

18. Project Alternatives

18.1 Introduction

Section 15126.6(c) of the *California Environmental Quality Act (CEQA) Guidelines* require an environmental impact report (EIR) to describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which could feasibly attain most of the basic project objectives while also avoiding or substantially lessening any of the significant environmental effects of the proposed project. A “rule of reason” governs the range of alternatives to be evaluated in the EIR and specifies that an EIR should only discuss those alternatives necessary to allow a reasoned choice by decision makers. Of the alternatives considered, an EIR needs to examine in detail only those the lead agency determines could feasibly attain most of the basic objectives of the project.

As defined by CEQA (Section 21061.1), “feasible” means an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into consideration economic, environmental, social, and technological factors. In accordance with CEQA Guidelines Section 15126.6(f)(1), in determining the feasibility of an alternative, the EIR evaluation may consider several factors, including site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project applicant can reasonably acquire, control, or otherwise have reasonable access to an alternative facility or proposed alternative site. If an alternative would cause one or more significant effects, over and beyond those associated with the proposed project after mitigation is applied, those significant effects must be discussed, but in less detail than the proposed project’s effects.

The proposed project would result in significant and unavoidable impacts on aesthetic resources, air quality, greenhouse gas (GHG) emissions, and transportation. Additionally, the proposed project would result in the loss of sensitive biological resources, including direct and indirect impacts on listed species. The proposed project’s impacts on biological resources would be reduced to less-than-significant levels through participation in the Placer County Conservation Program (PCCP)⁴¹ (refer to Chapter 7, Biological Resources, for additional information).

Aesthetics. Implementation of the proposed project would result in significant aesthetics impacts, primarily related to the final maximum elevation of the Western Regional Sanitary Landfill (WRSL). The landfill under the proposed project would be much more prominent in the landscape because of its larger size and height, resulting in greater levels of visual contrast with the surrounding open space and agricultural land uses. In many nearby views, the landfill would grow to become the dominant visual element. Additionally, the generation of offsite litter from vehicles accessing the facility would continue to be significant and unavoidable as the project expands.

Air Quality. Implementation of the proposed project would result in significant air quality impacts. Specifically, the proposed project has the potential to result in impacts related to construction and operational emissions of criteria air pollutants and ozone precursors and odors that remain significant and unavoidable after mitigation.

⁴¹ Federal, state, and local partners held a signing ceremony in Lincoln, California on July 22, 2021, to mark the Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan’s (HCP/NCCP) transition into implementation. This signing ceremony marked the final approval of the PCCP.

Biological Resources. Implementation of the proposed project would result in significant impacts to biological resources. Specifically, the proposed project would result in loss and degradation of habitat for special-status wildlife species that rely on vernal pool-type wetlands for at least a portion of their lifecycle, including federally listed vernal pool fairy shrimp and vernal pool tadpole shrimp and western spadefoot, a California species of special concern.

Greenhouse Gas Emissions. Implementation of the proposed project would result in significant impacts related to construction and operational GHG emissions that would remain significant and unavoidable after mitigation. Specifically, annual GHG emissions estimated for the proposed project would exceed the Placer County Air Pollution Control District's (PCAPCD) recommended GHG significance thresholds, including the bright-line threshold of 10,000 metric tons of carbon dioxide equivalent per year.

Transportation. Implementation of the proposed project would result in significant and unavoidable impacts related to transportation. Specifically, the proposed project would result in new daily vehicle travel, which would result in a net increase in vehicle miles traveled (VMT) in excess of the significance threshold.

The potential for project alternatives to reduce significant environmental impacts was taken into consideration in the alternatives selection process with a specific focus on the significant and unavoidable impacts identified previously. Biological resources were also specifically taken into consideration during the alternatives selection process because of the unique vernal pool resources on the project site and the substantial loss of these resources within the State.

The remainder of this chapter presents information used for identifying and evaluating alternatives. The purpose and objectives of the proposed project are restated in Section 18.2. Section 18.3 describes the process used for evaluating potential alternatives. Section 18.4 identifies alternatives considered but eliminated from consideration. Section 18.5 presents the alternatives to the proposed project fully analyzed in this Draft EIR (DEIR). Section 18.6 compares the alternatives, and Section 18.7 discusses the environmentally superior alternative.

18.2 Factors Considered in Identifying Project Alternatives

State CEQA Guidelines Section 15126.6(a) provides guidance regarding what the alternatives analysis should consider. Specifically, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Subsection (b) states the purpose of the alternatives analysis, as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (*Public Resources Code* Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The CEQA Guidelines further require that the alternatives be compared with the proposed project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6[d][e]).

In determining what alternatives should be considered in the EIR, it is important to acknowledge the project's objectives, the project's significant effects, and unique project considerations. These factors are crucial in developing alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted previously, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body; for this EIR, the Western Placer Waste Management Authority (WPWMA) Board is the lead agency. (See *Public Resources Code*, § 21081[a][3].) At the time that it considers taking action on the project, the Board may consider evidence beyond that found in this EIR in addressing such determinations. The Board, for example, may conclude that a particular alternative is infeasible (that is, undesirable) from a policy standpoint, and may reject an alternative on that ground, provided that the Board adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a "reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 714-716 (court upholds findings rejecting alternatives for not fully satisfying project objectives)).

The purpose and objectives of the proposed project were considered in selecting alternatives for evaluation and comparison in this chapter to determine whether the alternatives could feasibly accomplish most of the project's objectives. For reference purposes, the purposes and objectives of the proposed project are summarized as follows.

The purpose of the Waste Action Plan is to identify the physical and operational changes needed at the WPWMA facility so that the facility can support future waste recovery and waste disposal needs for the rapidly growing communities it serves while complying with an increasingly complex regulatory environment and fluctuating global recyclables markets. The Waste Action Plan was also developed to maintain a stable cost structure for the Participating Agencies, improve operational efficiencies and customer safety, and continue to enhance compatibility between ongoing operations and current and future adjacent land uses.

The WPWMA developed the Waste Action Plan to articulate a long-term vision for optimizing the ongoing solid waste management services provided to the Participating Agencies. The objectives of the Waste Action Plan that would help achieve this vision are described as follows:

- Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.
- Expand the site's capacity to divert materials from landfill disposal and reduce greenhouse gas emissions through expanded composting, improved recovery of construction and demolition (C&D) materials, recycling, and public buy-back activities.
- Increase the WRSL's permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies' waste streams.
- Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.
- Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and conduct operations associated with Waste Action Plan implementation in the most environmentally responsible manner possible.

- Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.
 - Compatible technologies could include both proven and innovative recycling strategies intended to capitalize on an evolving local recyclable materials market and potentially reduce dependence on foreign markets.
 - Developing compatible technologies could promote state-mandated waste diversion goals, offset costs associated with ongoing solid waste operations, and generate innovative and creative economic opportunities within the County consistent with the Sunset Area Plan's objectives (Placer County 2019).
- Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area's anticipated transition to a more urban environment.
- Encourage implementation of the Placer County Conservation Program (PCCP) and the integration of environmentally conscious practices into the facility operations.
- Develop the WPWMA's properties in a manner consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).
- Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.

Under CEQA Guidelines Section 15126.6, as noted earlier, the alternatives to be discussed in detail in an EIR should be able to "feasibly attain most of the basic objectives of the project"; for this reason, the objectives described previously provided the framework for defining possible feasible alternatives.

The following identifies the alternatives considered but eliminated from further evaluation and the rationale for determining their infeasibility. Those alternatives that were considered feasible and evaluated in comparison to the proposed project are also identified, followed by a detailed comparative analysis. The comparative analysis specifically identifies whether these alternatives could feasibly accomplish most of the project's objectives and could avoid or substantially lessen one or more of the significant project effects.

For a detailed description of how the plan concepts were developed and how Plan Concept 1 was identified as the preferred project, see Sections 4.1 and 4.2 of Chapter 4, Approach.

Alternatives considered by the WPWMA but eliminated from detailed discussion in this EIR include the following:

- Alternative Location in Placer County
- Landfill Closure and Transfer to Out-of-County Landfill

A qualitative evaluation of these alternatives is provided in Section 18.3.

Alternatives considered by the WPWMA and evaluated in this Alternatives chapter include the following:

- No Project (Alternative A)
- Prioritize Waste Recovery Alternative (Alternative B)
- No Organics Processing Alternative (Alternative C)
- Three-Bin Clean MRF Alternative (Alternative D)

A qualitative evaluation of these alternatives is provided in Section 18.5 and compared with the preferred plan concept in Section 18.6.

18.3 Alternatives Considered but Eliminated

18.3.1 Alternative Location in Placer County

This alternative assumes that the WPWMA would continue to be a regional authority established through a joint exercise of powers agreement between Placer County and the cities of Lincoln, Rocklin, and Roseville to own, operate, and maintain a sanitary landfill and all related improvements. Under the Alternative Location in Placer County Alternative, the WPWMA would relocate all solid waste management activities to a new facility located where it could continue to provide the solid waste management needs of Placer County and the cities of Lincoln, Rocklin, and Roseville, although the exact location of such a facility is unknown and speculative.

