

M e m o r a n d u m

To: ARV-18-020, City of Roseville - Energy Recovery Project, CEQA Analysis

Date: 3/26/2019

From: **Jonathan Bobadilla**
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Subject: California Environmental Quality Act Analysis for ARV-18-020

I am an Energy Analyst in the Fuels and Transportation Division of the California Energy Commission, and am the Commission Agreement Manager (CAM) for the proposed grant agreement, Agreement ARV-18-020 (Agreement) with the City of Roseville (City), titled Roseville Energy Recovery Project.

This memo analyzes the environmental impacts of the City's proposed Energy Recovery Project (ERP), which is part of a separate, but overlapping Pleasant Grove Wastewater Treatment Plant Expansion and Energy Recovery Project (Expansion & Recovery Project) described the California Environmental Quality Act (CEQA) documentation to be discussed later. The ERP portion of the Expansion & Recovery Project is described in the CEQA documentation as follows:

The proposed [ERP] would be located immediately south of the existing [Pleasant Grove Wastewater Treatment Plant]...would beneficially use digester gas from the anaerobic digesters constructed under the Expansion Project to generate fuel for solid waste trucks, generate electricity, and provide heating for the anaerobic digesters. The [ERP] would also provide a new receiving location for high strength waste that is currently being collected within the City and hauled to disposal locations outside of the City..... (Page 2-13 of the February 2017 *Comments, Responses, and Errata for the CEQA-Plus Initial Study/Mitigated Negative Declaration for the PGWWTP Expansion and Energy Recovery Project*)

The City Council considered, passed, and adopted the Initial Study/Mitigated Negative Declaration, which included a Mitigation Monitoring and Reporting Program for the Expansion & Recovery Project on April 5, 2017, by Resolution NO. 17-114. The City filed an original Notice of Determination with the State Clearinghouse on April 6, 2017. The City Council then considered, passed, and adopted the Addendum to the Initial Study/Mitigated Negative Declaration, which included an Amended Mitigation Monitoring and Reporting Program for the Expansion & Recovery Project, on November

7, 2018, by Resolution NO. 18-457. The City filed a Notice of Determination for the Addendum on November 14, 2018.

Pursuant to my work in developing the Agreement, including the Scope of Work (SOW) for the Agreement; I have reviewed the February 2017 *Comments, Responses, and Errata for the CEQA-Plus Initial Study/Mitigated Negative Declaration for the PGWWTP Expansion and Energy Recovery Project (IS/MND)*, and the June 2018 *Addendum to the CEQA-Plus Initial Study/Mitigated Negative Declaration for the PGWWTP Expansion and Energy Recovery Project (Addendum IS/MND)*. In the IS/MND and Addendum IS/MND, the City, as Lead Agency, determined that the Expansion & Recovery Project would not have a significant effect on the environment, once mitigation measures are implemented. I am not aware of any evidence which suggests that the Initial Study, Mitigated Negative Declaration, and Addendum to the Initial Study and Mitigated Negative Declaration are inadequate.

Based on my review and consideration of the above documents, it is my independent and professional opinion that, since the above CEQA documents were finalized, there have been no new project changes, and no new, additional, or increased significant environmental impacts have occurred. Furthermore, I have not identified any new information which would change the conclusions of the Lead Agency's CEQA documents, or render those conclusions inadequate. It is also my independent and professional opinion that the work to be performed under the proposed Agreement falls within the scope of work of the proposed Agreement, and will not result in any new significant environmental impacts. Finally, I have not identified any new mitigation measures, within the Commission's authority, that would lessen or further mitigate the environmental impacts from the ERP.

The reasons for my conclusions are as follows:

Under the Agreement, the City will construct and operate a 267,000-diesel gallon equivalent per year biomethane production facility (facility) under the ERP. There would be minimal excavation, vegetation clearing, and cut-and-fill would be balanced onsite. Operations activities would be done on a continuing basis, resulting in long-term vehicle trips associated with one additional full-time employee and occasional trips associated with maintenance. The environmental factors and mitigation measures identified for the ERP by the Lead Agency's CEQA IS/MND, and Addendum IS/MND are listed below:

Biological Resources:

The Agreement may result in impacts to fully protected bird and raptor species at or near the proposed ERP site. Prior to and during construction, the City will implement *Mitigation Measure 3.4-1*, which requires preconstruction surveys to avoid nesting sites. Therefore, the environmental impacts on Biological Resources will be reduced to less than significant levels.

Cultural Resources:

The Agreement may result in impacts to archaeologic resources and may disturb human remains interred outside dedicated cemeteries. During construction, the City and its designated construction contractor (Contractor) will implement *Mitigation Measure 3.5-1*, which requires the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented and significant archaeological resources, and *Mitigation Measure 3.5-2*, which requires halting of construction activities and notification to applicable state and local agencies if human remains discovered. Therefore, the environmental impacts on Cultural Resources will be reduced to less than significant levels.

Noise:

The Agreement may result in a temporarily substantial or periodic increase in ambient noise levels in the ERP sites vicinity. During construction, the City and Contractor will implement *Mitigation Measure 3.12-1*, which requires noise curtains use during nighttime construction activity. Therefore, the environmental impacts on construction-related Noise will be reduced to less than significant levels.

Transportation/Traffic:

The Agreement may result in increases to traffic levels in the ERP sites vicinity. Prior to and during construction, The City and Contractor will implement *Mitigation Measure 3.16-1*, which requires the construction contractor to implement a traffic management plan which can include, but is not limited to segmented or timed construction phasing, grade separating, and designated hours of construction. Therefore, the environmental impacts on Transportation/Traffic will be reduced to less than significant levels.

Mandatory Findings of Significance:

As noted in the Biological Resources, Cultural Resources, and Transportation/Traffic, the ERP may result in potentially significant impacts and degradation to the quality of the environment. However, adoption and implementation of the Mitigation Measures in the IS/MND and Addendum IS/MND would reduce these individual impacts to less than significant levels. The ERP would not increase population growth either directly or indirectly beyond what is planned for in the City General Plan and subsequent specific plans. In addition, ongoing operation and maintenance of the ERP would result in a very small increase in the number of permanent staff. Although the majority of construction would occur during the exempt daytime hours, or would be located at sufficient distance from sensitive receptors for noise levels to attenuate below noise thresholds, or both; construction activities with heavy-duty equipment and vehicles required outside of the noise-exempt hours could be potentially significant. Implementation of *Mitigation Measure 3.12-1* would reduce construction-related noise levels, if it were to occur outside of exempt noise hours, to a less than significant level because it would reduce

the level of noise exposure at off-site noise-sensitive receptors to less than the noise standards established in the City's General Plan and Noise Ordinance. Implementation of the mitigation measures proposed in the IS/MND and Addendum IS/MND would reduce the ERP effects on environmental impacts to a less than significant level. The ERP contribution to environmental impacts would be less than cumulatively considerable.

The City also evaluated the ERP's potential impacts on the resource areas listed below. In each case, the City found that the ERP would have less than significant impacts or no impact in each area. Based on my independent analysis, it is my professional opinion that the Agreement would not impact any of the following areas, and that no mitigation measures are warranted or needed:

Aesthetics

The Agreement is expected to have less than significant to no impact on Aesthetic Resources.

Agriculture and Forest Resources

The Agreement is expected to have no impact on Agricultural and Forest Resources.

Air Quality

The Agreement is expected to have less than significant impacts on Air Quality.