project site plan is shown in Figure 4. The changes associated with the revised project are shown in Table 1 below.

Table 1 Comparison of Revised Project to EDI Master Plan Project				
EDI Master Plan Project Proposed Use	EDI Master Plan Project Proposed Area (square feet)	Revised Project Proposed Use	Revised Project Square Footage	Overall Square Footage Change
Mixed Tipping and Transfer Station	36,798	Mixed Tipping and Transfer Station	35,910	-888
Mixed MRF	43,150	AD Receiving and Processing	40,335	-2,815
Anaerobic Digestion Area	30,037	Anaerobic Digestion Area	42,731	12,694*
Employee Area and Education Center	4,240	Employee Area and Education Center	4,911	671
*The noted 12,649 square footage increase represents area required for the AD equipment. Under the revised project, the 30,037-square-foot structure is no longer required, but a larger area is required to accommodate equipment.				

In addition, the project proposes to utilize the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system, rather than to fuel 40 to 50 CNG collection vehicles or generate 5.0 GWh of electricity, as proposed and discussed in the EDI Master Plan MND. The natural gas generated from the AD facility would be directly injected to the existing natural gas pipelines located within the project site.

The impact analysis contained herein will focus on whether the revised project would result in any new or more severe impacts not previously identified in the adopted EDI Master Plan MND.

E. Environmental Setting

The project site is located in the city of Escondido, east of Interstate 15 (I-15), and south of State Route 78. The site is located north of W. Washington Avenue, south of W. Mission Avenue, between Metcalf Street and Rock Springs Road. The project site encompasses two parcels (Assessor's Parcel Numbers 228-250-7700 and 228-250-1600) totaling 11.1 acres. The site is fully developed with the existing EDI facility, including the AD facility.

The area surrounding the project site is completely developed and includes industrial and commercial uses. A Sprinter Operations Yard and EDI's collection truck fueling and maintenance yard are located south of Washington Avenue; an asphalt paving business (G. W. Weir) and an auto parts business (Fix Auto) are located directly west of the site; RCP Block and Brick, Mission Paint and Body auto repair, and a U-Haul truck rental business are located to the north of Mission Avenue; and another Mission auto repair lot and an AT&T telephone company office with truck yard are located directly east of the site.

Project Location

FIGURE 1
Regional Location

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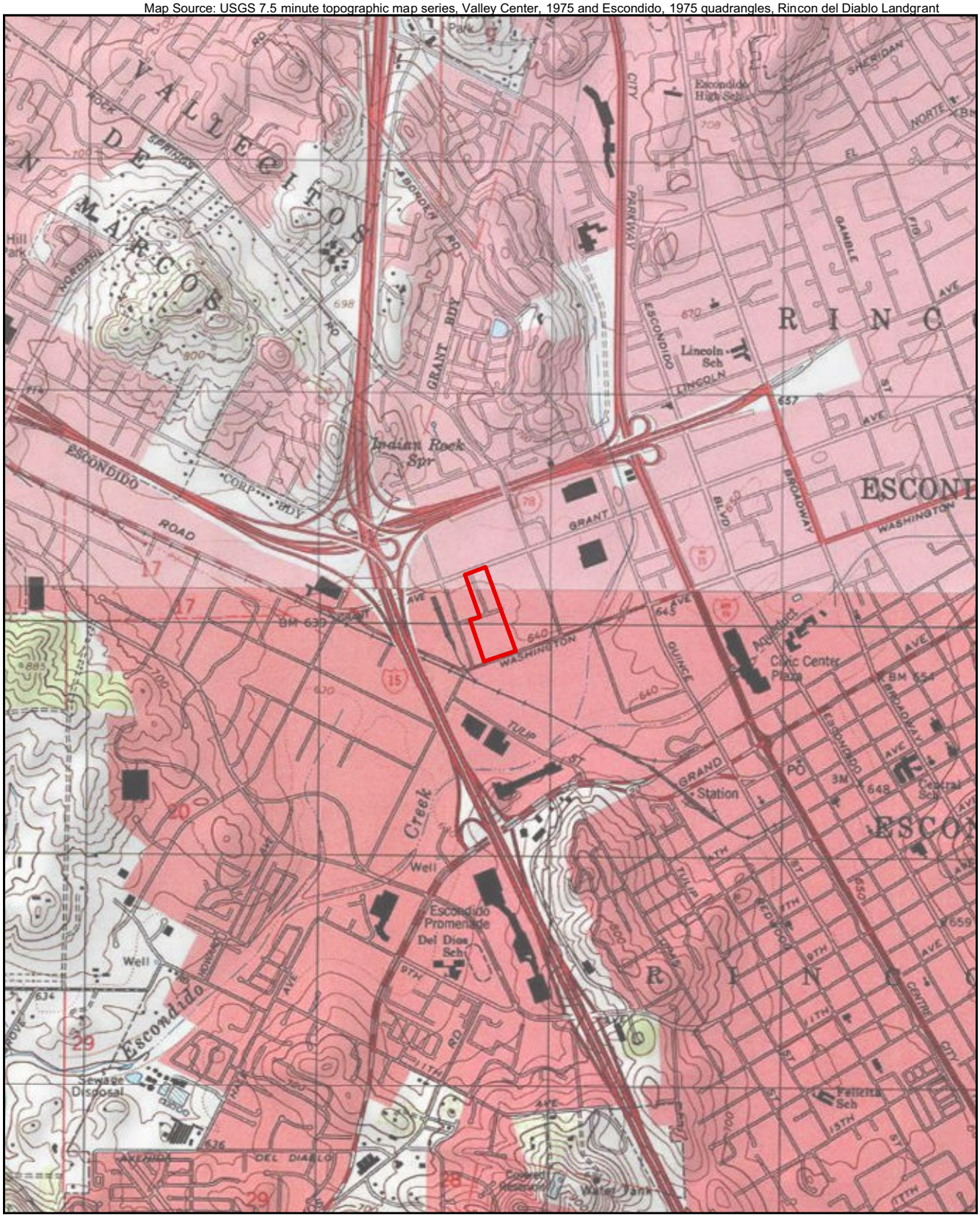
Map Source: USGS 7.5 minute topographic map series, Valley Center, 1975 and Escondido, 1975 quadrangles, Rincon del Diablo Landgrant



Project Boundary

FIGURE 2

Project Location on USGS Map

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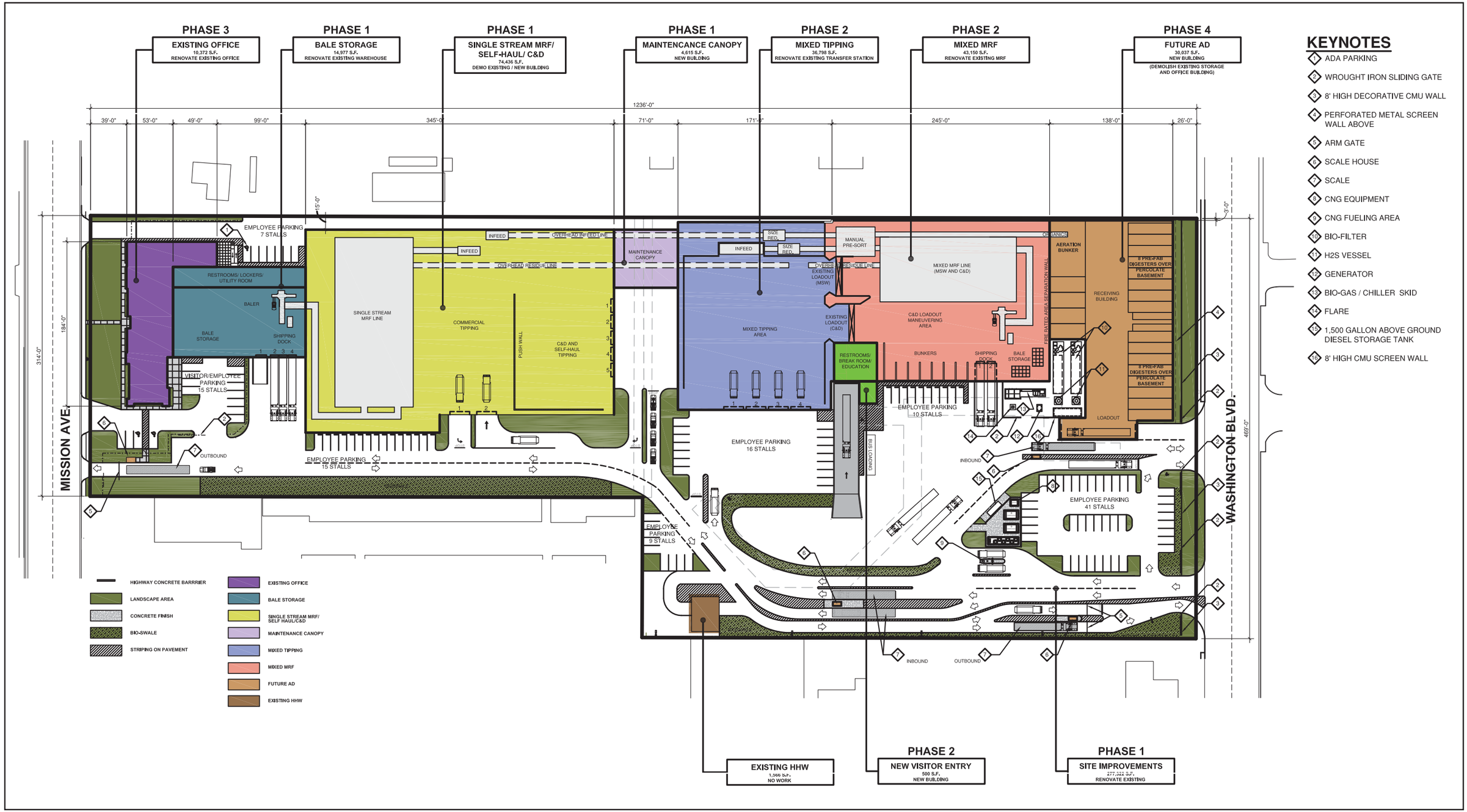
Map Source: JRM&A



KEYNOTES

1. ADA PARKING
2. WROUGHT IRON SLIDING GATE
3. 8' HIGH DECORATIVE CMU WALL
4. PERFORATED METAL SCREEN WALL ABOVE
5. ARM GATE
6. SCALE HOUSE
7. SCALE
8. CNG EQUIPMENT
9. CNG FUELING AREA
10. BIO-FILTER
11. H2S VESSEL
12. GENERATOR
13. BIO-GAS / CHILLER SKID
14. FLARE
15. 1,500 GALLON ABOVE GROUND DIESEL STORAGE TANK
16. 8' HIGH CMU SCREEN WALL

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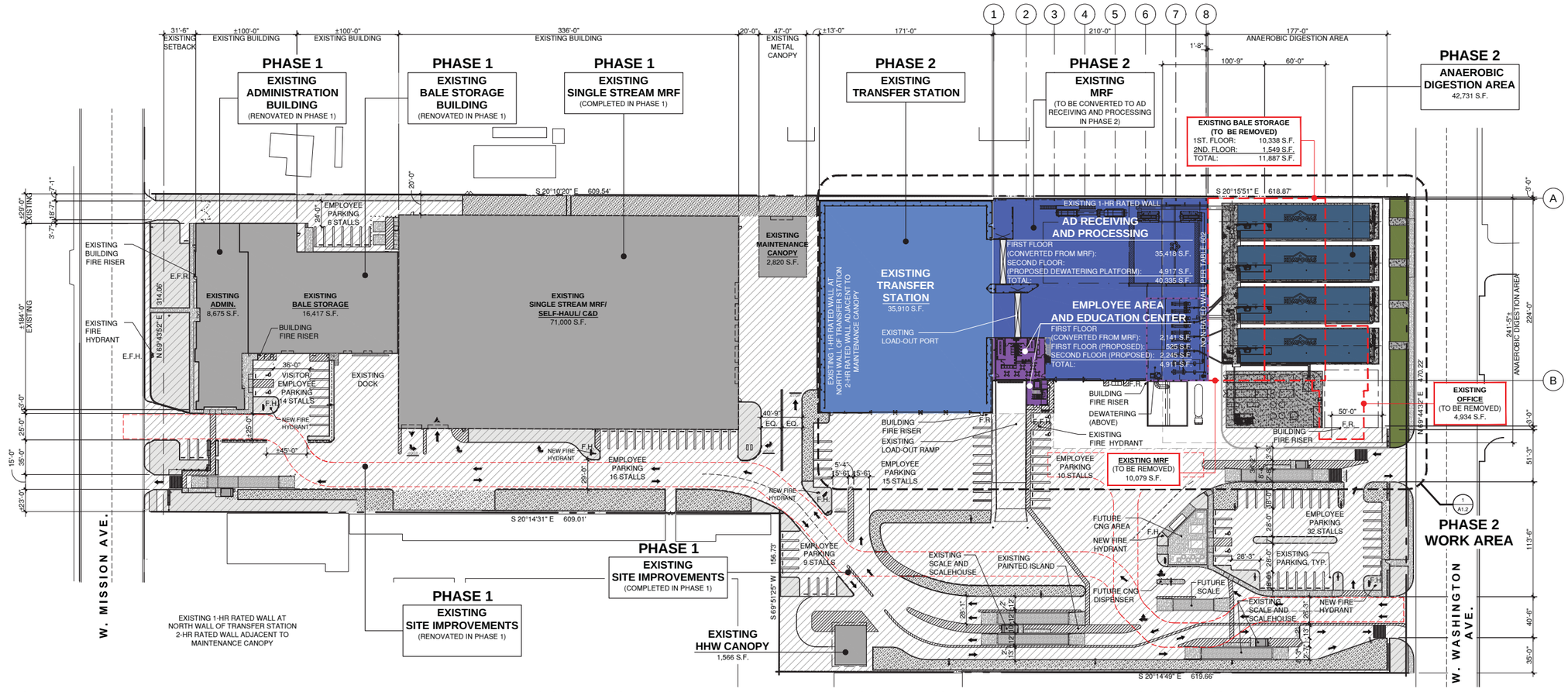
FIGURE 3
EDI Master Plan Project Site Plan

Map Source: JRM&A



LEGEND

EXISTING - PHASE 1

- EXISTING SITE IMPROVEMENTS (COMPLETED IN PHASE 1)
- EXISTING BUILDINGS
- EXISTING LANDSCAPE
- EXISTING LANDSCAPE
- EXISTING CONCRETE
- EXISTING BUILDING TO BE DEMO
- 24'-0" WIDE FIRE APPARATUS WITH 28' MINIMUM INSIDE TURN RADII
- E.F.H. EXISTING FIRE HYDRANT
- E.F.R. EXISTING FIRE RISER
- EXISTING LEASE LINE
- EXISTING CHAIN LINK FENCE
- ADA ACCESSIBLE SPACES
- (E) EXISTING

PHASE 2

- TIPPING FLOOR
- EMPLOYEE AREA AND EDUCATION CENTER
- AD RECEIVING AND PROCESSING
- DEWATERING ABOVE
- ANAEROBIC DIGESTERS
- LANDSCAPING
- CONCRETE
- AREA OF WORK
- WROUGHT IRON FENCE/GATE
- F.H. EXISTING FIRE HYDRANT
- F.R. EXISTING FIRE RISER

BUILDING SUMMARY - PHASE 2

EXISTING AND CONVERTED BUILDING AREA

TRANSFER STATION	35,910 S.F.
AD RECEIVING AND PROCESSING (EXISTING MRF):	35,418 S.F.
EMPLOYEE AREA AND EDUCATION CENTER (EXISTING MRF):	2,141 S.F.
TOTAL EXISTING AND CONVERTED BUILDING AREA:	73,469 S.F.

PROPOSED BUILDING AREA

EMPLOYEE AREA AND EDUCATION CENTER (FIRST FLOOR):	525 S.F.
EMPLOYEE AREA AND EDUCATION CENTER (SECOND FLOOR):	2,245 S.F.
DEWATERING PLATFORM (SECOND FLOOR):	4,917 S.F.
TOTAL PROPOSED BUILDING AREA:	7,687 S.F.
TOTAL BUILDING AREA (EXISTING/CONVERTED + PROPOSED):	81,156 S.F.

DEMO BUILDING AREA

EXISTING MRF:	10,079 S.F.
EXISTING BALE STORAGE (FIRST FLOOR):	10,338 S.F.
EXISTING BALE STORAGE (SECOND FLOOR):	1,549 S.F.
EXISTING OFFICE:	4,934 S.F.
TOTAL PROPOSED BUILDING AREA:	26,900 S.F.

BUILDING SUMMARY - PHASE 1

EXISTING BUILDING AREA

EXISTING SINGLE STREAM MRF:	71,000 S.F.
EXISTING BALE STORAGE:	16,417 S.F.
EXISTING ADMINISTRATION:	8,675 S.F.
TOTAL EXISTING BUILDING AREA:	96,092 S.F.

PARKING SUMMARY - PHASE 2

PARKING REQUIRED:

OFFICE (EMPLOYEE/EDUCATION CENTER):	1 SPACE PER 300 S.F.	
TRANSFER STATION (EXISTING):	1 SPACE PER 3,000 S.F.	
AD RECEIVING AND PROCESSING:	1 SPACE PER 3,000 S.F.	
OFFICE:	4,911 S.F./ 300 X 1.0	= 16.37 STALLS
TRANSFER STATION: (EXISTING):	35,910 S.F./ 3000 X 1.0	= 11.97 STALLS
AD RECEIVING AND PROCESSING:	40,335 S.F./ 3000 X 1.0	= 13.45 STALLS
SUBTOTAL:	81,156 S.F.	= 41.79 STALLS
		42 STALLS

PARKING SUMMARY - PHASE 1

PARKING REQUIRED:

OFFICE (ADMIN):	1 SPACE PER 300 S.F.	
BALE STORAGE:	1 SPACE PER 3,000 S.F.	
SINGLE STREAM MRF/ SELF-HAUL/C&D.:	1 SPACE PER 3,000 S.F.	
MAINTENANCE/HHW CANOPY:	1 SPACE PER 3,000 S.F.	
OFFICE (ADMIN):	8,675 S.F./ 300 X 1.0	= 28.92 STALLS
BALE STORAGE:	16,417 S.F./ 3000 X 1.0	= 5.47 STALLS
SINGLE STREAM MRF/ SELF-HAUL/C&D:	71,000 S.F./ 3000 X 1.0	= 23.67 STALLS
MAINTENANCE CANOPY:	2,820 S.F./ 3000 X 1.0	= 0.94 STALLS
HHW CANOPY:	1,566 S.F./ 3000 X 1.0	= 0.52 STALLS
SUBTOTAL:	100,478 S.F.	= 59.52 STALLS
		60 STALLS

PARKING PROVIDED:

STANDARD PARKING SPACES:	97
ADA PARKING SPACES:	5
TOTAL STALLS PROVIDED PER CUP PHG15-0010:	102

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FIGURE 4
Revised Project Site Plan

F. Impact Analysis

This document is an addendum to the previously adopted EDI Master Plan MND referenced above. This addendum provides the project-specific environmental review pursuant to CEQA to demonstrate the adequacy of the EDI Master Plan MND relative to the revised project. As indicated above, the previous MND identified significant impacts and proposed mitigation measures related to biological resources, cultural resources, and hazards and hazards materials. The analysis below discusses the adequacy and applicability of previous mitigation measures to the revised project. In addition, the analysis below addresses whether any new or more severe impacts would result from the project revisions and whether any additional mitigation measures beyond those previously identified in the MND would be required.

1. Aesthetics

EDI Master Plan MND

The MND identified no impacts related to aesthetics. The MND found that the project site is not located within the immediate vicinity of notable ridgelines, that public views are limited due to the flat topography of the project site, and that the project did not have an adverse effect on a scenic vista identified in the City's General Plan. In addition, the project was determined to have no impact on a scenic resource within a state scenic highway corridor, as there are no officially designated or eligible highways within the project area and there are no scenic resources on the project site.

In addition, the approved project would reorganize the site, the industrial character would remain similar to the existing conditions. As such, the MND determined that the industrial operations would not substantially degrade the existing character or quality of the site and its surroundings, and no impact would result. In regard to light and glare, the MND found that no impact would occur, as the project complied with Article 35 of the City's Zoning Ordinance by shielding and directing light downward and away from property line to prevent light spillage onto neighboring properties and the night sky.

Revised Project

Similar to the EDI Master Plan Project, the revised project would not affect views of mountains and ridgelines in the distance. The site is already developed with buildings that are partially visible from the I-15, and the revised development would not significantly alter the site characteristic or affect the distant view of the mountains. While the revised project would result in revisions to square footage of building renovation and construction during Phase 2 within the project site, the buildings associated with the revised project would be substantially similar to those assessed in the original project, and the industrial land use and character of the site would remain the same. The revised project would comply with Article 35 of the City's Zoning Ordinance (Escondido Outdoor Lighting Ordinance), thereby ensuring no new impacts associated with light and glare would occur.

As such, the revised project would not result in any changes that could impact views to scenic vistas; would not impact a scenic resource within a state scenic highway corridor; would not change the existing visual character or quality of the site and surrounding; and would not add a new source of light or glare to the site. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any aesthetic impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. No impact would occur, consistent with the EDI Master Plan MND.

Major revisions to the EDI Master Plan MND are not required due to proposed changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than previously disclosed in the EDI Master Plan MND.

2. Agricultural Resources

EDI Master Plan MND

The MND identified no impacts related to agricultural and forest/timberland resources, as the project site is developed and does not include any active agricultural uses or agricultural resources. The site is not zoned for agricultural uses and is not adjacent to areas zoned for or in agricultural use.

Revised Project

The revised project would not change the proposed uses of the project site. The project site does not include any active agricultural uses or agricultural resources, is not adjacent to such uses, and is not zoned or designated for agriculture uses. Thus, similar to the EDI Master Plan MND, the revised project would have no impact to agricultural resources.

Major revisions to the EDI Master Plan MND are not required due to proposed changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

3. Air Quality

EDI Master Plan MND

The MND determined that the project would not conflict with or obstruct implementation of the Regional Air Quality Strategy (RAQS), as the Air Quality Analysis prepared for the project concluded that air quality emissions associated with the project would be less than the significance thresholds for all criteria pollutants. Impacts were determined to be less than significant.

Additionally, the MND concluded that project construction and operation emissions would not exceed significance thresholds as determined under the Escondido Municipal Code. As such, the project would not generate emissions in quantities that would result in an exceedance of the National Ambient Air Quality Standards or California Ambient Air Quality Standards for ozone or particulate matter less than 10 microns (PM_{10}) or 2.5 microns ($PM_{2.5}$) in diameter. Emissions would be less than significant and, therefore, the MND determined that the project would not result in a cumulatively considerable increase in any criteria pollutant for which the region is in nonattainment, and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts were determined to be less than significant.

In regards to exposure of sensitive receptors to substantial pollutant concentrations, the MND stated that the project would not substantially affect the amount of traffic or the number of heavy trucks associated with the project. Therefore, the MND concluded that carbon monoxide (CO) and diesel particulate matter (DPM) emissions would not increase compared to the existing condition. In addition, the MND determined that the proposed use of the CNG from the AD facility to fuel collection vehicles would reduce vehicle CO emissions by 70 to 90 percent due to the reduction in use of diesel fueled trucks. The MND concluded that no impact would occur.

In regards to odors, the MND stated that all existing odor minimization measures would remain in place at the existing facility and would also be applied at the new facility. As such, the MND concluded that the project would not result in increased odor from waste handling and separation areas. In addition, the MND stated that all exhaust air generated from AD operations would be treated using a biofilter system to control odors, and as such, the AD facility would not generate substantial odors. Moreover, the MND determined that CNG fuel would not be odorous and CNG fueled vehicles would not generate odors. Impacts associated with odors were determined to be less than significant.

Revised Project

The revised project would result in an increased AD facility capacity and would supply natural gas to the utility natural gas pipeline. The revised project was evaluated in a Supplemental Air Quality Analysis prepared by RECON Environmental, Inc., dated September 11, 2018 (Appendix B).

This supplemental analysis provides updated emission calculation estimates based on the revised project changes. As detailed in the Supplemental Air Quality Analysis, no additional significant impacts were identified. Since the revised project would not change the land use within the project site, the light industrial use would be consistent with the General Plan land use designation for the site (LI-Light Industrial) and ensures that the revised project would be consistent with the RAQS, the same as the EDI Master Plan MND.

As detailed in the Supplemental Air Quality Analysis and summarized below, revised project emissions are not anticipated to exceed applicable regional thresholds for either construction or operation emissions. Updated emissions estimates are compared to the

emission estimates from the previous analysis conducted for the EDI Master Plan MND in Appendix A and are compared to the applicable significance thresholds in Table 2.

Table 2
Comparison to Previous Estimates (pounds per day)

Gas	Revised Estimate	Significance Thresholds	Exceeds Threshold?
Reactive Organic Gases (ROG)	54.8	55	No
Nitrogen Oxide (NOx)	39.2	250	No
Carbon Monoxide (CO)	116.1	550	No
Sulfur Oxides (SOx)	16.7	250	No
Respirable Particulate Matter (PM_{10})	40.0	100	No
Fine Particulate Matter ($PM_{2.5}$)	38.1	55	No
SOURCE: Appendix A.			

As shown, increasing the capacity of the AD facility to 650 tons per day (237,250 tons per year) would result in emissions that do not exceed the applicable significance thresholds. As such, the revised project would not result in regional emissions that would exceed the National Ambient Air Quality Standards or California Ambient Air Quality Standards or contribute to existing violations. The revised project would result in a less than significant air quality impact, the same as the EDI Master Plan MND. In addition, the revised project would not result in increased vehicle use, and would therefore not result in the operation of a signalized intersection at a Level of Service (LOS) E or worse, ensuring no CO hot spots would result. Thus, no impact to sensitive receptors would occur, the same as the EDI Master Plan MND. The increased capacity of the AD facility would not generate additional odors, as the AD facility would continue to be completely enclosed and operate on a negative air flow to draw any potential odors inward. All exhaust air generated from AD operations would continue to be treated using a biofilter system to control odors. Exposure to odors would be the same as identified in the EDI Master Plan MND and would be less than significant.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

4. Biological Resources

EDI Master Plan MND

The MND evaluated potential biological resource impacts associated with the renovation and construction of the project site. The following potentially significant biological resources impacts were identified:

- Sensitive Species: The MND identified impacts to nesting raptors or nesting migratory birds if tree removal or construction occurs during the typical breeding season (January 1 to September 1).

No impacts were identified to sensitive habitat, riparian habitat, or other sensitive natural community, wetlands, or vernal pools as none of these resources were identified on the project site. Additionally, no impact was identified to any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors or nursery sites. No conflicts with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance were identified. The MND identified the following mitigation measures to reduce potentially significant impacts:

BIO-1 A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.

BIO-2: If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

The MND concluded that implementation of these mitigation measures would reduce biological resource impacts to less than significant.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure beyond what was anticipated in the MND within the project site. While overall square footage of the buildings would change due to a revised layout, no additional grading beyond what was anticipated in the MND would occur. As discussed in the MND, there is the potential for project construction to impact mature trees within the project site. Therefore, the revised project would be required to implement mitigation measures BIO-1 and BIO-2 as called for in the MND. This would ensure impacts to nesting raptor and migratory birds would be less than significant with mitigation, the same that identified in the MND.

Similar to the MND, the revised project would result in no impact associated with sensitive habitat, riparian habitat or other sensitive natural community, wetlands or vernal pools native residents or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors or nursery sites. No conflicts with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance would occur under the revised project.

In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any biological resource impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Thus, no new or more severe impacts to biological resources would occur from the revised project.

Thus, major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

5. Cultural Resources

EDI Master Plan MND

The MND did not identify a significant impact to historical resources even though the Goldcraft building was determined to be a significant historical resource under CEQA. The MND stated that the demolition of some of the additions to the plant portion of the building would not have a significant impact on the integrity of the Goldcraft building, and impacts associated with historical structures were determined to be less than significant. In addition, no dedicated cemetery or human remains were identified on the project site. However, the MND concluded that, in the unlikely event that remains were found on-site, such remains were to be handled in accordance with procedures of the Public Resources Code Section 5097.98, the California Government Code Section 27491, and the Health and Safety Code Section 7050.5. No impact to human remains was identified.

The MND determined that ground-disturbing activities, such as grading or excavation, would have the potential to directly or indirectly impact undiscovered subsurface archaeological and paleontological resources, which represented a significant impact.

The MND included the following mitigation measure in order to ensure impacts to archaeological and paleontological resources would be reduced to a less than significant impact:

ARC-1: An archaeological resources monitoring program shall be implemented, which shall include the following:

A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing

activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.

PAL-1 Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:

1. A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).

2. In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.

3. A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above-described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

The MND concluded that implementation of these mitigation measures would reduce cultural resource impacts to less than significant.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure beyond what was anticipated in the MND within the project site. While overall square footage of the buildings would change due to a revised layout, no additional grading beyond what was anticipated in the MND would occur. As discussed in the MND, there is the potential for grading to impact significant archaeological and paleontological resources. Therefore, the revised project would be required to implement mitigation measures ARC-1 and PAL-1 as called for in the MND. This would ensure impacts to archaeological and paleontological resources would be less than significant with mitigation, the same that was identified in the MND.

Similar to the MND, the revised project would result in a less than significant impact to historical structures, and the revised project would not change any plans associated with renovation of the Goldcraft building. In addition, the revised project would result in no impact associated with human remains, as the revised project would proceed in accordance with CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) if human remains are encountered during grading activity.

In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any cultural resource impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Thus, no new or more severe impacts to cultural resources would occur from the revised project. As such, the mitigation measures for cultural resources identified in the EDI Master Plan MND would not apply to the revised project as no cultural resource impacts would occur.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

6. Geology and Soils

EDI Master Plan MND

The MND found that while there are no known active faults located on-site or within 15 miles of the site, the project is located within the seismically active southern California region, and thus could be subject to significant shaking during a major earthquake on any regional fault. However, compliance with the State Uniform Building Code would ensure that impacts associated with the risk of seismic ground shaking would be less than significant.

In regard to liquefaction and landslides, the MND stated that the southern area of the site may be subject to liquefaction. However, as required by the State Uniform Building Code,

the project was required to implement standard engineering measures to ensure that impacts would be less than significant related to liquefaction. The MND stated that the project site is relatively flat, and no impact associated with landslides would occur.

Regarding the loss of topsoil due to erosion, the MND determined that implementation of Best Management Practices (BMPs) during construction and operation in compliance with associated regulations would ensure impacts would be less than significant.

Impacts associated with unstable or expansive soils were determined to be less than significant, as the soils on-site consist of Ramona sandy loam and Placentia sandy loam, which are not expansive soils. The MND stated that the underlying geologic formations in the City are mostly granitic and have a very low potential of subsidence. As part of the grading permit process, the project was required to complete a geotechnical report, and the MND determined that compliance with the State Uniform Building Code and the geotechnical report ensured that the risk of geologic impacts was be less than significant.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure beyond what was anticipated in the MND within the project site. While overall square footage of the buildings would change due to a revised layout, no additional grading beyond what was anticipated in the MND would occur. As such, no new or more severe impacts related to geology and soils would occur. As discussed in the MND, compliance with the State Uniform Building Code would ensure that the risk impacts related to geology and soils would be less than significant, the same as the MND. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any geology and soils impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Thus, no new or more severe impacts associated with geology and soils would occur from the revised project.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

7. Greenhouse Gas Emissions

EDI Master Plan MND

A site-specific Greenhouse Gas Analysis was prepared for the MND that determined impacts associated with greenhouse gas (GHG) emissions would be less than significant. As detailed in the GHG evaluation, the project would result in total emissions of 2,088 metric tons (MT) of carbon dioxide equivalent (CO_2E) annually. This is less than the identified 2,500 MT CO_2E screening threshold adopted by the City. As the project would not exceed the 2,500 MT CO_2E screening threshold for GHG emissions, the MND found that the

project would not conflict with implementation of the City's Climate Action Program (CAP) and would not interfere with the City's ability to achieve the GHG reduction goals outlined in the CAP, nor would it conflict with the CARB Scoping Plan and would support the AB 341 mandate for a 75 percent recycling goal. GHG impacts of the project were determined to be less than significant.