Under this alternative, instead of proceeding with the Waste Action Plan at the current location, the WPWMA would search for and identify the location of a replacement facility. It is anticipated that a feasible location would be sought within approximately 20 miles of the existing facility, roughly equivalent in size to the currently owned WPWMA property acreage. This site would require construction of the existing and future solid waste management facilities currently at the site and proposed for the proposed project, including siting and permitting a new Class II or Class III sanitary landfill.

For an alternative location for the proposed project to be considered feasible, the site would have to be suitable for landfill development and meet the detailed siting and design criteria established in *California Code of Regulations* (CCR) Title 27. These criteria would preclude any property that would not meet the Title 27 landfill siting requirements. In general, the State of California siting regulations (which are mostly based on the federal Subtitle D regulations) restrict landfills from locating in areas near runways, within 100-year floodplains, in unstable terrain, in wetlands, or in active fault zones. Additional State of California criteria address site development and feasibility. Site feasibility is further determined by the WPWMA's ability to acquire, control, or otherwise have access to suitable properties.

This alternative assumes that it would take the WPWMA approximately 10 to 15 years to locate, acquire, and permit a new facility and an additional 5 years to finance, construct, and secure an operator for replacement facilities. Therefore, solid waste management operations at a new location could take approximately 15 to 20 years to be realized, at which time, the existing facility would end operations and the WRSL would close. The WRSL would require a minimum of 30 years of post-closure maintenance.

The California statutory and regulatory requirements for development of new landfills embodies a process that results in the planning and permitting for a new landfill easily taking 15 or more years to complete. The history of permitting landfills in California in the last 35 years demonstrates that few are actually approved and permitted, let alone built and operated. In the last 35 years, there have been a handful of new landfills permitted in California on non-tribal lands, such as Potrero Hills Landfill in Solano County (1986); Frank R. Bowerman Landfill in Orange County (1991); Keller Canyon Landfill in Contra Costa County (1992); Mesquite Regional Landfill in Imperial County (1999); and Eagle Mountain Landfill in Riverside County (1999). Of those five, three have been built (Potrero, Bowerman, and Keller Canyon). Mesquite, which had been scheduled to be placed into service to facilitate waste-by-rail from Los Angeles County, is not being developed at this time. The fifth site, Eagle Mountain Landfill, was blocked by litigation after nearly 20 years in the permitting process, and the project is now no longer viable.

The Alternative Location in Placer County Alternative would reduce potentially significant and unavoidable impacts near the WPWMA facility associated with aesthetics, as the WRSL would not achieve the final elevation proposed for the proposed project nor introduce a second landfill mound, as Plan Concept 2 would. However, by the time an alternative location in Placer County was ready to accept waste (up to

20 years), the WRSL would have increased in height to be closer to its currently permitted final elevation, which was determined in a previous EIR prepared for the WPWMA to have significant impacts. This alternative would reduce the significant and unavoidable impacts of the proposed project near the project site caused by offsite litter from vehicles accessing the facility once waste is hauled elsewhere. This alternative would also reduce potentially significant and unavoidable impacts near the site associated with air quality, GHG emissions, and transportation and traffic once the facility is closed. The potentially significant and unavoidable air quality impacts would be reduced by closure of the WRSL and elimination of organic waste management at the facility, but not until an alternative location in Placer County was ready to accept waste, although the WPWMA would fully implement the Site Wide Odor Program (SWOP) described for the proposed project during the intervening time, which would potentially reduce the significant and unavoidable odor impact. The significant impacts at the site associated with biological resources would be reduced by not expanding waste management activities onto the eastern and western properties. However, it is anticipated that impacts to biological resources should be expected at the alternative location in Placer County. Transportation impacts near the site associated with the proposed project would be reduced for the alternative location in Placer County, as traffic to the site would be limited to that allowed under current permits. However, given that any potentially available land of this size would be further removed from population centers and would therefore require additional VMT to the site and also for removal of recovered products from the site, such an alternative is expected to increase overall traffic and transportation impacts because of VMT, including contributing to roadway congestion.

The Alternative Location in Placer County Alternative has been eliminated from consideration for the following reasons:

- The alternative abandons the significant investment in real estate and infrastructure that the existing facility represents.
- The WPWMA's ability to identify and acquire a suitable parcel in an area that would allow them to continue serving the Member Agencies is unknown, complex, and highly subject to external factors.
- The WPWMA would be required to make a significant financial investment in an alternative location while also providing solid waste management services at the current location.
- Relocation of the WPWMA facility from its current location is inconsistent with the goals of the Sunset Area Plan, which include full buildout of the WPWMA property for solid waste management and similar ECO-Industrial uses.
- The alternative does not meet the objectives of the proposed project.

18.3.2 Landfill Closure and Transfer to Out-of-County Landfill

This alternative assumes that the WPWMA would convert the facility to a material recovery facility (MRF) and transfer station, cease composting and other organics management operations as well as C&D processing operations, and facilitate the transfer of solid waste from Placer County to an out-of-county landfill. This alternative also assumes that the WPWMA would remain as a regional authority established through a joint exercise of powers agreement between Placer County and the cities of Lincoln, Rocklin, and Roseville in order to own, operate, and maintain a transfer station at the existing site and provide closure and post-closure maintenance of the WRSL. Under the Landfill Closure and Transfer to Out-of-County Landfill Alternative, the WPWMA would convert the MRF building to a MRF and transfer station. Single-stream mixed-waste MRF waste processing services would continue, as would the ability for existing self-haul or other customers to bring waste to the transfer station. The WPWMA's role in solid waste management at the site would be limited to sorting waste and sending it offsite for processing elsewhere or for disposal at an out-of-county landfill. Under this alternative, each jurisdiction would eventually

(within approximately 3 years) need to arrange for organic waste management and C&D processing through their own facilities, contracts, and collections.

Under this alternative, instead of proceeding with the Waste Action Plan at the current location, the WPWMA would add a transfer station to the existing MRF building. Once the transfer station construction is complete, estimated to take 3 years, municipal solid waste (MSW) remaining after being processed through the MRF building would be transferred to an existing waste disposal facility, assumed to be Recology's Ostrom Road Landfill, which is anticipated to have the capacity to accept MSW from the WPWMA service area. Materials that are recovered after processing mixed waste through the MRF will be sent to market. Once the transfer station is operational, the WPWMA facility would cease disposal and would begin the process of closure of the WRS�. The WRS� would require a minimum of 30 years of post-closure maintenance.

Under this alternative, C&D operations and organic waste management would occur at the site in a limited capacity for approximately 3 years, or until the transfer station facilities are complete. At that time, WPWMA Member Agencies and other jurisdictions would be responsible for managing organic and C&D wastes, and these operations would no longer occur at the WPWMA's facility.

This alternative would reduce potentially significant and unavoidable impacts at the site associated with aesthetics, as the WRS� would not achieve the final elevation proposed for the proposed project nor introduce a second landfill mound, as Plan Concept 2 would. This alternative would potentially reduce significant and unavoidable impacts associated with air quality (odor), and transportation and traffic. The potentially significant and unavoidable odor impacts would be reduced by closure of the WRS� and elimination of organic waste management at the facility, although the WPWMA would fully implement the SWOP described for the proposed project during the intervening time. The significant impacts associated with biological resources would be reduced by not expanding waste management activities onto the eastern and western properties. Transportation impacts near the site associated with the proposed project would be reduced for the Landfill Closure and Transfer to Out-of-County Landfill Alternative, as traffic to the site would be reduced as a result of the reduction of recyclables, compostable materials, C&D waste, and self-haulers to the site. However, the level of waste hauled to an out-of-county location and the needs of the jurisdictions would result in traffic and VMT impacts that would possibly be greater than the proposed project because of decentralized waste disposal and recovery operations.

This alternative has been eliminated from consideration for the following reasons:

- The alternative abandons the significant investment in real estate and infrastructure that the existing facility represents.
- Member Agencies would lose control of rates charged for management of organic and C&D waste and waste disposal.
- The alternative places a significant burden on local jurisdictions to achieve waste diversion mandates and implement their own solid waste management plans and to do this within an expedited timeline.
- Relocation of the WPWMA facility from its current location is inconsistent with the goals of the Sunset Area Plan, which include full buildout of the WPWMA property for solid waste management and similar ECO-Industrial uses.