Revised Project

The revised project would result in increased AD facility capacity and proposes to supply natural gas to the utility natural gas pipeline. Thus, the revised project was evaluated in a Supplemental GHG Emissions Analysis prepared by RECON Environmental, Inc., dated September 11, 2018 (Appendix C).

As detailed in the Supplemental GHG Emissions Analysis, implementation of the revised project would result in an overall reduction of GHG emissions associated with the project site. Project GHG emissions are not anticipated to exceed the City's GHG significance threshold from Municipal Code Section 33-924 (2,500 MT CO_2E). The current AD facility has capacity to divert 31,200 tons per year, and thereby results in a net reduction of 10,421 MT CO_2E. The proposed AD facility would divert 237,250 tons per year, and would thereby result in a net reduction of 79,242 MT CO_2E. Updated GHG emission estimates are compared to the emission estimates from the previous analysis conducted for the EDI Master Plan MND in Table 3.

Table 3
Comparison to Previous Estimates (MT CO_2E)

GHG Emission Source	Previous Analysis		Revised Estimate
	Electricity Scenario	Vehicle Fuel Scenario	Direct Natural Gas Injection Scenario
Vehicles	434	434	478
Energy Use	775	775	525
Area Sources (AD Facility)	482	409	3,109
Water Use	266	266	161
Solid Waste Disposal	119	119	136
Construction	12	12	12
Total Gross Emissions	2,088	2,016	4,421
*Avoided Landfill Emissions**	*10,421*	*10,421*	*79,242*
Total Net Emissions	**-8,333**	**-8,405**	**-74,821**

SOURCE: Appendix A.
*This reduction in GHG emissions was not previously accounted for in the original GHG analysis. Avoided emissions have been calculated to provide a more complete emission comparison.

As shown, increasing the capacity of the AD facility to 650 tons per day (237,250 tons per year) would result in a net GHG emissions reduction. Additionally, the revised project would support state and local long-term solid waste diversion goals, and would continue to support applicable plans, policies and regulations intended to reduce GHG emissions. Impacts would be considered less than significant, the same as the EDI Master Plan MND.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND

revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

8. Hazards and Hazardous Materials

EDI Master Plan MND

The MND evaluated potential hazardous material impacts associated with the renovation and construction of the project site. The following potentially significant hazardous material impacts were identified:

- Asbestos and Lead: The MND identified impacts associated with the transport, use, or disposal of hazardous materials due to the fact that most of the existing structures on-site had the potential to contain asbestos and lead, as they were constructed prior to 1980. The exposure of workers to lead- or asbestos-containing dust during demolition and renovation resulted in a potentially significant hazardous material impact.

As detailed in the MND, all project operations would be conducted in compliance with applicable regulations regarding the proper use, transport, and disposal of hazardous materials. The MND stated that the project would comply with the County DEH requirements, including the requirement to prepare and comply with a Hazardous Materials Business, and would be required to comply with the three DEH permits that covered the project site. The MND determined that compliance with regulations would ensure that potential hazardous material use impacts would be below a level of significance. No impact related to hazardous material emissions or handling within the vicinity of a school was identified, as the project site is not located within one-quarter mile of a school.

A hazardous materials database search was completed for the project site, in which the MND stated that the project site was identified on the GEOTRACKER database as having a former leaking underground storage tank (LUST; Regional Water Quality Control Board (RWQCB) Case #9UT3802; Local Case #H29584- 001) that resulted in the release of diesel fuel. However, the MND determined that since the LUST was cleaned up in 1999 and the case was closed, grading activities were not expected to encounter contaminated soils that could potentially create a hazard to the public or environment, resulting in a less than significant impact. In addition, the MND stated that since the project would continue the use of the site as a recycling facility and would not include any sensitive receptors, the project would not expose the public or environment to hazards associated with a listed hazardous material site during operations and concluded the project would have a less than significant impact.

No impacts related to airport hazards were identified, as there are no airports or airstrips within a two-mile radius of the project site. In addition, the MND determined that the project would not alter or impede an existing evacuation route and would not impair implementation of goals and policies contained in the City's Community Protection Element

of the General Plan, resulting in no impact. Wildfire impacts were determined to be less than significant, as the MND determined that the project site was not adjacent to wildlands, was currently developed, and the project would comply with Fire Code regulations.

The MND identified the following mitigation measures to reduce potentially significant impacts associated with the routine transport, use, or disposal of hazardous materials:

HAZ-1 Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/Occupational Safety and Hazardous Administration (OSHA) pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an Environmental Protection Agency (EPA)-approved Building Inspector Course. Should regulated asbestos-containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.

HAZ-2: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all buildings to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

The MND concluded that implementation of these mitigation measures would reduce hazardous material impacts to less than significant.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure beyond what was anticipated in the MND within the project site. While overall square footage of the buildings would change due to a revised layout, no additional work beyond what was anticipated in the MND would occur. As such, no new or more severe impacts related to hazards and hazardous materials would occur.

As discussed in the MND, there is the potential for demolition and renovation activities to result in significant impacts associated with disposal of hazardous materials, namely asbestos and lead. Similar to the MND, the demolition and renovation of existing structures associated with the revised project could result in lead- and asbestos-containing materials becoming airborne and inhalable. The exposure of workers to lead- or asbestos-containing dust would result in a potentially significant hazardous material impact. Therefore, the revised project would be required to implement mitigation measures HAZ-1 and HAZ-2 as called for in the MND. This would ensure impacts associated with hazardous materials would be less than significant with mitigation, the same that was identified in the MND.

In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any hazardous material impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site.

The revised project would result in similar types of project operations within the same building footprint. Similar to the EDI Master Plan Project, the revised project operations would be conducted in compliance with hazardous materials regulations, including the proper use, transport, and disposal of hazardous materials and preparation of a Hazardous Materials Business Plan (if warranted) for project operations. All of the same regulatory framework would apply, and the revised project would not involve any changes that would increase the severity of a potential impact related to hazards and hazardous materials.

No grading activities beyond what was anticipated in the MND are proposed as part of the revised project, so implementation of the revised project is not anticipated to encounter contaminated soils associated with the LUST identified within the project site, as noted in the EDI Master Plan MND. In addition, as discussed in the EDI Master Plan MND, the project site is not located within one-quarter mile of a school or within an airport land use plan or within two miles of an airport or airstrip; thus, no impact would occur. The revised project would not increase any risk associated with wildfire hazards, and impacts would be less than significant. Thus, no new or more severe impacts associated with hazards and hazardous materials would occur from the revised project

The mitigation measures for hazards and hazardous materials identified in the EDI Master Plan MND would apply to the revised project, thereby ensuring all hazards or hazardous material impacts would be reduced to a less than significant level. Thus, major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is

no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

9. Hydrology and Water Quality

EDI Master Plan MND

The MND determined that impacts associated with hydrology were less than significant. According to the MND and the Preliminary Drainage Study prepared for the project, the 100-year flow rate would not increase as a result of implementation of the project, and would remain at pre-existing drainage conditions of 52.3 cubic feet per second for the 100-year storm event. This was because project grading was minimal; landscaping square footage increased 31,280 square feet to 61,271 square feet; and the project included bio-swales.

The MND determined that impacts associated with water quality were less than significant. According to the Water Quality Technical Report (WQTR) prepared for the project, the receiving waters for the site include Escondido Creek and the San Elijo Lagoon, which are both impaired water bodies as listed on the Clean Water Section 303(d) list. To address the potential pollutants of concern, the project complied with the City and RWQCB regulations during construction, and implemented post-construction BMPs including Low Impact Development (LID) design practices, source control, and treatment control BMPs. The use of these BMPs reduced potential water quality impacts to below a level of significance.

In regards to flooding, the MND determined that since the site is within Zone X per the Federal Emergency Management Agency (FEMA), the project would not place any structures or alter areas within a flood hazard. Also, the MND concluded that the project would not increase drainage discharge rates and would therefore not exacerbate any downstream flooding issue. The MND determined that the project would have less than significant impacts related to flooding.

While the MND stated that the project site is within both the Lake Wohlford Dam Failure and the Dixon Lake Inundation areas, the MND determined that impacts associated with dam inundation would be less than significant. The MND stated that compliance with the Multi-Jurisdictional Hazard Mitigation Plan and Lake Dixon and Lake Wohlford Dam Emergency Action Plans, along with the fact that the project would not attract additional people to the site or include any new “unique institution” uses, the potential flooding impact related to failure of a dam would be less than significant. In addition, the MND determined that no impact associated with inundation by levee failure, seiche, tsunami, or mudflow would occur.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure beyond what was anticipated in the MND within the project

site. While overall square footage of the buildings would change due to a revised layout, no revised project components would add impervious surfaces to the project site, and no new drainage facilities would be constructed. The existing hydrologic conditions would remain the same as the current condition. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any hydrology and water quality impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. As such, no impacts related to hydrology and water quality would occur. Thus, no new or more severe impacts associated with hydrology and water quality would occur as a result of implementing the revised project.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the EDI Master Plan MND.

10. Land Use Planning

EDI Master Plan MND

The MND found that no impact to land use planning would occur. The site was previously developed and the recycling facility reorganization did not divide the established central Escondido community. The site is designated as General Industrial and Light Industrial by the General Plan and zoned M-1 and M-2 by the City Zoning Code. The recycling facility is consistent with this designation, and the zoning code allows for a recycling transfer station as a conditional use. The recycling center currently has a conditional use permit, and the project included obtaining an updated conditional use permit to cover the reorganized facility. In addition, the project was determined to be consistent with the goals of the Downtown Transit Station Target Area as identified in the General Plan, as it continued the operations of the trash transfer facility and did not interfere with the implementation of the other goals.

The MND indicated that the site is not located within an area designated for conservation and does not include any native habitat covered by a natural community conservation plan. As such, the project had no environmental impact related to land use planning.

Revised Project

The revised project would not create any new land use barriers, preclude the development of surrounding parcels, or otherwise divide or disrupt the physical arrangement of the surrounding established community, as the areas surrounding the project site are mostly developed and consist of industrial and commercial uses. The installation of additional anaerobic digestion equipment, such as digestion vessels, and the revised changes to overall layout of buildings within the project site would not result in any land use planning conflicts. The site is designated as General Industrial and Light Industrial by the General

Plan, and zoned M-1 and M-2 by the City Zoning Code; these land use and zoning designations would not change as a result of implementing the revised project. The utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any land use planning impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. In addition, the revised project would not consist of components that would conflict with any applicable habitat conservation plans or natural conservation plans. Thus, no new or more severe impacts associated with hydrology and water quality would occur as a result of implementing the revised project.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

11. Mineral Resources

EDI Master Plan MND

The MND concluded that no impacts to mineral resources would occur, as the site is not feasible to utilize as a mining operation due to the site's size and adjacency to existing structures and roadways. The MND determined that the project would not result in the loss of a local, regional, or state mineral resource. No impacts to mineral resources were identified in the MND.

Revised Project

The underlying geologic conditions on the project site have not substantially changed from what was previously analyzed in the EDI Master Plan MND. Similar to the MND, it would not be feasible to use the project site for mining operations due to the site's zoning and land use designation, the location of the site adjacent to commercial and light industrial uses, and the site's size. The City's General Plan does not identify the project site as an existing or past extraction site. Thus, similar to the MND, implementation of the revised project would result in no impact related to the loss of a local, regional, or state mineral resource.

12. Noise

EDI Master Plan MND

The MND identified that the project would have a less than significant impact related to noise. As detailed in the MND, project construction and renovation activities would comply with the Noise Ordinance construction limits of 75 average equivalent A-weighted decibels (dB(A) L_{eq}), between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays, resulting in a less than significant impact.

In regards to operational noise, the MND determined that the project would not significantly alter on-site noise generation, as future uses would be similar to the existing uses, would use similar controls, would not increase through-put capacity which could require more collections transfer trucks, and would rearrange internal uses. In addition, the MND states that most of the noise-generating uses and equipment would be enclosed within structures. The only exceptions included the new conveyor systems that would pass outside under a canopy between buildings, the new CNG compressors used for fueling, and the combined heat and power unit, with associated flare. However, the MND concluded that the buildings would attenuate on-site noise sources from the adjacent uses to the east and north, and conveyor noise would attenuate to less than 50 dB(A) L_{eq} or less at the property line. The combined heat and power unit would be shielded from the western property line by an 8-foot-high concrete/masonry wall, which, in combination of the distance from the adjacent property line, would attenuate to 60 dB(A) L_{eq} or less at the property line, resulting in less than significant operation noise impacts. The MND also stated that the project would comply with the Noise Ordinance that establishes noise regulations to prohibit disturbing, excessive, or offensive noise, since the surrounding properties are zoned light industrial and general industrial, which are not noise-sensitive uses, resulting in a less than significant impact.

In regards to traffic noise impacts, the MND determined that impacts would be less than significant, as the project would not generate additional traffic and would not significantly affect the distribution of traffic. The MND also identified no impacts related to airport noise.

Revised Project

The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure within the project site beyond what was anticipated in the MND. As such, the revised project is not anticipated to generate significant construction noise beyond what was anticipated in the MND. Impacts would be less than significant, the same as the EDI Master Plan Project. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any construction related noise impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. No impact would occur, consistent with the EDI Master Plan MND.

In regards to traffic noise, the revised project would not increase the permitted capacity of the EDI transfer station. The station is permitted to accept a maximum of 3,223 tons of solid waste per day. Additional feedstock organics would result from increased separation of organics from the existing waste stream; however, the amount of solid waste accepted by the facility would remain limited to 3,223 tons per day. Therefore, the estimates of vehicle use and traffic provided in the EDI Master Plan MND would not change, and the revised project would not generate additional traffic. Impacts would be less than significant, the same as the EDI Master Plan Project. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any traffic-related noise impacts, as the natural gas would be

directly injected to the existing natural gas pipelines located within the project site. No impact would occur, consistent with the EDI Master Plan MND.

In regards to on-site noise, the revised project would not significantly alter on-site noise generation, as the proposed uses would be similar to the existing uses, would use similar controls, and the revised project would not increase through-put capacity which could require more collections transfer trucks. The revised project would rearrange internal uses, and most of the noise-generating uses and equipment would be enclosed within structures. The facility would not be expanded, and no new outdoor noise-generating equipment would be installed. Noise associated with the combined heat and power unit, and associated flare, was estimated to generate approximately 81 dB(A) L_{eq} at 50 feet under constant operation in the EDI Master Plan MND. The combined heat and power unit associated with the revised project would be approximately 255 feet from the western property line and would be shielded from the western property line by an 8-foot-high concrete/masonry wall, which attenuates noise to 60 dB(A) L_{eq} or less at the property line. With the increase in AD capacity, the amount of natural gas combustion necessary to heat percolate and the amount of flared waste gas would increase proportional to the AD facility capacity. However, any increase in natural gas combustion and flared waste gas would not be a substantial noise generating use, and on-site noise increases would be less than significant. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any on-site related noise impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Similar to the EDI Master Plan MND, noise levels associated with the revised project would not conflict with the City's Noise Ordinance or the General Plan noise standards, resulting in a less than significant impact.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

13. Population and Housing

EDI Master Plan MND

The MND identified no impacts related to population and housing. The project did not displace any housing or directly or indirectly alter population and/or housing. No increase in the capacity of the recycling facility occurred, and the increase in infrastructure capacity did not draw additional residents to the area. Thus, the project was determined to have no impact to population and housing.

Revised Project

The revised project would not displace any existing housing units or people, as there are no housing units located within the expanded site footprint. Therefore, similar to the EDI

Master Plan MND, the revised project would have no impact in regards to population and housing.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

14. Public Services

EDI Master Plan MND

The MND identified no impacts related to public services. The MND found that the project did not induce growth either directly or indirectly. Thus, the MND determined that no additional demand for schools, parks, libraries, police, or fire protection would occur.

Revised Project

Similar to the EDI Master Plan MND, the revised project would not result in any impacts to public services. The revised project would involve the installation of additional anaerobic digestion equipment, such as digestion vessels, and would change the overall square footage of the proposed buildings to be renovated and constructed, and therefore would not induce growth either directly or indirectly. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any public service impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Thus, the project would not result in additional demand for schools, parks, libraries, police, or fire protection, resulting in no impact, the same as the EDI Master Plan MND.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

15. Recreation

EDI Master Plan MND

The MND did not identify any impacts related to recreational resources, because the project involved redevelopment of an industrial site. As such, it did not result in a need for additional recreational facilities or affect any existing recreational facility.

Revised Project

The revised project does not propose any recreational facilities, and the installation of additional anaerobic digestion equipment, coupled with revisions to the overall square footage of the proposed buildings to be renovated and constructed, would not generate a new population base that would warrant the need for additional recreational facilities. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not generate a new population base that would warrant the need for additional recreational facilities. Thus, similar to the EDI Master Plan MND, the project would not result in any significant environmental impacts related to the construction or expansion of recreational facilities.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

16. Transportation/Traffic

EDI Master Plan MND

As detailed in the MND, the project would retain the existing permitted capacities of the facility and would not generate additional truck traffic. Additionally, as discussed in the MND, even with the addition of the visitor center, the project would likely decrease traffic generation from the overall site when considering the removal of the existing commercial business on W. Mission Avenue. The MND stated that while the project would slightly alter the distribution of the traffic from W. Washington Avenue to W. Mission Avenue, the redistribution would likely improve conditions on W. Washington Avenue and have little effect on W. Mission Avenue.

In regards to the LOS along W. Mission Avenue, the MND determined that it would require approximately 6,000 additional average daily traffic (ADT) on W. Mission Avenue to worsen the LOS. The MND concluded that the project is not anticipated to result in the addition of 6,000 ADT to W. Mission Avenue, resulting in a less than significant impact.

Additionally, the project would not alter transit, pedestrian, or bicycle usage or access. Therefore, the project would have a less than significant impact on the performance of the circulation system or conflict with the City's traffic operations standards.

No impacts were identified related to air traffic patterns, design features, emergency access or conflicts with policies plans or programs affecting public transit, bicycle, or pedestrian facilities.

Revised Project

The revised project would retain the existing permitted capacities of the facility and would not generate additional truck traffic. The revised project would not result in any revisions to circulation within the project site, and would not introduce any new land uses that could generate additional ADT beyond what was anticipated in the MND along W. Mission Avenue. As such, impacts regarding LOS along this roadway would be less than significant, the same as the MND. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any transportation and traffic impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site.

The EDI transfer station is permitted to accept a maximum of 3,223 tons of solid waste per day. Additional feedstock organics would result from increased separation of organics from the existing waste stream; however, the amount of solid waste accepted by the facility would remain limited to 3,223 tons per day. Therefore, the revised project would not require additional waste hauling trips beyond what was identified for the EDI Master Plan, and estimates of vehicle use would not change as a result of implementing the proposed project.

Additionally, the revised project would not alter transit, pedestrian, or bicycle usage or access. Therefore, the project would have a less than significant impact on the performance of the circulation system or conflict with the City's traffic operations standards, the same as the MND. No additional impacts related to air traffic patterns, design features, emergency access or conflicts with policies plans or programs affecting public transit, bicycle, or pedestrian facilities would occur as a result of implementing the revised project, resulting in no impact, the same as the MND.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

17. Tribal Cultural Resources

EDI Master Plan MND

Since the MND for the EDI Master Plan project was certified, there has been a change in circumstances. Assembly Bill 52 (AB-52) became effective on July 1, 2015. AB-52 requires that tribal cultural resources be evaluated under CEQA. The project was evaluated for cultural resources; however, AB-52 consultation does not apply since the environmental document is not a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report.

Revised Project

Although the revised project would not require tribal consultation under AB-52, the project site was evaluated for cultural resource impacts during the implementation of the EDI Master Plan Project. As discussed under Section F.5., Cultural Resources, the revised project would implement mitigation measures ARC-1 and PAL-1, thereby ensuring impacts associated with cultural resources would be less than significant.

In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any cultural resource impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site. Thus, no new or more severe impacts associated with cultural resources would occur from the revised project. As discussed in Section F.5., the mitigation measures for cultural resources identified in the EDI Master Plan MND would be implemented for the revised project, thereby ensuring cultural resource impacts would be less than significant with mitigation.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

18. Utilities and Service Systems

EDI Master Plan MND

The MND determined that no impacts related to exceeding wastewater treatment requirements or capacity and requirements to construct new water or wastewater treatment facilities would occur. This is because dry AD technologies, as implemented within the project site, have limited requirement for processed water. Water is introduced into the dry AD system via the organic waste itself. Depending on the moisture content of the organic waste processed in the dry digesters, there may be periods when additional percolate water makeup is required, or when excess percolate is generated. When there are periods with wetter organics, this percolate is sanitized and held to be applied later when the incoming organic waste material is dryer. As such, the MND determined that there would be no need for discharges to the waste water system. In addition, the MND determined that since the project did not increase the permitted capacity of the recycling center and would eliminate the existing commercial uses at the site, the project would decrease the water demand and wastewater treatment demand at the site. No new or expanded water or wastewater-related facilities would be required, as the project included all on-site wastewater and water system improvements necessary to serve the project.

In regard to impacts associated with construction of new storm water drainage facilities or expansion of existing facilities, the MND determined that no impact would result. The project installed a 36-inch RCP for storm water conveyance in W. Washington Avenue.

Additionally, the project decreased the impervious area on-site, and the project included all necessary storm water drainage facility upgrades necessary to meet the current storm water requirements. Therefore, the project was determined to have no impact related to storm-drain facilities.

In regard to water supplies, the MND determined that no impact would result. The project would not generate an additional demand for water and would not alter the zoning or land use of the site. Therefore, the MND determined that the project would not result in a need to revise estimated regional water demands or alter existing entitlements. Also, the existing Conditional Use Permit allowed for a recycling facility of the same capacity as the project.

In regard to landfill capacity, the MND determined that impacts were less than significant, as construction and demolition waste would be disposed of at regional landfills, green waste centers, and recycling centers, as appropriate. The project minimized construction waste by reusing existing buildings as possible, and recycling construction and demolition waste as possible. No need for new or expanded solid waste facilities off-site was required.

In regard to compliance with regulations related to solid waste, the MND determined that impacts were less than significant, as the project retained the same solid waste through-put capacity as the existing facility. In addition, the project would continue to comply with its existing solid waste permits (SANCO Recycling Permit, the Escondido Resource Recovery Permit, and the Escondido Disposal, Inc. Permit).

Revised Project

Similar to the EDI Master Plan MND, the revised project would not result in significant utilities-related impacts. The revised project would not require the demolition, renovation, or construction of new buildings or infrastructure within the project site beyond what was anticipated in the MND. No new water, storm drain, or sewer connections would be required, and no new project components would require the installation of new utilities or the increased use of existing utilities. Regarding water supply, the land use would be consistent with that allowed by the General Plan. Thus, the anticipated water use based on the planned industrial land use was considered in water supply planning documents, and water use would not increase as a result of implementing the revised project. In addition, the utilization of the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system would not result in any utility and service system impacts, as the natural gas would be directly injected to the existing natural gas pipelines located within the project site.

The revised project would involve demolition and construction that would generate solid waste; however, demolition and construction waste would not substantially change from that anticipated by the MND. As discussed in the MND, the revised project would ensure that construction and demolition waste would be disposed of at regional landfills, green waste centers, and recycling centers, as appropriate. The revised project would minimize construction waste by reusing existing buildings as possible and recycling construction and

demolition waste as possible. The revised project would not result in a need for new or expanded solid waste facilities off-site. Thus, project impacts related to solid waste would be less than significant, the same as the MND. Operational waste would continue to be collected by Escondido Disposal, Inc. and be disposed of at regional landfills. The project would not result in a need for new or expanded solid waste facilities off-site. Revised project impacts related to solid waste would be less than significant. Thus, no new or more severe impacts associated with utilities and service systems would occur as a result of implementing the revised project.

Major revisions to the EDI Master Plan MND are not required due to changes to the project as there have been no substantial changes in circumstances requiring major MND revisions; and there is no new information showing greater significant effects than disclosed in the previous EDI Master Plan MND.

19. Mandatory Findings of Significance

EDI Master Plan MND

The project was found to result in potentially significant impacts related to biological resources, cultural resources, and hazards and hazardous materials. As previously described, all of these impacts were reduced to below a level of significance with implementation of mitigation measures **BIO-1, BIO-2, ARC-1, PAL-1, HAZ-1, and HAZ-2.**

All other project impacts were found to be less than significant without mitigation, and no deficiencies related to the City's General Plan Quality of Life Standards were found to occur. The project would not result in environmental effects that would cause a substantial adverse effect on human beings either directly or indirectly.

Revised Project

Similar to the EDI Master Plan Project, the revised project would result in potentially significant impacts to biological resources, cultural resources, and hazards and hazardous materials. However, all of these impacts would be reduced to less than significant through implementation of the EDI Master Plan MND mitigation measures **BIO-1, BIO-2, ARC-1, PAL-1, HAZ-1, and HAZ-2.** No additional impacts were identified as a result of the revised project, and no deficiencies were identified related to the City's General Plan Quality of Life Standards as a result of the EDI Master Plan Project revisions.

G. Material Used in Preparation of this Analysis

Appendices

A. Final Mitigated Negative Declaration for Escondido Disposal Inc. Master Plan Project, RECON Environmental Inc., August 2015
B. EDI Transfer Station/MRF Expansion Master Plan Supplemental Air Quality Analysis. RECON Environmental, September 11, 2018
C. EDI Transfer Station/MRF Expansion Master Plan Supplemental Greenhouse Gas Analysis, RECON Environmental, September 11, 2018

MITIGATION AND MONITORING PROGRAM

PROJECT NAME: Escondido Disposal Inc. Master Plan

PROJECT DESCRIPTION: The revised project incorporates two main changes:

- Expand the capacity of the anaerobic digestion facility to increase capacity for processing organic waste
- Change how the natural gas produced from the AD facility would be used. Under the revised project, natural gas would be supplied directly into the utility gas pipeline system, rather than to fuel 40 to 50 CNG collection vehicles or generate 5.0 GWh of electricity as original described in the MND.

The AD facility was originally designed with a capacity of 31,200 tons of organic waste per year. Since opening and operation of the facility, it was found that operations generate larger quantities of organics suitable for anaerobic digestion than was anticipated. Therefore, the project proposes to expand the capacity of the anaerobic digestion facility to increase capacity for processing organic waste from 31,200 tons of organic waste per year to a maximum of 237,250 tons of organic waste per year (650 tons per day).

The original MND and solid waste facility permit authorized the facility to accept a maximum of 3,223 tons of municipal solid waste per day. This permitted maximum tonnage would not change with the proposed project revisions; rather existing volumes of organic material would be diverted toward anaerobic digestion. Increasing the capacity of the AD facility would involve installing additional anaerobic digestion equipment (digestion vessels) to provide additional processing capacity.

The revised project would combine the originally proposed Phase 2 and Phase 4 work, as described in the EDI Master Plan MND. Revisions proposed include renovating the mixed MRF facility into an AD receiving and processing building. The revised project would renovate the mixed tipping and transfer station, would demolish the existing bale storage area and office space, and build the AD area and employee area and education center, consistent with the proposed uses in the EDI Master Plan Project. Overall square footage of these individual uses would change under the revised project.

Comparison of Revised Project to EDI Master Plan Project				
EDI Master Plan Project Proposed Use	EDI Master Plan Project Proposed Area (square feet)	Revised Project Proposed Use	Revised Project Square Footage	Overall Square Footage Change
Mixed Tipping and Transfer Station	36,798	Mixed Tipping and Transfer Station	35,910	-888
Mixed MRF	43,150	AD Receiving and Processing	40,335	-2,815
Anaerobic Digestion Area	30,037	Anaerobic Digestion Area	42,731	12,694
Employee Area and Education Center	4,240	Employee Area and Education Center	4,911	671

In addition, the project proposes to utilize the natural gas produced by the anaerobic digestion process to supply natural gas to the utility gas pipeline system, rather than to fuel 40 to 50 CNG collection vehicles or generate 5.0 GWh of electricity, as proposed and discussed in the EDI Master Plan MND. The natural gas generated from the AD facility would be directly injected to the existing natural gas pipelines located within the project site.

APPROVAL BODY/DATE: The original EDI Master Plan MND and mitigation measures detailed below were approved by City Council on June 19, 2015. These mitigation measures will continue to apply to the revised project and would reduce all potentially significant impacts to less than significant.

CONTACT: Paul K. Bingham, Assistant Planner II

PHONE NUMBER: 760-839-4306

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
Potential impact to raptors protected by the California Department of Fish and Wildlife, and potential impact to nesting birds protected by the Migratory Bird Treaty Act	**BIO-1:** A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.	Applicant		
	BIO-2: If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.	Applicant		
Potential impact to unknown subsurface archaeological resources	**ARC-1:** An archaeological resources monitoring program shall be implemented, which shall include the following: A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.			
Potential impact to unknown subsurface paleontological resources	**PAL-2:** Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below: 1. A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist). 2. In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense. 3. A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.			
Potential impacts associated with the routine transport, use, or disposal of hazardous materials (asbestos and lead)	**HAZ-1:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.	Applicant		

Impact	Mitigation Measure	Responsible Party	Certified Completion	Comments
	HAZ-2: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all buildings to be demolished or renovated under the applicable permit. All lead containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).	Applicant		

APPENDICES

Bound Under Separate Cover

APPENDICES

APPENDIX A

Final Mitigated Negative Declaration for Escondido Disposal Inc. Master Plan Project, RECON Environmental Inc., August 2015

Escondido Disposal Inc. Master Plan

Final Mitigated Negative Declaration

SCH #2015061066
City Project # PHG 15-0010/ENV 15-0005

August 2015

Prepared for:

City of Escondido
Planning Division
201 North Broadway
Escondido, CA 92025

Prepared by:

RECON Environmental
1927 Fifth Avenue
San Diego, CA 92101

Comments Received on the Draft MND and Responses

All comments received on the Draft MND have been coded to facilitate identification and tracking. Each of the comment letters, forms, and emails received during the public comment period was assigned an identification number. These documents were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. To aid the readers and each commenter, the comment letters and responses have been reproduced together on a single sheet of paper, with the numbered comment letter on the left side of the page and the corresponding numbered response on the right side of the page.

Letter	Commenter	Date
A	Scott Morgan, Director, State Clearinghouse	July 23, 2015
B	Megan Emslander, Environmental Scientist, CalRecycle	July 22, 2015
C	KariLyn A. Merlos, Supervisor, Local Enforcement Agency	July 23, 2015

Letter A

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

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

July 23, 2015

RECEIVED
JUL 27 2015
PLANNING DIVISION

Rozanne Cherry
City of Escondido
201 North Broadway
Escondido, CA 92025-2798

Subject: CUP for Escondido Disposal Inc (EDI) Transfer Station / MRF Master Plan Expansion (City File No. ENV15-0005)
SCH#: 2015061066

Dear Rozanne Cherry:

A-1 The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 22, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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

A-1 This letter acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. Comment noted.

Document Details Report
State Clearinghouse Data Base

SCH#	**2015061066**
Project Title	CUP for Escondido Disposal Inc (EDI) Transfer Station / MRF Master Plan Expansion (City File No. ENV15-0005)
Lead Agency	Escondido, City of
Type	**MND** Mitigated Negative Declaration
Description	A Conditional use Permit for the master planned expansion of the existing transfer station/materials recovery facility (TS/MRF) into the adjacent parcel to the north and reconfiguration of uses to provide additional sorting & improve recovery of recyclable material for more efficient operations. The project would provide a total of 216,476 sf of TS/MRF building area. No change to the current approved throughput capacity is proposed. The project would include renovation of several structures, a well as demolition & new construction of buildings, off-site storm drain improvements and construction of an anaerobic digester that would produce biogas to generate electricity for the facilities and/or provide CNG fuel for collection vehicles. The project would be constructed in 4 phases.

Lead Agency Contact

Name	Rozanne Cherry		
Agency	City of Escondido		
Phone	760 839 4536	***Fax***	
email			
Address	201 North Broadway		
City	Escondido	***State*** CA	***Zip*** 92025-2798

Project Location

County	San Diego		
City	Escondido		
Region			
Lat / Long			
Cross Streets	W. Washington Ave. between Metcalf St. and Rock Springs Road		
Parcel No.	228-250-1600, -1700, -7700, -7800		
Township	***Range***	***Section***	***Base***

Proximity to:

Highways	Hwy 78 & I-15
Airports	
Railways	NCTD Sprinter
Waterways	
Schools	
Land Use	Solid waste transfer station & materials recovery facilities / M-1 & M-2 / Light & General industrial
Project Issues	Air Quality; Archaeologic-Historic; Biological Resources; Noise; Solid Waste; Toxic/Hazardous
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission
Date Received	06/23/2015 ***Start of Review*** 06/23/2015 ***End of Review*** 07/22/2015

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

Letter B

California Environmental Protection Agency Edmund G. Brown, Jr., Governor

CalRecycle DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027
P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

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July 22, 2015

RECEIVED
JUL 21 2015
STATE CLEARING HOUSE

City of Escondido
Rozanne Cherry
City of Escondido Planning Division
201 North Broadway
Escondido, CA 92025-2798

Subject: **SCH No. 2015061066** - Draft Mitigated Negative Declaration for the Proposed Master Planned Expansion and Renovation of the Existing Escondido Disposal Inc. (EDI) Transfer Station and Materials Recovery Facility [SANCO Recycling, Facility No. 37-AA-0965 and Escondido Resource Recovery, Facility No. 37-AA-0906], San Diego County

Dear Ms. Cherry:

B-1 Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of Escondido Planning Division, acting as Lead Agency, has prepared and circulated an Initial Study and 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 project is an expansion of the existing Escondido Resource Recovery facility located at 1044 W. Washington Avenue in the industrial area of Escondido in San Diego County. With the expansion the project site will increase from 6 acres to 11.1 acres. The two transfer processing facilities of Escondido Resource Recovery (37-AA-0906) and SANCO Recycling (37-AA-0965) will ultimately be combined into one solid waste permit facility through this project. The project does not propose any increase of tonnage in daily or annual allowances.

The proposed project consists of the following: Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI Transfer Station and Materials Recovery Facility (MRF) into the adjacent Mission Avenue parcel to the north and a reconfiguration of uses for more efficient operations. The overall throughput capacity of the facility would not change. The project would include renovation of several structures, as well as demolition and new construction. These improvements would be completed in phases, as follows:

Phase 1: Renovate a warehouse into bale storage, demolish a warehouse and rebuild a single stream MRF/self-haul/construction and demolition (C&D) area, construct a new maintenance canopy, and revise internal traffic flow.

B-1 This comment is an introduction to the comment letter and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft EIR. Therefore, no further response is necessary.

Phase 2: Renovate the existing transfer station into mixed tipping, renovate the existing MRF, and add a new visitor entry.

Phase 3: Renovate the Mission Avenue office.

Phase 4: Demolish the Washington Avenue office and storage, and construct an Anaerobic Digester (AD). The AD would generate natural gas that would be utilized to convert the EDI fleet from diesel to compressed natural gas (CNG)-fueled vehicles.

The proposed parking would provide 106 parking spaces. At nighttime 24 parking spaces would be used for overnight truck parking.

Comments

B-2 CalRecycle's comments on the IS/MND and proposed project are listed in the table below. Specific section, page number and location of comments on issues of concern or items needing clarification are included in the table.

Section	Page and Location	Comment
B-3 Project Purpose	Pg. 3 3rd paragraph	It is stated that "the processing capacity of the facility would remain the same as the existing conditions". Please explain exactly what conditions you are referring to.
B-4 Operations	Pg. 6 5th paragraph	It is stated that "The Solid Waste Facility Permits (SWFP) for Escondido Resource Recovery & SANCO Services would be ultimately combined into one through this project". Please explain how both permits will be combined? How will the tonnage amounts of each facility be combined? How will this project affect the design capacity? State exact measurements and calculations of how separate permitted amounts will be combined.

B-5 Solid Waste Facilities Permits
The San Diego County Department of Environmental Health (as the Local Enforcement Agency (LEA) for San Diego County and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities such as transfer processing, including permitting and inspections. The permitting and regulatory requirements for transfer processing facilities are contained in Title 14 and Title 27 of the California Code of Regulations (14 or 27CCR). Please contact the LEA at 858-495-5799 to discuss the permitting requirements for this proposed project..

Conclusion

B-6 CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

B-2 Responses to specific concerns are addressed in response to comments B-3 and B-4 that follow.

B-3 The "existing condition" is that which is described in the Environmental Checklist Supplemental Comments (page 2) and comprises the facility as it is currently operating. Specifically, the ERR permit (for standard municipal waste) allows a maximum throughput of 2,500 tons per day; while the SANCO permit (for comingled/source separated materials) allows a maximum throughput of 723 tons per day.

B-4 The procedures for combining the permits would be determined by the LEA, in accordance with state guidelines. The applicant and City shall continue to consult with the LEA and acknowledge that close coordination will be required during this process. Additionally, for clarification, the MND contains strikeout/underline revisions which state that the combined permits would allow a maximum throughput of 3,223 tons per day (see MND page 7). While the increase area would increase the size of the facility, the intent is to allow for more efficient separation of materials and greater diversion from landfilling and not to increase the overall maximum daily throughput of 3,223 tons per day. The design capacity of the remodeled facilities will be developed as part of the Transfer Processing Report, which is required as part of the Solid Waste Facility Permit revision through the LEA.

B-5 Comment noted.

B-6 Comment noted. CalRecycle shall be included on the distribution list for copies of any subsequent environmental documents, public notices, or Notice of Determination (NOD) for this project. The NOD will also be sent to the State Clearinghouse.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this project. Refer to 14 CCR, Section 15094(d) that states in part:

> If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].

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

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Sincerely,

Megan Emslander, Environmental Scientist
Permitting and Assistance Branch – South Unit
Waste Permitting, Compliance, and Mitigation Division
CalRecycle

cc: Virginia Rosales, CalRecycle

Anthony Torres, LEA
San Diego County Department of Environmental Health
anthony.torres@sdcounty.ca.gov

Kari Lyn Merlos, Supervisor
San Diego County Department of Environmental Health
karilyn.merlos@sdcounty.ca.gov

Letter C

County of San Diego

ELIZABETH A. POZZEBON
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
SOLID WASTE LOCAL ENFORCEMENT AGENCY
5500 OVERLAND AVENUE, SUITE 170, SAN DIEGO, CA 92123
Phone: (858) 694-2888 Fax: (858) 495-5004
www.sdcdeh.org

AMY HARBERT
ASSISTANT DIRECTOR

July 23, 2015

Rozanne Cherry, Principal Planner
City of Escondido
201 N. Broadway
Escondido, CA 92025
rcherry@ci.escondido.ca.us

RE: DRAFT MITIGATED NEGATIVE DECLARATION FOR ESCONDIDO DISPOSAL INCORPORATED MASTER PLAN CONDITIONAL USE PERMIT (ENV 15-0005/SCH NO: 2015061066)

Dear Ms. Cherry:

C-1 The County of San Diego Department of Environmental Health Solid Waste Local Enforcement Agency (LEA) appreciates the opportunity to review and comment on the Draft Mitigated Negative Declaration (DMND) for the above project.

C-2 The proposed project includes the expansion and reorganization of the footprint of the existing Escondido Disposal Inc. (EDI) Materials Recovery Facilities which include the Escondido Resource Recovery Transfer/Processing Facility and SANCO Recycling co-located at 1044 W. Washington Avenue, Escondido, CA 92025. EDI currently operates the site activities under two Solid Waste Facility Permits issued by the LEA and concurred upon by the California Department of Resources Recycling and Recovery. The combined maximum permitted throughput of the two facilities is 3,223 tons per day. This project does not include an increase to total throughput. Upon approval of this project by the City of Escondido, the applicant will need to submit an application to the LEA for a SWFP revision.

C-3 The applicant should continue to consult with the LEA prior to submission to discuss the scope of the permit revision. Please note, although an Odor Impact Minimization Plan dated December 3, 2014 is included in Attachment 2 to the DMND, this document has not yet been submitted to the LEA for review.

C-4 The LEA offers the following specific comment on the DMND for your consideration:
Page 11 of the Preliminary Water Quality Technical Report (Attachment 6) states that: "Hazardous materials are not expected to be generated on-site…" However pages 3 and 4 of the DMND Environmental Checklist/Supplemental Comments refer to the construction of a Vehicle Maintenance Canopy and page 22 discusses the use of regulated hazardous materials in the operations and maintenance of the site and acknowledges the requirements for a Hazardous Materials Business Plan and related hazardous materials permit. It is also common for some hazardous wastes (oil, batteries,

1

C-1 Comment noted.

C-2 This comment is an introduction to the comment letter and summarizes the proposed project description. This comment does not address the adequacy or accuracy of information presented in the Draft MND. The applicant acknowledges the need to submit an application to the LEA for a Solid Waste Facility Permit (SWFP) revision, and clarification of this requirement has been added to the MND on page 8.

C-3 The applicant acknowledges this comment and will continue to coordinate and consult with the LEA regarding the permit revision and combining. The applicant shall provide the Odor Impact Minimization Plan directly to the LEA for review.

C-4 Although, the Preliminary Water Quality Technical Report states that "Hazardous materials are not expected to be generated on-site; . . ." it goes on to acknowledge that hazardous materials may be encountered on-site. Section VIII of the Environmental Checklist Supplemental Comments discusses the handling of the various hazardous materials.

The existing Household Hazardous Waste (HHW) canopy would remain on-site and unchanged. Further, the use of regulated hazardous materials in routine operations and maintenance of the site and fleet is an existing condition that would continue upon approval of the proposed project. However, the applicant acknowledges that hazardous waste such as oil or batteries occasionally enter the site as part of the waste load check process. The MND contains strikeout/underline revisions on page 22 which provide clarification of these items and discusses the handling, temporary storage, and disposal procedures that are currently in place and which would continue to be implemented by the proposed project.

paint, etc.) to be discovered during the waste load check process. Ensure handling, temporary storage and disposal of hazardous wastes/hazardous materials are adequately described in environmental documents and site facility plans.

C-5 Please continue to include the LEA on the distribution list for copies of subsequent environmental documents, public notices and Notices of Determination for this project. If you should have any questions regarding this letter or the LEA permitting process and requirements, please feel free to contact me at (858) 495-5799 or by e-mail at: karilyn.merlos@sdcounty.ca.gov.

Sincerely,

KARILYN A. MERLOS, Supervisor
Local Enforcement Agency

Cc: Virginia Rosales, CalRecycle
Steve South, EDCO
Rebecca Lafreniere, DEH

C-5 The LEA shall be included on the distribution list for copies of any subsequent environmental documents, public notices, or NODs for this project.

CITY OF ESCONDIDO
Planning Division
201 North Broadway
Escondido, CA 92025-2798
(760) 839-4671
www.ci.escondido.ca.us

Environmental Checklist Form (Initial Study Part II)

1. Project title and case file number: Escondido Disposal Inc. (EDI) Materials Recovery Facility (MRF) Master Plan

2. Lead agency name and address: City of Escondido, 201 N. Broadway, Escondido, CA 92025

3. Lead agency contact person name, title, phone number and email:
   Rozanne Cherry, Principal Planner, 760-839-4557, Rcherry@ci.escondido.ca.us

4. Project location: 1044 W. Washington Avenue, Escondido, CA 92033 (APN 228-250-77 & APN 228-250-16)

5. Project applicant's name, address, phone number and email: Steve South, 1044 W. Washington Avenue, Escondido, CA 92033, 760.744.5615 x155, ssouth@edcodisposal.com

6. General Plan designation: General Industrial (GI)

7. Zoning: M-2

8. Description of project: (Describe the whole action involved, including, but not limited to, later phases of the project and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   The proposed project includes a Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI materials recovery facility (MRF) into the adjacent Mission Avenue parcel to the north and a reconfiguration of uses for more efficient operations. The overall throughput capacity of the facility would not change. The project would include renovation of several structures, as well as demolition and new construction. These improvements would be completed in phases, as follows:

   Phase 1- renovate a warehouse into bale storage, demolish a warehouse and rebuild a single stream MRF/self-haul/construction and demolition (C&D) area, construct a new maintenance canopy, and revise internal traffic flow.

   Phase 2 – renovate the existing transfer station into mixed tipping, renovate the existing MRF, add a new visitor entry.

   Phase 3 – renovate the Mission Avenue office.

   Phase 4 – demolish the Washington Avenue office and storage, and construct an Anaerobic Digester (AD). The AD would generate natural gas that would be utilized to convert the EDI fleet from diesel to compressed natural gas (CNG)-fueled vehicles.

   The proposed parking would provide 106 parking spaces. At nighttime 24 parking spaces would be used for overnight truck parking.

9. Surrounding land uses and setting (briefly describe the project's surroundings):

   The project site includes the 1044 Washington Avenue parcel which contains the existing MRF, in addition to the 1021 W. Mission Avenue parcel with the Golfcraft building. Both parcels are occupied by industrial buildings, parking, and landscaping. There are no notable biological, cultural, or scenic aspects with the exception of the Golfcraft building as denoted in the RECON report.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement).

    Local Enforcement Agency, Air Pollution Control District, County of San Diego Department of Health

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below potentially would be affected by this project involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agricultural Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Geology and Soils
☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities/Service Systems	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.

☒ I find that, although the proposed project might have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made, or agreed to, by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.

☐ I find that the proposed project might have a significant effect on the environment and/or deficiencies exist relative to the City's General Plan Quality of Life Standards, and the extent of the deficiency exceeds the levels identified in the City's Environmental Quality Regulations pursuant to Zoning Code Article 47, Section 33-924 (b), and an ENVIRONMENTAL IMPACT REPORT shall be required.

☐ I find that the proposed project might have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect: a.) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and b.) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT shall be required, but it shall analyze only the effects that remain to be addressed.

☐ I find that, although the proposed project might have a significant effect on the environment, no further documentation is necessary because all potentially significant effects: (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.

Rozanne Cherry — Signature

6-19-15 — Date

Rozanne Cherry, Principal Planner — Printed Name and Title

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. This section evaluates the potential environmental effects of the proposed project, generally using the environmental checklist from the State CEQA Guidelines as amended and the City of Escondido Environmental Quality Regulations (Zoning Code Article 47). A brief explanation in the Environmental Checklist Supplemental Comments is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. All answers must take into account the whole action involved, including off-site, on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts and mitigation measures. Once the lead agency has determined that a particular physical impact might occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. The definitions of the response column headings include the following:

   A. "Potentially Significant Impact" applies if there is substantial evidence that an effect might be significant. If there are one or more "Potentially Significant Impact" entries once the determination is made, an EIR shall be required.

   B. “Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 2 below, "Earlier Analyses," may be cross-referenced). Measures incorporated as part of the Project Description that reduce impacts to a “Less than Significant” level shall be considered mitigation.

   C. “Less Than Significant Impact” applies where the project creates no significant impacts, only less than significant impacts.

   D. "No Impact" applies where a project does not create an impact in that category. “No Impact” answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. Earlier Analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   A. Earlier Analysis Used. Identify and state where it is available for review.

   B. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of an adequately analyzed earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   C. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

3. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

4. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

5. The explanation of each issue should identify the significance of criteria or threshold, if any, used to evaluate each question, as well as the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:				
	a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
	b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
	c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
	d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
II.	**AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
	a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?	☐	☐	☐	☒
	b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
	c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	☐	☐	☐	☒
III.	**AIR QUALITY.** Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
	a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES: Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	**CULTURAL RESOURCES.** Would the project:				
a.	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒
VI.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☒	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐
IX.	**HYDROLOGY AND WATER QUALITY.** Would the project:				
a.	Violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters (Consider temperature, dissolved oxygen, turbidity and other typical storm water pollutants)?	☐	☐	☒	☐
b.	Have potentially significant adverse impacts on ground water quality, including but not limited to, substantially depleting groundwater supplies or substantially interfering with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial/increased erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and/or significant adverse environmental impacts?	☐	☐	☒	☐
e.	Cause significant alteration of receiving water quality during or following construction?	☐	☐	☒	☐
f.	Cause an increase of impervious surfaces and associated run-off?	☐	☐	☒	☐
g.	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Cause potentially significant adverse impact on ground water quality?	☐	☐	☒	☐
i. Cause or contribute to an exceedance of applicable surface or ground water receiving water quality objectives or degradation of beneficial uses?	☐	☐	☒	☐
j. Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?	☐	☐	☒	☐
k. Create or exacerbate already existing environmentally sensitive areas?	☐	☐	☒	☐
l. Create potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?	☐	☐	☒	☐
m. Impact aquatic, wetland or riparian habitat?	☐	☐	☒	☐
n. Otherwise substantially degrade water quality?	☐	☐	☒	☐
o. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
p. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
q. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
r. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
XI.	**MINERAL RESOURCES.** Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land-use plan?	☐	☐	☐	☒
XII.	**NOISE.** Would the project result in:				
a.	Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b.	Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e.	For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.	**POPULATION AND HOUSING.** Would the project:				
	a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
	b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
	c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIV.	**PUBLIC SERVICES.** Would the project:				
	a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i. Fire protection?	☐	☐	☐	☒
	ii. Police protection?	☐	☐	☐	☒
	iii. Schools?	☐	☐	☐	☒
	iv. Parks?	☐	☐	☐	☒
	v. Other public facilities?	☐	☐	☐	☒
XV.	**RECREATION.** Would the project:				
	a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
	b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.	**TRANSPORTATION/TRAFFIC.** Would the project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	☐	☐	☒	☐
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e.	Result in inadequate emergency access?	☐	☐	☐	☒
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
XVII.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c.	Require, or result in, the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e.	Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
XVIII.	**MANDATORY FINDINGS OF SIGNIFICANCE.** Would the project:				
a.	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c.	Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
d.	Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations {Zoning Code Section 33-924 (a) }?	☐	☐	☒	☐

Source of Information/Material Used in Preparation of this Analysis

Attachments

Attachment 1: Air Quality Analysis (RECON 2015)
Attachment 2: Odor Minimization Plan
Attachment 3: Historic Building Survey of Golfcraft Building at 1021 West Mission Avenue, Escondido, California (RECON 2014)
Attachment 4: Greenhouse Gas Analysis (RECON 2015)
Attachment 5: Preliminary Drainage Report (April 2015)
Attachment 6: Preliminary Water Quality Technical Report (April 2015)

Figures

Figure 1: Regional Location
Figure 2: Project Location on an Aerial Photograph
Figure 3: Existing Site
Figure 4: Proposed Site Plan
Figure 5: Anaerobic Digestion of Organic Waste
Figure 6: Circulation Plan
Figure 7: Grading Plan
Figure 8: Landscape Plan
Figure 9: Locations and Dates of Additions

Sources of Information

1. Plan Set (Existing Site Plan, Existing Aerial Site Plan, Area Analysis, Overall Site Circulation, Truck Overnight Parking, Landscape Plan, Grading Plan, Building Elevations, and Overall Site Plan), JRM&A Architects, Engineers, Planners, 2014
2. Historic Building Survey of the Golfcraft Building
3. Preliminary Drainage Report
4. Water Quality Technical Report,
5. Odor Impact Minimization Plan for EDI, Edgar & Associates, December 4, 2014.
6. Air Quality Report, RECON 2015a
7. Historic Building Survey of Golfcraft Building at 1021 West Mission Avenue, Escondido, CA, RECON 2015b
8. Greenhouse Gas Report, RECON 2015c
9. Climate Action Plan, City of Escondido 2013
10. SanGIS, Soils Map. Access 2015 at http://www.sangis.org/
11. Solid Waste Information System, 2014
    SANCO Permit. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0965/Detail/
    Escondido Resource Recovery Permit. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0906/Detail/
    Escondido Disposal, Inc. Permit. Available at: http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0970/Detail/
12. Escondido General Plan, City of Escondido 2012a
13. Escondido General Plan, Downtown Specific Plan and Climate Action Plan EIR, City of Escondido 2012b
14. Escondido Zoning Code and Land Use Map, City of Escondido
15. GEOTRACKER, RWQCB 2014
16. Ramona Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority 2011a
17. McClellan-Palomar Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority 2011b
18. Site Visit - Noise Measurements 2014
19. Site Visit – Photo Survey 2015
20. Project Description and Preliminary Information

Acronyms

AD	Anaerobic Digestion
AB	Assembly Bill
ADT	average daily trips
BMP	Best Management Practices
CAP	Climate Action Plan
CalEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
City	City of Escondido
CNG	compressed natural gas
CO	carbon monoxide
CRHR	California Register of Historic Resources
C&D	construction and demolition
CUP	Conditional Use Permit
dB(A)	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
EDI	Escondido Disposal Incorporated
EPA	Environmental Protection Agency
ERR	Escondido Resource Recovery
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
HHW	household hazardous waste
L_{eq}	hourly equivalent sound level
LID	Low Impact Development
LOS	level of service
MMRP	Mitigation Monitoring and Reporting Program
$MTCO_2E$	metric tons of CO_2 equivalent
MRF	Material Recovery Facility
MSW	municipal solid waste
$MTCO_2E$	metric tons of CO_2 equivalent
NO_2	nitrogen dioxide
NOx	nitrous oxide
OCC	Old Corrugated Container
OSHA	Occupational Safety and Health Administration
PI	Planned Industrial
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulates 2.5 microns or less in diameter
RAQS	Regional Air Quality Strategy
SANDAG	San Diego Association of Governments
SDG&E	San Diego Gas and Electric
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SO_2	sulfur dioxide
TCM	Transportation Control Measure
TMDLs	Total Maximum Daily Loads
TPY	tons per year
V/C	volume to capacity
WQTR	Water Quality Technical Report

MITIGATED NEGATIVE DECLARATION

(Draft)

For Escondido Disposal Incorporated Master Plan

CONDITIONAL USE PERMIT

(City File No. ENV 15-0005/PHG 15-0010)

ENVIRONMENTAL CHECKLIST SUPPLEMENTAL COMMENTS

This Mitigated Negative Declaration (MND) consists of the attached Initial Study Environmental Checklist as well as the Environmental Checklist Supplemental Comments below. These documents will be used by the City of Escondido (City) to determine potential impacts associated with the Escondido Disposal Incorporated (EDI) Master Plan project (proposed project).

INTRODUCTION

The proposed project includes a Conditional Use Permit (CUP) amendment for the master planned expansion of the existing EDI facility (1044 W. Washington Avenue; assessor's parcel numbers [APNs] 228-250-1600, -1700, -7700) into the Golfcraft site (1021 W. Mission Avenue; APN 228-250-7800) located within the City of Escondido, California (Figures 1 through 4) and a reconfiguration of uses for more efficient operations. With the expansion into the Golfcraft site, the project site would increase from 6 acres to 11.1 acres. The master plan improvements include both renovation of existing buildings as well as demolition and reconstruction of buildings, off-site storm drain improvements, and construction of an anaerobic digester. The project would be completed over four phases.

As required by California Environmental Quality Act (CEQA) Guidelines Section 15105, public review comments from public agencies and the other interested parties may submit comments on the MND in writing during the 30-day public review period. The public review period for this project starts on **June 24, 2015** and ends on **July 23, 2015**. Comments shall be submitted to the following address by 5:00 on July 23, 2015:

City of Escondido
Attn: Rozanne Cherry
City of Escondido, Planning Division
201 North Broadway
Escondido, CA 92025-2798

Contact: Rozanne Cherry
Telephone: 760.839.4536
Email: rcherry@escondido.org

A printed copy of this document and associated plans and/or documents are also available for review during the public review period at the address above during normal operation hours or online at www.escondido.org. The City of Escondido General Plan Update (2012); Final Environmental Impact Report (2012); and Climate Action Plan are incorporated by reference. These documents are available for review at or can be contained through the City of Escondido Planning Division or on the City's website. The City will consider all comments received in conjunction with the MND in determining the approval or denial of the proposed project.

EXISTING CONDITIONS

As indicated in Table 1, the project site is currently developed with a total of 175,743 square feet (see Figure 3). The northern parcel (Mission Parcel) (1021 W. Mission Avenue) currently includes the former Golfcraft office building and manufacturing plant building. The southern parcel (Washington Parcel) contains the existing EDI transfer station and materials recovery facility (MRF) (1044 W. Washington Avenue), which includes Escondido Resource Recovery (ERR) and SANCO Recycling. The facilities on the Washington Parcel include a mixed tipping floor, a self-haul area, and a mixed MRF line area in the warehouse portion, an office and bale storage building, and a household hazardous waste (HHW) canopy. Both parcels are almost entirely comprised of hardscape, with the exception of small strips of grass with streetscape trees along the street frontages and parking lot islands with trees and grass. The Mission Parcel is currently accessed from two driveways on Mission Avenue and the Washington parcel is accessed by three driveways on Washington Avenue.

TABLE 1
EXISTING ON-SITE USES

Identified Space	Existing (square feet)
Mission Parcel	
Office	10,372
Manufacturing Plant Building	58,850
Original Plant	*18,330*
Plant Addition	*40,520*
Subtotal	69,222
Washington Parcel	
Transfer Station/MRF	104,955
Mixed Tipping Floor	*36,798*
Self-Haul Area	*17,455*
Materials Recovery line/area	*34,040*
Office	*5,862*
Bale Facility and Bale Storage Area	*10,800*
HHW Canopy	1,566
Subtotal	106,521
TOTAL	175,743

The site currently operates under two Solid Waste Facility Permits issued by the County of San Diego Department of Environmental Health in its role as the Solid Waste Local Enforcement Agency—the SANCO Recycling Permit and the ERR Permit. The ERR and SANCO permits are both for Large Volume Transfer/Processing Facilities. The current SANCO permit allows a maximum throughput of 723 tons per day and a maximum capacity of 960 tons per day. The Escondido Resource Recovery Permit allows maximum throughput of 2,500 tons per day and a maximum capacity of 5,249 tons per day. The ERR permit is intended to allow for standard municipal waste and the SANCO permit is intended to allow for comingle/source separated materials.

The area surrounding (see Figure 2) the project site is completely developed, and includes industrial and commercial uses. A Sprinter Operations Yard and EDI's collection truck fueling and maintenance yard are located south of Washington Avenue; an asphalt paving business (G. W. Weir) and an auto parts business (Fix Auto) are located directly west of the site; RCP Block and Brick, Mission Paint and Body auto repair, and a U-Haul truck rental business are located to the north of Mission Avenue; and another Mission auto repair lot and an AT&T telephone company office with truck yard are located directly east of the site.

Project Purpose

The purpose of the project is to reorganize and expand the existing facility to provide for a more efficient and effective operations to achieve current state recycling objectives. The redesign, as shown in Figure 4, will allow for separation of self-haulers, i.e., private citizens dumping at the transfer station, from contracted haulers. The addition of a scale off

Mission Avenue would eliminate the current self-hauler "go-backs," which is when a self-hauler is required to exit the site on Washington Avenue and reenter the site at the same point they originally entered to be weighed.

The additional floor space provided would not only separate the different types of users it would provide area needed to separate the various streams of materials, e.g., construction and demolition (C&D), green waste, recyclables, and municipal solid waste (MSW), and increase diversion. The project would also incorporate an anaerobic digester (AD), which would be capable of reducing green waste and MSW mass by 30 percent and creating biogas that can be used in power generation or in compressed natural gas fueled trucks. As discussed below, the diversion requirements are necessary to achieve current state recycling objectives.

As part of the reorganization of the site, the existing EDI facility would be expanded to include the site to the north. While this would increase the footprint of the facility, the processing capacity of the facility would remain the same as the existing conditions (see above). Specifically, the facility footprint is being expanded to meet the following state objectives:

- Assembly Bill (AB) 939: Requires each city or county plan to include an implementation schedule which shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities.

- AB 32: The Mandatory Commercial Recycling Measure included in this bill focuses on increased commercial waste diversion as a method to reduce greenhouse gas (GHG) emissions. It is designed to achieve a reduction in GHG emissions of 5 million metric tons of carbon dioxide equivalents. To achieve the measure's objective, an additional 2 to 3 million tons of materials annually will need to be recycled from the commercial sector by the year 2020 and beyond.

- AB 341: The Commercial Recycling Requirements mandate that businesses (including public entities) that generate 4 cubic yards or more of commercial solid waste per week and multi-family residential with five units or more arrange for recycling services. Businesses can take one or any combination of the following in order to reuse, recycle, compost, or otherwise divert solid waste from disposal: self-haul, arrange for collection of source-separated recyclables, or subscribe to a recycling service.

- AB 1826: This measure requires businesses that generate 8 cubic yards or more of organic waste to start recycling it by April 2016, and also requires that local jurisdictions implement an organic waste recycling program to receive organic waste from businesses and multi-family developments. This measure includes a scaled approach that increases the organic waste recycling requirements for businesses in 2017, 2019, and 2020. This bill is intended to achieve the GHG reduction goals of AB 32.

Proposed Project

The project proposes to expand the footprint of the existing transfer station to accommodate additional sorting and improve recovery of recyclable material in order to increase diversion of waste from landfills, as required by state regulations. The project does not propose any increase in permitted daily and annual throughput allowances. The project is planned to be constructed in four phases (see Figure 4 and Table 2) as discussed below. However, this phasing plan may ultimately be adjusted to address the future needs and priorities of the recycling facility.

Based on the plans (see Figure 4), Phase 1 would include, but not necessarily in this order: the demolition of approximately 40,520 square feet of the former Golfcraft manufacturing plant building, the renovation and reconfiguration of the original manufacturing building, construction of on-site circulation improvements, installation of new scales at the W. Mission Avenue and W. Washington Avenue access points, and construction of a maintenance canopy. The original Golfcraft manufacturing building would be used to house a 14,977-square-foot baling facility and temporary storage warehouse for bales. The demolished portion of the manufacturing plant would be replaced with a 74,436-square-foot building connected to the baling facility. This building would house a single stream MRF line, a commercial and recyclable tipping area, and a self-haul/C&D materials receiving area. A 4,615-foot maintenance canopy would also be constructed between the new building and the existing transfer station building.

Phase 2 would involve the renovation of the existing transfer station including the existing mixed MRF line and tipping area. While the activities occurring within these buildings would largely remain the same as the existing operation, the removal of the self-haulers and separation of the commercial waste and recyclables would allow for the existing tipping floor and mixed MRF line area to be expanded. The existing mixed tipping area would be expanded to 36,798 square feet and the mixed MRF line area would be expanded to 43,150 square feet. The existing Household Hazardous Waste (HHW) canopy would remain on-site and unchanged. Additionally, as part of Phase 2, an employee break room and visitors center would be constructed inside the existing transfer station.