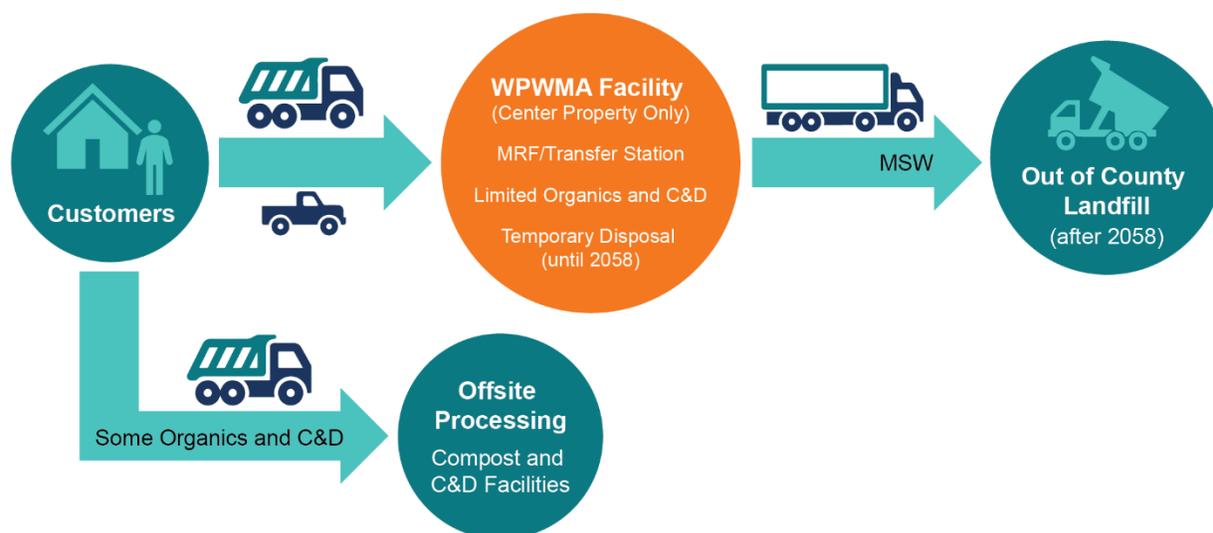
18.4 Evaluation of Project Alternatives

18.4.1 Alternative A: No Project Alternative

CEQA requires that an EIR consider a No Project Alternative. For this EIR, the No Project Alternative (Alternative A) is continued operation of the WPWMA facility under existing permits, without the Waste Action Plan. Ultimately, this results in phased closing of the WPWMA facility, which would eventually become a MRF and transfer station with limited organics and C&D waste processing. Figure 18-1 illustrates the primary features of this alternative.

Under Alternative A, the WPWMA would continue providing solid waste management services at the current location. Activities allowed under existing permits would continue until the WRS� reached capacity, at which time, the landfill portion of the facility would close. Solid waste management services would be constrained by limiting operation only to the center property and only to existing permit limits. Under Alternative A, there would be no change for how waste is collected and delivered to the site (single-stream mixed waste), and MSW would continue to be delivered to the site and processed through the MRF building accordingly.

The organics management facilities would be limited to the existing capacity. The organics management facilities would not be upgraded under Alternative A to meet current regulatory requirements and would not be expanded to a size adequate to address the organic waste of the WPWMA's Participating Agencies in order to comply with pending regulatory requirements. As the amount of incoming organic waste is projected to exceed the ability of the WPWMA facility to accommodate processing, the remaining organic waste would need to be managed on a jurisdiction-by-jurisdiction basis (i.e., Member Agencies would be given priority). Likewise, the C&D facility would be limited to the existing capacity and would not be upgraded to handle the complete C&D needs of the jurisdictions, with additional C&D material needing to be managed on a jurisdiction-by-jurisdiction basis.



Alternative A: No Project Alternative

Figure 18-1. Alternative A: No Project Alternative

Similar to how the center property is presently used, a currently permitted landfill disposal area (Module 9) will be dedicated to the existing organics management and C&D areas. The WPWMA estimates that the

remaining landfill capacity under Alternative A would be exhausted by 2058, at which time, the WRSL would close. After closure of the WRSL, MSW would be transferred to a disposal facility, possibly the Recology Ostrom Road Landfill, with the capacity to accept the MSW from the WPWMA service area. The WRSL would require a minimum of 30 years of post-closure maintenance.

Environmental Analysis

In accordance with CEQA, the following qualitative discussion considers the environmental impacts of Alternative A.

Aesthetics.

Similar to the proposed project, facilities associated with Alternative A would be visible from various viewpoints in the project vicinity. Operation of the most visually significant facility, the WRSL, would continue under Alternative A until approximately 2058, at which time, the landfill may have achieved the currently permitted maximum height of 295 feet. This height is less than the maximum height of 325 feet proposed as part of the proposed project, but still significant, as determined in WPWMA's 2000 Supplemental EIR (WPWMA, Supplemental Environmental Impact Report for the Western Regional Sanitary Landfill, 2000). Alternative A would not involve expansion of the WRSL onto either the eastern property (Plan Concept 1) or the western property (Plan Concept 2). As a result of the reduced height and reduced landfill footprint associated with Alternative A, overall visual impacts of Alternative A would be less than the proposed project but would remain significant.

Similar to the proposed project, waste would continue to be hauled to the facility during the project period. Accordingly, Alternative A would have the same potential as the proposed project for significant and unavoidable impacts associated with offsite litter from haul vehicles near the site.

Air Quality.

Under Alternative A, operations at the WPWMA would continue as under existing conditions. Inbound material quantities and traffic would increase slightly up to existing permit limits and then remain stable, resulting in slightly greater air emissions than the baseline but less than the proposed project. Composting as part of the organics management operation would continue but not expand significantly. The SWOP would be fully implemented, but the potential for odor impacts would continue to be significant and unavoidable. As the WPWMA facility became unable to take increasing quantities of waste in response to population growth, additional waste management operations would be required on a jurisdiction-by-jurisdiction basis. It is anticipated that these operations, at locations other than the WPWMA facility, would produce similar air emissions and impacts as wastes are processed and disposed.

Biological Resources.

The significant impacts at the site associated with biological resources would be eliminated by not expanding waste management activities onto the eastern and western properties. However, it is anticipated that impacts to biological resources could be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage organic and C&D waste materials.

Cultural Resources.

The potential for impacts to cultural resources at the site would be reduced under Alternative A, as site operations would not expand beyond the center property. However, impacts under the proposed project

would be less than significant after mitigation. The potential for unanticipated cultural resources to be found during construction could be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage organic and C&D waste materials.

Geology, Soils, and Paleontology.

The potential for impacts to geology, soils, and paleontology at the site would be reduced under Alternative A, as site operations would not expand beyond the center property. However, impacts to geology, soils, and paleontology under the proposed project would be less than significant after mitigation. The potential for impacts to geology, soils, and paleontology during construction could be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage organic and C&D waste materials.

Greenhouse Gas Emissions and Climate Change.

The potentially significant and unavoidable impacts at the site associated with construction and operational GHG emissions could be reduced under Alternative A without construction of the proposed project, but operations at the WPWMA would continue as under existing conditions. As the WPWMA facility became unable to take increasing quantities of waste in response to population growth, additional waste management operations would be required on a jurisdiction-by-jurisdiction basis. It is anticipated that these operations, at locations other than the WPWMA facility, would produce similar GHG emissions and impacts as wastes are processed and disposed, and, based on possible transport distances, could exceed the amount calculated for the proposed project.

Hazards and Hazardous Materials and Wildfire.

The potential for impacts related to hazards and hazardous materials and wildfire under Alternative A would be similar to the proposed project, as the measures the WPWMA takes currently to avoid impacts would occur regardless of the proposed project.

Hydrology and Water Quality.

The potential for impacts to hydrology at the site under Alternative A would be comparable to the proposed project, as appropriate site design and implementation of best management practices (BMPs) during construction and operation result in less-than-significant impacts. As Alternative A does not include excavation and relocation of solid waste placed in a landfill cell with a pre-Subtitle D liner, it would not provide the environmental benefit to water quality anticipated by removing the solid waste currently in place and redisposing of it in a Subtitle D-lined cell.

Land Use and Planning.

Similar to the proposed project, Alternative A would be consistent and nonconflicting with applicable local plans or policies, including the general plan, specific plan, zoning ordinance, or habitat conservation plan. Alternative A would be consistent with the existing land uses that have been occurring at the site. However, Alternative A would not develop the site in a manner consistent with the land use and zoning envisioned in the Sunset Area Plan, which identified industrial uses on all three of the WPWMA's properties, consistent with the site's ECO zoning.

Noise.

The potential noise impacts of Alternative A would be less than the proposed project because fewer pieces of onsite equipment would be needed and because waste management operations and complementary and programmatic elements would not be expanded onto the western and eastern properties. Landfill construction associated with Alternative A would result in a temporary direct increase in ambient noise levels around the area. However, estimated construction noise levels at existing surrounding sensitive land uses would be less than the statutory requirements of the County, as was determined for the proposed project. The operation-related noise at existing noise-sensitive areas would also be expected to be less than the statutory requirements. Potential noise impacts associated with Alternative A would be less than significant.

Public Services.

The potential public service impacts of Alternative A would be similar to but less than the proposed project. Operations at the site would increase slightly under Alternative A, but less than under the proposed project. Existing agreements related to fire protection, law enforcement, and road maintenance between the WPWMA and Placer County would continue.

Transportation.

Under Alternative A, operations at the WPWMA would continue as under existing conditions. Inbound material quantities and traffic would increase slightly up to existing permit limits and then remain stable, resulting in slightly greater traffic volumes than the baseline, but less than the proposed project. As the WPWMA facility becomes unable to take increasing quantities of waste in response to population growth, additional offsite waste management operations would be required on a jurisdiction-by-jurisdiction basis. It is anticipated that these operations, at locations other than the WPWMA facility, would produce traffic in amounts proportional to the amount of waste being processed, up to the amount assumed for the proposed project.

Utilities and Energy.

Alternative A would operate using similar infrastructure as the proposed project, including water, wastewater, and electrical infrastructure, although the increased need for water, wastewater, and electricity anticipated for the proposed project would likely be less under Alternative A. Additionally, new water and wastewater infrastructure necessary for the proposed project might not be required for Alternative A.

Alternative A (No Project Alternative) Summary

Alternative A is a continuation of the existing operations under existing permits at the WPWMA facility until closure, without implementation of the Waste Action Plan.

Alternative A would avoid or substantially lessen one or more potentially significant environmental impacts of the proposed project, described as follows:

Aesthetics. Alternative A would reduce the potential for significant visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRSL from the currently permitted height and by avoiding two landfill mounds as in Plan Concept 2. However, the currently permitted height, as determined in the previous EIR prepared for the WRSL, would continue to represent a significant and unavoidable aesthetic impact. This alternative would have the same

potential as the proposed project for significant and unavoidable impacts associated with offsite litter from haul vehicles near the site.

Air Quality. Alternative A would not reduce the potential for significant air quality impacts related to odor near the WPWMA facility but could reduce the overall duration of these impacts. Waste would increase up to permit limits and then level off. The SWOP would be fully implemented at the site, similar to the proposed project. However, while air quality impacts near the site would be reduced under Alternative A, it is assumed that additional air emissions would be produced wherever the solid waste that cannot be managed at the site is taken for processing.

Biological Resources. Alternative A would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property, where the majority of sensitive resources would be affected by the proposed project. There is a potential for impacts to biological resources at alternate locations where additional waste management activities would need to occur to replace those that could not expand at the WPWMA facility, but the severity of those impacts is unknown.

Greenhouse Gas Emissions and Climate Change. Alternative A would reduce GHG emissions associated with the proposed project by shortening the operational life of the WRS. GHG emissions could potentially increase because the facility would not expand management of organic wastes similar to the proposed project.

Transportation. Alternative A would reduce the potential for significant transportation impacts associated with the proposed project. Waste and associated traffic would increase up to permit limits and then level off. However, while traffic impacts near the site associated with the proposed project would be reduced under Alternative A, it is assumed that additional traffic impacts would be produced near to wherever the solid waste that cannot be managed at the site is taken for processing.

The ability of Alternative A to accomplish the objectives of the proposed project is illustrated in Table 18-1.

Table 18-1. Ability of Alternative A (No Project) to Meet Project Objectives

Project Objective	Project Objective Met by Alternative A?
Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.	No
Expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded composting, improved recovery of C&D materials, recycling, and public buy-back activities.	No
Increase the WRS's permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies' waste streams.	No
Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.	No
Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and conduct operations associated with Waste Action Plan implementation in the most environmentally responsible manner possible.	No

Table 18-1. Ability of Alternative A (No Project) to Meet Project Objectives

Project Objective	Project Objective Met by Alternative A?
Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.	No
Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area's anticipated transition to a more urban environment.	No
Encourage implementation of the PCCP and the integration of environmentally conscious practices into the facility operations.	No
Develop the WPWMA's properties in a manner consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).	No
Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.	No

18.4.2 Alternative B: Prioritize Waste Recovery

The Prioritize Waste Recovery Alternative (Alternative B) is similar to Plan Concept 2 of the proposed project, in that it concentrates waste recovery activities on the center property. However, Alternative B eliminates expansion of the WRSL onto the eastern or western properties and adds complementary and programmatic elements on the western property only. No activity would occur on the eastern property or the northern portion of the western property. The primary features of this alternative are shown in Figure 18-2.



Alternative B: Prioritize Waste Recovery

Figure 18-2. Alternative B: Prioritize Waste Recovery

Under Alternative B, the waste relocation of the unlined area of the landfill that is part of the proposed project would occur within the first 2 years after project approval. The relocation of waste would allow for expansion of the public waste drop-off area, organics management operation, and C&D operation to expand on the northern half of the center property. Waste disposal within the WRSL would be limited to the southern portion of the center property.

Under Alternative B, the waste recovery portions of the Waste Action Plan could be implemented. The public waste drop-off area, organics management area, and C&D facilities would be sized to accommodate current and future regulatory requirements and would be potentially adequate to address the organic waste management needs of the WPWMA's Participating Agencies. Similarly, the C&D facility would be upgraded to handle the complete C&D needs of the jurisdictions. Alternative B would provide space for organics management and C&D operations roughly equal to Plan Concept 2.

Because Alternative B prioritizes waste recovery activities over waste disposal activities, the WRS� is reduced in size from the proposed project and from the currently permitted landfill. Consequently, the WRS� capacity would be exhausted in approximately 2041, and the facility would transition to a MRF and transfer station. Upon completion of transfer station construction, MSW remaining after being processed through the MRF building would be transferred to an existing waste disposal facility, assumed to be Recology's Ostrom Road Landfill, which is anticipated to have the capacity to accept MSW from the WPWMA's service area. The WRS� would require a minimum of 30 years of post-closure maintenance.

Alternative B reserves space for complementary and programmatic activities on the western property, similar to the proposed project. The western property provides ample area for the 1.9 million square feet of industrial uses of activities that complement solid waste management included in the proposed project.

Environmental Analysis

In accordance with CEQA, the following qualitative discussion considers the environmental impacts of Alternative B.

Aesthetics.

Similar to the proposed project, facilities associated with Alternative B would be visible from various viewpoints in the project vicinity. Operation of the most visually significant facility, the WRS�, would continue under Alternative B until approximately 2041, at which time, the landfill would be at a final elevation greater than it is currently, but likely less than the currently permitted maximum height of 295 feet. Alternative B would not involve expansion of the WRS� onto either the eastern property (Plan Concept 1) or the western property (Plan Concept 2). As a result of the reduced height and reduced landfill footprint associated with Alternative B, overall visual impacts of Alternative B would be less than the proposed project.

Similar to the proposed project, waste would continue to be hauled to the facility. Accordingly, Alternative B would have the same potential as the proposed project for significant and unavoidable impacts associated with offsite litter from haul vehicles near the site.

Air Quality.

Under Alternative B, waste recovery operations at the WPWMA would be similar to Plan Concept 2 of the proposed project, particularly relative to activity on the center property. Inbound material quantities and traffic would increase similarly to the proposed project until the waste disposal capacity of the WRS� is reached in approximately 2041. Air emissions, including odor emissions, would be similar under Alternative B to the proposed project until the WRS� closes. Composting as part of the organics management operation would occur on the center property similarly to Plan Concept 2, and the SWOP would be fully implemented. When the WRS� closes, air emissions associated with waste disposal would be experienced at a different site, assumed to be Recology's Ostrom Road Landfill.

Biological Resources.

Alternative B would significantly reduce impacts to biological resources at the site, because the alternative would use neither the eastern property nor the northern half of the western property where the majority of sensitive resources would be affected by the proposed project. There is a potential for impacts to biological resources at alternate locations where additional waste management activities would need to occur to replace those that could not expand at the WPWMA facility, but the severity of those impacts is unknown.

Cultural Resources.

The potential for impacts to cultural resources at the site would be reduced under Alternative B, as site operations would not expand onto the eastern property or the northern portion of the western property. However, impacts under both Alternative B and the proposed project would be less than significant after mitigation.

Geology, Soils, and Paleontology.

Alternative B impacts associated with geology, soils, and paleontology would be similar to the preferred project, but potentially reduced, as development would not occur on the eastern property or the northern portion of the western property.

Greenhouse Gas Emissions and Climate Change.

GHG emissions would be similar under Alternative B to the proposed project until the WRS� closes. Composting as part of the organics management operation would occur on the center property similarly to Plan Concept 2. When the WRS� closes, waste disposal operations would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill. It is anticipated that these relocated operations would produce similar GHG emissions and impacts as wastes are processed and disposed.

Hazards and Hazardous Materials and Wildfire.

Alternative B impacts associated with hazards and hazardous materials and wildfire would be similar to the preferred project, but potentially reduced, as development would not occur on the eastern property or the northern portion of the western property.

Hydrology and Water Quality.

The potential for impacts to hydrology at the site under Alternative B would be comparable to the proposed project, as appropriate site design and implementation of BMPs during construction and operation would result in less-than-significant impacts. Alternative B provides the same environmental benefit to water quality anticipated for the proposed project by removing the solid waste currently in place in a pre-Subtitle D-lined area and redisposing of it in a Subtitle D-lined cell.

Land Use and Planning.