During Phase 3, the project would renovate the former Golfcraft office building and reconfigure part of the manufacturing plant to provide 10,372 square feet of office space. During Phase 3, the existing EDI offices would be relocated to the former Golfcraft office building.

Phase 4 would include the demolition of the existing baling and bale storage area and EDI office building and construction of a 30,037-square-foot anaerobic digester (AD) facility.

The proposed project would provide for a total of 216,476 square feet of transfer station/MRF building area. As stated, the facility would not increase throughput; rather the increased footprint is necessary to accommodate the separate sorting lines required to meet the increasing state level diversion requirements.

TABLE 2
PROPOSED ON-SITE CHANGES

Identified Space	Existing Area (square feet)	Proposed Change	Proposed Use	Proposed Area (square feet)	Phase
W. Mission Avenue Parcel					
Office	10,372	Renovate	Office	10,372	3
Golfcraft Plant	58,580	Renovate	Bale Storage	14,977	1
Original Plant	18,330	Demolish & Rebuild	Single-Stream MRF/ Self-Haul/C&D	74,436	1
Plant Addition	40,520				
		Build	Vehicle Maintenance Canopy	4,615	1
W. Washington Avenue Parcel					
Tipping Floor Area	36,798	Renovate	Mixed Tipping	36,798	2
Self-Haul Area	17,455	Build	Break Room/ Visitor Center*	4,420	2
		Build	Visitor Entry	525	2
		Renovate	Mixed MRF	43,150	2
MRF Line	34,040				
Bale Storage Area	10,800	Build	Future AD	30,037	4
Office	5,862				
HHW Canopy	1,566	No Change	HHW	1,566	-
TOTAL	175,743	-	-	216,476	-

AD = anaerobic digester
HHW = hazardous household waste
MRF = material recovery facility
C&D = construction and demolition
*Not counted in the total building area as it is included within existing transfer station

The AD facility would also be a key component in meeting the state's waste diversion goals as well as supporting efforts of the state to reduce GHG emissions as the solid waste and recycling industry is at the nexus of increasing landfill diversion of food waste with mandated commercial recycling programs starting in 2016 in order to reduce GHG with the development of anaerobic digestion projects and increased compost use, while producing a carbon negative fuel to run their fleets. Other advantages of AD technology include: increased diversion of waste from disposal, reduced GHG

emissions from waste and operations, and energy production. The state has a goal to have 100 of these facilities operating in the state by 2020 and CalRecycle prepared and certified a program level EIR in 2011 (SCH No. 2010042100). Subsequent to the certification of the Final EIR, CalRecycle prepared *Guidance Document for CEQA Review of Municipal Organic Waste Anaerobic Digester Facilities in California*, August 2011, to provide guidance for tiering off the Final EIR.

The AD facility would be designed to process up to 31,200 tons of food waste and green waste per year. The processed waste would be converted into biogas (a gaseous product generated by the degradation of organic matter under anaerobic conditions). The biogas, a renewable energy source, would be cleaned and converted into biogenic compressed natural gas (CNG) to be used in the generation of power or for fueling vehicles. The undigested waste material (digestate) left over from the AD process would be reduced 30 percent by volume and would be compostable. The biogas from the AD facility is expected to be capable of generating 5.0 million kilowatt hours (kw/hr) per year, enough to power the entire EDI facility, or produce 420,000 diesel gallons equivalent (dge) per year of CNG, which could fuel 40 to 50 collection vehicles annually.

Various equipment would be used to process incoming waste and recyclables and to recover the recyclable materials at every opportunity. The vast majority of the equipment would be located within the buildings and be shielded from public view.

Proposed Equipment

- Conveyor Systems – The reconfiguration of the mixed tipping and materials recovery operations would require additional conveyor systems some of which will carry material between buildings. The conveyor systems used for this application are fairly universal and are designed to handle single stream, C&D, municipal solid waste, compost, secondary plastic, and green/food waste.

- Drum Separator – The drum separator includes a recirculation fan, a separator with a rotating drum, and a connecting expansion chamber. In processing mixed waste, a drum separator is able to use controlled airflow to separate from heavy to very light materials in the waste stream. The separated material (up to 100 tons per hour) is separated automatically by the machine into bins for further processing or transport.

- Old Corrugated Container (OCC) Separator – An OCC separator uses triangular rotating discs to separate corrugated containers from other fiber, plastic and metal containers, and other debris via a bouncing wavelike action. The smaller material falls through while OCCs continue to travel up to another conveyor for recovery.

- Portable Mechanical Grinder – A portable mechanical grinder would be used to process smaller C&D material, green waste, stumps, and other materials. The portable mechanical grinder would likely be of the sort that is mounted upon a semi-tractor trailer. The grinders of the sort considered for this application typically consists of a 650 to 860 horse power hammer mill (up to 60 inches) which can process up to 85 tons of ground material per hour. The purpose of a hammer mill is to shred or crush aggregate material into smaller pieces by the repeated blows of spinning hammers. The mechanical grinder would be used on the transfer floor for processing green waste.

- Size Reducer – Similar to the OCC Separator, the size reducer utilizes triangular discs on a series of shafts that mesh together to shred single stream, municipal solid waste, C&D waste, wood waste, compost, and other materials. Size reducers would be included in the mixed MRF line.

Operations

While the receiving of material is limited between the hours of 7:00 A.M. and 4:30 P.M., the existing facility currently operates 24 hours day 7 days a week and would continue to in the future under the project. The facility essentially operates in two 10-hour shift with cleaning and maintenance activities occurring in the hours between shifts. Table 3 provides a summary of the number of employees working on each shift to operate the facility.

The existing facility includes a mixed MRF line, which would continue operations at its current location within the existing facility. A mixed MRF line accepts a mixed solid waste stream and then proceeds to separate out designated recyclable materials through a combination of manual and mechanical sorting. The sorted recyclable materials may undergo further processing required to meet specifications established by end-markets while the balance of the mixed waste stream would be sent to the AD facility of a disposal facility such as a landfill. A mixed MRF subjects 100 percent of the waste stream to the sorting process, and can target a greater number of materials for recovery than can usually be accommodated by sorting at the source.

TABLE 3
EMPLOYEE SUMMARY

Shift	Employees
Day Shift	
Commingled Recycling	30
Administrative	5
Transfer Drivers	30
Mixed Processing / C&D	25
Anaerobic Digestion	7
Transfer Facility	15
Total	**112**
Night Shift	
Commingled Recycling	30
Administrative	5
Transfer Drivers	0
Mixed Processing / C&D	25
Anaerobic Digestion	7
Transfer Facility	15
Total	**82**

A new single stream MRF line would be installed within the new building on the Mission Parcel. A single stream MRF line refers to a system in which all paper fibers, plastics, metals, and other containers are mixed in a collection truck, instead of being sorted by the depositor into separate commodities and handled separately throughout the collection process. In single stream, both the collection and processing systems are designed to handle this fully commingled mixture of recyclables, with materials being separated for reuse and baling.

In general the MRF line process involves dumping the incoming materials on a large tipping floor where a wheel loader is used to move the mixed recyclables to an inclined conveyor which feeds a presort conveyor. The loader also mixes incoming loads in order to help provide a consistent feed down the line. Sorting personnel then remove bulky items, garbage, and other throw-outs and open and remove plastic bags. From there, materials pass over a disk screen which separates OCC and then pass over a series of screens which separate out the containers and direct streams of material to sorting decks. On these decks, sorting personnel remove mixed paper and residues. The conveyors are equipped with variable speed controls to optimize the depth of material on the conveyors and the sorting speed. Approximately 25 to 30 sorters would work each shift, depending on the sorting line, along with a number of equipment operators. After sorting, the recyclable materials are usually baled and loaded onto trucks for transport to businesses which manufacture new products.

As with the MRF, the digester would use similar equipment to sort and transport organic materials into the digester. Within the digester, decomposition occurs in four phases: hydrolysis, acidogenesis, acetogenesis, and methanogeneis resulting in methane, carbon dioxide, water and digestate/residuals. The AD process is shown in Figure 5.

The Solid Waste Facility Permits (SWFP) for Escondido Resource Recovery & SANCO Services (which are issued by the San Diego County Department of Environmental Health (DEH) in its role as the Local Enforcement Agency [LEA]) would be ultimately combined into one through this project. Combining the SANCO existing permitted maximum throughput of 723 tons per day and the ERR maximum throughput of 2,500 tons per day will result in a total of 3,223 tons per day maximum throughput for the combined permit. The intent of the increased area is to allow for more efficient separation of materials and greater diversion from landfilling and not to increase the maximum throughput. The design capacity of the remodeled facilities will be developed as part of the Transfer Processing Report during the revision to the SWFP through the DEH-LEA.

Circulation and Parking

The site includes three driveways on Mission Avenue and three driveways on W. Washington Avenue. The new internal circulation improvements would be a major component of the project to improve the efficiency of the recycling facility operations. Internal routes have been designed for transfer, shipping, HHW, collection, self-haul/C&D and employee/visitor traffic. Refer to Figure 6 for a detailed diagram of internal traffic flow.

As shown on Figure 6, each proposed area would have a dedicated parking lot to reduce internal traffic back-ups and blockages as well. The standard parking stalls would be focused on the northern and southern sides of the site near the driveways. Truck parking, including overnight truck parking, would be provided near the shipping dock, mixed tipping, mixed MRF, and along the internal HHW roadway loop. The total site parking would include 82 standard-size parking stalls and 40 semi-truck parking stalls.

Grading and Utilities

The project would involve disturbance of 8.62 acres of the 11.1-acre site (Figure 7); however, very little actual grading would occur as the proposed site grades closely match the existing grade. The grading that would occur is primarily the result of the demolition of existing surface improvements which are a maximum of approximately 12 inches thick. The AD facility would require an 8-foot-deep percolate basement below the facility to collect and temporarily hold the digestate. Based on these estimates a maximum of 7,000 cubic yards of material would be removed from the site. This quantity includes both soils and demolished asphalt/concrete. Sliver cuts would occur along the western boundary in order to install the bioretention area; these cuts would be a maximum of 2 feet deep. No cut or fill slopes or retaining walls are proposed and the site grade is less than 10 percent slope.

Off-site improvements would include the removal of the current EDI office driveway and widening of the other two existing driveways along W. Washington Avenue. In addition, the project would install a 36-inch reinforced concrete pipe (RCP) for storm water conveyance in W. Washington Avenue. The RCP would extend along the right-of-way to connect downstream of Metcalf Street. Along the W. Mission Avenue frontage, the project would improve the existing driveway and construct a new driveway south of the existing driveway on W. Mission Avenue.

The City has water, sewer, and storm drain lines within the local roadways surrounding the project site. As with the existing development, the proposed project would include an on-site system that would connect to these existing off-site City utilities.

Landscaping

The proposed Master Plan reorganizes the site, including the circulation, parking, and landscaping such that very little of the existing landscaping would remain. Existing turf along W. Mission Avenue would remain as shown on the Landscaping Plan (Figure 8). New xeric accent plantings (Mexican grass tree and red yucca) with pervious cobble and crushed gravel would be installed along the site entrances on W. Washington Avenue. Bioswale plantings would be provided along the western perimeter, interspersed with eastern redbud and acacia trees for screening purposes. Low water use plantings (deer grass, coral aloe, and trailing rosemary) would be included throughout the parking area. Overall, Master Plan improvements would decrease the impervious area by 29,991 square feet and increase the landscaped area by the same amount.

Demolition and Construction

The project would be implemented over four primary phases. The project would be phased over a period of approximately 5 years. The initial phases would be focused on improving the recycling facility drop-off, sorting areas and

internal circulation first, then the office area and future AD area. This phasing may ultimately be adjusted to address the future needs and priorities of the recycling facility. The phases are summarized below:

Phase 1

- Renovate the original Golfcraft manufacturing plant into a bale storage facility
- Demolish the southern additions to the former Golfcraft manufacturing plant
- Construct a new building to house the single-stream MRF, self-haul and C&D tipping and processing areas
- Revise the internal circulation and install scales
- Construct the vehicle maintenance canopy
- Off-site storm water improvements

Phase 2

- Renovate the existing transfer station into a mixed tipping area
- Renovate the existing MRF (also includes construction of a break room/education room)

Phase 3

- Renovate the former Golfcraft office building

Phase 4

- Demolish the existing storage and office building on Washington Avenue
- Construct a new building and canopy for future AD
- Construct facilities for power generation or CNG fueling

Other Required Permits

- Revised SWFP through the LEA, including a Transfer Process Report
- Hazardous Materials Business Plan

ISSUES:

I. AESTHETICS

a. Have a substantial adverse effect on a scenic vista?

No Impact. The project site is visible from I-15 and the adjacent local streets, which consist of W. Washington Avenue and Mission Avenue. Due to the flat topography of the area and the intervening buildings, the site is not highly visible from other local roadways such as Metcalf Street or Rock Springs Road.

The General Plan (Resource Conservation Chapter; City of Escondido 2012a) identifies scenic vistas as views of "ridgelines, unique landforms, visual gateways and edges of the community." The adjacent local roadways do not have scenic vistas due to topography and intervening structures. Motorists on Interstate 15 (I-15) have a more expansive view due to the raised I-15 elevation. Views from the I-15 area that include the project site have mountains and ridgelines in the distance. Redevelopment of the project site would not affect those views. The site is already developed with buildings that are partially visible from the I-15, and the proposed redevelopment would not significantly alter the site characteristic or affect the distant view of the mountains. Thus, the project would have no impact to a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The site is currently developed (see Figure 3), and scenic resources on-site consist of landscaping trees (palms, eucalyptus, etc.) and the original Golfcraft building (see Section V, Cultural Resources). Article 55, Section 33-1068 of the City's Zoning Ordinance protects mature trees, and requires their preservation or, in the event that trees are to be removed, their replacement. Per this regulation, the project would be required to replace significant mature trees at a one-to-one ratio. The project would retain and repurpose the Golfcraft building. The site does not include any other scenic resources that are identified as significant by the General Plan (2012), such as "ridgelines, unique landforms, visual gateways and edges of the community." The site is located approximately 1,000 feet east of I-15, but this segment of I-15 is not a state scenic highway.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. The site is located in the urbanized, industrial area of the City and is completely developed with commercial and industrial uses. The project would reorganize the site, but the industrial character would remain similar to the existing conditions. Both the existing and proposed conditions include large warehouse-sized buildings with surface parking lots full of semi-trucks, trash trucks, and standard size vehicles. The project would include a decorative screen wall along W. Washington Avenue and the view of the office area along Mission Avenue would not substantially change from the existing conditions. Overall, the project would have no impact to visual character or quality.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. Article 35 of the City's Zoning Ordinance, referred to as the Escondido Outdoor Lighting Ordinance, is intended to minimize unnecessary nighttime lighting and glare for the benefit of the citizens of the City and astronomical research at Palomar Mountain Observatory. In Section 33-713, the ordinance defines requirements for outdoor lighting, such as shielding and automatic timing devices. Shielding would also minimize nuisance light to neighboring land uses. The proposed project would comply with this ordinance and shield and direct light downward and away from property line to prevent light spillage onto neighboring properties and the night sky. Considering this and the fact that the site is currently developed with lighting, the overall change in lighting at the site would be minimal.

As the project would orient light down ward and would reduce lighting in non-work areas at night, potential glare impact along this Washington Avenue would not be substantial. The project would renovate the existing office, but no major changes in window area would occur. Thus, the project would have no impact related to substantial glare.

II. AGRICULTURAL RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency or (for annexations only) as defined by the adopted policies of the Local Agency Formation Commission, to non-agricultural use?*

b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

c. *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

No Impact. The project site is developed and does not include any active agricultural uses or agricultural resources. The site is not zoned for agricultural uses and is not adjacent to areas zoned for or in agricultural use. Therefore, the project would have no direct or indirect agricultural resource impact.

III. AIR QUALITY

Where applicable, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a. *Conflict with or obstruct implementation of the applicable air quality plan?*

Less than Significant Impact. The California Clean Air Act requires areas that are designated nonattainment of state ambient air quality standards for ozone, carbon monoxide (CO), sulfur dioxide (SO_2), and nitrogen dioxide (NO_2) to prepare and implement plans to attain the standards by the earliest practicable date. The San Diego Air Basin (SDAB) is designated nonattainment for ozone. Accordingly, the Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state standard for ozone particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) (but as noted, the California Clean Air Act only requires, in this case, a plan for ozone). The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the Transportation Control Measures (TCM), were most recently adopted in 2009 as the air quality plan for the region.

The stationary source control measures identified in the RAQS include maximum daily operational emission limits. RECON prepared an air quality analysis (RECON 2015a; Attachment 1) to determine the operational emissions generated by the project. Table 4 displays air quality emission generated by operation of the proposed project. Operational emissions shown in the Table 4 are the worst-case scenario (electricity or CNG production) for each individual criteria pollutant. As shown in the table, project emissions would be less than

the significance thresholds for all criteria pollutants including ROG and NO_X. As such, the project would not affect the RAQs implementation and impacts would be less than significant.

TABLE 4
MAXIMUM DAILY OPERATIONAL EMISSIONS
(pounds per day)

Source	ROG[1]	NO_X	CO	SO_x[2]	PM_{10}	$PM_{2.5}$
Mobile	1.4	2.9	13.7	<0.1	2.6	0.7
Area	5.6	0.7	0.6	<0.1	36.2	36.2
AD Facility	15.0	58.1	132.1	32.9	0.2	0.2
Total	22.0	61.6	146.3	32.9	38.9	37.0
Significance Threshold	55	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*

SOURCE: RECON 2015a.
[1]ROG and VOC are interchangeable in this context.
[2]Emissions calculated by CalEEMod 2013.2.2 are for SO_2.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact. The project would generate air pollutants during both construction and operation. Thus, an air quality analysis of both of these project phases is provided below.

Construction

While the project construction may be phased, this construction air quality emission analysis is based on the worst-case immediate buildout of the project. Construction would include the proposed demolition, grading, renovation and construction as described in the project description. The project's construction emissions are presented in Table 5. As shown, worst-case emissions would be less than the thresholds for all criteria pollutants. Since construction would be phased, actual emissions would be less than those calculated. Construction impacts would be less than significant.

TABLE 5
WORST-CASE CONSTRUCTION EMISSIONS
(pounds per day)

Pollutant	Construction Emissions	Significance Thresholds
ROG	11.7	75
NO_x	72.2	250
CO	57.8	550
SO_2	0.1	250
PM_{10}	7.5	100
$PM_{2.5}$	4.1	55

Operation

The existing site is currently a source of operational pollutant emissions. The completion of the proposed project would increase daily operational emissions, as discussed under "Air Quality Plans" above. However, as the operational emissions would be less than the applicable threshold for all criteria pollutant, operational emissions would be less than significant.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact. The region is classified as attainment for all criterion pollutants except ozone, PM_{10}, and $PM_{2.5}$. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Nitrogen oxides and hydrocarbons (ROG) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. As discussed in Sections III(a) and III(b) above, project-emissions would be less than the significance threshold for ROG and NO_X. Thus, impacts would be less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?

No Impact. A sensitive receptor is a person who is particularly susceptible to health effects due to exposure to an air contaminant. Examples of land uses which may have sensitive receptors include residences, schools, playgrounds, child care centers, churches, athletic facilities, retirement homes, and long-term health care facilities. As the site is located in an industrial/commercial area, the area adjacent to the site does not include sensitive receptors.

Operational emissions include CO and diesel particulate matter (DPM) emissions associated with vehicle traffic. The project would not change the throughput of existing EDI Recycling Facility. Thus, the project would not substantially affect the amount of traffic or the number of heavy trucks associated with the project. Therefore, CO and DPM would not increase compared to the existing condition. No impacts would occur.

The project AD facility may produce up to 420,000 diesel gallon equivalent (dge) of CNG per year. Under this scenario, the AD facility would fuel 40 CNG-fueled collection vehicles that would otherwise remain diesel fueled. Overall, the proposed project change from diesel to CNG vehicles would reduce vehicular CO emissions by 70 to 90 percent relative to the existing conditions. Thus, the project would result in beneficial air quality impacts, and would have no impact to sensitive receptors.

e. Create objectionable odors affecting a substantial number of people?

Less than Significant Impact. The existing EDI Recycling Facility currently collects mixed solid waste (MSW), recyclables, and green waste for processing and transfer. To reduce potential odors from organics, the maximum allowable hold time for all MSW, green waste, and food waste is restricted to 48 hours. If an odor is detected, the site operator investigates the source of the odor and determines whether the odor is travelling beyond the site and whether on-site practices could remedy the problem. Roll-up doors to waste handling and separation areas are closed when the facility is not in operation. The project would reorganize the EDI Recycling Facility. All existing odor minimization measures would remain in place at the existing facility and would be applied at the new facility. As such, the project would not result in increased odor from waste handling and separation areas.

The project would be operated in compliance with an Odor Impact Minimization Plan (Edgar & Associates 2014; Attachment 2). The AD facility would be completely enclosed and placed on a negative air flow to draw any potential odors inward. All exhaust air generated from AD operations would be treated using a biofilter system to control odors. Thus, the AD facility would not generate substantial odors and impacts would be less than significant.

CNG-fueled collection vehicles would replace diesel-powered collection vehicles. Thus, the project would reduce odors from diesel exhaust but potentially increase CNG exhaust odors. In the scenario where natural gas in compressed for use a fuel for collection vehicles, CNG fuel would be treated by two air pre-treatment technologies prior to distribution to vehicles. First, an acid scrubber would remove ammonia from exhaust air generated from digester shutdown operations and in-vessel composting tunnels that would be optimized for the

removal of ammonia. After air is treated in the acid scrubber it would be moisturized in an automated humidifier to assure proper process conditions are maintained for biological oxidation. Thus, the CNG fuel would not be odorous and CNG fueled vehicles would not generate odors. Thus, under CEQA definitions the project operational emissions to sensitive receptors would be considered less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less than significant with mitigation. The mature trees on-site have potential biological value, as they may provide nesting opportunities. Raptor breeding is protected by the California Department of Fish and Wildlife Code, and migratory bird nesting is protected by the Migratory Bird Treaty Act. In accordance with these regulations, the following mitigation would be placed on any construction permits issued by the City for this project:

BIO-1 A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.

BIO-2 If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

Implementation of these measures would ensure avoidance of nesting raptor and migratory bird impacts. Thus, biological resource impact would be less than significant with mitigation.

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

c. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No impact. The site is currently developed and includes buildings, hardscape, and landscaping. No native habitats or wetlands exist on-site.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than Significant. The site was previously graded and is currently developed. The existing buildings on-site were constructed between 1952 and 1995. Considering some structures are over 50 years old, a Historic Building Survey Report (RECON 2015b; Attachment 3) was conducted for the existing Mission Avenue building. The analysis below is based on that report, which determines resource significance based on California Register of Historical Resources (CRHR) evaluative criteria and the seven applicable City's Historic Resources Code (Article 40, sec. 33-794, Escondido Zoning Ordinances) criteria. In summary, the Golfcraft building is a significant historical resource but the project would have a less than significant impact because it would retain and reuse the original office building. The plant additions (Figure 9) added in between 1964 and 1980 are not a significant historical resource.

Building History

The Mission Avenue building includes an original 1952 structure, as well as various add-ons completed throughout the years (see Figure 3). The original structure housed the Golfcraft plant that manufactured and sold golf equipment. The office portion of the original building is currently contemporary commercial concrete block with stucco exterior, flat roof, with two horizontal window bands and a door. Features include glass blocks, pilasters, and a red brick planter. The original warehouse is enclosed by additions with the exception of the northeast wall. The curved composition roof is supported by wooden bowstring trusses, and the original wall is concrete block with seven large windows.

The 2001 Escondido Historic Architecture Update Survey identifies the Golfcraft building as individually significant because of its association with the relocation of Golfcraft from the Midwest to the west coast. The site is also associated with Edward Woolley, who was a professional golfer. He owned and managed the Escondido Golfcraft facility since its opening and grew the business into 167 workers by 1965. The business was also responsible for technological advances; it was the first to develop fiberglass club shafts, a machine that analyzed golfers swing to determine the appropriate club, and a machine that replicates swings to test balls and clubs. Woolley retired in 1971.

Significance Determination

CEQA

The Golfcraft building was determined to meet two of the four CRHR criteria. The site was considered to be associated with the lives of persons important to the nation or to California's past (Criterion B), as it is associated with Mr. Woolley who made a significant contribution to the development of the golf industry in the U.S. and California. The site also embodies a distinctive construction characteristic (Criteria C) since it represents Contemporary Commercial through its strong roofline, windows, and concrete construction. The site is not associated with events significant to Californian or U.S. history (Criterion A) and does not have significant prehistory or history information (Criterion D). Overall, the Golfcraft building is eligible for California

Register of Historical Places listing under Criteria B and C, and is therefore a significant historical resource under CEQA.

City

Of the 13 City historical significance criteria, the seven potentially applicable to the building are analyzed below. A historic property must meet at least two of these criteria to be eligible for inclusion on the local register of historic places or be given historic landmark status. The Golfcraft building is eligible for listing on the Local Register of Historic Places under Criteria 1, 2, 4, and 5, as discussed below and detailed in the Historic Building Survey Report (RECON 2014b).

1 Resources that are strongly identified with a person or persons who significantly contributed to the culture, history, pre-history, or development of the city of Escondido, region, state, or nation.

☒ The site meets criterion 1, as it was associated with Mr. Wooley between 1952 and 1971, the plant made significant golf-related technological advances on a national level, and brought the golf industry to Escondido.

2 Building or buildings that embody distinguishing characteristics of architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered.

☒ While no information could be found regarding an architect associated with the design of the Golfcraft building, the original building and the two subsequent additions are prime examples of Contemporary Commercial style of the 1950s to 1960s time period. Thus, the site meets this criterion.

3 Historical resources that are connected with a business or use that was once common but is now rare.

☐ There are no features of the building specific to the golf industry and the site does not meet this criterion.

4 Historical resources that are the site of significant historical events.

☒ Woolley Manufacturing developed three important innovations in the golf industry at the site, which are considered significant historical events.

5 Historical resources that are 50 years old or have achieved historical significance within the past 50 years.

☒ The majority of the building is over 50 years old, and so does meet this criterion.

6 Historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, or district.

☐ The Golfcraft building is not a key focal point in the visual quality or character of its surrounding neighborhood.

7 Historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type.

☐ The Golfcraft building does not qualify under this criterion. There are numerous other buildings in the Contemporary Commercial architectural style in Escondido.

Current Integrity

The site has been modified since its original construction, and therefore an integrity analysis is important to determine if the site currently qualifies for listing and, as analyzed below, if the project would affect the integrity significantly. Integrity is necessary for the property to convey its proposed significance. There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. While the first two additions changed the exterior of the original structure, they were completed consistent with the original design and did not affect the integrity of the building significantly. However, the plant additions did not match the original design features such as the multi-light, metal-framed windows. The building is located at its original site, and the current surrounding commercial and industrial is similar to the 1950s setting. The stucco-faced additions do not match the original block structure building materials or workmanship, which reduces integrity. The office portion of the building retains its original feel, while the plant portion has more of a monolithic feel. Since most the additions occurred when Mr. Woolley was operating the facility, the building's association with him is still intact. Overall, the office has more remaining integrity than the plant portion, but both have sufficient integrity to support its eligibility under CEQA and City of Escondido criteria.

Project Impacts

The project proposes to renovate the office and retain the core components for reuse. The most current plans for the utilization of the Golfcraft building by Escondido Disposal, Incorporated call for the retention of the core components of the building for reuse. The plans for remodeling of the office exterior to alter the front door, remove the pilasters, and modify the parapet roofline have been dropped, and the office portion of the building façade will be retained in its current configuration. The only modification will be covering the existing block above the front entrance area between the two pilasters with a wide metal facing. This metal facing will not extend above the existing roofline, so the pilasters will continue to extend above the main roofline. The metal facing will set less than four inches away from the wall so the area between the pilasters will still be inset. The metal facing will be capped with a metal strip set flush with the current roofline. The metal covering will continue the horizontal feel and the basic horizontal massing of the façade. Signage is planned to be attached to the metal facing, which will not need alterations of the building to install. As currently designed, the proposed alterations to the façade will not have a significant impact to the integrity of the Golfcraft building.

Plans also call for demolishing the majority of the additions to the plant portion of the building. As currently proposed, the two additions constructed between 1964 and 1980 will be demolished, as well as the small 1952–1964 addition. The 1964–1980 additions may be associated with the period of Woolley's ownership of Golfcraft between 1952 and 1971. The 210 feet by 24 feet flat-roofed building along the southwest side of the original plant has only a single exterior wall which displays no unique architectural design features. This wall does not contribute to the Contemporary Commercial architectural style of the building. The second addition, the largest, also displays no Contemporary Commercial design elements. It is strictly a utilitarian, industrial design addition. It also does not have the banks of multi-light metal frame windows present on the 1964–1980 addition exterior wall. The loss of these two additions would not significantly alter the integrity of the original plant building.

The southwest wall of the original plant building will be exposed when the 1964–1980 additions are removed. Current plans call for a complete demolition of the existing wall and construction of a new wall with shipping dock, ramps, and access doors. The wall currently has four large rectangular holes which were probably originally banks of windows. There are also two doors on the southeastern end of the wall. Since no photographs or drawings of the original plant configuration were found it is difficult to know if these openings were part of the original design, especially the doors.

The northeast wall of the original plant building will remain an exterior wall. Current plans call for retention of the existing shed roof, wood patio cover, windows, and doors.

The small 1953–1964 addition is mostly surrounded by building and only a single northeast-facing exterior wall is visible. This wall has no architectural detail, and its loss would not be a significant impact to the integrity of the plant building.

In summary, the current plans for the reuse of part of the Golfcraft building and demolition of some of the additions to the plant portion of the building will not have a significant adverse impact on the integrity of the Golfcraft building. The office portion of the building would be retained in its current condition, with no significant exterior structural alterations. The addition of a metal strip above the door and windows will not alter the design of the office façade and is not an irreversible alteration. The demolition of one wall of the original plant building area will not have a significant impact on the integrity of the plant building. The Golfcraft building will remain eligible for listing on the CRHR and the City of Escondido Local Register of Historic Places. Impacts would be less than significant.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant with Mitigation. Since substantial subsurface excavation was not previously required to construct the existing development and the site is located in a flat valley area that was near a river, there is potential that subsurface archaeological resources could exist. Proposed grading would involve cuts up to 9 feet in depth and up to approximately 7,000 cubic yards of total earthwork. Thus, the proposed grading could impact significant archaeological resources and mitigation would be required to reduce this potential impact to below a level of significance. Mitigation would consist of grading monitoring by qualified archaeology and Native American monitors as follows:

ARC-1: A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation. Underlying geology includes Old Alluvial Valley Deposits (late to middle Pleistocene), which is a formation with a moderate potential to yield paleontological resources (City of Escondido 2012b). Given that the site was previously graded to complete the existing development on-site, the site is also underlain by fill. The site does not contain any unique geologic features.

If earthwork extends into the underlying Old Alluvial Valley Deposits, it could potentially damage or destroy significant fossils. Destruction or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. The project involves grading cuts up to 2 feet within a narrow swath along the western project boundary in order to construct the bio-swales; this grading is not anticipated to extend into the Old Alluvial Valley Deposits and would be less than significant. Further, the majority of the cut is located within previously disturbed soils where no potential for significant paleontological resources exists. However, there is a limited area within the southern portion of the site, adjacent to Washington Avenue building in which there would be grading up to 9 feet in depth to construct a basement. The basement would catch percolate from the anaerobic digester proposed as part of Phase 4. The impact associated with grading for the percolate basement would be potentially significant and would require mitigation. Mitigation would consist of grading monitoring by a qualified paleontological monitor as follows:

PAL-1 Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:

- A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).

- In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.

- A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

d. Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. If any remains are encountered, the project would proceed in accordance with CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5). Thus, the project would have no impact to human remains.

VI. GEOLOGY AND SOILS

Would the project:

a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

Less than Significant Impact. The site is located within the southern California seismically active region. No known active faults are located on-site or within 15 miles of site vicinity (City of Escondido 2012b). Nonetheless, the site could be subject to significant shaking during a major earthquake on any regional fault. Compliance with the State Uniform Building Code ensures that the risk of seismic ground shaking project impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. According to the General Plan (Figure VI-9), the southern area of the site may be subject to liquefaction. As required by the State Uniform Building Code, the project would be required to

implement standard engineering measures to ensure that impacts would be less than significant impact related to liquefaction.

iv. Landslides?

No Impact. As with the surrounding area, the site is relatively flat. Per the General Plan (Figure VI-9), the site is not located in an area with slopes over 25 percent or in a potential landslide area. Thus, the project would have no impact related to landslides.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. As indicated under Section IX, Hydrology and Water Quality, the project would implement best management practices (BMPs) during construction and operation in compliance with regulations. Project impacts related to soil erosion would be less than significant.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d. Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. As indicated above, the project site may be subject to liquefaction (General Plan Figure VI-9). The soils on-site consist of Ramona sandy loam and Placentia sandy loam (SANGIS 2015), which are not expansive soils (City of Escondido 2012b). The underlying geologic formations in the City are mostly granitic and have a very low potential of subsidence (City of Escondido 2012b). As a part of the grading permit process, the project will complete a geotechnical report. Ultimately, compliance with the State Uniform Building Code ensures that the risk of geologic impacts would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project is connected to the City's wastewater system and would not utilize septic tanks or an alternative wastewater disposal system.

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The City of Escondido has prepared a Climate Action Plan (E-CAP, City of Escondido 2013) demonstrating how the City would reduce GHG emissions. Local GHG reductions would come from improvements to residential and commercial building energy efficiency (45.8 percent), revised land use policies and increased public transportation (33.9 percent), and implementation of a Waste Disposal Program (18.1 percent). The E-CAP establishes a threshold level of 2,500 metric tons of carbon dioxide equivalent ($MTCO_2E$) per year for identifying projects that require a project-specific technical analysis to quantify and mitigate project emissions.

Emissions due to the project were calculated using CalEEMod, and the associated data are included in the GHG analysis prepared by RECON (RECON 2015c; Attachment 4). The emissions sources include

construction (amortized over 30 years), mobile (on-road vehicles), energy use, water use, and solid waste sources, as shown in Table 6.

TABLE 6
PROPOSED FACILITY EMISSIONS IN 2020
($MTCO_2E$ per year)

Emission Source	Facility Emissions
Vehicles	434
Energy Use	775
Area Sources	482
Water Use	266
Solid Waste Disposal	119
Construction	12
Total Emissions	**2,088**

SOURCE: RECON 2015c.

The project would generate 2,088 $MTCO_2E$. This conservatively includes all emissions associated with the entire EDI Recycling Facility even though the project would only renovate and construct part of the EDI Recycling Facility. According to the City's CEQA Thresholds and Screening Tables, projects that generate less than 2,500 $MTCO_2E$ per year would not have a significant impact on the environment as a result of GHG emissions. Therefore, project emissions would result in less than significant impacts.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

Less than Significant Impact. The E-CAP Reduction Measure R2-S1 is implementation of a Waste Disposal Program. The measure sets target disposal rates of 5 pounds per resident and 14 pounds per employee in Escondido. The measure identifies potential methods of achieving this goal as "expanded recycling facilities and increased recycling pickups." Consistent with the measure, this project would expand the EDI Recycling Facility. Additionally, the project would generate less than 2,500 $MTCO_2E$ per year. According to the E-CAP, projects that generate less than 2,500 $MTCO_2E$ would be considered to have a "less than significant GHG emissions impact because of the low amount of GHG emissions generated" (City of Escondido 2013). Thus, the project would be consistent with local plans to reduce GHG emissions.

The project would support the CARB Scoping Plan's Key Recommended Actions for the waste and energy sectors. The Scoping Plan states "meeting the AB 341 mandate 75 percent recycling goal is the best path forward to maximizing GHG emissions reductions from the waste management sector. The purpose of the project is to accommodate the separate sorting lines required to meet the state-level diversion requirements (AB 341). Thus, the project supports AB 341 and the Scoping Plan waste reduction goals.

The Scoping Plan promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. The project would incorporate an AD facility capable of converting 31,200 tons of organic waste into 5.0 gigawatts per hour per year of renewable energy or 420,000 dge per year of CNG, a renewable vehicle fuel source. As discussed in Section 6.4, Assessment Methodology, this analysis conservatively assumes natural gas from the AD facility would be used for generation of electricity. This generation of electricity would offset GHGs that would have been generated by the San Diego Gas & Electric (SDG&E) to produce this amount of energy.

Emissions offsets were modeled using CalEEMod, which calculates emissions based on current SDG&E intensity factors. The project would potentially offset annual emission of 1,637 $MTCO_2E$ from SDG&E using

fossil fuel energy sources. Therefore, as the project would support SDG&E's efforts to achieve RPS requirements, the project is consistent with the Scoping Plan. Overall, the project would reduce GHG emissions generated at the site, and would comply with the E-CAP and associated GHG policies. The project would result in less than significant impacts to applicable plans, policies, and regulations.

VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less than Significant Impact with Mitigation.

Asbestos and Lead

The U.S. Environmental Protection Agency (EPA), California Environmental Protection Agency (CalEPA) and the Occupational Health and Safety Administration (OSHA) regulate hazardous materials, including asbestos- and lead-containing materials. EPA banned several asbestos-containing products in the 1970s (see 40 Code of Federal Regulations [CFR] Part 61, Subpart M; 16 CFR Part 1305; and 16 CFR 1304). Per OSHA (29 CFR 1926.1101 and 29 CFR 1910.1001), insulation, surfacing, asphalt, and vinyl flooring materials prior to 1980 should be assumed to be asbestos-containing materials and handled accordingly. EPA and OSHA require proper abatement and disposal of asbestos- and lead-containing materials to protect human health and safety. If the abatement activities involve over 100 square feet of asbestos-containing materials, then the asbestos abatement is required to be completed or overseen by a certified consultant (Title 8, California Code of Regulations [CCR], Article 2.6, Section 341.15). On a local level, these regulations are implemented through County of San Diego Air Pollution Control District (APCD) and the County of San Diego Department of Environmental Health.

Most of the existing structures on-site have potential to contain asbestos and lead, as they were constructed prior to 1980. As such, the proposed demolition and renovation could result in lead- and asbestos-containing materials becoming airborne and inhalable. The exposure of workers to lead- or asbestos-containing dust would result in a potentially significant hazardous material impact.

To mitigate these potential impacts to below a level of significance, the following shall be implemented:

HAZ-1: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.

HAZ-2: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based

paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. The project would include typical construction activities, which may involve the use of lubricating oils, paints, solvents, and other materials. Operations and maintenance of the proposed project would also involve the use of pesticides, herbicides, cleaning solvents, oils, paints, and other regulated common hazardous materials. ~~As in the existing conditions, the site would include a household hazardous waste drop-off facility and a recycling center that would involve hazardous materials.~~ The project activities would be completed in compliance with regulations, including the proper use, transport, and disposal of hazardous materials. The project would comply with the County DEH requirements, including the requirement to prepare and comply with a Hazardous Materials Business Plan. As in the existing conditions, the site would include an HHW drop-off and a recycling center that would involve hazardous materials. The use of regulated hazardous materials in routine operations and maintenance of the site and fleet vehicles is an existing condition that would continue upon approval of the proposed project. While hazardous wastes such as oil or batteries occasionally enter the site as part of the waste load check process, the handling, temporary storage, and disposal procedures that are currently in place pursuant to an approved Hazardous Materials Business Plan would continue to be implemented by the proposed project. When the Solid Waste Facility Permit is revised, the Hazardous Materials Business Plan will be updated. The site currently is covered by three DEH permits, including the SANCO Recycling permit, the Escondido Resource Recovery Permit, and the Escondido Disposal, Inc. Permit. Compliance with regulations would ensure potential hazardous material use impacts of the project would be below a level of significance.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The project is not located within one-quarter mile of a school.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. According to GEOTRACKER (RWQCB 2014), the project site is identified as having a former leaking underground storage tank (LUST; RWQCB Case #9UT3802; Local Case #H29584-001) that resulted in the release of diesel fuel. The site was also a former manufacturing center. In addition, the site is currently used as a recycling center and includes a household hazardous waste drop-off facility.

As the LUST was cleaned up in 1999 and the case was closed, grading activities are not expected to encounter contaminated soils that could potentially create a hazard to the public or environment. Considering the proposed project would continue the use of the site as a recycling facility and would not include any sensitive receptors, the project would not expose the public or environment to hazards associated with a listed hazardous material site during operations and the project would have a less than significant impact.

e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard for people residing or working in the project area?

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The site is not located within 2 miles of a private or public airstrip. The nearest airports are McClellan-Palomar Airport located over 9 miles to the west and Ramona Airport located over 11.5 miles to the southeast. The project is not located within an Airport Influence Area for either of these airports (San Diego County Regional Airport Authority 2011a and 2011b) or any other airport land use compatibility plan.

g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

No Impact. The Escondido General Plan (City of Escondido 2012a) Figure VI-1 illustrates the evacuation routes for the City. In the project vicinity, W. Washington Avenue, Valley Parkway, Rock Springs Road, Quince Street, Centre City Parkway, Highway 78/Lincoln Avenue, and I-15 are identified as evacuation routes. The project site is already developed, and the proposed site reorganization would not impair the use of these roadways for evacuation purposes. Thus, the project would have no impact to emergency response or evacuation plans.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than Significant Impact. The Escondido General Plan (City of Escondido 2012a) Figure VI-6 illustrates the wildfire risk within the City. Per that map, the site is identified as having a moderate wildland fire risk, which is the lowest risk category in the City. The site is not adjacent to wildlands, is currently developed, and the project would comply with Fire Code regulations. Considering this, the project's reorganization of an existing recycling facility would result in a less than significant impact associated with the increased exposure of people or structures to a wildfire risk.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements, including but not limited to increasing pollutant discharges to receiving waters (Consider temperature, dissolved oxygen, turbidity and other typical storm water pollutants)?

b. Have potentially significant adverse impacts on ground water quality, including but not limited to, substantially depleting groundwater supplies or substantially interfering with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would result in substantial/increased erosion or siltation on- or off-site?

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and/or significant adverse environmental impacts?

e. Cause significant alteration of receiving water quality during or following construction?

f. Cause an increase of impervious surfaces and associated run-off?

g. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

h. Cause potentially significant adverse impact on ground water quality?

i. Cause or contribute to an exceedance of applicable surface or ground water receiving water quality objectives or degradation of beneficial uses?

j. Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, can it result in an increase in any pollutant for which the water body is already impaired?

k. Create or exacerbate already existing environmentally sensitive areas?

l. Create potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?

m. Impact aquatic, wetland or riparian habitat?

n. Otherwise substantially degrade water quality?

o. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

p. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less than Significant Impact. The site is currently developed and no existing flooding issues exist on-site or in the immediate vicinity. The site is not located within a 100-year floodplain (SANGIS and City of Escondido 2012b).

A Preliminary Drainage Report (Chang Consultants 2015a; Attachment 5) and a Preliminary Water Quality Technical Report (WQTR; Chang Consultants 2015b; Attachment 6) have been prepared to address water quality and drainage for the proposed project. The following analysis is based on those reports.

Drainage

As discussed in the drainage report, under existing pre-project conditions, the northerly site runoff is tributary to a storm drain system approximately mid-way up the site that extends west to Metcalf Street. There is an off-site area to the east that is tributary to the northerly half of the site. The off-site runoff is conveyed through the site with the northerly on-site runoff to the existing storm drain system. The southerly site runoff is tributary to an existing storm drain system in W. Washington Avenue. The two storm drain systems confluence at the intersection of Metcalf Street and W. Washington Avenue. Under proposed post-project conditions, the entire on- and tributary off-site runoff would be directed towards W. Washington Avenue where it would be conveyed towards the storm drain confluence location. An additional storm drain would be constructed in W. Washington Avenue from the site to the confluence location to handle the added runoff at the south end of the site.

The 100-year rational method was used during preparation of the drainage report and the results of the analysis indicated that the existing condition 100-year runoff from the northerly and southerly portions of the site are 34.7 and 17.6 cubic feet per second (cfs), respectively, or 52.3 cfs total. The proposed condition 100-year runoff is 51.0 cfs and 1.3 cfs (respectively) or 52.3 cfs total. Therefore, the project would not increase the runoff or the 100-year flow rate. This result is to be expected because the land use is not changing and the grading is minimal. In addition, as discussed in the project description, the project would increase the landscaping from 31,280 square feet to 61,271 square feet. Therefore, when considering the increased amount of landscaping and the proposed bio-swales, the overall runoff would actually be slightly less after

implementation of the master plan improvements. Further, the project is exempt from hydromodification requirements.

The site is within Zone X per the Federal Emergency Management Agency (FEMA). Zone X is outside of the 500-year floodplain (FIRM Panels 06073C1076G and 06073C0813G). As such, the project would not place any structures or alter areas within a flood hazard. Also, the project would not increase drainage discharge rates and would therefore not exacerbate any downstream flooding issue. Overall, the project would have less than significant impacts related to drainage and flooding.

Water Quality

As discussed in the WQTR, the project is located within the Escondido Hydrologic Subarea (904.62) of the Escondido Creek Hydrologic Area (904.60), which is within the Carlsbad Hydrologic Unit (904.00). The total drainage area of the hydrologic unit is approximately 210 square miles. Runoff from the site and portions of the hydrologic subarea ultimately drain to Escondido Creek, which is approximately 1,500 feet south of the site. Escondido Creek extends west to San Elijo Lagoon, then the Pacific Ocean. The project site represents less than one percent of the overall watershed. Inland surface water beneficial uses listed for the Escondido Creek Hydrologic Area are municipal, agricultural, industrial, contact recreation, non-contact recreation, warm freshwater habitat, cold freshwater habitat, and wildlife habitat.

The receiving waters for the site include Escondido Creek and the San Elijo Lagoon. According to the 2010 303(d) list approved by the State Water Resources Control Board (and by the EPA in November 2010), Escondido Creek is 303(d) listed for dichlorodiphenyltrichloroethane (DDT), enterococcus, fecal coliform, manganese, phosphate, selenium, sulfates, total dissolved solids, total nitrogen and toxicity. San Elijo Lagoon is 303(d) listed for eutrophic, indicator bacteria, and sedimentation/siltation. Neither of the two water bodies is subject to total maximum daily loads (TMDLs). Pollutants of concern that are anticipated or can potentially exist for this project type (included within the Heavy Industry, parking lot, and streets, roads, highways and freeways categories) are: sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, and pesticides.

As indicated above, the additional storm drain that would be constructed within W. Washington Avenue as part of the proposed project, as well as the on-site improvements, would ensure that the on-site and off-site runoff would continue to confluence at the same location and that the project would not increase the overall runoff. The proposed storm drain system would collect the off-site runoff at the easterly edge of the site in order to prevent commingling of the on- and off-site runoff until the on-site runoff is treated. Treatment would occur via the installation of on-site basins throughout the landscaped areas which treat the runoff through contact and bio-filtration by vegetation.

To address the potential pollutants of concern, the project would implement construction and post-construction BMPs in compliance with the City and Regional Water Quality Control Board regulations. These BMPs are identified briefly below and listed in their entirety within the WQTR appended to this document:

- Construction BMPs are anticipated to include silt fencing, gravel bag barriers, street sweeping, solid waste management, stabilized construction entrance/exits, water conservation practices, and spill prevention and control.

- Operational BMPs would include BMPs Low Impact Development (LID) design practices, source control, and treatment control:

    - Site design BMPs include the landscaping and bio-retention areas mentioned previously which serve to increase the pervious surfaces within the site. Other site design BMPs would include

provisions for roof drains which discharge to the landscaped areas; and using water efficient irrigation systems (with rain shutoffs) for the landscaping.

- Source control BMPs are measures used to prevent polluted runoff and include items such as marking the storm drain inlets, designing landscaping to minimize the need for fertilizers and pesticides, and plumbing interior floor drains to the sewer system.

- LID site design BMPs are required to meet the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and include optimizing the site layout to preserve natural drainage features and minimizing roofs and paving, utilizing pervious surfaces, dispersing runoff from impervious to pervious surfaces, and/or draining impervious surfaces to bio-retention facilities.

The use of these BMPs (listed in detail within the WQTR) would reduce potential water quality impacts to below a level of significance.

q. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than significant. Per the General Plan Dam Failure Inundation Areas Figure VI-8, the site is located within both the Lake Wohlford Dam Failure and the Dixon Lake Inundation Areas. To address such potential issues, the Multi-Jurisdictional Hazard Mitigation Plan and Lake Dixon and Lake Wohlford Dam Emergency Action Plans were prepared by the City, County and various jurisdictions. These Emergency Action Plans identify these dams as having a low dam failure risk. These plans provide the proper planning to address potential dam failure, including evacuation and emergency response planning.

The project would not attract additional people to the site or include any new "unique institution" uses (e.g., hospitals, schools, jails/ detention facilities, stadiums) that would result in a high density of people at the site. Considering the emergency plans in place and the nature of the proposed project, the potential flooding impact related to failure of a dam would be less than significant.

No levees are located near the project. Thus, the project would have no impact related to inundation by levee failure.

r. Inundation by seiche, tsunami, or mudflow?

No Impact. The site is not located near a significant body of water that is not protected by a dam. The project site is over 13 miles inland from the Pacific Ocean and is over 600 feet above sea level. The site is not located on or near an unstable hillside that could result in mudflow. Thus, the project would have no impact related to inundation by seiche tsunami or mudflow.

X. LAND USE PLANNING

Would the project:

a. Physically divide an established community?

b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The site is already developed and the proposed recycling facility reorganization would not divide the established central Escondido community. The site is designated as General Industrial and Light Industrial by the General Plan (2012a), and zoned M-1 and M-2 by the City Zoning Code. The recycling facility would be consistent with this designation, and the zoning code allows for a recycling transfer station as a conditional use. The recycling center currently has a conditional use permit, and the project includes obtaining an updated conditional use permit to cover the proposed reorganized facility.

The site is within the Downtown Transit Station Target Area identified in the General Plan (2012a), which calls for a regional attraction north of the transit center, incentives for increased densities and employment, and continuation of existing construction material manufacturing, trash transfer, and agricultural supply land uses west of Reidy Creek and prohibition of similar new uses. The project would be consistent with these goals, as it would continue the operations of the trash transfer facility and would not interfere with the implementation of the other goals.

The site is not located within an area designated for conservation and does not include any native habitat covered by a natural community conservation plan. The site is not located in a specific plan area per the General Plan (2012).

For the reasons described above, the project would have no environmental impact related to land use planning.

XI. MINERAL RESOURCES

Would the project:

a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

b. *Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land-use plan?*

No Impact. Regardless of underlying geology, it would not be feasible to utilize the site for mining operations due to the site's size and adjacency to existing structures and roadways. The implementation of the project would, therefore, result in no impact related to the loss of a local, regional, or state mineral resource.

XII. NOISE

Would the project result in:

a. *Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

b. *Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?*

c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

d. *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less than Significant Impact. The site is partially developed with a recycling facility and a manufacturing plant within an industrial area. Existing noise at the site is primarily generated by large trucks. Existing noise

in the vicinity is generated by local vehicular traffic, I-15 traffic, and the railroad (Site Visit - Noise Measurements 2014). There are no existing on-site or surrounding land uses that are noise-sensitive.

The project construction and renovation activities would comply with the Noise Ordinance construction limits of 75 average equivalent A-weighted decibels (dB(A) L_{eq}), between the hours of 7:00 A.M. and 6:00 P.M. on weekdays and between the hours of 9:00 A.M. and 5:00 P.M. on Saturdays. Construction noise impacts would thus be less than significant.

The proposed project would not significantly alter on-site noise generation, as future uses would be similar to the existing uses, would use similar controls, and the project would not increase through-put capacity which could require more collections transfer trucks. The project would rearrange internal uses, and most of the noise-generating uses and equipment would be enclosed within structures. The only exceptions would include the new conveyor systems that would pass outside under a canopy between buildings, the new CNG compressors used for fueling, and the combined heat and power unit, with associated flare. The buildings would attenuate on-site noise sources from the adjacent uses to the east and north.

Two conveyor lines would extend between the new buildings and the existing transfer station under the maintenance canopy a distance of approximately 71 feet. Conveyor noise levels can range from 80 to 85 dB(A) L_{eq} at 3 feet depending on the material being transported and the speed of the conveyor. The conveyors used in the material recovery process move at relatively slow speed and would likely generate noise levels on the lower end. The two conveyor lines are 260 and 285 feet from the western property. At this distance the conveyor noise would attenuate to less than 50 dB(A) L_{eq} or less at the property line.

The combined heat and power unit, the biogas chiller, and the bio-filer would be located at the southwest corner of the existing mixed MRF area. A biogas combustion flare would be located approximately 50 feet north of the biogas chiller. The primary noise source in this equipment package would be the combined heat and power unit, which is estimated to generate approximately 81 db(A) L_{eq} at 50 feet under constant operation. The combined heat and power unit would be approximately 255 feet from the western property line; however, unlike the conveyor, the combined heat and power unit would be shielded from the western property line by an 8-foot-high concrete/masonry wall. Thus, with consideration of the wall and distance the noise level from the power generation equipment would attenuate to 60 dB(A) L_{eq} or less at the property line.

The project would also comply with the Noise Ordinance that establishes noise regulations to prohibit disturbing, excessive, or offensive noise. The surrounding properties are zoned light industrial and general industrial, which are not noise-sensitive uses. The light industrial noise limit is 70 dB(A) L_{eq} and the general industrial zone noise limit is 75 dB(A) $L_{eq.}$ Therefore, on-site stationary noise of the project would be less than significant.

As described in the traffic analysis, the project would not generate additional traffic and would not significantly affect the distribution of traffic. In addition, the uses adjacent to the roadways primarily utilized by the site traffic are not sensitive to noise. The project's recycling center use is not noise-sensitive as well. Thus, the project would have less than significant impact related to traffic noise.

e. *For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The site is not a noise-sensitive receptor, would not attract additional people to the site, and is not within an airport noise contour. The project would have no impact related to placing a noise-sensitive receptor or additional people within an excessive airport noise area.

XIII. POPULATION AND HOUSING

Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The project involves the redevelopment of an existing industrial site. As such, it would not displace any housing or directly or indirectly alter population and/or housing. The project would not increase the capacity of the recycling facility and would not increase infrastructure capacity or draw additional residents to the area. All infrastructure improvements included as a part of the project are intended to serve the project only and would not promote additional development in the area. Thus, the project would have no impact to population and housing.

XIV. PUBLIC SERVICES

Would the project:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?
ii. Police protection?
iii. Schools?
iv. Parks?
v. Other public facilities?

No Impact. As indicated above, the project would not induce growth either directly or indirectly. Thus, the project would not result in additional demand for schools, parks, libraries, police, or fire protection. The project would have no impact to public services.

XV. RECREATION

Would the project:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The project involves redevelopment of an industrial site. As such, it would not result in a need for additional recreational facilities or affect any existing recreational facility. Thus, the project would result in no impact to recreational facilities.

XVI. TRANSPORTATION/TRAFFIC

Would the project:

a. *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?*

b. *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less than Significant Impact. The proposed project would retain the existing permitted capacities of the facility and would not generate additional truck traffic. Additionally, even with the addition of the visitor center, which is not anticipated to generate any trips during peak hours as it is intended for school programs or small organizational tours by appointment, the project would likely decrease traffic generation from the overall site when considering the removal of the existing commercial business on W. Mission Avenue. While the project would slightly alter the distribution of the traffic from W. Washington Avenue to W. Mission Avenue, the redistribution would likely improve conditions on W. Washington Avenue and have little effect on W. Mission Avenue.

This is supported by the existing conditions, as the City determines the level of service (LOS) on roadway based on the volume-to-capacity ratio. The LOS and associated volumes are presented in Table 7. As shown in Table 8, the existing average daily traffic (ADT) volumes of on W. Mission Avenue are currently 21,400 ADT. Thus, it would require approximately 6,000 additional ADT on W. Mission Avenue to worsen the LOS. Thus, even with a very conservative estimate for project related traffic, the project is not anticipated to result in the addition of 6,000 ADT to W. Missions Avenue. Furthermore, the overall change in traffic is anticipated be negligible when considering (1) the elimination of the commercial sales and warehouse traffic from the former Golfcraft plant, (2) the use of the northern W. Mission Avenue driveways for office and self-haulers traffic only, (3) the fact that self-haulers are more active on weekends and would not affect weekday peak hour conditions at intersections, and (4) the continuation of the southern W. Washington Avenue driveways use for the majority of site truck traffic. Additionally, the project would not alter transit, pedestrian or bicycle usage or access. Therefore, the project would have a less than significant impact the performance of the circulation system or conflict with the City's traffic operations standards.

TABLE 7
CITY OF ESCONDIDO LEVEL OF SERVICE STANDARDS STREET SEGMENT ADT THRESHOLDS

Street Classification	Lanes	Cross Sections	Level of Service						
			A	B	Mid C	C	Mid D	D	E
Major Road	(6 Lanes)	90/110	17,000	2,700	32,000	37,000	40,750	44,500	50,000
	(4 Lanes)	82/102	12,600	20,000	23,700	27,400	30,150	32,900	37,000

TABLE 8
CITY OF ESCONDIDO LEVEL OF SERVICE STANDARDS STREET SEGMENT ADT THRESHOLDS

Roadway	Roadway Characteristics			General Plan Roadway Classification	Existing ADT	Existing LOS
	Number of Lanes	Parking	Cross-Section Width			
W. Mission Avenue						
Andreasen Drive to Rock Springs Road	4	No	64	Major Road	21,400	C

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. As indicated above, the project is not located within an Airport Influence Area and would not affect air traffic patterns.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The project would not include improvements to roadways, but would modify existing driveways. Driveway changes would not increase hazardous conditions, as driveways already exist on these roadways and driveways would be designed to accommodate large trucks.

e. Result in inadequate emergency access?

No Impact. As the project access driveways are designed for large vehicles, they would also adequately accommodate emergency vehicle access. Similar, internal circulation is also geared towards large vehicles and would provide adequate turn-around areas and overall emergency access.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The project would retain the existing sidewalks along the perimeter and would not alter any public transit or bicycle facilities. Therefore, the project would have no impact to public transit, bicycle, or pedestrian facilities.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. Dry AD technologies have limited requirement for process water. Water is introduced into the dry AD system via the organic waste itself. Depending on the moisture content of the organic waste processed in the dry digesters, there may be periods when additional percolate water makeup is required (in the case of lower moisture content feedstocks), or when excess percolate is generated (in the case of higher moisture content feedstocks). When there are periods with wetter organics, this percolate is sanitized and held to be

applied later when the incoming organic waste material is dryer. There would be no need for discharges to the waste water system.

Additionally, considering the project would not increase the permitted capacity of the recycling center and would eliminate the existing commercial uses at the site, the project would decrease the water demand and wastewater treatment demand at the site. The project would include all on-site wastewater and water system improvements necessary to serve the project. No new or expanded water or wastewater-related facilities would be required.

c. Require, or result in, the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. The project would install a 36-inch RCP for storm water conveyance in W. Washington Avenue; the RCP would extend along the right-of-way to connect downstream of Metcalf Street. Additionally, implementation of the project would decrease the impervious area on-site, and the project would include all necessary storm water drainage facility upgrades necessary to meet the current storm water requirements. See Section IX, Hydrology and Water Quality, for additional information. Therefore, the project would have no impact related to storm-drain facilities.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact. As indicated above, the project would not generate an additional demand for water. Further, regional water planning documents utilize zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate water supply. The project would not alter the zoning or land use of the site and, therefore, would not result in a need to revise estimated regional water demands or alter existing entitlements. Also, the existing Conditional Use Permit allows for a recycling facility of the same capacity as the project. Therefore, the project would not result in a need to alter existing water entitlements and would have no impact related to water supply entitlements.

e. Result in a determination by the wastewater treatment provider which serves, or may serve, the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. As indicated above, the project includes all on-site wastewater improvements necessary to serve the project, and no off-site improvements would be required to provide wastewater treatment for the project. The project would not increase wastewater generated at the site. Thus, the project would have no impact related to wastewater treatment capacity.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. The project would involve demolition and construction that would generate solid waste. Construction and demolition waste would be disposed of at regional landfills, green waste centers, and recycling centers, as appropriate. The project would minimize construction waste by reusing existing buildings as possible, and recycling construction and demolition waste as possible. The project would not result in a need for new or expanded solid waste facilities off-site. Thus, project impacts related to solid waste would be less than significant

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. The proposed project would expand the physical size of the existing recyclable materials sorting facility, but would retain the same solid waste through-put capacity as the existing

facility. The project would comply with its existing solid waste permits (SANCO Recycling Permit, the Escondido Resource Recovery Permit, and the Escondido Disposal, Inc. Permit). Thus, the project would comply with solid waste regulations.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

a. *Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range, of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

c. *Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?*

Less than Significant Impact with Mitigation. The project would have no significant impact to biological resources with the exception that monitoring and avoidance (**BIO-1** and **BIO-2**, Section IVa) would be required to ensure that impacts would not occur to raptor or migratory bird nests (if present). Monitoring during grading activities would be required by an archaeological and Native American monitor (**CUL-1,** Section Vb) to ensure that there would be no impacts to subsurface cultural resources. A paleontological monitor (**PAL-1,** Section Vc) would be required during excavation for the percolate basement proposed as part of Phase 4 in order to ensure that potential impacts to subsurface paleontological resources would not occur. The project would result in significant hazards impacts related to potential asbestos and lead within existing structures, but would mitigate these impacts to below a level of significance through **HAZ-1** and **HAZ-2** (Section VIIIa).

b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

d. *Where deficiencies exist relative to the City's General Plan Quality of Life Standards, does the project result in deficiencies that exceed the levels identified in the Environmental Quality Regulations {Zoning Code Section 33-924 (a)}?*

Less than Significant Impact. As described previously, cumulative impacts of the project would be less than significant. No deficiencies related to the City's General Plan Quality of Life Standards would occur.

MANDATORY FINDINGS OF SIGNIFICANCE

The project would have potential impacts related to biological resources, cultural (archaeological) resources, paleontological resources, and hazards and hazardous materials. With the implementation of the mitigation measures and conditions of approval, the project is not expected to have any significant impacts, either short-term or long-term, nor would it cause substantial adverse effects on human beings, either directly or indirectly. The project would not degrade the quality of the environment for plant or animal communities since the project would not cause fish and wildlife populations to drop below self-sustaining levels, nor reduce the number or restrict the range of endangered plants or animals. The project would not materially degrade levels of service of the adjacent streets, intersections, or utilities. Therefore, in the City of Escondido staff's opinion, the proposed project would not have a significant individual or cumulative impact to the environment.

SUMMARY OF MITIGATION MEASURES

Biological Resource Mitigation:

BIO-1: A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.