Similar to the proposed project, Alternative B would be consistent and nonconflicting with applicable local plans or policies, including the general plan, specific plan, zoning ordinance, or habitat conservation plan. Alternative B would be consistent with the existing land uses that have been occurring at the site. However, Alternative B would not fully develop the site in a manner consistent with the land use and zoning envisioned in the Sunset Area Plan, which identified industrial uses on all three of the WPWMA's properties, consistent with the site's ECO zoning.

Noise.

The potential noise impacts of Alternative B would be similar to but less than the proposed project, because fewer pieces of onsite equipment would be needed and because waste management operations would not be expanded onto the western and eastern properties. However, up to 1.9 million square feet of complementary and programmatic activities could occur on the western property, similar to the proposed project. Construction associated with Alternative B would result in a temporary direct increase in ambient

noise levels around the area associated with development on the central and western properties. However, estimated construction noise levels at existing surrounding sensitive land uses would be less than the statutory requirements of the County, as was determined for the proposed project. The operation-related noise at existing noise-sensitive areas would also be expected to be less than the statutory requirements.

Public Services.

The potential public services impacts of Alternative B would be similar to the proposed project. Existing agreements related to fire protection, law enforcement, and road maintenance between the WPWMA and Placer County would continue and be revised or expanded under Alternative B as needed, similar to the proposed project.

Transportation.

Inbound material quantities and associated traffic would increase similarly to the proposed project, until the waste disposal capacity of the WRSL is reached in 2041. When the WRSL closes, traffic associated with waste disposal would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill, which would be anticipated to increase traffic volumes on roads leading to the Recology facility, as well as adding VMT by waste vehicles traveling farther distances to deliver waste material.

Utilities and Energy.

The potential utilities and energy impacts of Alternative B would be similar to the proposed project through 2041, when the WRSL would close, after which time, the utilities and energy impacts of Alternative B would be reduced compared with the proposed project. The potential energy impacts for Alternative B would be similar to but less than the proposed project, because less equipment would be required to operate the composting facility.

Alternative B (Prioritize Waste Recovery) Summary

Alternative B concentrates waste recovery operations on the center property, restricts landfill capacity, and adds complementary and programmatic elements on the southern portion of the western property.

Alternative B would avoid or substantially lessen one or more potentially significant environmental impacts of the proposed project, described as follows.

Aesthetics. Alternative B would reduce the potential for significant visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRSL from the currently permitted height and by avoiding two landfill mounds as in Plan Concept 2.

Biological Resources. Alternative B would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property, where the majority of habitat for special-status wildlife species that rely on vernal pool-type wetlands would be affected by the proposed project.

Greenhouse Gas Emissions and Climate Change. Alternative B would reduce GHG emissions associated with the proposed project by shortening the operational life of the WRSL.

The ability of Alternative B to accomplish the objectives of the proposed project is illustrated in Table 18-2.

Table 18-2. Ability of Alternative B (Prioritize Waste Recovery) to Meet Project Objectives

Project Objective	Project Objective Met by Alternative B?
Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.	Partially
Expand the site’s capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded composting, improved recovery of C&D materials, recycling, and public buy-back activities.	Partially
Increase the WRSL’s permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies’ waste streams.	No
Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.	Yes
Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and conduct operations associated with Waste Action Plan implementation in the most environmentally responsible manner possible.	Partially
Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.	Yes
Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area’s anticipated transition to a more urban environment.	Partially
Encourage implementation of the PCCP and the integration of environmentally conscious practices into the facility operations.	Partially
Develop the WPWMA’s properties in a manner consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).	Partially
Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.	Partially

18.4.3 Alternative C: No Organics Processing

The No Organics Processing Alternative (Alternative C) is similar to Plan Concept 1 of the proposed project but excludes processing of organic waste. Like Plan Concept 1, Alternative C uses all of the property available to WPWMA. The WRSL would be expanded onto the eastern property, creating a single landfill mound with disposal capacity until approximately 2101. The public waste drop-off area would be relocated to the western property, with a new entrance to the western property at the intersection of Athens Avenue and Fiddymont Road. On the center property, the waste relocation and excavation would be expected to occur over time, the C&D facility would be expanded, and other facilities would be expanded or redesigned similar to the proposed project. Figure 18-3 presents the features of this alternative.



Alternative C: No Organics Processing

Figure 18-3. Alternative C: No Organics Processing

Under Alternative C, the northern and southern parts of the western property would continue to be available for the complementary and programmatic elements – industrial uses that complement solid waste management activities. These parts of the western property provide ample area for the 1.9 million square feet of industrial uses of activities that complement solid waste management included in the proposed project. However, consideration of potential future industrial uses on the project site would be limited to those that do not contemplate management of organic wastes.

Alternative C would allow the WPWMA to provide long-term disposal capacity through expansion of the WRS. This alternative would not allow the WPWMA to address the diversion and onsite processing of organic material, nor would it allow the WPWMA to provide services directly to the Participating Agencies to comply with SB 1383. As such, the management of organic waste would be necessary on a jurisdiction-by-jurisdiction basis. Alternative C would allow the WPWMA to comply with regulations associated with C&D waste. The WPWMA's ability to contribute to increased recycling rates and maintain local control of solid waste management activities would be limited.

Alternative C would provide long-term recycling capacity, enhance compatibility of waste recovery and waste disposal operations, and provide opportunities for innovation, although those opportunities would be limited compared with the proposed project, as Alternative C does not include processing of organic waste.

Alternative C (No Organics Processing) Environmental Analysis

In accordance with CEQA, the following qualitative discussion considers the environmental impacts of Alternative C.

Aesthetics.

Similar to the proposed project, facilities associated with Alternative C would be visible from various viewpoints in the project vicinity. Operation of the most visually significant facility, the WRSL, would be the same for Alternative C as for Plan Concept 1 of the proposed project. Similar to the proposed project, aesthetics impacts for Alternative C would be significant and unavoidable.

Similar to the proposed project, waste would continue to be hauled to the facility under Alternative C. Accordingly, Alternative C would have the same potential as the proposed project for significant and unavoidable impacts associated with offsite litter from haul vehicles near the site.

Air Quality.

Similar to the proposed project, Alternative C uses all of the property available to the WPWMA and proposes all the same uses except for management of organic waste. By removing the processing of organic waste from the WPWMA site, the odor-producing aspects of that facility would be eliminated. The SWOP would be fully implemented under Alternative C, although the portion of the SWOP applying to organics management would no longer be applicable. The potential for Alternative C to produce offsite odors resulting from the WRSL, C&D waste management, or public area drop-off would remain, but Alternative C is likely to result in a significantly reduced potential for offsite odors. Similar to the proposed project, the construction and operational emissions of criteria air pollutants and ozone precursors would remain significant and unavoidable.

Biological Resources.

The potential for impacts to biological resources from Alternative C would be the same as those identified for the proposed project.

Cultural Resources.

The potential for impacts to cultural and tribal resources from Alternative C would be the same as those identified for the proposed project.

Geology, Soils, and Paleontology.

The potential for impacts to geology, soils, and paleontology from Alternative C would be the same as those identified for the proposed project.

Greenhouse Gas Emissions and Climate Change.

Similar to the proposed project, Alternative C uses all of the property available to the WPWMA and proposes all the same uses except for management of organic waste. By removing the processing of organic waste from the WPWMA site, the generation of GHG emissions from this organic waste processing would no longer occur at the site. However, these organic wastes would continue to generate GHG emissions wherever they are processed. GHG emissions associated with the construction and operation of this alternative would remain significant and unavoidable.

Hazards and Hazardous Materials and Wildfire.

The potential for impacts related to hazards and hazardous materials and wildfire from Alternative C would be the same as those identified for the proposed project.

Hydrology and Water Quality.

Alternative C proposes all the same uses of the proposed project, including excavation and relocation of waste placed in a pre-Subtitle D cell, with the exception of management of organic waste. The potential for impacts related to hydrology and water quality from Alternative C would be the same as those identified for the proposed project.

Land Use and Planning.

Similar to the proposed project, Alternative C would be consistent and nonconflicting with applicable local plans or policies, including the general plan, specific plan, zoning ordinance, or habitat conservation plan. Alternative C would be consistent with the existing land uses that have been occurring at the site and would largely develop the site in a manner consistent with the land use and zoning envisioned in the Sunset Aera Plan, which identified industrial uses on all three of the WPWMA's properties, consistent with the site's ECO zoning.

Noise.

The potential for impacts related to noise from Alternative C would be similar to those identified for the proposed project but could be slightly reduced because the noise from equipment associated with organic waste management would be eliminated.

Public Services.

The potential for impacts related to public services from Alternative C would be the same as those identified for the proposed project.

Transportation.

Alternative C proposes all the same uses of the proposed project except for management of organic wastes. Consequently, the amount of waste and associated vehicles arriving at the WPWMA facility might be reduced under Alternative C compared with the proposed project, which would result in fewer vehicles on the roadways adjacent to the site and fewer VMT for Alternative C. However, it is anticipated that an equivalent or greater amount of traffic would occur within the WPWMA's service area under Alternative C, as the management of organic wastes transitions from being managed at a single site to a jurisdiction-by-jurisdiction basis, and collection and transfer programs would adjust accordingly.

Utilities and Energy.

The potential for impacts related to utilities and energy from Alternative C would be similar to those identified for the proposed project. As the management of organic wastes at the site would be eliminated under Alternative C, less water and electricity would be required compared with the proposed project. However, it is anticipated that equivalent water and electricity would be required to manage organic wastes generated within the WPWMA's service area wherever they occur.

Alternative C (No Organics Processing) Summary

Alternative C is essentially Plan Concept 1 of the proposed project without management of organic waste at the WPWMA facility.

Alternative C would avoid or substantially lessen one or more potentially significant environmental impacts of the proposed project, described as follows:

Air Quality and Odor. Alternative C would substantially reduce the potential for offsite odor impacts as a result of eliminating the management of organic waste.

The ability of Alternative C to accomplish the objectives of the proposed project is illustrated in Table 18-3.

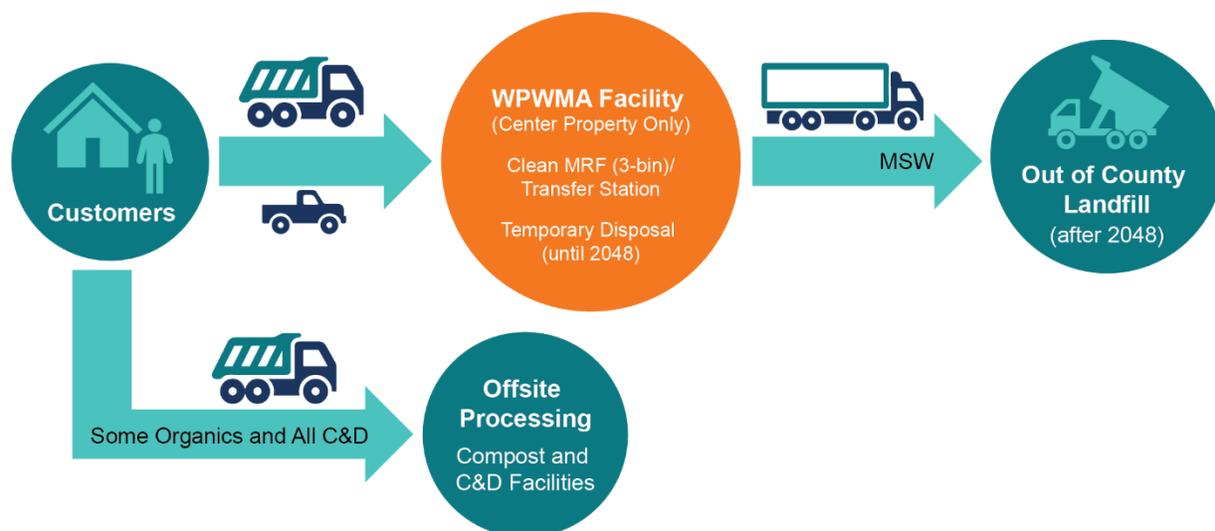
Table 18-3. Alternative C (No Organics Processing) Ability to Meet Project Objectives

Project Objective	Project Objective Met by Alternative C?
Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.	Partially
Expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded composting, improved recovery of C&D materials, recycling, and public buy-back activities.	Partially
Increase the WRS's permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies' waste streams.	Yes
Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.	Yes
Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and conduct operations associated with Waste Action Plan implementation in the most environmentally responsible manner possible.	Partially
Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.	Partially
Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area's anticipated transition to a more urban environment.	Yes
Encourage implementation of the PCCP and the integration of environmentally conscious practices into the facility operations.	Yes
Develop the WPWMA's properties in a manner consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).	Yes
Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.	Partially

18.4.4 Alternative D: Three-Bin Clean MRF Alternative

The Three-Bin Clean MRF Alternative (Alternative D) is similar to Alternative A (No Project), in that solid waste management activities would occur only on the center property. However, the Clean MRF Alternative makes several distinct changes regarding solid waste management. For the Clean MRF Alternative, the current single-stream mixed-waste system for waste collection would convert to a three-bin system that would require each Participating Agency and their designated waste haulers to comply

accordingly. Correspondingly, the existing “dirty” MRF (one that sorts incoming mixed municipal waste) would be converted to a “clean” MRF, one that only sorts source-separated mixed recyclables (no mixed waste, green waste, or food waste). Because there would be no mixed-waste processing, the waste bin (referred to as a black bin) of the three-bin system would be delivered straight to the WRSL for disposal. Consequently, once black bin waste material is received onsite, there would be no opportunity for removing organics or other recyclable materials from that part of the waste stream. The primary features of Alternative D are illustrated on Figure 18-4.



Alternative D: Three-Bin Clean MRF Alternative

Figure 18-4. Alternative D: Three-Bin Clean MRF Alternative

The existing area of the site designated for future Module 9 of the WRSL that is currently used for Waste Recovery operations would continue to be used in this manner, restricting long-term waste disposal capacity development. No waste excavation and relocation of the pre-Subtitle D landfill would occur.

Because Alternative D prioritizes a range of solid waste management activities occurring on the center property, the WRSL would be reduced in size from the proposed project and from the currently permitted landfill. Consequently, the WRSL capacity would be exhausted in approximately 2048, and the facility would close for disposal at that time, and transition to a MRF and transfer station. Once the transfer station construction is complete, MSW remaining after being processed through the MRF building and MSW that was previously sent directly to the WRSL would be transferred to another waste disposal facility, assumed to be Recology’s Ostrom Road Landfill, which is anticipated to have the capacity to accept the MSW from the WPWMA service area. The WRSL would require a minimum of 30 years of post-closure care.

In order to make room on the center property for management of organic waste, the C&D operation would be eliminated under Alternative D. Aerated static-pile composting, as described for the proposed project, is the anticipated form of organics waste management under Alternative D. Because the C&D operation would be discontinued, management of C&D material would be handled on a jurisdiction-by-jurisdiction basis. Self-haul would continue to be accepted for MSW and organic material; there would be no significant changes to the current operation of the public waste drop-off area.

Waste management operations would not be expanded to either the eastern or western properties. Accordingly, only those complementary and programmatic elements that would fit onto the center property would be accommodated.

Alternative D (Three-Bin Clean MRF) Environmental Analysis

In accordance with CEQA, the following qualitative discussion considers the environmental impacts of Alternative D (Three-Bin Clean MRF).

Aesthetics.

Similar to the proposed project, facilities associated with Alternative D would be visible from various viewpoints in the project vicinity. Operation of the most visually significant facility, the WRSL, would continue under Alternative D until approximately 2048, at which time, the landfill would be at a final elevation greater than it is currently, but it is anticipated to be less than the currently permitted maximum height of 295 feet. Alternative D would not involve expansion of the WRSL onto either the eastern property (Plan Concept 1) or the western property (Plan Concept 2). As a result of the reduced height and reduced landfill footprint associated with Alternative D, overall visual impacts of Alternative D would be less than the proposed project.

Similar to the proposed project, waste would continue to be hauled to the facility during the project period. Accordingly, Alternative D would have a similar potential as the proposed project for significant and unavoidable impacts associated with offsite litter from haul vehicles near the site.

Air Quality.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to the proposed project but limited to the center property. Inbound material quantities and traffic would increase similar to the proposed project until the waste disposal capacity of the WRSL is reached in 2048. The C&D operation would be eliminated, but the organics management operation would expand as described for the proposed project. Air emissions, including offsite odor emissions, under Alternative D would be similar to but potentially less than the proposed project until the WRSL closes. The SWOP would be fully implemented. When the WRSL closes, air emissions associated with waste disposal would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill.

Biological Resources.

The significant impacts at the site associated with biological resources would be eliminated under Alternative D by not expanding waste management activities onto the eastern and western properties. However, impacts to biological resources may be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage C&D waste materials.

Cultural Resources.

The potential for impacts to cultural resources at the site would be reduced under Alternative D, as site operations would not expand beyond the center property. However, impacts under the proposed project would be less than significant after mitigation. The potential for unanticipated cultural resources to be found during construction would be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage C&D waste materials.

Geology, Soils, and Paleontology.

The potential for impacts to geology, soils, and paleontology at the site would be reduced under Alternative D, as site operations would not expand beyond the center property. However, impacts to geology, soils, and paleontology under the proposed project would be less than significant after mitigation. The potential for impacts to geology, soils, and paleontology during construction would be expected at other locations where solid waste would be managed, such as new facilities required by the jurisdictions to manage C&D waste materials.

Greenhouse Gas Emissions and Climate Change.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to the proposed project but limited to the center property. Inbound material quantities and traffic would increase similar to the proposed project until the waste disposal capacity of the WRSL is reached in 2048. Construction and operational GHG emissions may be reduced from the proposed project. When the WRSL closes, GHG emissions associated with waste disposal would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill.

Hazards and Hazardous Materials and Wildfire.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to Plan Concept 2 of the proposed project, although the C&D operation would cease at the site, and expansion of the WRSL on the western property would not occur. Alternative D impacts associated with hazards and hazardous materials and wildfire would be similar to the preferred project, but potentially reduced, as development would not occur on the eastern or western properties.

Hydrology and Water Quality.

The potential for impacts to hydrology at the site under Alternative D would be comparable to the proposed project, as appropriate site design and implementation of BMPs during construction and operation result in less-than-significant impacts. However, impacts to water quality under Alternative D may be greater than the proposed project, as Alternative D does not include excavation and relocation of solid waste placed in a landfill cell with a pre-Subtitle D liner. Alternative D would not provide the environmental benefit to water quality anticipated by removing the solid waste currently in place and redisposing of it in a Subtitle D-lined cell.

Land Use and Planning.

Similar to the proposed project, Alternative D would be consistent and nonconflicting with applicable local plans or policies, including the general plan, specific plan, zoning ordinance, or habitat conservation plan. Alternative D would be consistent with the existing land uses that have been occurring at the site. However, Alternative D would not develop the site in manner consistent with the land use and zoning envisioned in the Sunset Area Plan, which identified industrial uses on all three of the WPWMA's properties, consistent with the site's ECO zoning.

Noise.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to Plan Concept 2 of the proposed project, although the C&D operation on the center property would end, the expansion of the WRSL on the western property would not occur, and complementary and programmatic elements would not be developed on the western or eastern properties. The potential noise impacts of

Alternative D would be similar to but less than the proposed project, because fewer pieces of onsite equipment would be needed and because waste management operations would not be expanded onto the western and eastern properties. Construction associated with Alternative D may result in a temporary direct increase in ambient noise levels around the area. However, estimated construction noise levels at existing surrounding sensitive land uses would be below the statutory requirements of the County, as was determined for the proposed project. The operation-related noise at existing noise-sensitive areas would also be expected to be less than the statutory requirements.

Public Services.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to Plan Concept 2 of the proposed project through 2048, although the C&D operation on the center property would be eliminated, expansion of the WRS� on the western property would not occur, and no complementary and programmatic elements would be developed. Existing agreements related to fire protection, law enforcement, and road maintenance between the WPWMA and Placer County would continue and be revised or expanded under Alternative D as needed, similar to the proposed project.

Transportation.

Under Alternative D, waste recovery and waste disposal operations at the WPWMA would be similar to the proposed project, but with activity occurring only on the center property. Inbound material quantities and associated traffic would increase in a manner similar to the proposed project until the waste disposal capacity of the WRS� is reached in 2048, with the exception of reduced material and traffic associated with the C&D operation. When the WRS� closes, traffic that currently goes to the WPWMA facility associated with waste disposal would be relocated to a different site, assumed to be Recology's Ostrom Road Landfill, which would be anticipated to increase traffic volumes on roads leading to the Recology facility, as well as adding VMT by waste vehicles traveling farther distances to deliver waste material.

Utilities and Energy.

The potential utilities and energy impacts of Alternative D would be similar to the proposed project through 2048, when the WRS� is anticipated to be full and close, after which time, the utilities and energy impacts of Alternative D would be reduced compared with the proposed project. The potential energy impacts for Alternative D would be similar but less than the proposed project because of less equipment is required to operate the C&D facility.

Alternative D (Three-Bin Clean MRF) Summary

Under Alternative D, management of solid waste at the WPWMA facility would occur on the center property only. The current single-stream mixed-waste system for waste collection would convert to a three-bin system that would require each Participating Agency and their designated waste haulers to comply accordingly. Waste disposal capacity would be limited, and the C&D operation would be eliminated to make room on the center property for management of organic waste.

Alternative D would avoid or substantially lessen one or more potentially significant environmental impacts of the proposed project, described as follows.

Aesthetics. Alternative D would reduce significant impacts to visual impacts associated with the proposed project in the vicinity of the WPWMA facility, by not increasing the overall permitted height of the WRS� from the currently permitted height and by avoiding two landfill mounds as in Plan Concept 2.

Biological Resources. Alternative D would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern nor western properties.

Greenhouse Gas Emissions and Climate Change. Alternative D would reduce GHG emissions associated with the proposed project by shortening the operational life of the WRSL. Additional GHG emissions beyond the project site could result from increased transport from vehicles.

The ability of Alternative D to accomplish the objectives of the proposed project is illustrated in Table 18-4.

Table 18-4. Alternative D (Three-Bin Clean MRF) Ability to Meet Project Objectives

Project Objective	Project Objective Met by Alternative D?
Maintain a stable and relatively predictable cost structure through continued local-government control of solid waste management operations, improve operational efficiencies, and extend the operational life of the current WPWMA facility.	Partially
Expand the site’s capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions through expanded composting, improved recovery of C&D materials, recycling, and public buy-back activities.	Partially
Increase the WRSL’s permitted footprint and height to optimize the efficient use of land for waste disposal and provide sufficient waste disposal capacity to accommodate anticipated long-term growth in the Participating Agencies’ waste streams.	No
Enhance customer safety by improving site access and internal circulation, which would minimize potential conflicts between commercial vehicles and public users.	Partially
Provide the WPWMA with operational flexibility to accommodate an increasingly complex and evolving regulatory environment and conduct operations associated with Waste Action Plan implementation in the most environmentally responsible manner possible.	No
Facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA.	No
Continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses based on the surrounding area’s anticipated transition to a more urban environment.	No
Encourage implementation of the PCCP and the integration of environmentally conscious practices into the facility operations.	Partially
Develop the WPWMA’s properties consistent with the goals, policies, and implementation programs identified in the Sunset Area Plan (Placer County 2019).	No
Position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.	No

18.5 Comparison of Alternatives

A comparative summary of the significance of potential environmental impacts associated with the project alternatives, based on a qualitative evaluation compared with the preferred plan concept, is provided in Table 18-5. A discussion of the preferred plan concept was provided in Chapter 4, Approach. A detailed

discussion of the potential impacts associated with each alternative was provided in Section 18.5, and a summary of each alternative is provided as follows.

Alternative A (No Project) is a continuation of the existing operations under existing permits at the WPWMA facility until closure, without implementation of the Waste Action Plan. Activities allowed under existing permits would continue until the WRS� reached capacity, at which time, the landfill part of the facility would close. Solid waste management services would be constrained by limiting operation only to the center property and only to the existing permit limits.

Alternative A would avoid or substantially lessen one or more potentially significant environmental impacts of the proposed project, but those onsite impact reductions would likely be offset by increases in impacts wherever the solid waste that cannot be managed at the WPWMA facility is managed.

Alternative A would not significantly reduce impacts associated with aesthetics, as the permitted height of the WRS� still represents a significant impact, and waste would still be delivered to the site, which would result in the same level of offsite litter visual impact. While air quality impacts near the site would be reduced under Alternative A as a result of there being lesser quantities of solid waste managed, it is assumed that additional air emissions would be produced wherever the solid waste that cannot be managed at the site is taken for processing. Alternative A would use neither the eastern property nor the northern half of the western property, where the majority of sensitive biological resources would be affected by the proposed project; however, there is potential for impacts to biological resources at alternate locations where additional waste management activities would need to occur to replace those that could not expand at the WPWMA facility. While traffic impacts near the site associated with the proposed project would be reduced under Alternative A, it is assumed that additional traffic impacts would be produced near where the solid waste that cannot be managed at the site is ultimately taken for processing.

As shown in Table 18-1, Alternative A does not meet any of the objectives established for the proposed project. Alternative A will not allow the WPWMA to maintain a stable and relatively predictable cost structure through local control of solid waste. Alternative A will not expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emissions reductions, nor optimize the site to provide sufficient waste disposal capacity for long-term growth in the project area. Alternative A would not provide the WPWMA with the ability to respond to an increasingly complex and evolving regulatory waste environment nor allow the WPWMA to enhance customer safety by improving site access and internal circulation. By not using the eastern and western properties, Alternative A would not facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA, would not position the WPWMA facility as a hub of innovation with regard to a circular economy, and would not develop the WPWMA's properties in a manner consistent with the Sunset Area Plan.

Alternative B (Prioritize Waste Recovery) concentrates waste recovery operations on the center property, restricts landfill capacity to the center property, and adds complementary and programmatic elements on the southern portion of the western property. No activity would occur on the eastern property or the northern portion of the western property.

Alternative B would reduce visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRS� from the currently permitted height and by avoiding two landfill mounds as in Plan Concept 2; however, it would not reduce the potential for offsite litter visual impacts. Alternative B would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property,

where the majority of habitat for special-status wildlife species that rely on vernal pool-type wetlands would be affected by the proposed project.

As shown in Table 18-2, Alternative B partially meets the objectives established for the proposed project. Alternative B would not allow the WPWMA to increase the permitted footprint and height of the WRSL in order to maximize use of the facility and secure long-term waste disposal capacity. By not fully using the eastern and western properties, Alternative B would enhance customer safety by improving site access and internal circulation, but would only partially allow the WPWMA to expand the site's capacity to divert materials from landfill disposal or provide operational flexibility to accommodate an increasingly complex and evolving regulatory environment. As Alternative B uses the southern part of the western property for complementary and programmatic elements, such as compatible technologies, the alternative would facilitate the siting and development of compatible technologies that would benefit from proximity to the WPWMA, partially develop the WPWMA's properties in a manner consistent with the goals and policies of the Sunset Area Plan, and partially position the WPWMA facility as a hub of innovation that promotes a circular economy.

Alternative C (No Organics Processing) is similar to Plan Concept 1 of the proposed project but excludes processing of organic waste. Like the proposed project, Alternative C uses portions of all of the property available to the WPWMA.

Alternative C would reduce the potential for significant offsite odor impacts by eliminating processing of organic waste material at the WPWMA facility. Potentially significant impacts associated with aesthetics, biological resources, and transportation and traffic are unlikely to be reduced under Alternative C.

As shown in Table 18-3, Alternative C partially meets the objectives established for the proposed project. Alternative C would allow the WPWMA to increase the WRSL's permitted footprint and height to provide long-term waste disposal capacity, enhance customer safety by improving site access and internal circulation, and continue to improve compatibility between current and future WPWMA operations and existing and proposed adjacent land uses. Alternative C would also encourage implementation of the PCCP and integrate environmentally conscious practices into facility operations and allow for the development of the WPWMA's properties in a manner consistent with the goals and policies of the Sunset Area Plan. Alternative C would partially allow the WPWMA to maintain a stable and relatively predictable cost structure through local control of solid waste management operations. By eliminating the management of organic waste material at the site under Alternative C, the WPWMA would have limited ability to expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions, less operational flexibility to accommodate an increasingly complex and evolving regulatory environment, and a lesser ability to position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.

Under Alternative D (Three-Bin Clean MRF), management of solid waste at the WPWMA facility would occur on the center property only. The current single-stream mixed-waste system for waste collection would convert to a three-bin system that would require each Member Agency and delivering entity to comply accordingly. Waste disposal capacity would be limited, and the C&D operation would be eliminated.

Table 18-5. Significance of Potential Environmental Impacts Compared with Preferred Plan Concept

Environmental Resource Area	Preferred Plan Concept (Plan Concept 1)	Plan Concept 2	Alternative A (No Project)	Alternative B (Prioritize Waste Recovery)	Alternative C (No Organics Processing)	Alternative D (Three-Bin Clean MRF Alternative)
Aesthetics	S/U	S/U	Less (S/U)	Less (LTS)	Similar (S/U)	Less (S/U)
Air Quality	S/U	S/U	Less (S/U)	Less (S/U)	Less	Less
Biological Resources	LTS	LTS	Less	Less	Similar (LTS)	Less
Cultural and Tribal Resources	LTS	LTS	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Geology, Soils, and Paleontology	LTS	LTS	Similar (LTS)	Less (LTS)	Similar (LTS)	Less (LTS)
Greenhouse Gas Emissions and Climate Change	S/U	S/U	Less (S/U)	Similar (S/U)	Less (S/U)	Less (S/U)
Hazards, Hazardous Materials, and Wildfire	LTS	LTS	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Hydrology and Water Quality	LTS	LTS	Greater (LTS)	Similar (LTS)	Similar (LTS)	Greater (LTS)
Land Use	NI	NI	Similar (NI)	Similar (NI)	Similar (NI)	Similar (NI)
Noise	LTS	LTS	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Public Services	LTS	LTS	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)

Table 18-5. Significance of Potential Environmental Impacts Compared with Preferred Plan Concept

Environmental Resource Area	Preferred Plan Concept (Plan Concept 1)	Plan Concept 2	Alternative A (No Project)	Alternative B (Prioritize Waste Recovery)	Alternative C (No Organics Processing)	Alternative D (Three-Bin Clean MRF Alternative)
Transportation	S/U	S/U	Less (S/U)	Similar (S/U)	Similar (S/U)	Greater (S/U)
Utilities and Energy	LTS	LTS	Less (LTS)	Similar (LTS)	Less (LTS)	Less (LTS)
Meet Project Objectives?	Yes	Yes	No	Partially	Partially	Partially
Reduce Significant and Unavoidable Impacts?	n/a	n/a	Yes	Yes	Yes	Yes

Notes:

NI = No Impact; PS = Potentially Significant; LTS = Less than Significant; S/U = Significant and Unavoidable. LTS impacts encompasses both significant (with mitigation) and less than significant impacts (without mitigation).

Impact comparison is for onsite and vicinity-related impacts only and does not reflect potential offsite impacts in cases where waste would be managed at different locations.

Alternative D would reduce the potential for significant visual impacts associated with the proposed project near the WPWMA facility by not increasing the overall permitted height of the WRS� from the currently permitted height and by avoiding two landfill mounds as in Plan Concept 2; however, it would not reduce the potential for offsite litter visual impacts. Alternative D would significantly reduce impacts to biological resources at the site, as the alternative would use neither the eastern property nor the northern half of the western property, where the majority of habitat for special-status wildlife species that rely on vernal pool-type wetlands would be affected by the proposed project.

As shown in Table 18-4, there are no objectives of the proposed project that would be fully met by Alternative D. Alternative D would allow the WPWMA to partially maintain a stable and relatively predictable cost structure through continued local control of solid waste management operations, partially expand the site's capacity to divert materials from landfill disposal and contribute to greenhouse gas emission reductions, and partially enhance customer safety by improving site access and internal circulation. Alternative D would not allow the WPWMA to secure long-term waste disposal capacity and would not provide the WPWMA with the operational flexibility to accommodate an increasingly complex and evolving regulatory environment. Alternative D would not contribute to improved compatibility between current and future WPWMA operations and existing and proposed adjacent land uses, would not develop the WPWMA properties in a manner consistent with the goals and policies of the Sunset Area Plan, would not facilitate the siting and development of compatible technologies that would benefit from proximity to WPWMA, and would not position the WPWMA facility as a hub of innovation that promotes the development of a circular economy in Placer County.

18.6 Environmentally Superior Alternative

From among the alternatives evaluated, CEQA requires that a DEIR identify the environmentally superior alternative. Based on the discussion of the various alternatives, the alternative that would result in the fewest onsite or local environmental impacts is Alternative A, the No Project Alternative. Alternative A is a continuation of the existing operations under existing permits at the WPWMA facility until closure, without implementation of the Waste Action Plan. Activities allowed under existing permits would continue until the WRS� reaches capacity, at which time, the landfill portion of the facility would close. While Alternative A would continue operations on the center property of the WPWMA facility, the constraints of the alternative would reduce but not eliminate potentially significant impacts of the proposed project related to aesthetics, air quality and odor, GHG emissions, and transportation and traffic. Alternative A would potentially eliminate significant impacts at the site associated with biological resources by not expanding waste management activities onto the eastern and western properties.

However, while air quality impacts near the site would be reduced under Alternative A, it is assumed that additional air and GHG emissions would be produced wherever the solid waste that cannot be managed at the site is taken for processing. Similarly, as the WPWMA facility becomes unable to take increasing quantities of waste in response to population growth, additional waste management would be required elsewhere on a jurisdiction-by-jurisdiction basis. It is anticipated that these operations, at locations other than the WPWMA facility, would produce traffic in amounts proportional to the amount of waste being processed, up to the amount assumed for the proposed project. Nevertheless, when considering the ability of the alternatives to reduce direct environmental impacts at the project site, the No Project Alternative (Alternative A) would be the environmentally superior alternative, although it would not achieve the project objectives.

Per Section 15126.6(e)(2) of the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, "the EIR shall also identify an environmentally superior alternative among the other alternatives."

The remaining alternatives, Alternatives B (Prioritize Waste Recovery), C (No Organics Processing), and D (Three-Bin Clean MRF), each have the potential to avoid or reduce some of the significant and unavoidable impacts of the proposed project. By not fully using the WPWMA's eastern and western properties, Alternatives B and D eliminate the loss and degradation of habitat for special-status wildlife species that rely on vernal pool-type wetlands for at least part of their lifecycle, including federally listed vernal pool fairy shrimp and vernal pool tadpole shrimp and western spadefoot, a California species of special concern. However, the PCCP would address potential impacts to vernal pool-type wetlands on a County-wide basis, with or without implementation of the proposed project. Comparatively, by eliminating the processing of organic waste at the WPWMA facility, Alternative C would significantly reduce the potential for offsite odor impacts. Because offsite odor impacts have the potential to significantly affect adjacent residents, the WPWMA determined that reducing the potential for odor impacts was of greater concern than reducing impacts to vernal pools.

As such, the WPWMA has determined that Alternative C (No Organics Processing) is the Environmentally Superior Alternative.

18.7 References

Placer County. 2019. Sunset Area Plan / Placer Ranch Specific Plan Final Environmental Impact Report. State Clearinghouse #2016112012. October. Prepared by Ascent Environmental, Sacramento, CA.