BIO-2: If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.

Cultural Resource Mitigation:

ARC-1: A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented

Paleontological Resources Mitigation:

PAL-1 Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below:

- A qualified paleontologist or a paleontological monitor shall be on site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist).

- In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil remains shall be

cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense.

- A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.

Hazardous Materials Mitigation:

HAZ-1: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that would be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that would be taken to remediate the hazard.

HAZ-2: Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

Project Location

FIGURE 1

Regional Location

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Image Source: SanGIS (flown May 2012)

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Project Boundary

FIGURE 2
Project Location
on Aerial Photograph

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Map Source: JRM&A

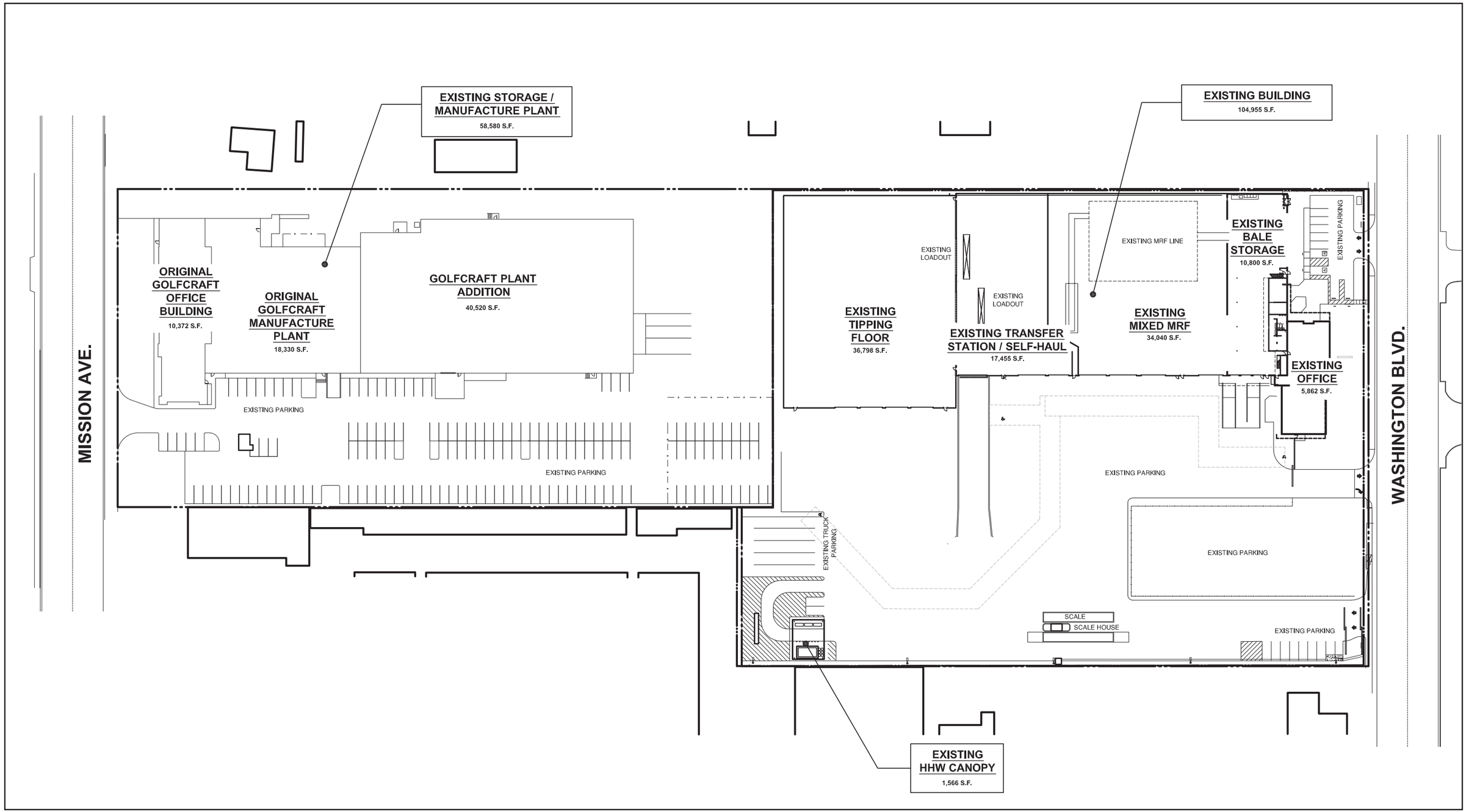

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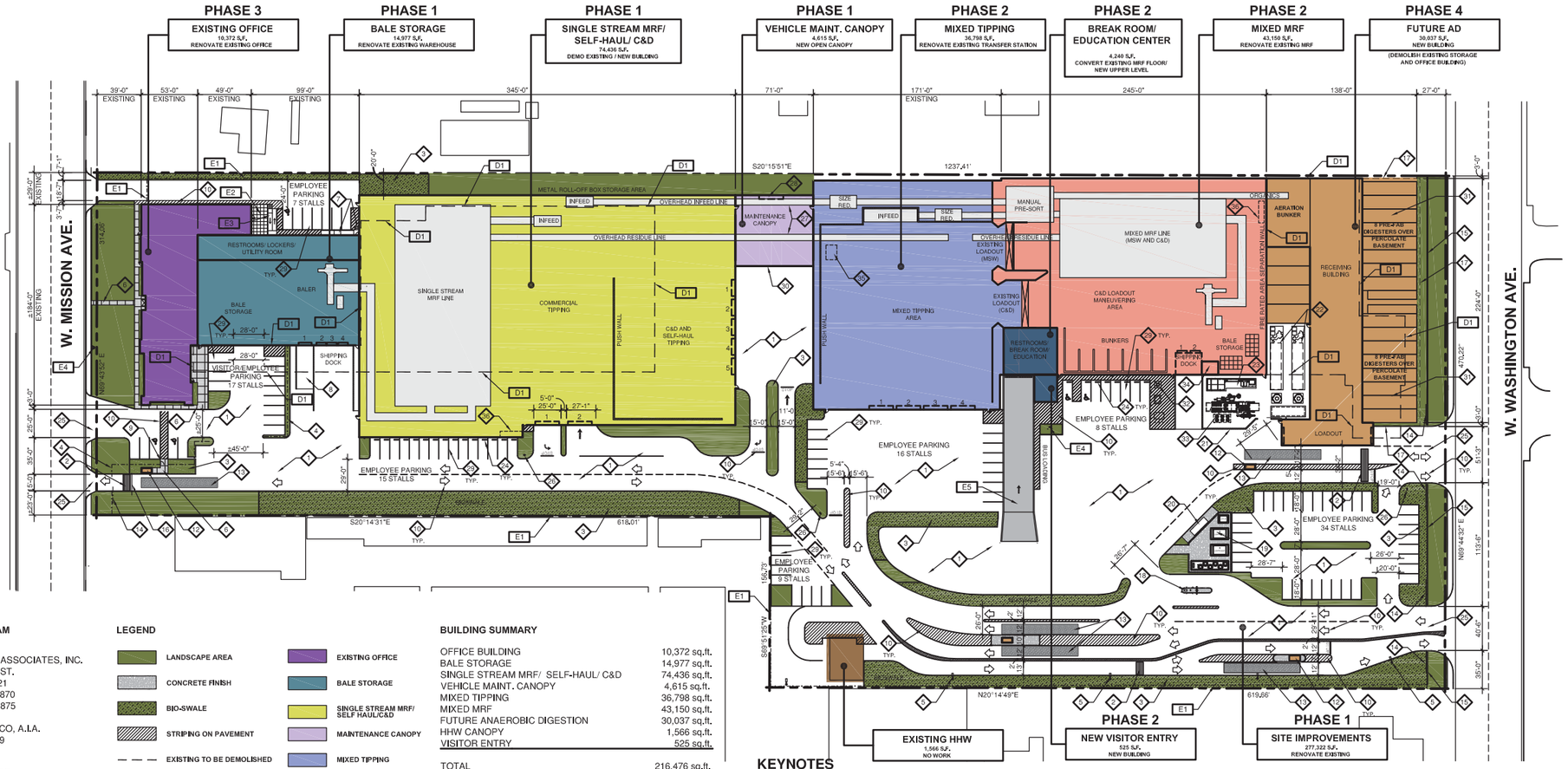
FIGURE 3
Existing Site Plan

Map Source: JRM&A



PROJECT TEAM

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LEGEND

- LANDSCAPE AREA
- CONCRETE FINISH
- BIO-SWALE
- STRIPING ON PAVEMENT
- EXISTING TO BE DEMOLISHED
- EXISTING OFFICE
- BALE STORAGE
- SINGLE STREAM MRF/ SELF HAUL/C&D
- MAINTENANCE CANOPY
- MIXED TIPPING
- MIXED MRF
- FUTURE AD
- VISITOR ENTRY
- EXISTING HHW

SITE COVERAGE

TOTAL LOT SITE	495,469 sq.ft.
TOTAL BUILDING COVERAGE	214,910 sq.ft.
TOTAL LANDSCAPE COVERAGE	61,335 sq.ft.
TOTAL HARDSCAPE COVERAGE	219,224 sq.ft.
PERCENTAGE BUILDING COVERAGE	43.4%
PERCENTAGE LANDSCAPE COVERAGE	12.3%
PERCENTAGE HARDSCAPE COVERAGE	44.3%

BUILDING SUMMARY

OFFICE BUILDING	10,372 sq.ft.
BALE STORAGE	14,977 sq.ft.
SINGLE STREAM MRF/ SELF-HAUL/ C&D	74,436 sq.ft.
VEHICLE MAINT. CANOPY	4,615 sq.ft.
MIXED TIPPING	36,798 sq.ft.
MIXED MRF	43,150 sq.ft.
FUTURE ANAEROBIC DIGESTION	30,037 sq.ft.
HHW CANOPY	1,566 sq.ft.
VISITOR ENTRY	525 sq.ft.
TOTAL	216,476 sq.ft.

PARKING ANALYSIS

OFFICE BUILDING (1:300) 10,372 sq.ft. / 300	35 STALLS
BALE STORAGE (1:3,000) 14,977 sq.ft. / 3,000	5 STALLS
SINGLE STREAM MRF/ SELF-HAUL / C&D (1:3,000) 74,436 sq.ft. / 3,000	25 STALLS
VEHICLE MAINT. CANOPY 4,615 sq.ft. /3,000	2 STALLS
MIXED TIPPING FLOOR (1:3,000) 36,798 sq.ft. / 3,000	12 STALLS
MIXED MRF (1:3,000) 43,150 sq.ft. / 3,000	15 STALLS
FUTURE ANAEROBIC DIGESTION (1:3,000) 30,037 sq.ft. / 3,000	10 STALLS
TOTAL REQUIRED	104 STALLS
PROVIDED	106 STALLS

KEYNOTES

1. CONCRETE PAVING
2. STEEL TRENCH COVER CONCRETE PIT
3. BIO-SWALE/LANDSCAPE AREA, SEE CIVIL & LANDSCAPE PLANS
4. 8'-0" HIGH CHAIN LINK FENCE
5. 25'-0" HIGH LIGHT POLE
6. DECORATIVE PEDESTRIAN CONCRETE WALK
7. ACCESSIBILITY CONCRETE STAIR & RAMP
8. VEHICLE CONCRETE RAMP
9. CHAIN LINK SWING GATE
10. PAVEMENT MARKING PAINT CAUTION YELLOW
11. CHAIN LINK SLIDING GATE
12. PRE-FABRICATED SCALE HOUSE
13. TRUCK SCALE OVER CONCRETE PIT. SEE CIVIL PLANS
14. 8'-0" HIGH WROUGHT IRON SLIDING GATE
15. 8'-0" HIGH DECORATIVE CMU WALL
16. MOTORIZED SECURITY ARM GATE
17. METAL SCREEN WALL ABOVE, SEE ELEVATIONS
18. CNG FUELING AREA
19. CNG EQUIPMENT AREA
20. AT GROUND DIESEL STORAGE TANK (CAPACITY: 1,500 GALLONS)
21. EQUIPMENT CMU SCREEN WALL
22. BIO-FILTER
23. BIO-GAS/CHILLER SKID
24. CONCRETE WHEEL STOP
25. DRIVEWAY APPROACH
26. FIRE HYDRANT
27. OVERHEAD CONVEYOR WITH 17' MIN CLEARANCE BELOW CONVEYOR
28. 20' WIDE X 17' HIGH ROLL-UP DOOR FOR EASEMENT ACCESS
29. 9' X 18' PARKING SPACE
30. 30' CLEAR AT UNDERSIDE OF CANOPY
31. PERCOLATE BASEMENT (APPROXIMATELY 8'-0" DEEP)
32. BIOGAS COMBUSTION FLARE
33. COMBINE HEAT & POWER UNIT
34. ELECTRICAL ROOM
35. MOBILE GRINDER
36. HAZARDOUS WASTE STORAGE W/ INTEGRAL CONTAINMENT

EXISTING KEYNOTES

(EXISTING ITEMS TO REMAIN, UNLESS OTHERWISE NOTED)

- E1 CHAIN LINK FENCE/GATE
- E2 RAISED COVER PATIO
- E3 WOOD STAIR & RAMP
- E4 FIRE HYDRANT
- E5 CONCRETE RAMP

DEMOLITION KEYNOTES

- D1 DASHED LINES INDICATE EXISTING BUILDING/AREA TO BE DEMOLISHED PRIOR TO START CONSTRUCTION PHASES

0 Feet 80

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FIGURE 4
Site Plan

Map Source: ESA, 2011

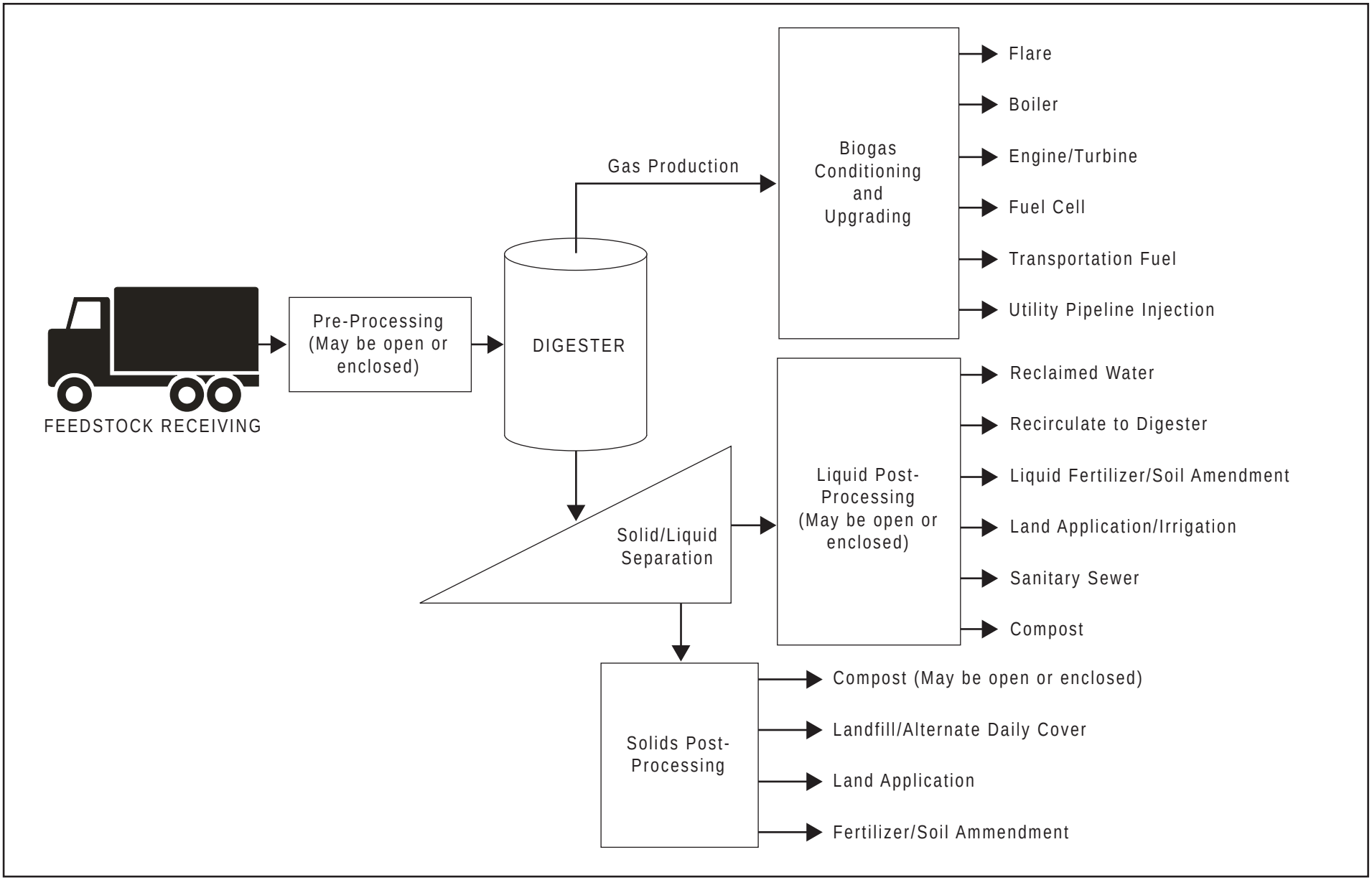

FIGURE 5

Anaerobic Digestion of Organic Waste

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Map Source: JRM&A

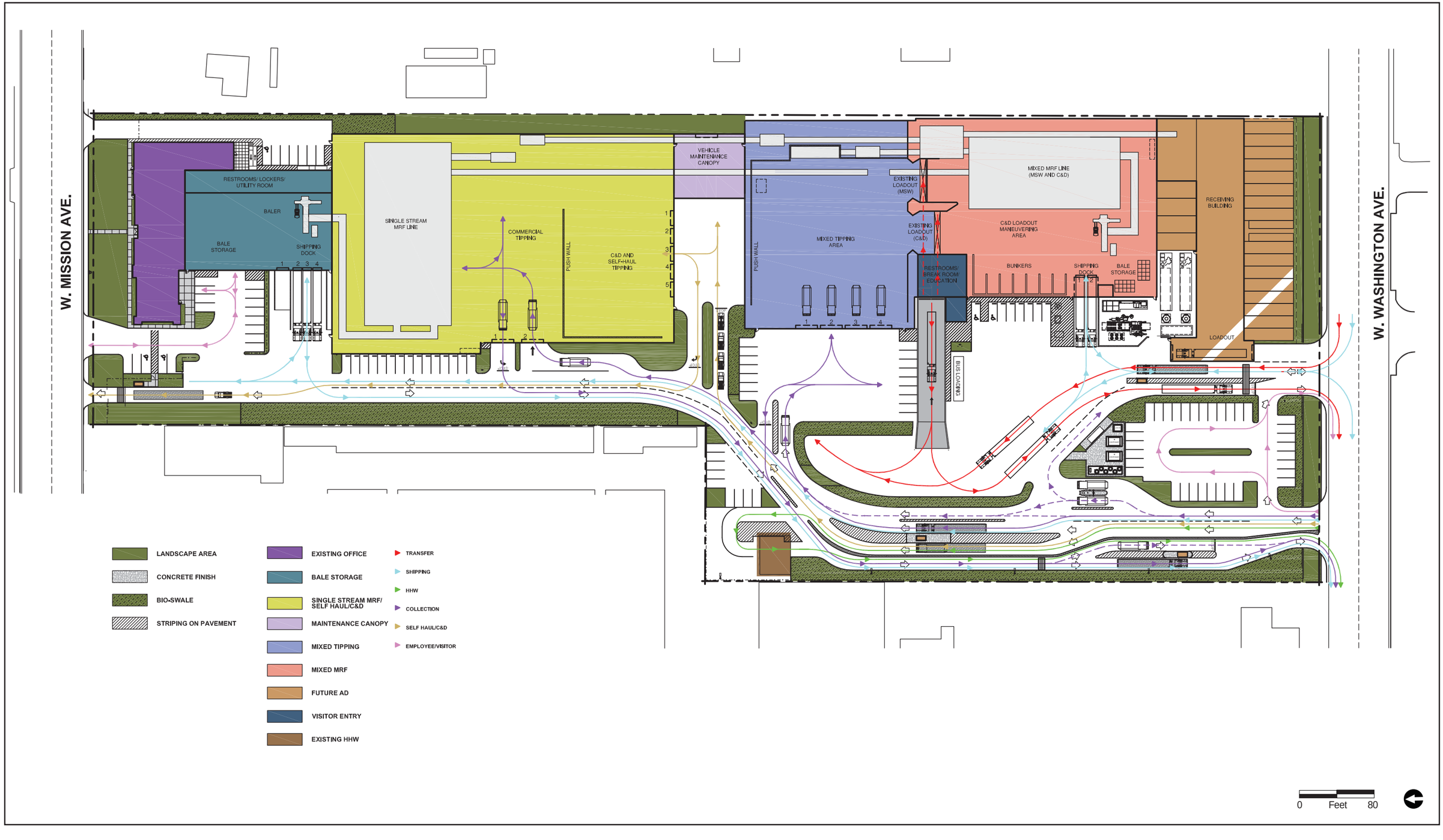

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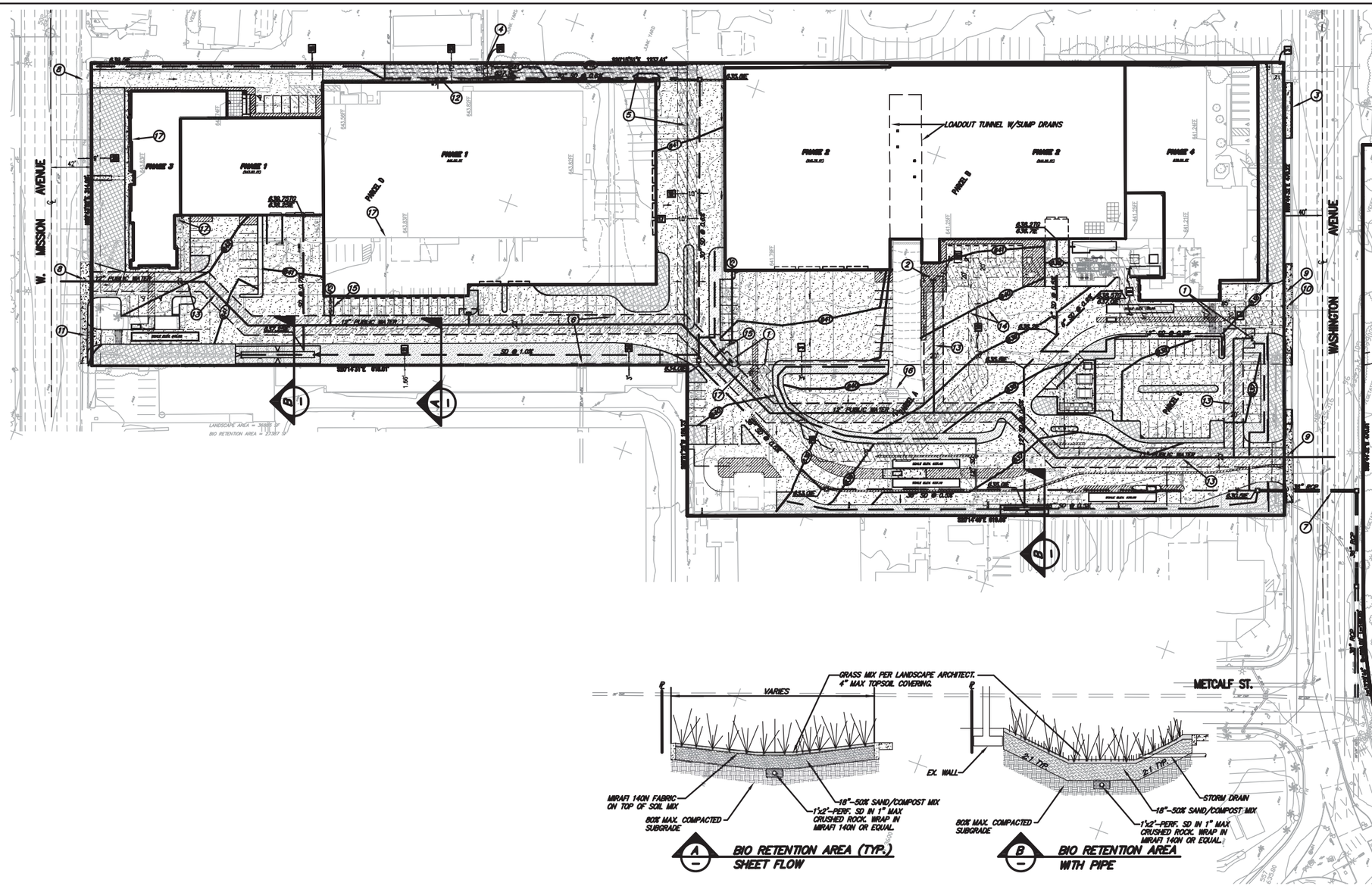
FIGURE 6
Circulation Plan

Map Source: Cherry Engineering



LEGEND

PROPOSED IMPROVEMENTS

IMPROVEMENT	SYMBOL
6" CONCRETE CURB	
6" MOW CURB	
PCC PAVEMENT	
LANDSCAPE AREA	
BIO-RETENTION AREA	
EXISTING WATER/SEWER EASEMENT TO CITY	
PROPOSED WATER/SEWER EASEMENT TO CITY	
DETECTOR CHECK ASSEMBLY (FIRE SPRINKLER)	DCA
FIRE HYDRANT	
18"x18" PRECAST CATCH BASIN	
STORM DRAIN CLEANOUT	
GRADE BREAK	
MASONRY WALL (FENCE)	
PRIVATE PVC STORM DRAIN	
PUBLIC 12" WATER MAIN	
PUBLIC 18" RCP STORM DRAIN	
EXISTING CONTOUR	640
FINISH CONTOUR	640

NOTES

1. EXISTING FIRE HYDRANT TO BE REPLACED/RELOCATED.
2. EXISTING FIRE HYDRANT LOCATION TO REMAIN
3. EXISTING DRIVEWAY TO BE CLOSED.
4. OFFSITE RUNON TO BE INTERCEPTED AND PIPED TO WASHINGTON ST.
5. EXISTING PUBLIC SEWER MAIN TO REMAIN.
6. NORTH SITE SHEET FLOW CURRENTLY DRAINING TO METCALF ST. WILL BE TREATED IN BIO RETENTION AREAS AND CONVEYED TO WASHINGTON ST.
7. THE EXISTING WASHINGTON STREET STORM DRAIN IS UNDERSIZED TO ACCOMMODATE THE METCALF ST DIVERSION. A SEPARATE 36" RCP WILL BE EXTENDED ACROSS WASHINGTON AND CONNECTED DOWNSTREAM.
8. EXISTING DRIVEWAY TO REMAIN.
9. EXISTING WASHINGTON ST DRIVEWAY TO BE WIDENED.
10. EXISTING STREET LIGHT TO BE RELOCATED.
11. PROPOSED MISSION AVE. DRIVEWAY.
12. PROPOSED 5' WIDE SEWER EASEMENT TO CITY OF ESCONDIDO.
13. PROPOSED 12" WATER MAIN AND 20' EASEMENT TO CITY OF ESCONDIDO.
14. EXISTING 20' WATER EASEMENT TO BE ABANDONED (SDVO).
15. PROPOSED DETECTOR CHECK ASSEMBLY FOR FIRE SPRINKLER SERVICE.
16. EXISTING CLARIFIER FOR LOADOUT TUNNEL PUMPED EFFLUENT.
17. EXISTING DETECTOR CHECK.

OWNER

FEDERAL BOULVARD PROPERTIES – PARCELS A & B
FEDERAL BOULVARD PROPERTIES – PARCEL C
JEMCO EQUIPMENT CORPORATION – PARCEL D

CONTACT: STEVE SOUTH – PRESIDENT PH. 619.287.3532

APN

228-250-16, 17, 77 & 78

LEGAL DESCRIPTION

PORTIONS OF LOTS 1 AND 8, IN BLOCK 147 OF RANCHO RINCON DEL DIABLO, IN THE CITY OF ESCONDIDO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 527, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, APRIL 1, 1888.

PROJECT SITE DATA

1. TOTAL AREA OF PROPERTY = 485,087 SF
2. EXISTING IMPERVIOUS AREA = 453,787 SF (31280 SF LANDSCAPE)
3. PROPOSED IMPERVIOUS AREA = 420795 SF (64,272 SF LANDSCAPE)
4. TOTAL AREA TO BE DISTURBED = 375,537 SF (8.62 ACRES)
5. PROPOSED SITE DRAINS TO STORM DRAIN
6. WATERSHED – ESCONDIDO CREEK
7. PROPOSED SITE GRADES ARE LESS THAN 10%

0 Feet 100

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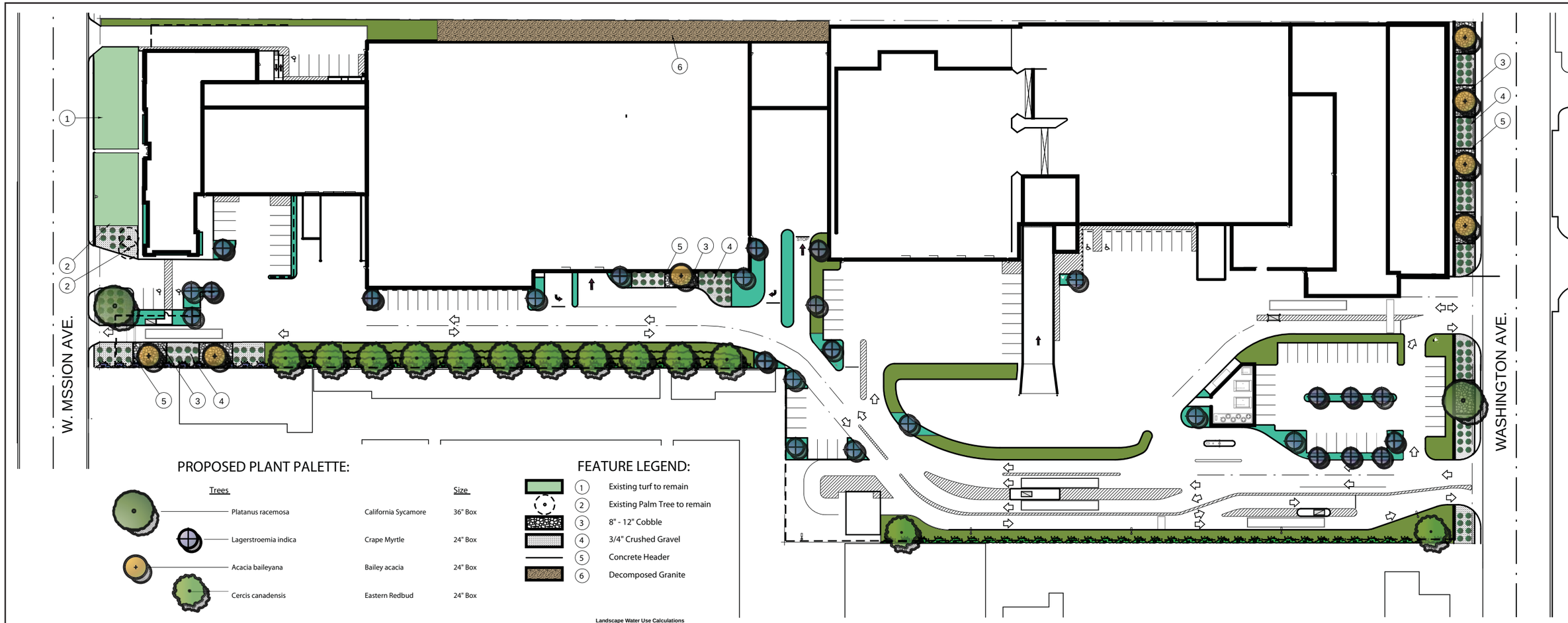
FIGURE 7
Grading Plan

Map Source: Architerra Design Group



PROPOSED PLANT PALETTE:

		Size
Trees		
Platanus racemosa	California Sycamore	36" Box
Lagerstroemia indica	Crape Myrtle	24" Box
Acacia baileyana	Bailey acacia	24" Box
Cercis canadensis	Eastern Redbud	24" Box
Low Water Use Planting		
Muhlenbergia rigens	Deer Grass	1 gal
Aloe striata	Coral Aloe	1 gal
Rosmarinus officinalis 'Prostrata'	Trailing Rosemary	1 gal
Xeric Accent Planting at Entry		
Dasilirion quadrangulatum	Mexican Grass Tree	15 gal
Hesperaloe parvifolia	Red Yucca	15 gal
Bio-Swale Planting		
Carex divulsa	Berkeley Sedge	1 gal
Lomandra longifolia 'Breeze'	Mat Rush	1 gal
Chondropetalum tectorum	Small Cape Rush	5 gal
Vine Screen at Wall and Fence		
Begnonia c.'Tangerine Beauty'	Crossvine	15 gal
Parthenocissus tricuspidata	Boston Ivy	15 gal

FEATURE LEGEND:

1. Existing turf to remain
2. Existing Palm Tree to remain
3. 8" - 12" Cobble
4. 3/4" Crushed Gravel
5. Concrete Header
6. Decomposed Granite

Landscape Water Use Calculations

Project Information

[illegible]

Hist. ETo for the area ETo: <8.7

Maximum Annual Water Allocation (MAWA)

[illegible]

MAWA = 1,550 [illegible]

Estimated Applied Water Use (EAWU)

[illegible]

Hydrozone # 1: Low Shrubs Drip — Plant Factor PF= >7L
square footage of hydrozone HA= 11,853
hydrozone irrigation efficiency IE= >79
QR&F3AP&S= 80 [illegible]

Hydrozone # 2: Xeric Shrubs Drip — Plant Factor PF= >7R
square footage of hydrozone HA= 9,214
hydrozone irrigation efficiency IE= >79
QL&F3AP&S= 8G [illegible]

Hydrozone # 3: Bioswale Spray — Plant Factor PF= >7>
square footage of hydrozone HA= 27,450
hydrozone irrigation efficiency IE= >7R
QL&F3AP&S= <G< [illegible]

Hydrozone # 5: Trees RWS Bubbler — Plant Factor PF= >7>
square footage of hydrozone HA= 768
hydrozone irrigation efficiency IE= >79
Q>&F3AP&S= R9 [illegible]

Total EAWU = 1,111 [illegible]

MAWA - EAWU = 439 [illegible]

Estimated Applied Water Use must be less than the Maximum Annual Water Allocation

0 Feet 80

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FIGURE 8
Landscape Plan

Image Source: SanGIS (flown May 2012)

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FIGURE 9

Locations and Dates of Additions

MITIGATION MONITORING PROGRAM

PROJECT NAME: Escondido Disposal Incorporated Master Plan
PROJECT LOCATION: 1044 W. Washington Avenue and 1021 W. Mission Avenue
PROJECT DESCRIPTION: Conditional Use Permit (to reconfigure the existing waste facility and add an anaerobic digester)
APPROVAL BODY/DATE: City Council
CONTACT: Rozanne Cherry, City Planning Division
PHONE NUMBER: 760.839.4536

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Potential impact to raptors protected by the California Department of Fish and Wildlife, and potential impact to nesting birds protected by the Migratory Bird Treaty Act	**BIO-1:** A qualified biologist shall determine if any active raptor nests occur on or in the immediate vicinity of the project site if construction is set to commence or continue into the breeding season of raptors (January 1 to September 1). If active nests are found, their situation shall be assessed based on topography, line of sight, existing disturbances, and proposed disturbance activities to determine an appropriate distance of temporal buffer.	Section IVa, Biological Resources	Applicant		
	BIO-2: If project construction cannot avoid the period of January 1 through September 1, a qualified biologist shall survey potential nesting vegetation within the project site for nesting birds, prior to commencing any project activity. Surveys shall be conducted at the appropriate time of day, no more than three days prior to vegetation removal or disturbance. Documentation of surveys and findings shall be submitted to the City for review and concurrence prior to conducting project activities. If no nesting birds were observed and concurrence was received, project activities may begin. If an active bird nest is located, the nest site shall be fenced a minimum of 200 feet (500 feet for special status species and raptors) in all directions on-site, and this area shall not be disturbed until after September 1 or until the nest becomes inactive. If threatened or endangered species are observed within 500 feet of the work area, no work shall occur during the breading season (January 1 through September 1) to avoid direct or indirect (noise) take of listed species.	Section IVa, Biological Resources	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Potential impact to unknown subsurface archaeological resources	**ARC-1:** A qualified archaeologist and Native American monitors representing both Kumeyaay and Luiseño tribes shall be present for initial ground-disturbing activities for the project (brushing, grubbing, and grading in the upper several feet). If cultural resources are discovered during construction monitoring, the qualified archaeologist or Native American monitor shall have the authority to temporarily halt or redirect grading away from the area of the finds. Sufficient time and resources must be allowed for the archaeologist and the Native American monitor to assess the nature and significance of the finds, in consultation with City staff. If significant resources are identified, appropriate mitigation measures must be developed and implemented.	Section Vb, Cultural Resources	Applicant		
Potential impact to unknown subsurface paleontological resources	**PAL-1:** Prior to commencement of project construction, a qualified paleontologist shall be retained to attend the project pre-construction meeting and discuss proposed grading plans with the project contractor(s). If the qualified paleontologist determines that proposed grading/excavation activities would likely affect previously undisturbed areas of Pleistocene-age alluvial deposits, then monitoring shall be conducted as outlined below: • A qualified paleontologist or a paleontological monitor shall be on-site during original cutting of Pleistocene-age alluvial deposits. A paleontological monitor is defined as an individual who has at least one year of experience in the field identification and collection of fossil materials, and who is working under the direction of a qualified paleontologist. Monitoring of the noted geologic unit shall be conducted at least half-time at the beginning of excavation, and may be either increased or decreased thereafter depending on initial results (per direction of a qualified paleontologist). • In the event that well-preserved fossils are discovered, a qualified paleontologist shall have the authority to temporarily halt or redirect construction activities in the discovery area to allow recovery in a timely manner (typically on the order of 1 hour to 2 days). All collected fossil	Section Vc, Cultural Resources	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
	remains shall be cleaned, sorted, catalogued and deposited in an appropriate scientific institution (such as the San Diego Museum of Natural History) at the applicant's expense. • A report (with a map showing fossil site locations) summarizing the results, analyses and conclusions of the above described monitoring/recovery program shall be submitted to the City within three months of terminating monitoring activities.				
Disturbance of asbestos-containing materials during demolition and renovation activities.	**HAZ-1:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of one or more on-site structures, a survey shall be performed to determine the presence or absence of asbestos-containing materials in all buildings to be demolished or renovated under the applicable permit. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA approved Building Inspector Course. Should regulated asbestos containing materials be found, they shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.	Section VIIIa, Hazards and Hazardous Materials	Applicant		

Impact	Mitigation Measure	Location in Document	Responsible Party	Certified Completion	Comments
Disturbance of lead-containing materials during demolition and renovation activities.	**HAZ-2:** Prior to issuance of a building permit or other applicable permit that includes demolition or renovation of on-site structures, a survey shall be performed by a California Department of Health Services-certified lead inspector/risk assessor to determine the presence or absence of lead based paint located in all building to be demolished or renovated under the applicable permit. All lead-containing materials scheduled for demolition or renovation must comply with applicable regulations for demolition/renovation methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 CCR Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).	Section VIIIa, Hazards and Hazardous Materials	Applicant		

APPENDIX B

EDI Transfer Station/MRF Expansion Master Plan Supplemental Air Quality Analysis, RECON Environmental, September 11, 2018

RECON

An Employee-Owned Company

September 11, 2018

Mr. Steve South
Chief Executive Officer
Escondido Disposal, Inc.
1044 W. Washington Avenue
Escondido, CA 92033

Reference: EDI Transfer Station/MRF Expansion Master Plan Supplemental Air Quality Analysis; City Case Numbers ENV15-0005 and PHG15-0010 (RECON Number 7488)

Dear Mr. South:

Per your request, RECON has prepared this supplemental air quality analysis for the Escondido Disposal, Inc. (EDI) Transfer Station/Materials Recovery Facility (MRF) Expansion Master Plan Project (project). This letter is intended to provide the City of Escondido (City) with additional information related to the findings of the Air Quality Analysis dated June 19, 2015. The project involved reorganization of the existing EDI recycling facility at 1044 West Washington Avenue, expansion of the facility into the lot at 1021 West Mission Avenue, and construction of an anaerobic digester (AD) facility capable of converting organic waste into natural gas. The facility is permitted to accept a maximum of 3,223 tons of solid waste per day.

The AD facility was originally designed with a capacity of 31,200 tons of organic waste per year. Operations generate larger quantities of organics suitable for anaerobic digestion than was anticipated and planned improvements to waste separation processes to support state and local long-term solid waste diversion goals will result in increased quantities of organics suitable for anaerobic digestion. Therefore, increased AD facility capacity is necessary. This analysis assesses the potential environmental impacts associated with increasing AD facility capacity to 650 tons per day (237,250 tons per year).

Additional project details have been refined. The previous analysis assessed two scenarios: (1) natural gas from the AD facility would be used to fuel a fleet of 40 to 50 compressed natural gas (CNG) collection vehicles or (2) natural gas from the AD facility would be used to generate 5.0 gigawatt hours (GWh) of electricity per year. These scenarios are no longer being considered. The project now proposes to supply natural gas to the utility natural gas pipeline system. This analysis updates emissions estimates to more accurately reflect site conditions and address the increased capacity.

Previous Emissions Estimates

The previous analysis evaluated pollutant emission sources such as construction, vehicle emissions, natural gas combustion as an energy source (space and water heating), fugitive dust from material conveyance in tipping area and on conveyor belts, and additional sources associated with the AD facility such as the combustion of natural gas to heat percolate and flaring waste gases.

The previous analysis concluded that project emissions would be less than the City's air quality significance thresholds from Municipal Code Section 33-924 and, therefore, would not have a significant impact on the environment.

Revised Emission Estimates Methodology

This supplemental analysis includes updates to previous project methodology based on new information and to reflect the revised project description. Whereas the previous emission estimates were calculated using CalEEMod Version 2013.2.2, updated emission estimates were calculated using CalEEMod Version 2016.3.2 (CAPCOA 2017). Updates are summarized below.

Construction

Increasing the capacity of the AD facility would involve installing additional anaerobic digestion equipment such as digestion vessels in the existing AD facility. No additional heavy-duty construction equipment would be required. Estimates of construction-related emissions are not dependent on the AD facility capacity and, therefore, remain up-to-date.

Vehicle Use

Vehicle emissions are calculated based on the vehicle type, the trip rate, and trip length for each land use. The previous vehicle emissions estimate was calculated using the California Air Resources Board's (CARB) EMFAC2011 model.

The EDI transfer station is permitted to accept a maximum of 3,223 tons of solid waste per day. Additional feedstock organics would result from increased separation of organics from the existing waste stream; the amount of solid waste accepted by the facility would remain limited to 3,223 tons per day. Therefore, estimates of vehicle use remain up-to-date; however, the emissions estimate has been revised based on CARB's EMFAC2014 model.

Energy Use - Natural Gas

The previous energy use emissions estimate was based on average energy use rates for buildings of similar size and land use type. Estimates of building energy use are not dependent on the AD facility capacity and, therefore, remain up-to-date.

Fugitive Dust from Material Conveyance

The previous fugitive dust emissions estimate was based on the amount of solid waste accepted by the facility. Additional feedstock organics would result from increased separation of organics from the existing waste stream; the amount of solid waste accepted by the facility would remain limited to 3,223 tons per day. Therefore, estimates of fugitive dust from material conveyance remain up-to-date.

Anaerobic Digestion Facility

The previous estimates of area source emissions include various emissions sources associate with the AD facility. The AD facility would generally be a sealed system designed to capture all emissions; however, it would include natural gas combustion to heat percolate, flaring waste gas associated with biogas purification to CNG that is suitable for vehicles, and natural gas combustion for electricity generation.

The project no longer includes electricity generation; therefore, potential emission offsets from electricity generation have been removed. Although the project does not include a CNG vehicle fueling station, supplying natural gas to the utility natural gas pipeline system requires the same biogas purification process and flaring of waste gas. The amount of natural gas combustion necessary to heat percolate and the amount of flared waste gas would increase proportional to the AD facility capacity.

Revised Emission Estimates

Updated emissions estimates are compared to the emission estimates from the previous analysis in Table 1 and are compared to the applicable significance thresholds in Table 2. For detailed modeling results, see Attachment 1.

Table 1
Comparison to Previous Estimates (pounds per day)

Gas	Previous Analysis		Revised Estimate
	Electricity Scenario	Vehicle Fuel Scenario	
Reactive Organic Gases (ROG)	22.0	13.4	54.8
Nitrogen Oxides (NO_X)	61.6	8.1	39.2
Carbon Monoxide (CO)	146.3	28.0	116.1
Sulfur Oxides (SO_X)	32.9	2.2	16.7
Respirable Particulate Matter (PM_{10})	38.8	38.9	40.0
Fine Particulate Matter ($PM_{2.5}$)	36.9	37.0	38.1
SOURCE: Attachment 1.			

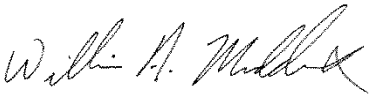
Table 2
Comparison to Significance Thresholds (pounds per day)

Gas	Revised Estimate	Significance Threshold	Exceeds Threshold?
Reactive Organic Gases (ROG)	54.8	55	***No***
Nitrogen Oxides (NO_X)	39.2	250	***No***
Carbon Monoxide (CO)	116.1	550	***No***
Sulfur Oxides (SO_X)	16.7	250	***No***
Respirable Particulate Matter (PM_{10})	40.0	100	***No***
Fine Particulate Matter ($PM_{2.5}$)	38.1	55	***No***
SOURCE: Attachment 1.			

As shown, increasing the capacity of the AD facility to 650 tons per day (237,250 tons per year) would result in emissions that approach, but do not exceed the applicable significance thresholds. Impacts would remain less than significant.

If you have any questions or if there is additional information you would like to bring to our attention, please contact me at (619) 308-9333 extension 124 or wmaddux@reconenvironmental.com.

Sincerely,



William Maddux
Senior Noise and Air Quality Specialist

WAM:sh

Attachment

Reference Cited

California Air Pollution Control Officers Association (CAPCOA)
2017 California Emissions Estimator model (CalEEMod). User's Guide Version 2016.3.2. November.

ATTACHMENT 1

Air Quality Modeling Results

Air Quality Emissions Estimates

CalEEMod Operational Emissions

Source	Season	Pollutant Emissions (pounds per day)					
		ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	Summer	5.6	0.0	0.0	0.0	0.0	0.0
Energy		0.1	0.7	0.6	0.0	0.1	0.1
Mobile		0.8	3.4	9.6	0.0	2.6	0.7
Area	Winter	5.6	0.0	0.0	0.0	0.0	0.0
Energy		0.1	0.7	0.6	0.0	0.1	0.1
Mobile		0.8	3.5	9.5	0.0	2.6	0.7
Area	Max	**5.7**	**0.7**	**0.6**	**0.0**	**0.1**	**0.1**
Mobile		**0.8**	**3.5**	**9.6**	**0.0**	**2.6**	**0.7**
Total		**6.5**	**4.2**	**10.3**	**0.0**	**2.7**	**0.8**

Conveyor Belt - Fugitive Dust Emissions

Parameter	Quantity	Units
Material Conveyed	3,223	Imperial tons per day
Emission Factor	0.005	kg per metric ton
	0.011	lbs per imperical ton
Fugitive Dust Emissions	**36.1**	lbs PM_{10} per day
Fugitive Dust Emissions	**36.1**	lbs $PM_{2.5}$ per day

Anaerobic Digestion Facility Emissions — *237,250 ton capacity*

Source	Pollutant Emissions (tons per year)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Short-term Storage (Aeration Bay)	6.24	0.00	0.00	0.00	0.00	0.00
Flare Emissions	2.43	3.04	16.50	3.04	0.00	0.00
Boiler (Heating Percolate)	0.15	3.35	2.81	0.00	0.23	0.23
Total	8.82	6.39	19.31	3.04	0.23	0.23

Source	Pollutant Emissions (pounds per day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Short-term Storage (Aeration Bay)	34.2	0.0	0.0	0.0	0.0	0.0
Flare Emissions	13.3	16.7	90.4	16.7	0.0	0.0
Boiler (Heating Percolate)	0.8	18.3	15.4	0.0	1.3	1.3
Total	**48.3**	**35.0**	**105.8**	**16.7**	**1.3**	**1.3**

Total Project Emissions — *237,250 ton capacity*

Totals	Pollutant Emissions (pounds per day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Total	54.8	39.2	116.1	16.7	40.0	38.1
Significance Thresholds	55	250	550	250	100	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

EDI Transfer Station Master Plan

San Diego County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	10.40	1000sqft	0.00	10,400.00	0
General Heavy Industry	210.50	1000sqft	2.62	210,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2020
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	432.29	**CH4 Intensity (lb/MWhr)**	0.017	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Revised to account for additional renewable energy procurement achieved by SDG&E between 2009 and 2017.

Land Use - Project site acreage

Construction Phase - Apllication of architectural coatings overlaps with building construction

Grading - Imported soils

Demolition - Demolished building area

Architectural Coating - SDAPCD Rule 67

Area Coating - SDAPCD Rule 67

Construction Off-road Equipment Mitigation - SDAPCD Rule 55

Water Mitigation - CalGreen

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	150.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	150.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaCoating	Area_EF_Nonresidential_Interior	250	150
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	PhaseEndDate	1/11/2017	12/14/2016
tblConstructionPhase	PhaseStartDate	12/29/2016	2/11/2016
tblGrading	MaterialImported	0.00	7,000.00
tblLandUse	LotAcreage	0.24	0.00
tblLandUse	LotAcreage	4.83	2.62
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.017
tblProjectCharacteristics	CO2IntensityFactor	720.49	432.29
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.004

2.0 Emissions Summary

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Energy	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419
Mobile	0.8238	3.3831	9.6071	0.0318	2.5860	0.0305	2.6166	0.6912	0.0286	0.7199		3,221.1327	3,221.1327	0.1693		3,225.3651
Total	**6.4766**	**4.1272**	**10.2547**	**0.0362**	**2.5860**	**0.0872**	**2.6732**	**0.6912**	**0.0853**	**0.7765**		**4,113.9179**	**4,113.9179**	**0.1865**	**0.0164**	**4,123.4586**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.8238	3.3831	9.6071	0.0318	2.5860	0.0305	2.6166	0.6912	0.0286	0.7199		3,221.1327	3,221.1327	0.1693		3,225.3651
Unmitigated	0.8238	3.3831	9.6071	0.0318	2.5860	0.0305	2.6166	0.6912	0.0286	0.7199		3,221.1327	3,221.1327	0.1693		3,225.3651

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	315.75	315.75	315.75	921,836	921,836
Office Park	118.77	17.06	7.90	221,552	221,552
Total	434.52	332.81	323.65	1,143,388	1,143,388

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3
Office Park	9.50	7.30	7.30	33.00	48.00	19.00	82	15	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271
Office Park	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419
NaturalGas Unmitigated	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	6666.79	0.0719	0.6536	0.5490	3.9200e-003		0.0497	0.0497		0.0497	0.0497		784.3288	784.3288	0.0150	0.0144	788.9896
Office Park	921.468	9.9400e-003	0.0903	0.0759	5.4000e-004		6.8700e-003	6.8700e-003		6.8700e-003	6.8700e-003		108.4081	108.4081	2.0800e-003	1.9900e-003	109.0523
Total		**0.0818**	**0.7440**	**0.6249**	**4.4600e-003**		**0.0565**	**0.0565**		**0.0565**	**0.0565**		**892.7368**	**892.7368**	**0.0171**	**0.0164**	**898.0419**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	6.66679	0.0719	0.6536	0.5490	3.9200e-003		0.0497	0.0497		0.0497	0.0497		784.3288	784.3288	0.0150	0.0144	788.9896
Office Park	0.921468	9.9400e-003	0.0903	0.0759	5.4000e-004		6.8700e-003	6.8700e-003		6.8700e-003	6.8700e-003		108.4081	108.4081	2.0800e-003	1.9900e-003	109.0523
Total		**0.0818**	**0.7440**	**0.6249**	**4.4600e-003**		**0.0565**	**0.0565**		**0.0565**	**0.0565**		**892.7368**	**892.7368**	**0.0171**	**0.0164**	**898.0419**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Unmitigated	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8415					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Consumer Products	4.7273					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.1400e-003	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Total	**5.5709**	**2.1000e-004**	**0.0227**	**0.0000**		**8.0000e-005**	**8.0000e-005**		**8.0000e-005**	**8.0000e-005**		**0.0483**	**0.0483**	**1.3000e-004**		**0.0516**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8415					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.7273					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.1400e-003	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Total	**5.5709**	**2.1000e-004**	**0.0227**	**0.0000**		**8.0000e-005**	**8.0000e-005**		**8.0000e-005**	**8.0000e-005**		**0.0483**	**0.0483**	**1.3000e-004**		**0.0516**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EDI Transfer Station Master Plan

San Diego County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	10.40	1000sqft	0.00	10,400.00	0
General Heavy Industry	210.50	1000sqft	2.62	210,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2020
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	432.29	**CH4 Intensity (lb/MWhr)**	0.017	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Revised to account for additional renewable energy procurement achieved by SDG&E between 2009 and 2017.

Land Use - Project site acreage

Construction Phase - Apllication of architectural coatings overlaps with building construction

Grading - Imported soils

Demolition - Demolished building area

Architectural Coating - SDAPCD Rule 67

Area Coating - SDAPCD Rule 67

Construction Off-road Equipment Mitigation - SDAPCD Rule 55

Water Mitigation - CalGreen

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	150.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	150.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaCoating	Area_EF_Nonresidential_Interior	250	150
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	PhaseEndDate	1/11/2017	12/14/2016
tblConstructionPhase	PhaseStartDate	12/29/2016	2/11/2016
tblGrading	MaterialImported	0.00	7,000.00
tblLandUse	LotAcreage	0.24	0.00
tblLandUse	LotAcreage	4.83	2.62
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.017
tblProjectCharacteristics	CO2IntensityFactor	720.49	432.29
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.004

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Energy	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419
Mobile	0.8017	3.4869	9.4648	0.0301	2.5860	0.0307	2.6168	0.6912	0.0288	0.7201		3,054.3266	3,054.3266	0.1698		3,058.5717

Total	**6.4544**	**4.2311**	**10.1124**	**0.0346**	**2.5860**	**0.0874**	**2.6734**	**0.6912**	**0.0855**	**0.7767**		**3,947.1118**	**3,947.1118**	**0.1870**	**0.0164**	**3,956.6652**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Energy	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419
Mobile	0.8017	3.4869	9.4648	0.0301	2.5860	0.0307	2.6168	0.6912	0.0288	0.7201		3,054.3266	3,054.3266	0.1698		3,058.5717
Total	**6.4544**	**4.2311**	**10.1124**	**0.0346**	**2.5860**	**0.0874**	**2.6734**	**0.6912**	**0.0855**	**0.7767**		**3,947.1118**	**3,947.1118**	**0.1870**	**0.0164**	**3,956.6652**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.8017	3.4869	9.4648	0.0301	2.5860	0.0307	2.6168	0.6912	0.0288	0.7201		3,054.3266	3,054.3266	0.1698		3,058.5717
Unmitigated	0.8017	3.4869	9.4648	0.0301	2.5860	0.0307	2.6168	0.6912	0.0288	0.7201		3,054.3266	3,054.3266	0.1698		3,058.5717

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	315.75	315.75	315.75	921,836	921,836
Office Park	118.77	17.06	7.90	221,552	221,552
Total	434.52	332.81	323.65	1,143,388	1,143,388

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3
Office Park	9.50	7.30	7.30	33.00	48.00	19.00	82	15	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271
Office Park	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419
NaturalGas Unmitigated	0.0818	0.7440	0.6249	4.4600e-003		0.0565	0.0565		0.0565	0.0565		892.7368	892.7368	0.0171	0.0164	898.0419

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	6666.79	0.0719	0.6536	0.5490	3.9200e-003		0.0497	0.0497		0.0497	0.0497		784.3288	784.3288	0.0150	0.0144	788.9896
Office Park	921.468	9.9400e-003	0.0903	0.0759	5.4000e-004		6.8700e-003	6.8700e-003		6.8700e-003	6.8700e-003		108.4081	108.4081	2.0800e-003	1.9900e-003	109.0523
Total		**0.0818**	**0.7440**	**0.6249**	**4.4600e-003**		**0.0565**	**0.0565**		**0.0565**	**0.0565**		**892.7368**	**892.7368**	**0.0171**	**0.0164**	**898.0419**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Heavy Industry	6.66679	0.0719	0.6536	0.5490	3.9200e-003		0.0497	0.0497		0.0497	0.0497		784.3288	784.3288	0.0150	0.0144	788.9896
Office Park	0.921468	9.9400e-003	0.0903	0.0759	5.4000e-004		6.8700e-003	6.8700e-003		6.8700e-003	6.8700e-003		108.4081	108.4081	2.0800e-003	1.9900e-003	109.0523
Total		**0.0818**	**0.7440**	**0.6249**	**4.4600e-003**		**0.0565**	**0.0565**		**0.0565**	**0.0565**		**892.7368**	**892.7368**	**0.0171**	**0.0164**	**898.0419**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Unmitigated	5.5709	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8415					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.7273					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.1400e-003	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Total	**5.5709**	**2.1000e-004**	**0.0227**	**0.0000**		**8.0000e-005**	**8.0000e-005**		**8.0000e-005**	**8.0000e-005**		**0.0483**	**0.0483**	**1.3000e-004**		**0.0516**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.8415					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.7273					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000

Landscaping	2.1400e-003	2.1000e-004	0.0227	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0483	0.0483	1.3000e-004		0.0516
Total	**5.5709**	**2.1000e-004**	**0.0227**	**0.0000**		**8.0000e-005**	**8.0000e-005**		**8.0000e-005**	**8.0000e-005**		**0.0483**	**0.0483**	**1.3000e-004**		**0.0516**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

APPENDIX C

EDI Transfer Station/MRF Expansion Master Plan Supplemental Greenhouse Gas Analysis, RECON Environmental, September 11, 2018

RECON

An Employee-Owned Company

September 11, 2018

Mr. Steve South
Chief Executive Officer
Escondido Disposal, Inc.
1044 W. Washington Avenue
Escondido, CA 92033

Reference: EDI Transfer Station/MRF Expansion Master Plan Supplemental Greenhouse Gas Analysis; City Case Numbers ENV15-0005 and PHG15-0010 (RECON Number 7488)

Dear Mr. South:

Per your request RECON has prepared this supplemental greenhouse gas (GHG) analysis for the Escondido Disposal, Inc. (EDI) Transfer Station/Materials Recovery Facility (MRF) Expansion Master Plan Project (project). This letter is intended to provide the City of Escondido (City) with additional information related to the findings of the GHG Analysis dated June 19, 2015. The project involved reorganization of the existing EDI recycling facility at 1044 West Washington Avenue, expansion of the facility into the lot at 1021 West Mission Avenue, and construction of an anaerobic digester (AD) facility capable of converting organic waste into natural gas. The facility is permitted to accept a maximum of 3,223 tons of solid waste per day.

The AD facility was originally designed with a capacity of 31,200 tons of organic waste per year. Operations generate larger quantities of organics suitable for anaerobic digestion than was anticipated and planned improvements to waste separation processes to support state and local long-term solid waste diversion goals will result in increased quantities of organics suitable for anaerobic digestion. Therefore, increased AD facility capacity is necessary. This analysis assesses the potential environmental impacts associated with increasing AD facility capacity to 650 tons per day (237,250 tons per year).

In addition, other project details have been refined. The previous analysis assessed two scenarios: (1) natural gas from the AD facility would be used to fuel a fleet of 40 to 50 compressed natural gas (CNG) collection vehicles or (2) natural gas from the AD facility would be used to generate 5.0 gigawatt hours (GWh) of electricity per year. These scenarios are no longer being considered. The project now proposes to supply natural gas to the utility natural gas pipeline system. This analysis updates emissions estimates to more accurately reflect site conditions and address the increased capacity.

Previous Emissions Estimates

The previous analysis evaluated GHG emission sources such as construction, vehicle emissions, energy demand, water use demand and wastewater treatment, solid waste generation, and additional sources associated with the AD facility such as the combustion of natural gas to heat percolate and flaring waste gases.

The previous analysis concluded that project emissions would be less than the City's GHG significance threshold from Municipal Code Section 33-924, which is 2,500 metric tons (MT) of carbon dioxide equivalent (CO_2E) per year.

Revised Emission Estimates Methodology

This supplemental analysis includes updates to previous project methodology based on new information and to reflect the revised project description. Whereas the previous emission estimates were calculated using CalEEMod Version 2013.2.2, updated emission estimates were calculated using CalEEMod Version 2016.3.2 (California Air Pollution Control Officers Association 2017). Updates are summarized below.

Construction

Increasing the capacity of the AD facility would involve installing additional anaerobic digestion equipment such as digestion vessels in the existing AD facility. No additional heavy-duty construction equipment would be required. Previous estimates of construction-related emissions are not dependent on the AD facility capacity and, therefore, remain up-to-date.

Vehicle Emissions

Vehicle emissions are calculated based on the vehicle type, the trip rate, and trip length for each land use. The previous vehicle emissions estimate was calculated using the California Air Resources Board's (CARB) EMFAC2011 model.

The EDI transfer station is permitted to accept a maximum of 3,223 tons of solid waste per day. Additional feedstock organics would result from increased separation of organics from the existing waste stream; the amount of solid waste accepted by the facility would remain limited to 3,223 tons per day. Therefore, estimates of vehicle use remain up-to-date; however, the emissions estimate has been revised based on CARB's EMFAC2014 model.

Energy Use

Electricity demand is causally linked to indirect emissions released from the generation of electricity from fossil fuels off-site in power plants. Additionally, natural gas consumption as an energy source results in direct emissions.

The previous estimates of electricity and natural gas use were based on average energy use rates for buildings of similar size and land use type. Estimates of building energy use are not dependent on the AD facility capacity and therefore remain up-to-date. The project no longer includes electricity generation; therefore, potential emission offsets from electricity generation have been removed.

The previous analysis was based on energy intensity factors (i.e., the amount of GHG emissions per kilowatt-hour [kW-h] of electricity generated) for San Diego Gas & Electric (SDG&E). When the previous analysis was prepared, the most recently published energy intensity factors reflected 10.5 percent procurement of renewable energy achieved by SDG&E in 2009 (California Public Utilities Commission [CPUC] 2010). The CPUC has indicated that SDG&E has achieved 46.3 percent in 2017 (CPUC 2018). Therefore, emission estimates were revised to account for reductions achieved by 46.3 percent renewable energy procurement. SDG&E energy intensity factors used in modeling are shown in Table 1.

Table 1
San Diego Gas & Electric Energy Intensity Factors

Gas	2009 Factors (lbs/MWh)	2017 Factors (lbs/MWh)
Carbon Dioxide (CO_2)	720.49	432.29
Methane (CH_4)	0.029	0.017
Nitrous Oxide (N_2O)	0.006	0.004

SOURCE: CPUC 2010 and 2018.
lbs = pounds; MWh = megawatt hour

Area Source – Anaerobic Digestion Facility

The previous estimates of area source emissions include various emissions sources associate with the AD facility. The AD facility would generally be a sealed system designed to capture all emissions, however, it would include natural gas combustion to heat percolate, flaring waste gas associated with biogas purification to CNG that is suitable for vehicles, and natural gas combustion for electricity generation.

The project no longer includes electricity generation; therefore, potential emission offsets from electricity generation have been removed. Although the project does not include a CNG vehicle fueling station, supplying natural gas to the utility natural gas pipeline system requires the same biogas purification process and flaring of waste gas. The amount of natural gas combustion necessary to heat percolate and the amount of flared waste gas would increase proportional to the AD facility capacity.

Water and Wastewater Emissions

Water demand results in indirect emissions from the electricity consumed for water extraction, conveyance, treatment, distribution, and end uses. Wastewater generation results in additional direct fugitive emissions from biodegrading organics in the wastewater stream.

The previous estimates of water use and wastewater generation were based on average water use rates for buildings of similar size and land use type. Estimates of water use and wastewater generation are not dependent on the AD facility capacity and therefore remain up-to-date; however, the emissions estimate has been revised due to the updated energy intensity factors.

Solid Waste Emissions

The disposal of solid waste containing organics results in GHG emissions from anaerobic decomposition in landfills. Solid waste emissions are defined as emission from waste generated by the project. Thus, facility GHG emissions from solid waste only includes waste produced on-site and does not include waste throughput.

The previous estimates of on-site solid waste generation were based on average disposal rates for similarly-sized heavy industrial facilities as identified by California Department of Resources Recycling and Recovery. These estimates are not dependent on the AD facility capacity and therefore remain up-to-date

Solid Waste Diversion

The project is a solid waste transfer station that includes waste separation to prevent the landfilling of organic waste. By increasing the capacity of the AD facility, the project would result in a net reduction in organics disposed of in landfills, and therefore, a reduction in area-wide GHG emissions associated with solid waste. This reduction in GHG emissions was not previously accounted for in the original GHG analysis.

Based on the methodology presented in CARB's *Method for Estimating Greenhouse Gas Emissions Reductions from Diversion of Organic Waste from Landfills to Compost Facilities*, diversion of mixed organics streams avoids 0.334 MT CO_2E per ton (CARB 2017). The current AD facility has capacity to divert 31,200 tons per year, and thereby it results in a net reduction of 10,421 MT CO_2E. The proposed AD facility would divert 237,250 tons per year, and would thereby result in a net reduction of 79,242 MT CO_2E.

Revised Emission Estimates

Updated emissions estimates are compared to the emission estimates from the previous analysis in Table 2. For detailed modeling results see Attachment 1.

Table 2
Comparison to Previous Estimates (MT CO_2E)

Gas	Previous Analysis		Revised Estimate
	Electricity Scenario	Vehicle Fuel Scenario	
Vehicles	434	434	478
Energy Use	775	775	525
Area Sources (AD Facility)	482	409	3,109
Water Use	266	266	161
Solid Waste Disposal	119	119	136
Construction	12	12	12
Total Gross Emissions	2,088	2,016	4,421
*Avoided Landfill Emissions**	*10,421*	*10,421*	*-79,242*
Total Net Emissions	**-8,333**	**-8,405**	**-74,806**

SOURCE: Attachment 1.
* This reduction in GHG emissions was not previously accounted for in the original GHG analysis. Avoided emissions have been calculated to provide an apples-to-apples emissions comparison.

Under the California Environmental Quality Act (CEQA) an impact is a "substantial, or potentially substantial, adverse change in the environment…"; CEQA does not recognize beneficial changes in the environment. As shown, increasing the capacity of the AD facility to 650 tons per day (237,250 tons per year) would result in a net emissions reduction. Additionally, the project would support state and local long-term solid waste diversion goals. The project would thereby result in environmental benefits by reducing net GHG emissions. Impacts would be considered less than significant under CEQA.

If you have any questions or if there is additional information you would like to bring to our attention, please contact me at (619) 308-9333 ext. 124 or wmaddux@reconenvironmental.com.

Sincerely,

William Maddux
Senior Noise and Air Quality Specialist

WAM:jg

Attachment

References Cited

California Air Pollution Control Officers Association
2017 California Emissions Estimator model (CalEEMod). User's Guide Version 2016.3.2. November.

California Air Resources Board (CARB)
2017 *Method for Estimating Greenhouse Gas Emissions Reductions from Diversion of Organic Waste from Landfills to Compost Facilities, Final Draft*. May 2017. Accessed September 7, 2018 at https://www.arb.ca.gov/cc/waste/cerffinal.pdf

California Public Utilities Commission (CPUC)
2010 Renewable Portfolio Standard Quarterly Report, 2nd Quarter 2010.

2018 2018 Padilla Report, Costs and Cost Savings for the RPS Program (Public Utilities Code 913.3. May 1, 2018. Accessed September 7, 2018 at: http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/Office_of_Governmental_Affairs/Legislation/2018/MASTER%202018%20PADILLA%20REPORT_FINAL.pdf

ATTACHMENT 1

Greenhouse Gas Modeling Results

Greenhouse Gas Emissions Estimates

EDI Transfer Station

Emission Source	Emissions (MT CO_2E)
Vehicles	478
Energy Use	525
Area Sources	0
Water Use	161
Solid Waste Disposal	136
Construction	12

Solid Waste Diversion	*31,200 ton capacity*	
Parameter	Quantity	Units
Existing AD Facility Capacity	31,200	tons per year
Existing Avoided Emissions Rate	0.334	MT CO_2E per ton
Existing Avoided Emissions	**10,421**	**MT CO_2E**

	237,250 ton capacity	
Proposed AD Facility Capacity	237,250	tons per year
Proposed Avoided Emissions Rate	0.334	MT CO_2E per ton
Proposed Avoided Emissions	**79,242**	**MT CO_2E**

AD Facility Emissions	*237,250 ton capacity*
Emissions (MT CO_2E)	Vehicle Fuel
CH4	3,036
N2O	73
Total	**3,109**

Total Project Emissions	*237,250 ton capacity*
Emission Source	Emissions (MT CO_2E)
Vehicles	478
Energy Use	525
Area Sources	3,109
Water Use	161
Solid Waste Disposal	-79,105
Construction	12
Total	**-74,820**

Exceeds 2,500 MT CO_2E?	**No**

EDI Transfer Station Master Plan

San Diego County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Office Park	10.40	1000sqft	0.00	10,400.00	0
General Heavy Industry	210.50	1000sqft	2.62	210,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	40
Climate Zone	13			**Operational Year**	2020
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MWhr)	432.29	**CH4 Intensity (lb/MWhr)**	0.017	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Revised to account for additional renewable energy procurement achieved by SDG&E between 2009 and 2017.

Land Use - Project site acreage

Construction Phase - Apllication of architectural coatings overlaps with building construction

Grading - Imported soils

Demolition - Demolished building area

Architectural Coating - SDAPCD Rule 67

Area Coating - SDAPCD Rule 67

Construction Off-road Equipment Mitigation - SDAPCD Rule 55

Water Mitigation - CalGreen

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	150.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	150.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaCoating	Area_EF_Nonresidential_Interior	250	150
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	PhaseEndDate	1/11/2017	12/14/2016
tblConstructionPhase	PhaseStartDate	12/29/2016	2/11/2016
tblGrading	MaterialImported	0.00	7,000.00
tblLandUse	LotAcreage	0.24	0.00
tblLandUse	LotAcreage	4.83	2.62
tblProjectCharacteristics	CH4IntensityFactor	0.029	0.017
tblProjectCharacteristics	CO2IntensityFactor	720.49	432.29
tblProjectCharacteristics	N2OIntensityFactor	0.006	0.004

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2016	2.1352	4.3793	3.0705	6.1900e-003	0.1860	0.2405	0.4265	0.0513	0.2303	0.2816	0.0000	556.4644	556.4644	0.0866	0.0000	558.6301
Maximum	**2.1352**	**4.3793**	**3.0705**	**6.1900e-003**	**0.1860**	**0.2405**	**0.4265**	**0.0513**	**0.2303**	**0.2816**	**0.0000**	**556.4644**	**556.4644**	**0.0866**	**0.0000**	**558.6301**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2016	2.1352	4.3793	3.0705	6.1900e-003	0.1549	0.2405	0.3954	0.0423	0.2303	0.2726	0.0000	556.4641	556.4641	0.0866	0.0000	558.6298
Maximum	**2.1352**	**4.3793**	**3.0705**	**6.1900e-003**	**0.1549**	**0.2405**	**0.3954**	**0.0423**	**0.2303**	**0.2726**	**0.0000**	**556.4641**	**556.4641**	**0.0866**	**0.0000**	**558.6298**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**16.73**	**0.00**	**7.30**	**17.54**	**0.00**	**3.19**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**1-1-2016**	**3-31-2016**	1.6052	1.6052
2	**4-1-2016**	**6-30-2016**	1.6897	1.6897
3	**7-1-2016**	**9-30-2016**	1.7083	1.7083
		Highest	1.7083	1.7083

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.0165	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003
Energy	0.0149	0.1358	0.1141	8.1000e-004		0.0103	0.0103		0.0103	0.0103	0.0000	522.9822	522.9822	0.0176	6.1800e-003	525.2639

Mobile	0.1328	0.5948	1.5934	5.1800e-003	0.4309	5.2100e-003	0.4361	0.1154	4.8900e-003	0.1203	0.0000	476.9909	476.9909	0.0260	0.0000	477.6404
Waste						0.0000	0.0000		0.0000	0.0000	54.9476	0.0000	54.9476	3.2473	0.0000	136.1304
Water						0.0000	0.0000		0.0000	0.0000	16.0298	131.4726	147.5023	1.6516	0.0401	200.7391
Total	**1.1642**	**0.7306**	**1.7095**	**5.9900e-003**	**0.4309**	**0.0155**	**0.4465**	**0.1154**	**0.0152**	**0.1306**	**70.9774**	**1,131.4496**	**1,202.4270**	**4.9425**	**0.0463**	**1,339.7780**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.0165	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003
Energy	0.0149	0.1358	0.1141	8.1000e-004		0.0103	0.0103		0.0103	0.0103	0.0000	522.9822	522.9822	0.0176	6.1800e-003	525.2639
Mobile	0.1328	0.5948	1.5934	5.1800e-003	0.4309	5.2100e-003	0.4361	0.1154	4.8900e-003	0.1203	0.0000	476.9909	476.9909	0.0260	0.0000	477.6404
Waste						0.0000	0.0000		0.0000	0.0000	54.9476	0.0000	54.9476	3.2473	0.0000	136.1304
Water						0.0000	0.0000		0.0000	0.0000	12.8238	105.6717	118.4955	1.3213	0.0321	161.0868
Total	**1.1642**	**0.7306**	**1.7095**	**5.9900e-003**	**0.4309**	**0.0155**	**0.4465**	**0.1154**	**0.0152**	**0.1306**	**67.7714**	**1,105.6487**	**1,173.4202**	**4.6122**	**0.0383**	**1,300.1257**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.52**	**2.28**	**2.41**	**6.68**	**17.31**	**2.96**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2016	1/28/2016	5	20	

2	Site Preparation	Site Preparation	1/29/2016	2/2/2016	5	3	
3	Grading	Grading	2/3/2016	2/10/2016	5	6	
4	Building Construction	Building Construction	2/11/2016	12/14/2016	5	220	
5	Paving	Paving	12/15/2016	12/28/2016	5	10	
6	Architectural Coating	Architectural Coating	2/11/2016	12/14/2016	5	220	

Acres of Grading (Site Preparation Phase): 4.5

Acres of Grading (Grading Phase): 3

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 331,350; Non-Residential Outdoor: 110,450; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	8.00	231	0.29
Building Construction	Forklifts	2	7.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	8.00	130	0.42
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41

Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Scrapers	1	8.00	367	0.48
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	260.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	875.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	92.00	36.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0285	0.0000	0.0285	4.3200e-003	0.0000	4.3200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0295	0.2832	0.1577	2.4000e-004		0.0179	0.0179		0.0167	0.0167	0.0000	22.2392	22.2392	5.6100e-003	0.0000	22.3794
Total	**0.0295**	**0.2832**	**0.1577**	**2.4000e-004**	**0.0285**	**0.0179**	**0.0464**	**4.3200e-003**	**0.0167**	**0.0211**	**0.0000**	**22.2392**	**22.2392**	**5.6100e-003**	**0.0000**	**22.3794**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.7800e-003	0.0509	0.0105	1.1000e-004	2.2200e-003	4.2000e-004	2.6500e-003	6.1000e-004	4.0000e-004	1.0200e-003	0.0000	10.4141	10.4141	9.6000e-004	0.0000	10.4381
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.8000e-004	5.6000e-004	5.4100e-003	1.0000e-005	1.0400e-003	1.0000e-005	1.0500e-003	2.8000e-004	1.0000e-005	2.8000e-004	0.0000	1.0594	1.0594	4.0000e-005	0.0000	1.0605
Total	**2.4600e-003**	**0.0515**	**0.0159**	**1.2000e-004**	**3.2600e-003**	**4.3000e-004**	**3.7000e-003**	**8.9000e-004**	**4.1000e-004**	**1.3000e-003**	**0.0000**	**11.4735**	**11.4735**	**1.0000e-003**	**0.0000**	**11.4986**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0111	0.0000	0.0111	1.6800e-003	0.0000	1.6800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0295	0.2832	0.1577	2.4000e-004		0.0179	0.0179		0.0167	0.0167	0.0000	22.2392	22.2392	5.6100e-003	0.0000	22.3793
Total	**0.0295**	**0.2832**	**0.1577**	**2.4000e-004**	**0.0111**	**0.0179**	**0.0290**	**1.6800e-003**	**0.0167**	**0.0184**	**0.0000**	**22.2392**	**22.2392**	**5.6100e-003**	**0.0000**	**22.3793**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Hauling	1.7800e-003	0.0509	0.0105	1.1000e-004	2.2200e-003	4.2000e-004	2.6500e-003	6.1000e-004	4.0000e-004	1.0200e-003	0.0000	10.4141	10.4141	9.6000e-004	0.0000	10.4381
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.8000e-004	5.6000e-004	5.4100e-003	1.0000e-005	1.0400e-003	1.0000e-005	1.0500e-003	2.8000e-004	1.0000e-005	2.8000e-004	0.0000	1.0594	1.0594	4.0000e-005	0.0000	1.0605
Total	**2.4600e-003**	**0.0515**	**0.0159**	**1.2000e-004**	**3.2600e-003**	**4.3000e-004**	**3.7000e-003**	**8.9000e-004**	**4.1000e-004**	**1.3000e-003**	**0.0000**	**11.4735**	**11.4735**	**1.0000e-003**	**0.0000**	**11.4986**

3.3 Site Preparation - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.3900e-003	0.0000	2.3900e-003	2.6000e-004	0.0000	2.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3600e-003	0.0426	0.0229	4.0000e-005		1.7800e-003	1.7800e-003		1.6400e-003	1.6400e-003	0.0000	3.4677	3.4677	1.0500e-003	0.0000	3.4939
Total	**3.3600e-003**	**0.0426**	**0.0229**	**4.0000e-005**	**2.3900e-003**	**1.7800e-003**	**4.1700e-003**	**2.6000e-004**	**1.6400e-003**	**1.9000e-003**	**0.0000**	**3.4677**	**3.4677**	**1.0500e-003**	**0.0000**	**3.4939**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	5.0000e-005	5.0000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0978	0.0978	0.0000	0.0000	0.0979

Total	**6.0000e-005**	**5.0000e-005**	**5.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0978**	**0.0978**	**0.0000**	**0.0000**	**0.0979**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.3000e-004	0.0000	9.3000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.3600e-003	0.0426	0.0229	4.0000e-005		1.7800e-003	1.7800e-003		1.6400e-003	1.6400e-003	0.0000	3.4677	3.4677	1.0500e-003	0.0000	3.4939
Total	**3.3600e-003**	**0.0426**	**0.0229**	**4.0000e-005**	**9.3000e-004**	**1.7800e-003**	**2.7100e-003**	**1.0000e-004**	**1.6400e-003**	**1.7400e-003**	**0.0000**	**3.4677**	**3.4677**	**1.0500e-003**	**0.0000**	**3.4939**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	5.0000e-005	5.0000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0978	0.0978	0.0000	0.0000	0.0979
Total	**6.0000e-005**	**5.0000e-005**	**5.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0978**	**0.0978**	**0.0000**	**0.0000**	**0.0979**

3.4 Grading - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0202	0.0000	0.0202	0.0102	0.0000	0.0102	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2500e-003	0.0819	0.0329	6.0000e-005		4.1300e-003	4.1300e-003		3.8000e-003	3.8000e-003	0.0000	5.8408	5.8408	1.7600e-003	0.0000	5.8848
Total	**7.2500e-003**	**0.0819**	**0.0329**	**6.0000e-005**	**0.0202**	**4.1300e-003**	**0.0243**	**0.0102**	**3.8000e-003**	**0.0140**	**0.0000**	**5.8408**	**5.8408**	**1.7600e-003**	**0.0000**	**5.8848**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.9800e-003	0.1714	0.0353	3.6000e-004	7.4900e-003	1.4200e-003	8.9100e-003	2.0600e-003	1.3600e-003	3.4200e-003	0.0000	35.0474	35.0474	3.2400e-003	0.0000	35.1283
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.3000e-004	1.2500e-003	0.0000	2.4000e-004	0.0000	2.4000e-004	6.0000e-005	0.0000	7.0000e-005	0.0000	0.2445	0.2445	1.0000e-005	0.0000	0.2447
Total	**6.1400e-003**	**0.1715**	**0.0365**	**3.6000e-004**	**7.7300e-003**	**1.4200e-003**	**9.1500e-003**	**2.1200e-003**	**1.3600e-003**	**3.4900e-003**	**0.0000**	**35.2919**	**35.2919**	**3.2500e-003**	**0.0000**	**35.3730**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Fugitive Dust					7.8600e-003	0.0000	7.8600e-003	3.9700e-003	0.0000	3.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2500e-003	0.0819	0.0329	6.0000e-005		4.1300e-003	4.1300e-003		3.8000e-003	3.8000e-003	0.0000	5.8408	5.8408	1.7600e-003	0.0000	5.8848
Total	**7.2500e-003**	**0.0819**	**0.0329**	**6.0000e-005**	**7.8600e-003**	**4.1300e-003**	**0.0120**	**3.9700e-003**	**3.8000e-003**	**7.7700e-003**	**0.0000**	**5.8408**	**5.8408**	**1.7600e-003**	**0.0000**	**5.8848**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.9800e-003	0.1714	0.0353	3.6000e-004	7.4900e-003	1.4200e-003	8.9100e-003	2.0600e-003	1.3600e-003	3.4200e-003	0.0000	35.0474	35.0474	3.2400e-003	0.0000	35.1283
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.3000e-004	1.2500e-003	0.0000	2.4000e-004	0.0000	2.4000e-004	6.0000e-005	0.0000	7.0000e-005	0.0000	0.2445	0.2445	1.0000e-005	0.0000	0.2447
Total	**6.1400e-003**	**0.1715**	**0.0365**	**3.6000e-004**	**7.7300e-003**	**1.4200e-003**	**9.1500e-003**	**2.1200e-003**	**1.3600e-003**	**3.4900e-003**	**0.0000**	**35.2919**	**35.2919**	**3.2500e-003**	**0.0000**	**35.3730**

3.5 Building Construction - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4086	2.7303	1.8461	2.7500e-003		0.1798	0.1798		0.1721	0.1721	0.0000	236.0234	236.0234	0.0545	0.0000	237.3853
Total	**0.4086**	**2.7303**	**1.8461**	**2.7500e-003**		**0.1798**	**0.1798**		**0.1721**	**0.1721**	**0.0000**	**236.0234**	**236.0234**	**0.0545**	**0.0000**	**237.3853**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0286	0.6139	0.1828	1.1000e-003	0.0263	6.9900e-003	0.0333	7.5900e-003	6.6900e-003	0.0143	0.0000	106.4277	106.4277	9.6600e-003	0.0000	106.6691
Worker	0.0532	0.0438	0.4211	9.1000e-004	0.0812	6.3000e-004	0.0818	0.0216	5.9000e-004	0.0222	0.0000	82.4693	82.4693	3.3700e-003	0.0000	82.5536
Total	**0.0817**	**0.6577**	**0.6038**	**2.0100e-003**	**0.1074**	**7.6200e-003**	**0.1151**	**0.0292**	**7.2800e-003**	**0.0364**	**0.0000**	**188.8970**	**188.8970**	**0.0130**	**0.0000**	**189.2227**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4086	2.7303	1.8461	2.7500e-003		0.1798	0.1798		0.1721	0.1721	0.0000	236.0232	236.0232	0.0545	0.0000	237.3851
Total	**0.4086**	**2.7303**	**1.8461**	**2.7500e-003**		**0.1798**	**0.1798**		**0.1721**	**0.1721**	**0.0000**	**236.0232**	**236.0232**	**0.0545**	**0.0000**	**237.3851**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0286	0.6139	0.1828	1.1000e-003	0.0263	6.9900e-003	0.0333	7.5900e-003	6.6900e-003	0.0143	0.0000	106.4277	106.4277	9.6600e-003	0.0000	106.6691
Worker	0.0532	0.0438	0.4211	9.1000e-004	0.0812	6.3000e-004	0.0818	0.0216	5.9000e-004	0.0222	0.0000	82.4693	82.4693	3.3700e-003	0.0000	82.5536
Total	**0.0817**	**0.6577**	**0.6038**	**2.0100e-003**	**0.1074**	**7.6200e-003**	**0.1151**	**0.0292**	**7.2800e-003**	**0.0364**	**0.0000**	**188.8970**	**188.8970**	**0.0130**	**0.0000**	**189.2227**

3.6 Paving - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.0100e-003	0.0908	0.0615	9.0000e-005		5.6800e-003	5.6800e-003		5.2400e-003	5.2400e-003	0.0000	8.3009	8.3009	2.4600e-003	0.0000	8.3624
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.0100e-003**	**0.0908**	**0.0615**	**9.0000e-005**		**5.6800e-003**	**5.6800e-003**		**5.2400e-003**	**5.2400e-003**	**0.0000**	**8.3009**	**8.3009**	**2.4600e-003**	**0.0000**	**8.3624**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.9000e-004	3.2000e-004	3.1200e-003	1.0000e-005	6.0000e-004	0.0000	6.1000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.6112	0.6112	2.0000e-005	0.0000	0.6118

Total	**3.9000e-004**	**3.2000e-004**	**3.1200e-003**	**1.0000e-005**	**6.0000e-004**	**0.0000**	**6.1000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.6112**	**0.6112**	**2.0000e-005**	**0.0000**	**0.6118**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	9.0100e-003	0.0908	0.0615	9.0000e-005		5.6800e-003	5.6800e-003		5.2400e-003	5.2400e-003	0.0000	8.3009	8.3009	2.4600e-003	0.0000	8.3623
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**9.0100e-003**	**0.0908**	**0.0615**	**9.0000e-005**		**5.6800e-003**	**5.6800e-003**		**5.2400e-003**	**5.2400e-003**	**0.0000**	**8.3009**	**8.3009**	**2.4600e-003**	**0.0000**	**8.3623**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.9000e-004	3.2000e-004	3.1200e-003	1.0000e-005	6.0000e-004	0.0000	6.1000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.6112	0.6112	2.0000e-005	0.0000	0.6118
Total	**3.9000e-004**	**3.2000e-004**	**3.1200e-003**	**1.0000e-005**	**6.0000e-004**	**0.0000**	**6.1000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.6112**	**0.6112**	**2.0000e-005**	**0.0000**	**0.6118**

3.7 Architectural Coating - 2016

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.5358					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0405	0.2610	0.2072	3.3000e-004		0.0216	0.0216		0.0216	0.0216	0.0000	28.0858	28.0858	3.3100e-003	0.0000	28.1686
Total	**1.5763**	**0.2610**	**0.2072**	**3.3000e-004**		**0.0216**	**0.0216**		**0.0216**	**0.0216**	**0.0000**	**28.0858**	**28.0858**	**3.3100e-003**	**0.0000**	**28.1686**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0104	8.5700e-003	0.0824	1.8000e-004	0.0159	1.2000e-004	0.0160	4.2200e-003	1.1000e-004	4.3300e-003	0.0000	16.1353	16.1353	6.6000e-004	0.0000	16.1518
Total	**0.0104**	**8.5700e-003**	**0.0824**	**1.8000e-004**	**0.0159**	**1.2000e-004**	**0.0160**	**4.2200e-003**	**1.1000e-004**	**4.3300e-003**	**0.0000**	**16.1353**	**16.1353**	**6.6000e-004**	**0.0000**	**16.1518**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Archit. Coating	1.5358					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0405	0.2610	0.2072	3.3000e-004		0.0216	0.0216		0.0216	0.0216	0.0000	28.0858	28.0858	3.3100e-003	0.0000	28.1685
Total	**1.5763**	**0.2610**	**0.2072**	**3.3000e-004**		**0.0216**	**0.0216**		**0.0216**	**0.0216**	**0.0000**	**28.0858**	**28.0858**	**3.3100e-003**	**0.0000**	**28.1685**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0104	8.5700e-003	0.0824	1.8000e-004	0.0159	1.2000e-004	0.0160	4.2200e-003	1.1000e-004	4.3300e-003	0.0000	16.1353	16.1353	6.6000e-004	0.0000	16.1518
Total	**0.0104**	**8.5700e-003**	**0.0824**	**1.8000e-004**	**0.0159**	**1.2000e-004**	**0.0160**	**4.2200e-003**	**1.1000e-004**	**4.3300e-003**	**0.0000**	**16.1353**	**16.1353**	**6.6000e-004**	**0.0000**	**16.1518**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1328	0.5948	1.5934	5.1800e-003	0.4309	5.2100e-003	0.4361	0.1154	4.8900e-003	0.1203	0.0000	476.9909	476.9909	0.0260	0.0000	477.6404

Unmitigated	0.1328	0.5948	1.5934	5.1800e-003	0.4309	5.2100e-003	0.4361	0.1154	4.8900e-003	0.1203	0.0000	476.9909	476.9909	0.0260	0.0000	477.6404

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	315.75	315.75	315.75	921,836	921,836
Office Park	118.77	17.06	7.90	221,552	221,552
Total	434.52	332.81	323.65	1,143,388	1,143,388

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3
Office Park	9.50	7.30	7.30	33.00	48.00	19.00	82	15	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271
Office Park	0.588316	0.042913	0.184449	0.110793	0.017294	0.005558	0.015534	0.023021	0.001902	0.002024	0.006181	0.000745	0.001271

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	375.1796	375.1796	0.0148	3.4700e-003	376.5830
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	375.1796	375.1796	0.0148	3.4700e-003	376.5830
NaturalGas Mitigated	0.0149	0.1358	0.1141	8.1000e-004		0.0103	0.0103		0.0103	0.0103	0.0000	147.8026	147.8026	2.8300e-003	2.7100e-003	148.6809
NaturalGas Unmitigated	0.0149	0.1358	0.1141	8.1000e-004		0.0103	0.0103		0.0103	0.0103	0.0000	147.8026	147.8026	2.8300e-003	2.7100e-003	148.6809

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	2.43338e+006	0.0131	0.1193	0.1002	7.2000e-004		9.0700e-003	9.0700e-003		9.0700e-003	9.0700e-003	0.0000	129.8544	129.8544	2.4900e-003	2.3800e-003	130.6261
Office Park	336336	1.8100e-003	0.0165	0.0139	1.0000e-004		1.2500e-003	1.2500e-003		1.2500e-003	1.2500e-003	0.0000	17.9482	17.9482	3.4000e-004	3.3000e-004	18.0548
Total		**0.0149**	**0.1358**	**0.1141**	**8.2000e-004**		**0.0103**	**0.0103**		**0.0103**	**0.0103**	**0.0000**	**147.8026**	**147.8026**	**2.8300e-003**	**2.7100e-003**	**148.6809**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	2.43338e+006	0.0131	0.1193	0.1002	7.2000e-004		9.0700e-003	9.0700e-003		9.0700e-003	9.0700e-003	0.0000	129.8544	129.8544	2.4900e-003	2.3800e-003	130.6261
Office Park	336336	1.8100e-003	0.0165	0.0139	1.0000e-004		1.2500e-003	1.2500e-003		1.2500e-003	1.2500e-003	0.0000	17.9482	17.9482	3.4000e-004	3.3000e-004	18.0548
Total		**0.0149**	**0.1358**	**0.1141**	**8.2000e-004**		**0.0103**	**0.0103**		**0.0103**	**0.0103**	**0.0000**	**147.8026**	**147.8026**	**2.8300e-003**	**2.7100e-003**	**148.6809**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	1.74925e+006	343.0000	0.0135	3.1700e-003	344.2830
Office Park	164112	32.1797	1.2700e-003	3.0000e-004	32.3000
Total		**375.1796**	**0.0148**	**3.4700e-003**	**376.5830**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	1.74925e+006	343.0000	0.0135	3.1700e-003	344.2830
Office Park	164112	32.1797	1.2700e-003	3.0000e-004	32.3000
Total		**375.1796**	**0.0148**	**3.4700e-003**	**376.5830**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.0165	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003
Unmitigated	1.0165	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1536					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.8627					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003
Total	**1.0165**	**2.0000e-005**	**2.0400e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**	**0.0000**	**3.9500e-003**	**3.9500e-003**	**1.0000e-005**	**0.0000**	**4.2100e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1536					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.8627					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.9000e-004	2.0000e-005	2.0400e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	3.9500e-003	3.9500e-003	1.0000e-005	0.0000	4.2100e-003
Total	**1.0165**	**2.0000e-005**	**2.0400e-003**	**0.0000**		**1.0000e-005**	**1.0000e-005**		**1.0000e-005**	**1.0000e-005**	**0.0000**	**3.9500e-003**	**3.9500e-003**	**1.0000e-005**	**0.0000**	**4.2100e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	118.4955	1.3213	0.0321	161.0868
Unmitigated	147.5023	1.6516	0.0401	200.7391

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			

General Heavy Industry	48.6781 / 0	139.7284	1.5911	0.0386	191.0088
Office Park	1.84843 / 1.13291	7.7739	0.0605	1.4900e-003	9.7303
Total		**147.5023**	**1.6516**	**0.0401**	**200.7391**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	38.9425 / 0	111.7828	1.2729	0.0309	152.8070
Office Park	1.47874 / 1.13291	6.7127	0.0484	1.2000e-003	8.2797
Total		**118.4955**	**1.3213**	**0.0321**	**161.0868**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	54.9476	3.2473	0.0000	136.1304
Unmitigated	54.9476	3.2473	0.0000	136.1304

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	261.02	52.9847	3.1313	0.0000	131.2674
Office Park	9.67	1.9629	0.1160	0.0000	4.8631
Total		**54.9476**	**3.2473**	**0.0000**	**136.1304**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	261.02	52.9847	3.1313	0.0000	131.2674
Office Park	9.67	1.9629	0.1160	0.0000	4.8631
Total		**54.9476**	**3.2473**	**0.0000**	**136.1304**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation