STANISLAUS COUNTY PLANNING COMMISSION

April 17, 2025

STAFF REPORT

USE PERMIT APPLICATION NO. PLN2021-0012
WEST MAIN COMPOST

REQUEST: TO OPERATE A COMPOSTING FACILITY ON 23.5± ACRE PORTION OF A 47.82± ACRE PARCEL, IN THE GENERAL AGRICULTURE (A-2-40) ZONING DISTRICT.

APPLICATION INFORMATION

Applicant:	Manual Machado, Machado and Sons Construction, Inc.
Property owner:	D. & C. Starkey 2011 Trust (David and Cynthia Starkey)
Agent:	Sean Kilgrow, Machado and Sons Construction, Inc.
Location:	1236 West Main Street, between S Carpenter Road and Crows Landing Road, in the Turlock area.
Section, Township, Range:	20-5-9
Supervisorial District:	District 2 (Supervisor Chiesa)
Assessor's Parcel:	058-003-006
Referrals:	See Exhibit H Environmental Review Referrals
Area of Parcel(s):	47.82± acres
Water Supply:	Private well
Sewage Disposal:	Private septic system
General Plan Designation:	Agriculture
Community Plan Designation:	N/A
Existing Zoning:	General Agriculture (A-2-40)
Sphere of Influence:	N/A
Williamson Act Contract No.:	1978-3106
Environmental Review:	Mitigated Negative Declaration
Present Land Use:	Almond orchard and row crops.
Surrounding Land Use:	Row crops, orchards, and scattered single-family dwellings in all directions; dairies to the south; and Mountain View Middle School to the east.

RECOMMENDATION

Staff recommends the Planning Commission approve this request based on the discussion below and on the whole of the record provided to the County. If the Planning Commission decides to approve the project, Exhibit A provides an overview of all the findings required for project approval, which include use permit findings.

PROJECT DESCRIPTION

This is a request to operate a composting facility on a 23.5±-acre portion of a 47.82±-acre parcel, in the General Agriculture (A-2-40) zoning district. The facility will receive a maximum of 160 tons of feedstock material per-day, which will consist of a combination of landscape residue, vegetative food material (including produce), non-vegetative food material (including dairy and meat products), and green waste. The end product will consist of soil amendments which will be sold to local farms. Up to 43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendments are expected on-site at one time. On-site equipment, which will be portable but remain on-site, will be diesel powered and will consist of a grinder, two front end loaders, a trommel screen, and a water truck. A 960 square-foot modular office with restroom and two separate additional portable restrooms are proposed for the employees. No other structures are proposed as part of this request.

The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. Daily truck trips are expected to be up to 26 a day, consisting of 20 daily incoming truck deliveries of feedstock and three daily outgoing truckloads of finished compost. Additional truck trips consist of the removal of non-compostable material (such as plastic) to be trucked off site to a landfill facility once per week, and the on-site servicing of the portable restrooms twice a week. Daily employee vehicle trips are expected to be up to seven.

The feedstock will be separated at local municipal solid waste (MSW) hauler transfer stations in Stanislaus County, including Turlock Scavenger, prior to coming on-site. Only feedstock originating in Stanislaus County will be accepted. The feedstock is proposed to be delivered by 20-yard dump trucks, which will be weighed and dumped for inspection at the feedstock unloading zone, which is anticipated to be on engineered fill dirt. Loads that contain greater than 1% contamination (such as plastic or other non-compostable material) will be rejected. The level of contamination is determined based on a visual inspection, prior to entering the grinder. Rejected loads will undergo additional mechanical separation on-site or will be diverted to the landfill if too contaminated to be separated. Once the feedstock has passed inspection, the material has been unloaded, and any contaminants removed, it is fed into a grinder by a front-end loader and stockpiled for up to three days, before being formed into eight-foot-high aerated static piles (ASP) by the front-end loader. ASP compost piles are constructed over a network of aeration pipes which induce airflow into the pile using an electric blower that is operated in conjunction with a pile temperature control system, cycling air into the pile. The ASP pad is proposed to be 56,000 square feet in size and located towards the middle of the parcel, approximately 375 feet from the western property line and 500 feet from the northern property line. The scales, receiving area, sorting, grinding, amendment storage, and office are proposed to be located just south of the ASP pad. Water will be added to the piles by a water truck to achieve proper moisture content. Up to

16,500 cubic yards of active composting material is expected on the ASP slab at one time. After 45-60 days, the piles are moved to the curing area and formed into piles each approximately 4,440 square feet in size and eight-feet-high, located on engineered fill dirt, for 60-90 days. Up to 51,682 square feet of material, in up to 40 piles, is expected to be curing on-site at one time. Once the curing period is complete, the finished compost is filtered via portable diesel-powered screening equipment; the product is loaded onto trucks and delivered to the end user in bulk. The operator has prepared a Nuisance Control Plan (NCP) to address dust, odor, vectors, and litter (see Attachment II of Exhibit E - *Amended Initial Study, dated March 20, 2025, with Attachments*). The project proposes one new well for fire suppression water, landscaping, and dust control. No septic systems are proposed. Proposed landscaping includes a 15-foot-wide landscaping strip adjacent to the northern property line outside of the ultimate right-of-way, and oleander trees on a five-foot-tall berm directly behind the landscaping strip, and along the western and eastern border of the operation. Oleander trees (without a berm) are also proposed adjacent to the southern property line. A six-foot-tall chain link fence with 98 percent opacity privacy slats is proposed around the entire perimeter of the operation. A composite lined storm water detention basin will handle all runoff, and the water will be recycled and used on the ASP curing pile. The project site will have access to County-maintained West Main Street via a proposed driveway.

SITE DESCRIPTION

The project site is located at 1236 West Main Street, between S Carpenter Road and Crows Landing Road, in the Turlock area (see Exhibit B – *Maps, Site Plan, and Elevations*). The western half of the 47.82±-acre parcel (which the facility will be located on) is planted in row crops, and the eastern half is planted in almonds (which will remain). Row crops, orchards, and scattered single-family dwellings are located in all directions. Several dairies are located to the south of the project site and Mountain View Middle School is located approximately 0.66 miles to the east.

ISSUES

Three issues have been identified as part of the review of the project, including: (1) traffic concerns from the Mountain View Fire Protection District, (2) general concerns from surrounding landowners, and (3) comments received from the San Joaquin Valley Air Pollution Control District (Air District) in response to the environmental review circulated for the project.

The Mountain View Fire Protection District has voiced concerns regarding truck traffic generated by the project and the potential for accidents when trucks exiting the facility turn left. The project was reviewed by the Stanislaus County Public Works Department (Public Works), who did not identify the need for a Traffic Impact Assessment (TIA) or for a turning lane to be installed based on their review of the project. As requested by Public Works, conditions have been applied to the project requiring that grading and encroachment permits be obtained, and that a tonnage fee of $0.082 per ton of material entering or leaving the property be required to be paid by the operator to offset impacts to the road. Additionally, Condition of Approval No. 21 requires that the storage depth outside of any gate be adequate for trucks coming off the road and entry vehicles shall not block any travel lane or shoulder in the County right-of-way. If the storage depth is inadequate, it may require that the fence be moved further into the property, or a deceleration lane be installed. West Main Street, from Crows Landing Road to S Carpenter Road has an estimated Pavement Condition Index (PCI) of 54, which is considered fair. While not required by Public Works, the applicant is proposing that the trucks make only right turns in and out of the facility and has

provided a circulation diagram with the proposed routes (see Exhibit B – *Maps, Site Plan, and Elevations*).

Two letters from neighboring landowners located on the adjacent parcels to the east (Stanley and Joanne Bettencourt) and west (Dean and Laura Wilson) have been received. The letters were written in response to the environmental review prepared and circulated in accordance with the California Environmental Quality Act (CEQA) (see Exhibit D – *Letters of Opposition*). The letters raise concerns regarding: nuisance associated with noise, odor, rodents, insects, and dust; increased risk of accidents due to truck traffic; a decrease in property values; and existing ground and water contamination, and impacts to air quality.

Prior to receipt of the letter, an environmental noise assessment was prepared to evaluate potential noise impacts that may occur from the project due to the nature of the use. The noise assessment quantified noise generation of the proposed project operations at the nearest sensitive receptors, which included six neighboring residences (two of which were the adjacent parcels to the east and west), to compare those levels against the applicable Stanislaus County noise standards for acceptable noise exposure. The data collected indicated that maximum noise would comply with the County's stationary daytime (7:00 a.m. to 10:00 p.m.) and nighttime maximum noise standards (10:00 p.m. to 7:00 a.m.).

The NCP prepared by the applicant includes measures to address dust, odor, vectors, and litter. Measures in the NCP include, but are not limited to, maintaining the appropriate aeration, carbon to nitrogen ratio, and moisture content of the compost, not accepting compostable plastics, and always maintaining an operable water truck on-site. Additionally, mitigation measures have been incorporated into the project requiring the NCP to be revised by the applicant at the request of the Planning Department, if nuisances persist despite implementation of the NCP.

Regarding existing ground and water contamination concerns, neither the project site nor nearby properties are on the Department of Toxic Substances Control's (DTSC's) online search and Geographic Information System (GIS) tool for identifying sites that have known or potential contamination as well as facilities permitted to treat, store, or dispose of hazardous waste. The project was referred to the Central Valley Regional Water Quality Control Board (CVRWQCB), which did not respond with any concerns pertaining to water contamination, but did respond with potential permits the project may be subject to. Following receipt of the letter, staff reached out to the CVRWQCB, which confirmed they are not aware of water contamination issues at the project site. Additionally, Condition of Approval No. 31 has been applied to the project requiring all applicable permits from the CVRWQCB to be obtained prior to issuance of a building or grading permit. One new well is proposed for landscaping, fire suppression, and dust suppression. Should the project ever meet the requirements to become a public water system, it will be required to meet minimum drinking water quality standards.

The Air District also provided a response to the environmental review circulated for the project, recommending that a Health Risk Assessment (HRA) be conducted to determine the project's potential health impacts on surrounding receptors (including residences). Accordingly, the applicant prepared a HRA, which was sent to the Air District for comment and the Air District confirmed that the project is not expected to have a significant health impact on nearby sensitive receptors. The environmental document has been amended to address the Air District's

comments and additional discussion may be found in the *Environmental Review* section of this report.

No other issues have been identified as a part of this request. Standard conditions of approval have been added to the project.

GENERAL PLAN CONSISTENCY

The site is currently designated Agriculture in the Stanislaus County General Plan. The agricultural designation recognizes the value and importance of agriculture by acting to preclude incompatible urban development within agricultural areas and, as such, should generally be zoned with 40- to 160-acre minimum parcel sizes. This designation establishes agriculture as the primary use, but allows dwelling units, limited agriculturally related commercial services, agriculturally related light industrial uses, and other uses which by their unique nature are not compatible with urban uses, provided they do not conflict with the primary use.

Goal Three, Policy 19 of the Land Use Element encourages accommodating the siting of industries with unique requirements and Goal One, Objective 1.2 of the General Plan's Agricultural Element encourages vertical integration of agriculture by organizing uses requiring use permits into three tiers based on the type of uses and their relationship to agriculture. Tier Two uses include agriculture-related commercial and industrial uses, such as agricultural processing plants and facilities, agricultural services establishments, soil reclamation, and commercial or municipal composting operations. Composting operations are allowed in the A-2 zoning district when the Planning Commission finds that the operation will not be substantially detrimental to or in conflict with the agricultural use of other property in the vicinity; the establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity; and it is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned commercial or industrial. An assessment of the proposed uses compliance with the findings required for approval of a Tier Two use is provided in the *Zoning Ordinance Consistency* section of this report.

Goal Seven of the Conservation and Open Space Element "Supports efforts to minimize the disposal of solid waste through source reduction, reuse, recycle, compositing, and transformation activities". Implementation Measure Five encourages and promotes projects that cause special wastes (e.g., food processing by-products, demolition/construction waste, inert wastes, e-waste/universal waste, tires, de-watered sludge, household hazardous waste, etc.) to be safely diverted from landfills or transformation facilities, including composting and co-composting operations and Implementation Measure Six encourages the permitting and operation of recycling facilities that receive waste materials diverted from landfills or transformation facilities.

To protect the long-term health of local agriculture by minimizing conflicts resulting from normal agricultural practices as a consequence of new or expanding uses approved in or adjacent to the A-2 (General Agriculture) zoning district, Appendix "A" of the Agricultural Element requires a buffer between agricultural and non-agricultural uses. These guidelines state that all projects shall incorporate a minimum 150-foot-wide buffer setback; projects which propose people-intensive outdoor activities, such as athletic fields, shall incorporate a minimum 300-foot-wide buffer setback. Agricultural buffer design standards for new or expanding uses stipulate that certain activities are permitted uses within the buffer area such as parking lots and low-people intensive

uses. Uses classified under Tier One and Tier Two use permits in the A-2 zoning district are generally considered to be low-people intensive; however, the decision-making body (Planning Commission) shall have the ultimate authority to determine if the proposed or expanded use is "low-people intensive." The project meets the 150-foot setback to the parcels to the east. The proposed project is located 10 feet from parcels to the south and west and 95 feet to the north across West Main Street; however, the uses within the buffer setback area consist of the stormwater retention pond and composting windrow space, which are unlikely to be people intensive. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. Planning staff believes the project can be considered low people-intensive, thus not subject to the County's Agricultural Buffer requirements. The project was referred to the Stanislaus County Agricultural Commissioner, who responded with no concerns.

Staff believes that the proposed use can be found to be consistent with the General Plan if the Planning Commission can make the necessary findings to approve the request, as outlined in the *Zoning Ordinance Consistency* section of this report.

ZONING ORDINANCE CONSISTENCY

The site is currently zoned General Agriculture (A-2-40). In accordance with Section 21.20.020(B) of the Stanislaus County Zoning Ordinance, Tier Two uses, which are agriculture-related commercial and industrial uses such as commercial or municipal composting facilities, may be allowed when the Planning Commission makes the following findings:

1. The establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity; and

2. The establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity; and

3. It is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage.

In addition to the findings outlined above, the following finding is required for approval of any use permit:

- The establishment, maintenance, and operation of the proposed use or building applied for is consistent with the General Plan and will not, under the circumstances of the particular case, be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

The project site is enrolled under Williamson Act Contract No. 1978-3106. County Code Section 21.20.045, in compliance with Government Code Section 51238.1, specifies that uses approved on contracted lands shall be consistent with the following principles of compatibility:

1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in the A-2 zoning district.

2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in the A-2 zoning district. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use.

Within the A-2 zoning district, the County has determined Tier Two uses shall be evaluated on a case-by-case basis by the Planning Commission and/or Board of Supervisors to determine whether they are consistent with the principles of compatibility set forth in Section 21.20.045 of the County Code. As designed, the request is not expected to significantly compromise the long-term productive agricultural capability of the subject contracted parcel or other contracted parcels in the A-2 zoning district. There are no permanent structures proposed as part of the project. While the project will displace 23.5±-acre of existing row crops, the use is directly in support of the agricultural productivity of the surrounding area, as the end product is sold to agricultural users, and the remaining 24.32± acres will remain in production. There is no indication this project will result in the removal of adjacent contracted land from agricultural use. During project review, this application was referred to the Department of Conservation (DOC) for review and no response has been received to date.

Staff believes the establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity, nor be detrimental to the health, safety, property or improvements and the general welfare of persons within the surrounding area of use and the County as a whole; the proposed use will not create a concentration of commercial or industrial uses in the vicinity; and that all findings required for approval can be made.

ENVIRONMENTAL REVIEW

Pursuant to CEQA, the proposed project was circulated to interested parties and responsible agencies for review and comment and no environmental issues were raised with the exception of those discussed in the *Issues* section of this report (see Exhibit H – *Environmental Review Referrals*). An Initial Study was circulated from December 20, 2024, to January 24, 2025.

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the project which identifies measures to mitigate potentially significant impacts resulting from the project (see Exhibit F – *Mitigation Monitoring and Reporting Program*). The mitigation includes Mitigation Measure No. 1 which requires the operator implement the dust, odor, vector, and litter control measures as described in the NCP. If nuisances persist despite implementation of the NCP, the operator is required to work with the Planning Department to revise the NCP within 30-days of being notified by the Planning Department and implement additional measures as deemed

necessary by the Planning Department. Should the Planning Department determine that analysis associated with nuisance mitigation requires review by a qualified consultant, Mitigation Measure No. 2 requires the facility operator to provide a deposit based on the estimated cost of the work to be performed by the consultant and staff time and materials costs.

As previously mentioned in the *Issues* section of this report, a comment was received from the Air District in response to the environmental assessment prepared and circulated for the project. The Air District recommended a HRA be prepared to evaluate the project's health-related impacts on sensitive receptors. The applicant submitted a HRA to the Air District in response to the comments, which included a calculation of emission rates, exposure concentrations, and health risks from potential Toxic Air Contaminants (TACs). The analysis indicated the project's health risk would be below the threshold of significance for all risk types. The Air District reviewed the analysis and confirmed that the project is not expected to have a significant health impact on nearby sensitive receptors. Accordingly, Section III – *Air Quality* and Section VIII – *Greenhouse Gas Emissions*, of the Initial Study (IS) have been amended to include the additional information.

As permitted by CEQA Guidelines, amendments to an IS may be made without recirculation provided they are providing clarifying information only. The amendments made to the IS are considered to be clarifying in nature and will not create new significant impacts. Accordingly, the amended IS is not required to be re-circulated (see Exhibit E – *Amended Initial Study, dated March 20, 2025, with Attachments*).

A Mitigated Negative Declaration has been prepared for approval prior to action on the project (see Exhibit G – *Mitigated Negative Declaration*). Conditions of approval reflecting referral responses have been placed on the project (see Exhibit C – *Conditions of Approval and Mitigation Measures*).

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Note: Pursuant to California Fish and Game Code Section 711.4, all project applicants subject to the California Environmental Quality Act (CEQA) shall pay a filing fee for each project; therefore, the applicant will further be required to pay **$3,025.75** for the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the Clerk-Recorder filing fees. The attached conditions of approval ensure that this will occur.

Contact Person: Teresa McDonald, Associate Planner, (209) 525-6330

Attachments:
Exhibit A - Findings and Actions Required for Project Approval
Exhibit B - Maps, Site Plan, and Elevations
Exhibit C - Conditions of Approval and Mitigation Measures
Exhibit D - Letters of Opposition
Exhibit E - Amended Initial Study, dated March 20, 2025, with Attachments
Exhibit F - Mitigation Monitoring and Reporting Program
Exhibit G - Mitigated Negative Declaration
Exhibit H - Environmental Review Referrals
Exhibit I - Levine Act Disclosure Statement

Findings and Actions Required for Project Approval

1. Adopt the Mitigated Negative Declaration pursuant to CEQA Guidelines Section 15074(b), by finding that on the basis of the whole record, including the Amended Initial Study and any comments received, that there is no substantial evidence the project will have a significant effect on the environment and that the Mitigated Negative Declaration reflects Stanislaus County's independent judgment and analysis.

2. Find that the Mitigation Monitoring and Reporting Program is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

3. Order the filing of a Notice of Determination with the Stanislaus County Clerk-Recorder's Office pursuant to Public Resources Code Section 21152 and CEQA Guidelines Section 15075.

4. Find that:

    a. The establishment, maintenance and operation of the proposed use or building applied for is consistent with the General Plan and will not, under the circumstances of the particular case, be detrimental to the health, safety and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county;

    b. The establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity;

    c. The establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity;

    d. It is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage;

    e. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in the A-2 zoning district;

    f. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in the A-2 zoning district. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping;

    g. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use;

    h. That the proposed Tier Two use is ""low-people intensive" and not subject to the agricultural buffer; and

i. The project will increase activities in and around the project area, and increase demands for roads and services, thereby requiring dedication and improvements.

5. Approve Use Permit Application No. PLN2021-0012 – West Main Compost, subject to the attached Conditions of Approval and Mitigation Measures.

WEST MAIN COMPOST

UP PLN2021-0012

AREA MAP

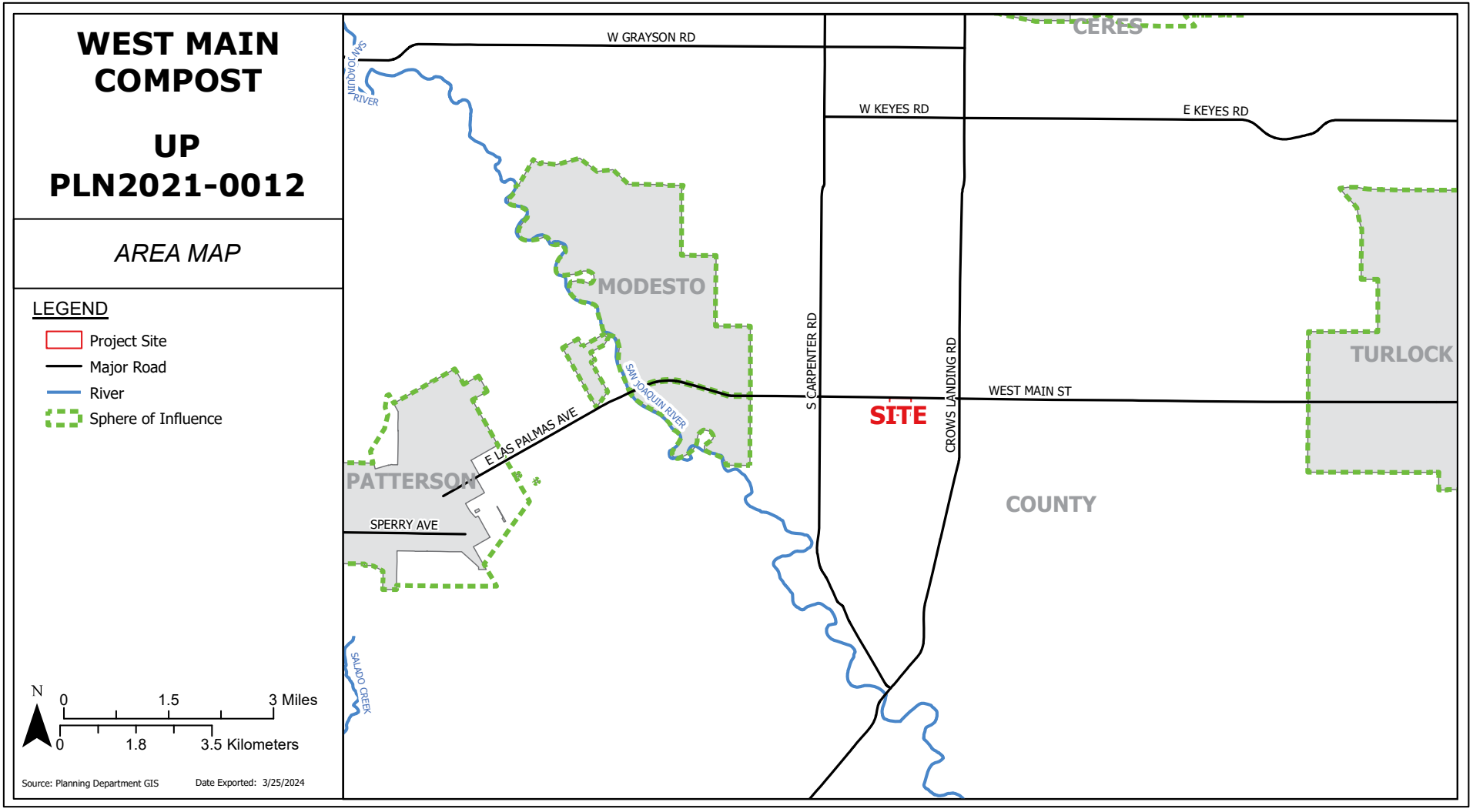


EXHIBIT B

WEST MAIN COMPOST

UP PLN2021-0012

GENERAL PLAN MAP

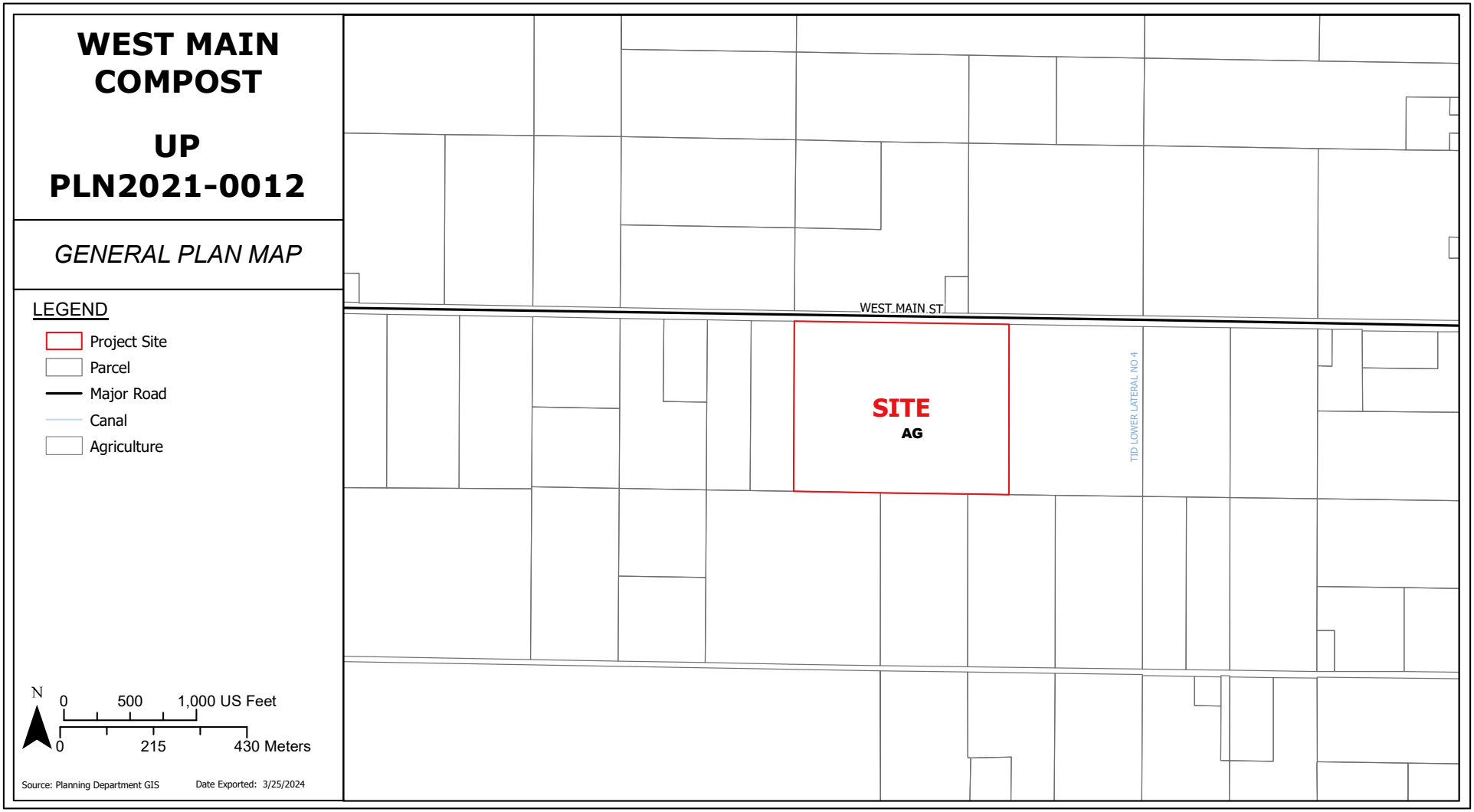


EXHIBIT B-1

WEST MAIN COMPOST

UP PLN2021-0012

ZONING MAP

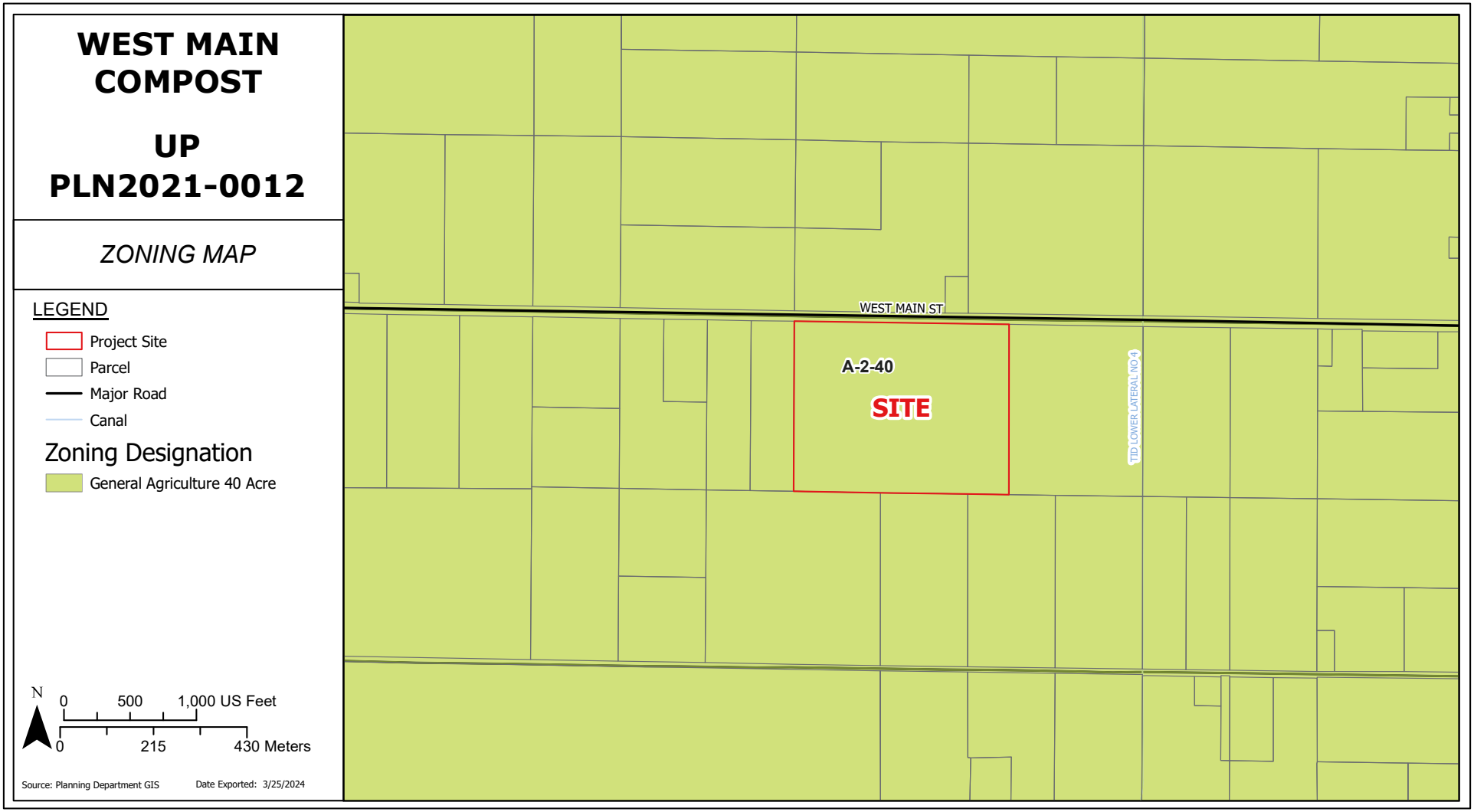


EXHIBIT B-2

WEST MAIN COMPOST

UP PLN2021-0012

2023 AERIAL AREA MAP

LEGEND

- Project Site
- Parcel
- Major Road
- Canal

N

0 500 1,000 US Feet

0 215 430 Meters

Source: Planning Department GIS

Date Exported: 3/25/2024

EXHIBIT B-3

WEST MAIN COMPOST

UP PLN2021-0012

2023 AERIAL SITE MAP

LEGEND

- Project Site
- Parcel

N

0 165 330 US Feet

0 45 90 Meters

Source: Planning Department GIS

Date Exported: 3/25/2024

EXHIBIT B-4

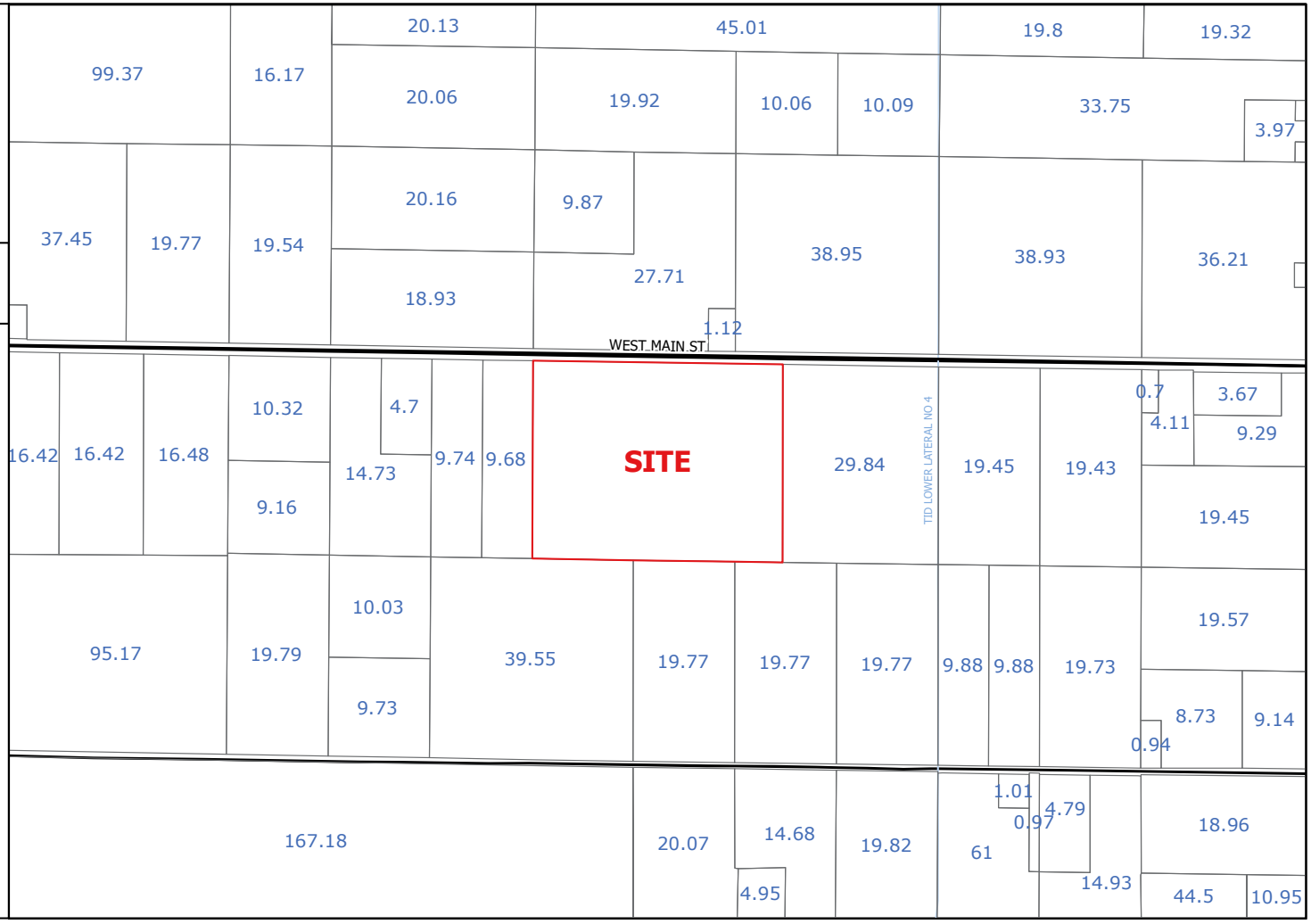
WEST MAIN COMPOST

UP PLN2021-0012

ACREAGE MAP

LEGEND

- Project Site
- Parcel
- Acres
- Major Road
- Canal



N 0 500 1,000 US Feet

0 215 430 Meters

Source: Planning Department GIS Date Exported: 3/25/2024

EXHIBIT B-5

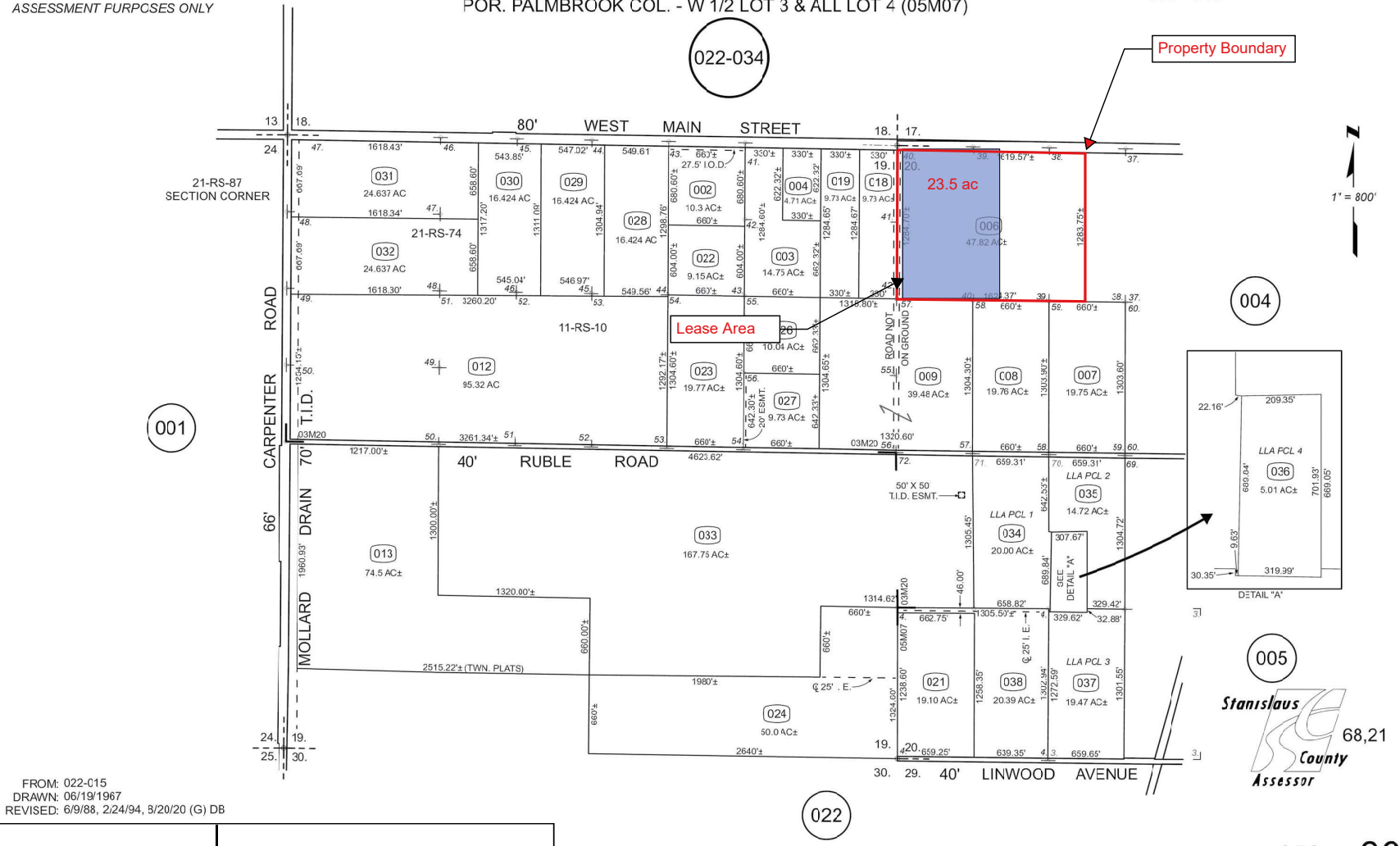
058 — 003

PORTION SECTIONS 19 & 20 T.5S. R.9E. M.D.B. & M.

POR. GLENDORA COL. - W 1/2 LOT 38 & ALL LOTS 39 TO 59, 70, 71, 72 (03M20)
POR. PALMBROOK COL. - W 1/2 LOT 3 & ALL LOT 4 (05M07)

079 008
079 010

THIS MAP FOR ASSESSMENT PURPCSES ONLY



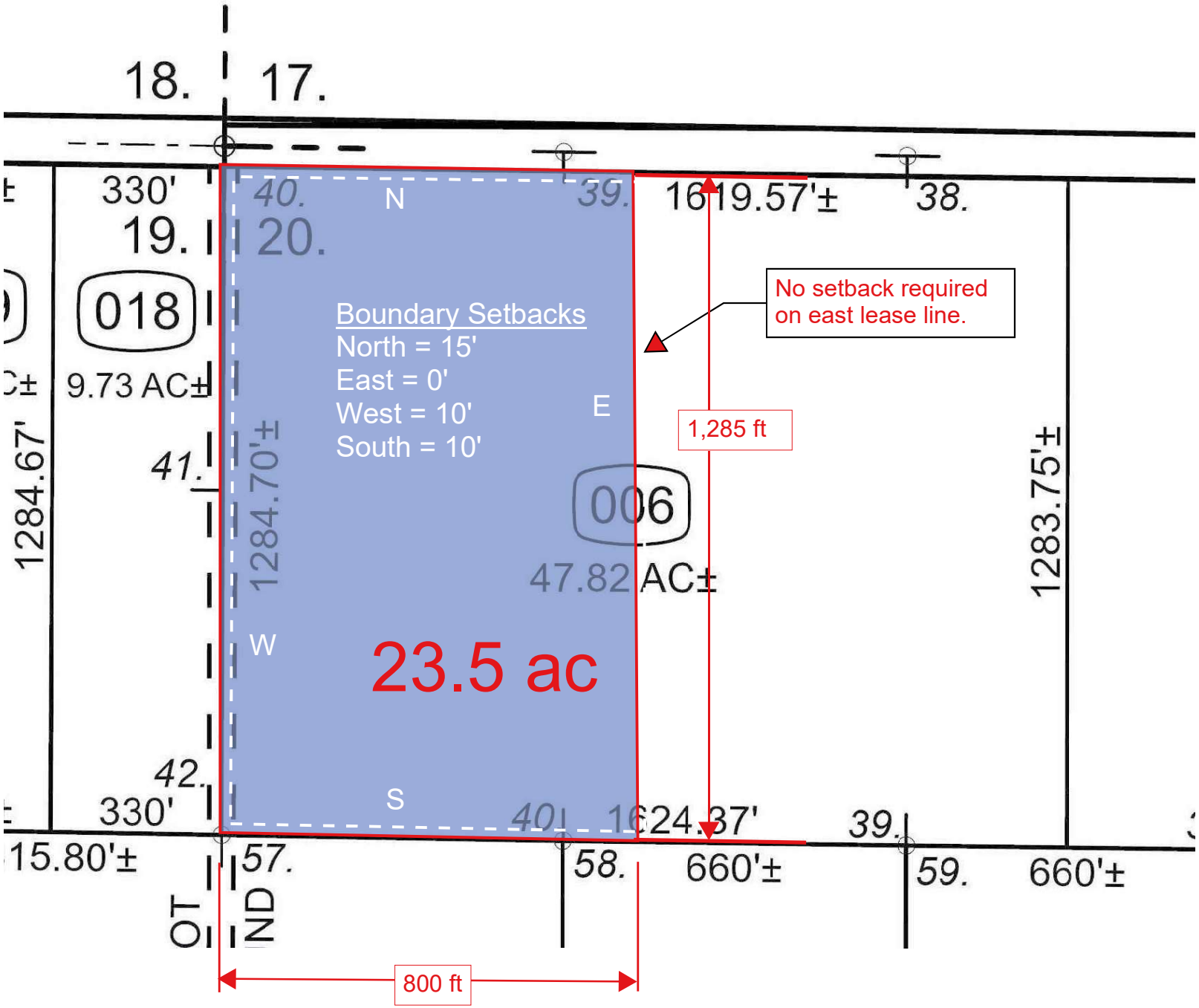
FROM: 022-015
DRAWN: 06/19/1967
REVISED: 6/9/88, 2/24/94, 3/20/20 (G) DB

West Main Compost	Parcel Map and Property Line
5/1/24	by: Sean Kilgrow, P.E. (916) 206-4342

058 — 003

17

EXHIBIT B-6



West Main Compost	Lease Line and Setbacks
5/1/24	by: Sean Kilgrow, P.E. (916) 206-4342

18

EXHIBIT B-7

West Main Compost

Aerated Static Pile System

43,350 tons separated organics per year

1	Site Ingress - Egress
2	Scales
3	Receiving & Inspection
4	Grinding & Loading
5	ASP pad
6	Office and parking
7	Electrical
8	Curing - Screening
9	Retention pond

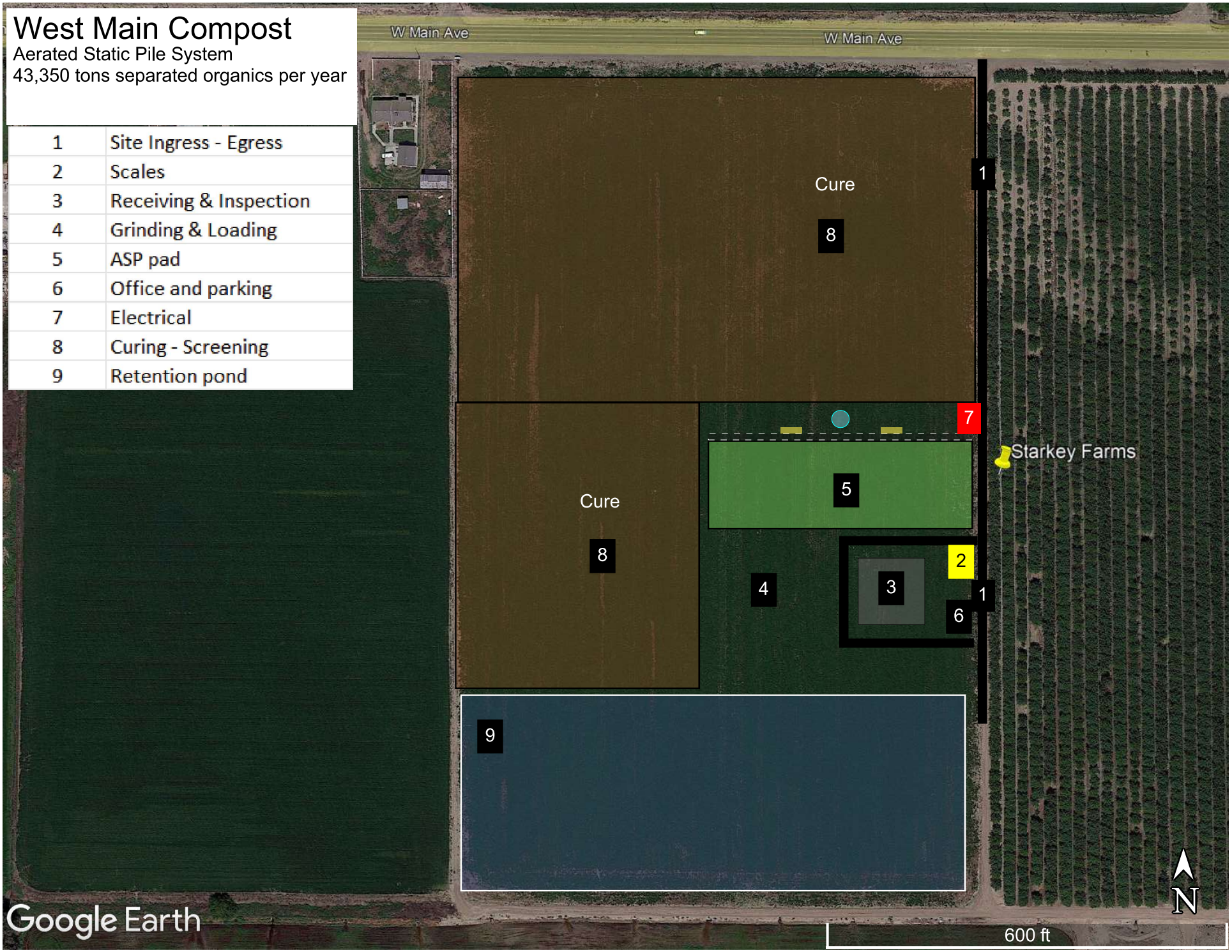
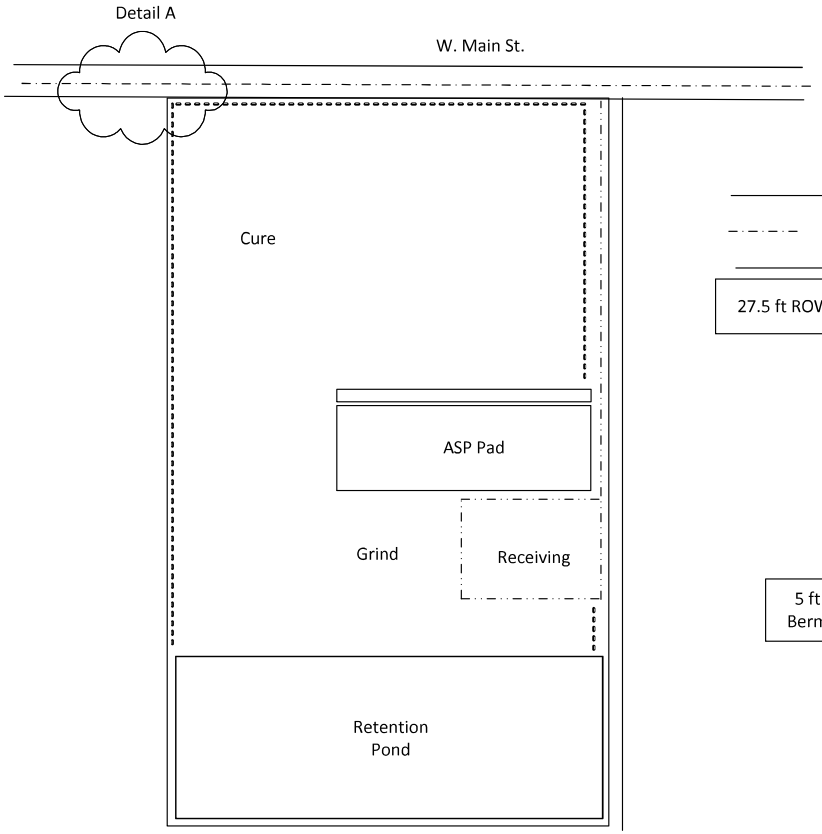
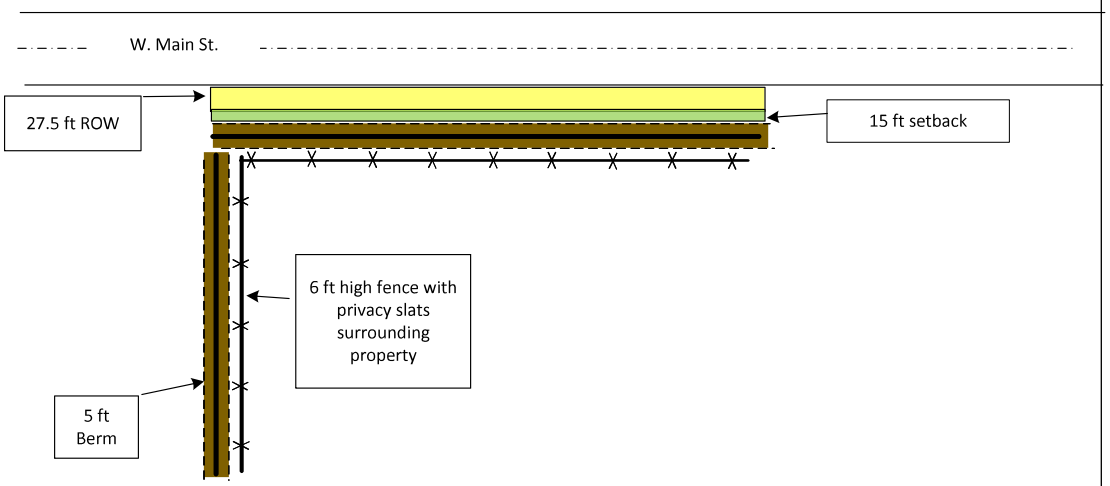


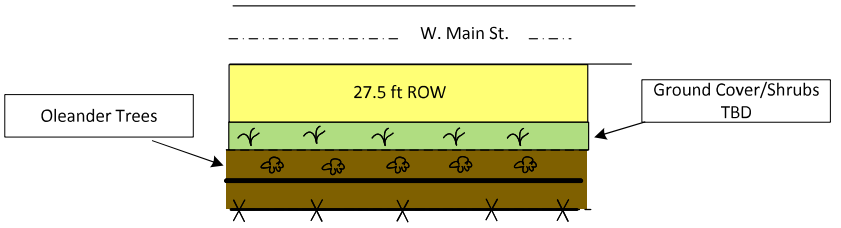
EXHIBIT B-8



Detail A

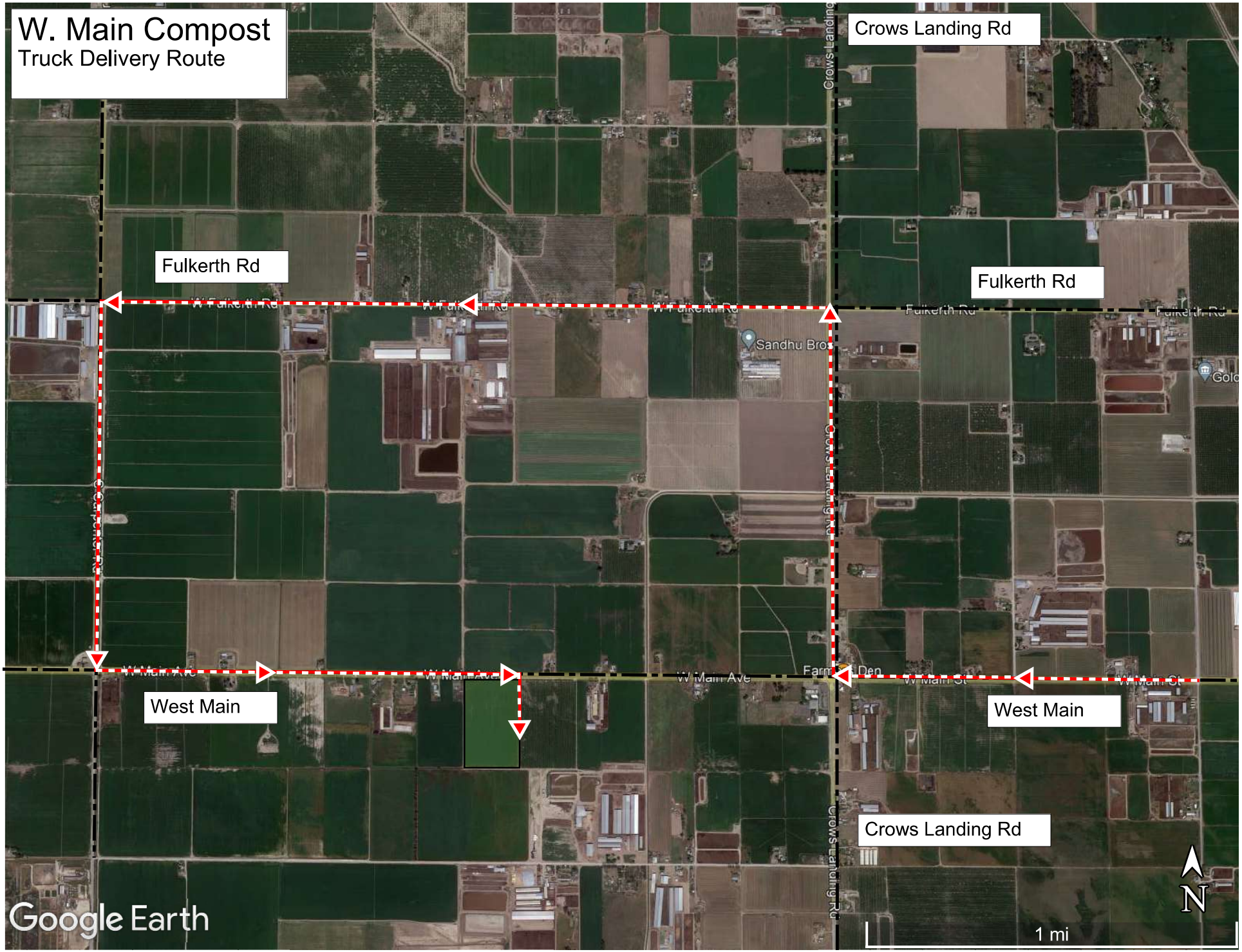


Landscaping



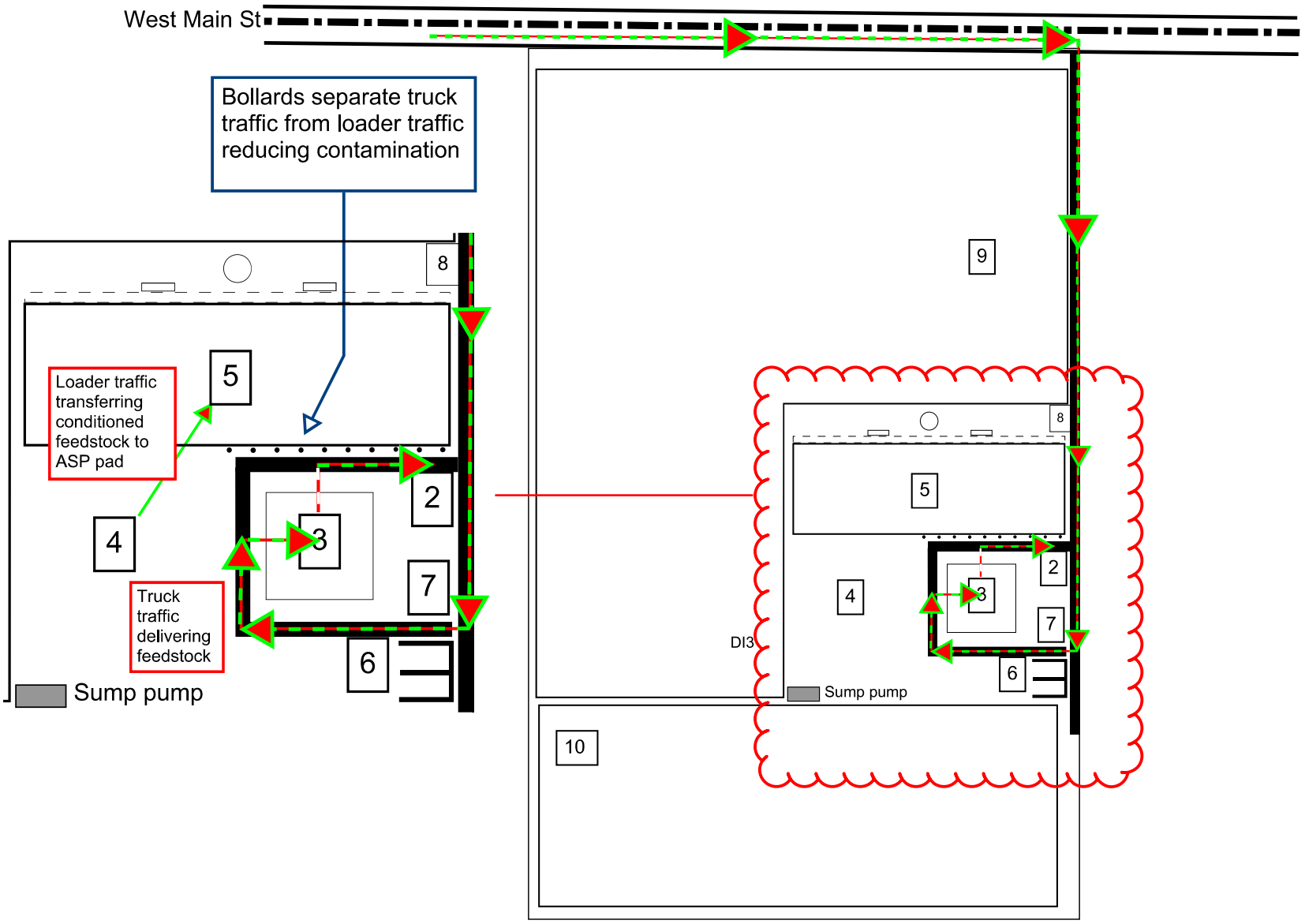
Client: West Main Compost	Page 1 of 3	Prepared by: Sean Kilgrow, P.E.	Date: 4/8/24
Process: 1236 W. Main Crows Landing, CA		Approved by: Site Overview	Revision: 5/7/24
NODE:	TITLE:		NO.:

EXHIBIT B-9



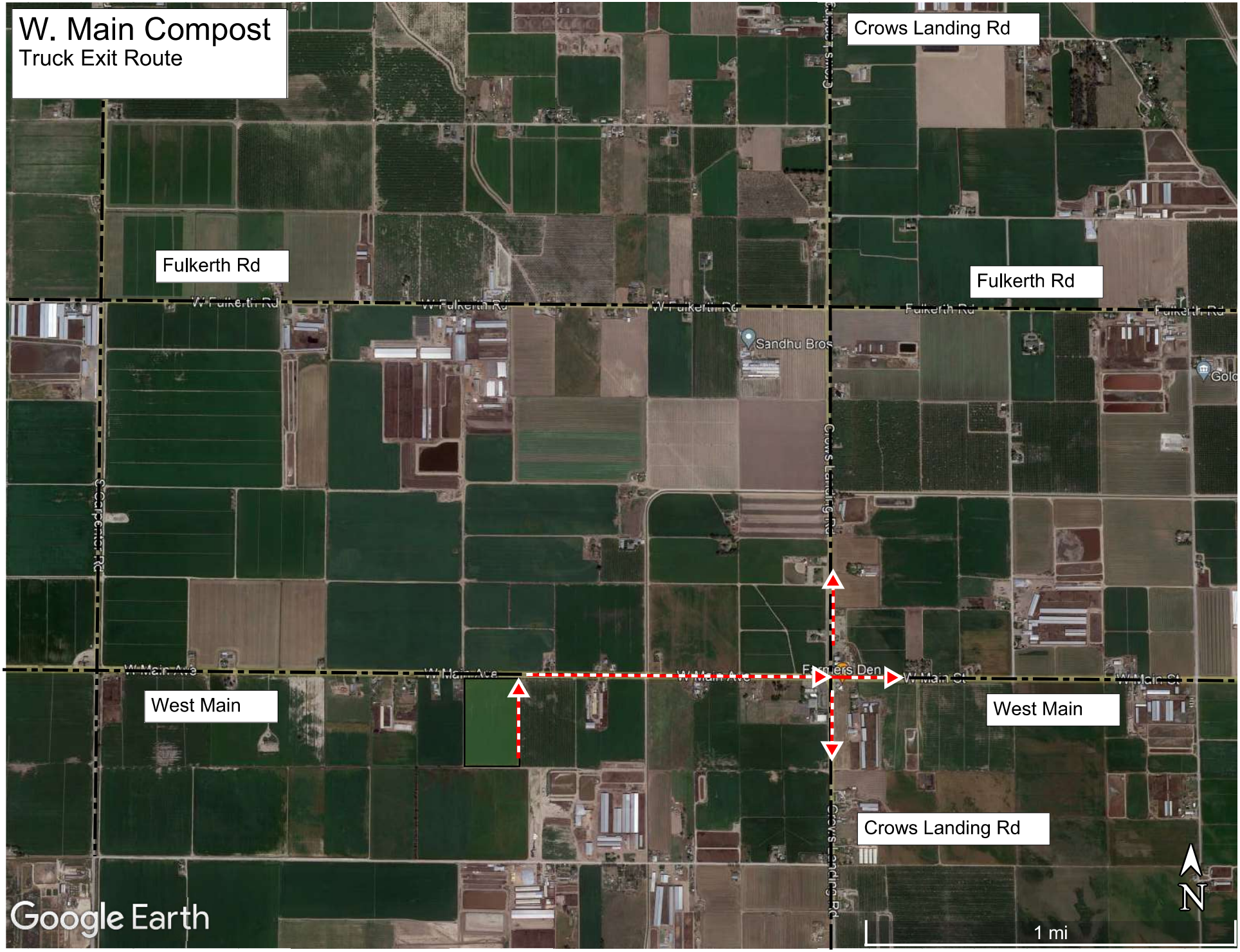
21

EXHIBIT B-10



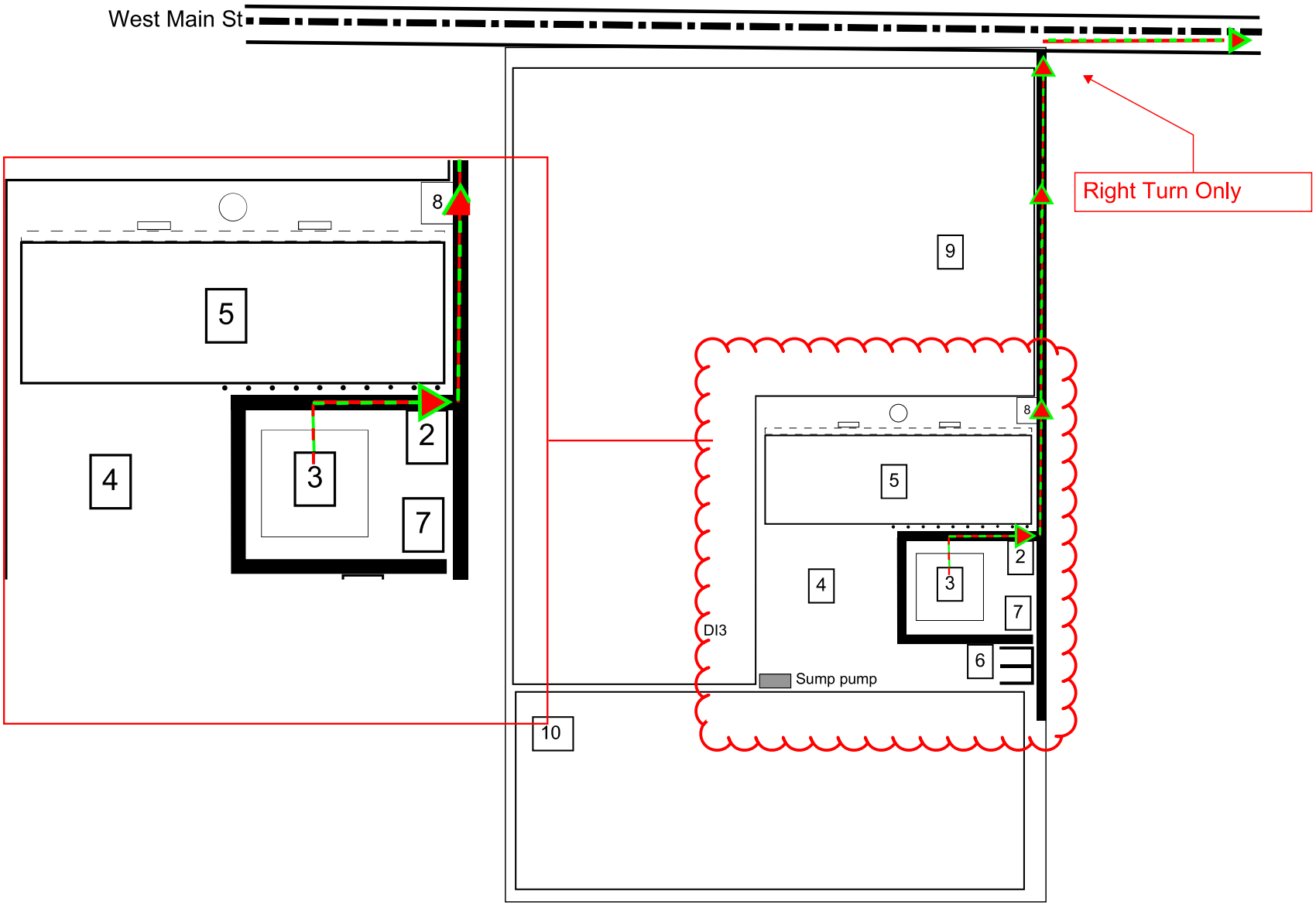
	Delivery Truck Ingress	West Main Compost
Sean Kilgrow, PE	Machado and Sons, Inc	3/26/25

EXHIBIT B-11



23

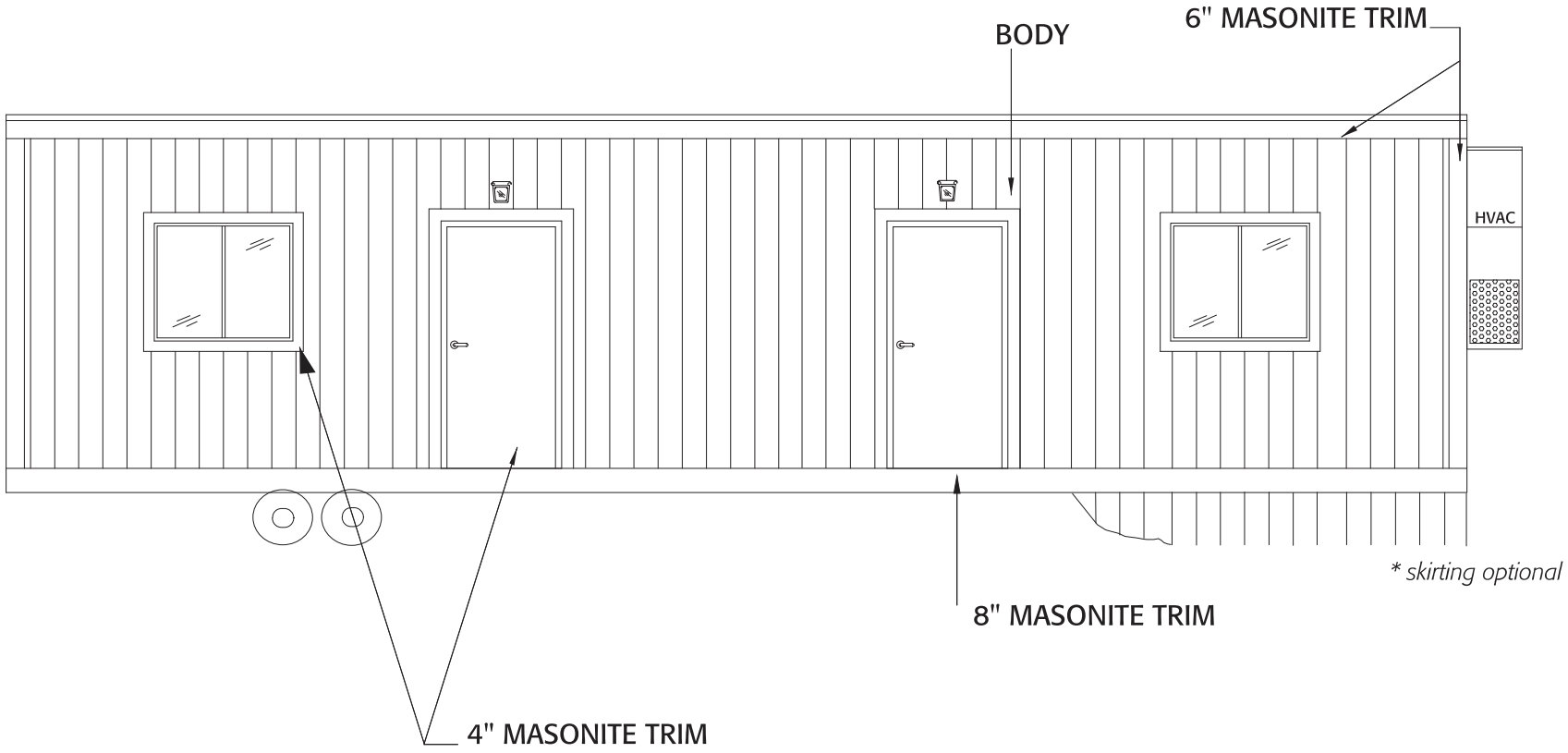
EXHIBIT B-12



	Truck Egress	West Main Compost
Sean Kilgrow, PE	Machado and Sons, Inc	3/25/24

EXHIBIT B-13

Elevation



mobile modular SM

Your Project – Our Commitment

GENERAL OFFICE
24′ x 40′
(960 Sq. Ft.)

MOBILE MODULAR
5700 Las Positas Rd.
Livermore, CA 94551
Phone: 925.606.9000
Fax: 925.453.3201
Toll Free: 800.944.3442
www.MobileModularRents.com

Mobile Modular Management Corporation
5700 Las Positas Road
Livermore, CA 94551
(925) 606-9000 Fax: (925) 453-3201
www.mobilemodular.com

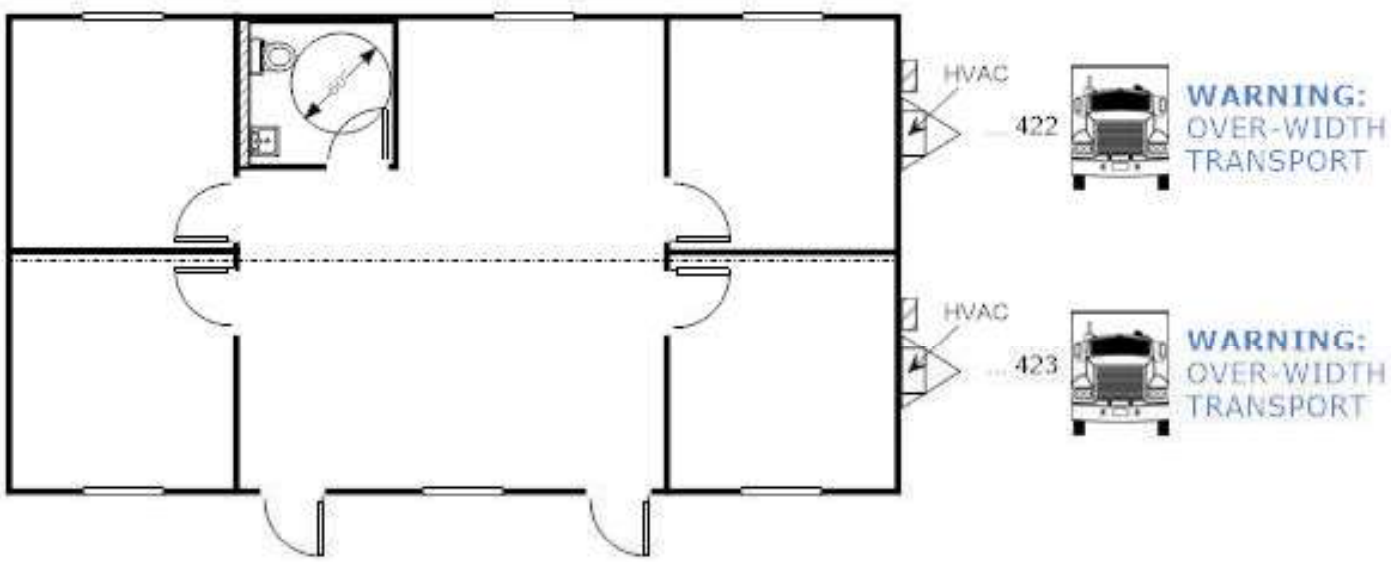
External Floorplan

Building Size:	24 X 45
Building ID:	43185
Number of Floors:	2
A#:	

Floor Plan

Office, 24x45 HCD (NonStd)

Actual Layout



Building Information:

Dimensions are nominal.

Manufacturer: **Catalac**
SN#: 776124888611, 776124858612
E-Code: 41422, 41423
Yard Location: FW Kakures Cayn, FW Kakures Cayn

Exterior Information:

Roof Load: **20**
Floor Load: **50 PSF**
Wind Rating: **15**
Height: **13' 8"**
Width: **12' 2"**

Towbar: **3' Bolted**
Axles: **3**
Occupancy: **B2**
Exterior Finish: **Duratemp**
Exterior Color: **Sand/Frost**

HVAC Volts: **220**
Power Panel: **125**
Roof Type: **Rolled**
Window Type: **Horiz XO**
Door Type: **Hollow Metal**

Interior Information:

Interior Finish: **Panel,HampGy**
Flooring: **Carpet Tile**
Flooring Color: **Mohawk (Arch)**
HVAC Return:

Ceiling Type: **Random Fiss**
Ceiling Height: **95"**
Max Span: **N/A**

Plumbing Information:

Urinals: **0**
Toilets: **1**
Sinks: **1**
Water Heater: **Tankless**
Showers: **0**

Accessories Information:

NOTE: Approval of this application is valid only if the following conditions are met. This permit shall expire unless activated within 18 months of the date of approval. In order to activate the permit, it must be signed by the applicant and one of the following actions must occur: (a) a valid building permit must be obtained to construct the necessary structures and appurtenances; or, (b) the property must be used for the purpose for which the permit is granted. (Stanislaus County Ordinance 21.104.030)

CONDITIONS OF APPROVAL

USE PERMIT APPLICATION NO. PLN2021-0012
WEST MAIN COMPOST

Department of Planning and Community Development

1. Use(s) shall be conducted as described in the application and supporting information (including the plot plan) as approved by the Planning Commission and/or Board of Supervisors and in accordance with other laws and ordinances.

2. Pursuant to Section 711.4 of the California Fish and Game Code, the applicant is required to pay a California Department of Fish and Wildlife (fee at the time of filing a "Notice of Determination." Within five (5) days of approval of this project by the Planning Commission or Board of Supervisors, the applicant shall submit to the Department of Planning and Community Development a check for **$3,025.75**, made payable to **Stanislaus County**, for the payment of California Department of Fish and Wildlife and Clerk-Recorder filing fees.

   Pursuant to Section 711.4 (e) (3) of the California Fish and Game Code, no project shall be operative, vested, or final, nor shall local government permits for the project be valid, until the filing fees required pursuant to this section are paid.

3. Developer shall pay all Public Facilities Impact Fees and Fire Facilities Fees as adopted by Resolution of the Board of Supervisors. The fees shall be payable at the time of issuance of a building permit for any construction in the development project and shall be based on the rates in effect at the time of building permit issuance.

4. The applicant/owner is required to defend, indemnify, or hold harmless the County, its officers, and employees from any claim, action, or proceedings against the County to set aside the approval of the project which is brought within the applicable statute of limitations. The County shall promptly notify the applicant of any claim, action, or proceeding to set aside the approval and shall cooperate fully in the defense.

5. Prior to installation of any exterior lighting, a photometric lighting plan shall be submitted for review and approval by the Planning Department for any exterior lighting. All exterior lighting shall be designed (aimed down and toward the site) to provide adequate illumination without a glare effect. This shall include, but not be limited to, the use of shielded light fixtures to prevent skyglow (light spilling into the night sky) and the installation of shielded fixtures to prevent light trespass (glare and spill light that shines onto neighboring properties). The height of the lighting fixtures should not exceed 17 feet above grade.

6. The Department of Planning and Community Development shall record a Notice of Administrative Conditions and Restrictions with the County Recorder's Office within 30-days of project approval. The notice includes: conditions of approval; and a project area map.

7. Should any archeological or human remains be discovered during development, work shall be immediately halted within 150 feet of the find until it can be evaluated by a qualified archaeologist. If the find is determined to be historically or culturally significant, appropriate mitigation measures to protect and preserve the resource shall be formulated and implemented. The Central California Information Center shall be notified if the find is deemed historically or culturally significant.

8. A business license shall be maintained by the facility operator at all times.

9. Noise levels associated with on-site activities shall comply with all applicable Stanislaus County Noise Standards. In the event that a documented noise complaint is received by the County, for noise resulting from activities associated with Use Permit No. PLN2021-0012, such complaint shall be investigated to determine if the allowable noise standards were exceeded. A documented noise complaint shall be considered one of the following:

    a. Multiple bona fide complaints received during a 24-hour period from more than one property owner and/or resident of the surrounding area; or,

    b. Receipt of noise measurements showing exceeded noise standards from a noise consultant determined by the County Planning Director to be qualified; or,

    c. Receipt of results from noise monitoring equipment calibrated by a noise consultant determined by the County Planning Director to be qualified and showing exceeded noise standards.

    Upon receipt of a documented noise complaint, the County shall require additional noise analysis to be conducted, at the operator's/property owner's expense, in order to determine if noise standards may have been exceeded or, to identify sound control measures to reduce the noise if the documented complaint via the methods identified in B or C above identified exceeded noise standards.

    An exception to the noise analysis may be allowed by the County if the applicant has identified the source of the noise exceedance and provided verification of operational changes within 48 hours of being notified by the County, and the complaining party makes no further bona fide complaints for 48 hours.

    Any additional noise analysis required to be conducted, including review, acceptance, development of recommended sound controls, and/or inspection associated with noise mitigation, shall be conducted by a qualified noise consultant, whose contract shall be procured either by the County Planning Department or by the operator/property owner. Should the County Planning Department procure the contract, a deposit based on actual cost of the noise analysis shall be made with the Planning Department, by the operator/property owner, prior to any work being conducted. Should the operator/property

owner choose to procure their own noise consultant, they shall be responsible to pay the County's costs to hire a third party to review the noise analysis if determined necessary. Upon receiving written notice from the County of the need for additional noise analysis or third-party review, the operator/property owner shall submit a deposit, in the amount determined necessary by the County, within 30-days of the deposit amount being identified by the County. The property owner/operator shall implement any new or additional sound control measures required to reduce noise to allowable levels within 30-days of the County having accepted the analysis as adequate. Additional time to implement County-approved sound control measures may be approved at the discretion of the Planning Director upon written request outlining the need for additional time and the interim steps to be taken to address the noise issues.

In the event the facility is determined to have exceeded noise standards, all equipment determined to be the source of exceedances shall cease operation during the daytime (7:00 a.m. to 10:00 p.m.) or nighttime (10:00 p.m. to 7:00 a.m.) period where exceedances occurred until sound reductions to comply with sound limits are achieved.

10. A final landscape and irrigation plan for the entire site shall be submitted to the Stanislaus County Planning Department for review and approval. Landscape and Irrigation plans shall meet current State of California water use requirements at the time of submittal. The review of the landscape plan shall be subject to applicable County landscape review and inspection fees in effect at the time of review and inspection. The applicant shall have an approved landscape and irrigation plan prior to issuance of a building permit and/or use of the site for the approved use. The landscaping and irrigation shall be inspected by the Stanislaus County Planning Department and determined to be in compliance with the approved landscape plan, prior to final inspection of the first building or grading permit and/or use of the site for the approved use.

11. All landscaped areas, fences, and walls shall be maintained in an attractive condition and in compliance with the approved final landscape and irrigation plan. The premises shall be kept free of weeds, trash, and other debris. Dead or dying plants shall be replaced with materials of equal size and similar variety within 30-days, at the property owner's expense.

12. All access roads utilized to access the operation shall be properly graded and maintained, including but not limited to, regularly oiled to control dust, and in addition, shall be graded and maintained to an all-weather standard that is appropriate to be used by emergency vehicles. "Regularly maintained" shall be semi-annually at a minimum, unless additional maintenance is necessary.

13. At the discretion of the Planning Director, Use Permit No. PLN2021-0012 may be brought back to the Planning Commission for review at any time. The Planning Commission, as part of the review, may amend conditions of approval, as necessary, to address nuisance concerns.

14. Incoming feedstock contamination shall not exceed one percent, measured by dry weight.

Building Permits Division

15. All required building permits shall conform to the California Code of Regulations, Title 24, and any other applicable standards.

Department of Public Works

16. No parking, loading or unloading of vehicles will be permitted within the County road right-of-way.

17. The developer will be required to install or pay for the installation of any signs and/or markings, if warranted.

18. West Main Street is classified as a 135-foot-wide Principle Arterial road. The required half width of West Main Street is 67.5-feet south of the centerline of the roadway. The existing right-of-way is 40-feet south of the centerline. The remaining 27.5-feet south of the centerline shall be dedicated as an Irrevocable Offer of Dedication prior to issuance of a building permit.

19. Prior to issuance of a building permit, an Encroachment Permit shall be obtained for the unpaved driveways that access the site from West Main Street. All driveway widths and locations shall be approved by Public Works and shall be installed to Public Works Standards and Specifications Plate No. 3-F5, and shall prevent all track out from the site.

20. Prior to use of the site for the approved use, a grading, drainage, and erosion/sediment control plan for the project site shall be submitted for any building permit that will create a larger or smaller building footprint. The grading and drainage plan shall include the following information:

    a. The plan shall contain drainage calculations and enough information to verify that runoff from project will not flow onto adjacent properties and Stanislaus County road right-of-way. Public Works will review and approve the drainage calculations.

    b. For projects greater than one acre in size, the grading drainage and erosion/sediment control plan shall comply with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. A Waste Discharge Identification Number (WDID) and a copy of the Notice of Intent (NOI) and the project's Storm Water Pollution Prevention Plan (SWPPP) shall be provided prior to the approval of any grading, if applicable.

    c. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for review of the grading plan.

    d. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for all on-site inspections. The Public Works inspector shall be contacted 48 hours prior to the commencement of any grading or drainage work on-site.

21. The applicant shall enter into an agreement with Stanislaus County Department of Public Works to pay a fee of $0.082 per ton of material entering or leaving the property to offset the traffic impacts to West Main Street. The agreement shall be in place prior to use of the site for the approved use. The fee shall be tied to the Engineering News Record Construction Cost Index; the base Construction Cost Index is 13731.60 as of January 2025. The applicant will pay Stanislaus County Public Works quarterly, with quarters ending March 31, June 30, September 30, and December 31.

22. The storage depth outside of any gate shall be adequate for trucks coming off the road. The entry vehicles shall not block any travel lane or shoulder. If the storage depth is inadequate, it may require that the fence be moved further into the property, or a deceleration lane be installed.

Department of Environmental Resources – Hazardous Materials Division

23. The applicant shall determine, to the satisfaction of the Department of Environmental Resources (DER), that a site containing (or formerly containing) residences or farm buildings, or structures, has been fully investigated (via Phase I study, and Phase II study if necessary) prior to the issuance of a grading permit. DER recommends research be conducted to determine if pesticides were used on the proposed development site; if confirmed, suspect site areas should be tested for organic pesticides and metals. Any discovery of underground storage tanks, former underground storage tank locations, buried chemicals, buried refuse, or contaminated soil shall be brought to the immediate attention of DER.

24. The applicant shall contact the DER – Hazardous Materials Division regarding regulatory requirements for hazardous materials and/or wastes prior to operation.

Department of Environmental Resources – Environmental Health Division

25. Any proposed work to an existing or proposed on-site wastewater treatment system (OWTS) shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks, and be designed according to type and/or maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate.

26. Prior to operation, the developer is required to obtain a recycling facility permit from the Solid Waste Division of DER.

Turlock Irrigation District (District)

27. There is a 36-inch-wide unreinforced cast in place concrete (CIP) irrigation pipeline belonging to Improvement District 940, is located approximately 25 feet south of, and parallel with, West Main. Additionally, there is a second CIP irrigation pipeline located along the south boundary of the project site. Prior to operation, the developer is required to submit plans detailing the existing irrigation facilities, relative to the proposed site improvements in order for the District to determine specific impacts and requirements.

28. Prior to operation, the District shall review and approve all maps and plans of the project. Any improvements to this property which impact irrigation facilities shall be subject to the District's approval and meet all District standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. There is a District Board approved time and material fee associated with this review. Any required facility modifications shall be completed prior to operation, or as otherwise allowed by the District.

29. Work on irrigation facilities shall only be performed during the non-irrigation season.

San Joaquin Valley Air Pollution Control District (SJVAPCD)

30. Prior to issuance of a grading or building permit, the developer shall contact the SJVAPCD to determine if any SJVAPCD rules or permits are required.

Central Valley Regional Water Quality Control Board (CVRWQCB)

31. Prior to issuance of a grading or building permit, developer shall be responsible for contacting the CVRWQCB and obtaining any necessary permits.

CalRecyle

32. Prior to operation, the developer is required to obtain a Compostable Materials Handling Facility Permit issued by CalRecycle.

Mountain View Fire Protection District

33. A minimum of 50,000 gallons of on-site fire suppression water shall be installed and in service prior to the operation. A building permit is required for the water tank installation.

34. A 20-foot-wide all-weather fire access to and around the facility shall be installed prior to operation. Fire access shall comply with California Fire Code.

Mitigation Measures

35. The facility operator shall implement the dust, odor, vector, and litter control measures as described in the Nuisance Control Plan (NCP), dated December 2024 and provided as Attachment II of the Initial Study. If nuisances persist despite implementation of the NCP, the operator shall work with the Stanislaus County Department of Planning and Community Development (the Department) to revise the NCP within 30-days of being notified by the Department, and shall implement additional measures as deemed necessary by the Department, which may include, but not be limited to the following:

    - Ceasing operations when Visible Dust Emissions exceed 20 percent opacity
    - Paving of drive aisles
    - Increasing frequency of water truck application

- Application of chemical/organic dust suppressants
- Installation of rumble strips or other improvements to prevent track-out onto the County right-of-way
- Processing all incoming compostable feedstock materials into active aerated static pile (ASP) compost piles within 24 hours
- Refusing new material
- Altering moisture management operations
- Decreasing pile sizes
- Aeration of the stormwater retention basin
- Use of microbial inoculants or lime on pad surfaces and water collection systems
- Covering the entire ASP system with a one-inch biofilter consisting of a layer of unscreened compost
- Best management practices (BMPs) to address insect, bird, rodent and other animal vectors will be implemented as needed
- Additional screening and contaminant removal of material conducted off-site
- Not contract with any agencies that accept non-organic materials (including biodegradable plastics and plastic-coated cardboard) that do not break down at the same rate as the other organic materials in the compost pile
- Installation of additional fencing
- Utilization of vacuum trucks

36. Should the Stanislaus County Department of Planning and Community Development (the Department) determine that analysis associated with nuisance mitigation requires review by a qualified consultant, the contract shall be procured by the Department, and paid for by the operator/property owner. A deposit based on the estimated cost of the work to be performed by the consultant and staff time and materials cost shall be made with the Department, by the operator/property owner, prior to any work being conducted. Staff costs and expenses will be billed at fully burdened weighted labor rates as provided by the County's Auditor's Office at the time services are rendered.

****

Please note: If Conditions of Approval/Development Standards are amended by the Planning Commission or Board of Supervisors, such amendments will be noted in the upper right-hand corner of the Conditions of Approval/Development Standards; new wording will be in bold font and deleted wording will be in strikethrough.

From:	Joanne Bettencourt
To:	Planning
Subject:	Comment on PLN2021-0012--West Main Compost
Date:	Tuesday, January 21, 2025 9:10:26 AM
Attachments:	Scan_20250121.png Scan_20250121 (2).png

Hello,

I am attaching a comment about the PLN2021-0012 proposed West Main Compost.

We respectfully hope that this plan does not get passed. It would affect so many people and landowners negatively.
Please read on to the 2 pages that are attached for many details.

Sincerely,
Stanley and Joanne Bettencourt
942 West Main St.
Crows Landing, CA 95313

Phone [redacted]

January 18, 2025

Department of Planning and Community Development:

This comment is referring to a Notice of Intent for
Use Permit Application No. PLN2021-0012 – West Main Compost.

We own the property just to the east of 1236 West Main St., Crows Landing, which is the site of the proposed compost facility.

We have lived at 942 West Main St., Crows Landing for decades and have enjoyed our life living there. In fact, my parents purchased this property in 1950, and 4 generations of our family have felt very fortunate to be able to live and earn a living and enjoy our rural heritage there.

Mr. Starkey and his son-in-law Mr. Machado are threatening to put an end to our rural heritage with their "plan" to put in a composting facility in a heavily populated agricultural area.

Their potential facility would be sandwiched between 2 parcels with homes on them, and plenty of homes further to the east, west, north and south.

Their plan is to run this potential facility year round, 6 days a week, from 7am to 5pm.

While the term "compost" seems good and natural, this potential facility has many issues that we, the agricultural residents should not have to deal with.

They are, but not limited to:

NOISE- Up to 20 incoming trucks with "feedstock", slowing down, shifting gears, dumping, and exiting the facility with up to 3 outgoing trucks loading up, slowing, shifting gears and exiting the facility will create a tremendous amount of clatter, banging noises. Also compost equipment noise, 3 employees each day, and on certain days more employees than that.

TRAFFIC- West Main is a very busy, dangerous road . It is the main throughfare between I-5 and Hwy.99. It is used by commuters to go to the bay area. Countless drivers do not obey the speed limit and drive dangerously. Adding 23 trucks a day slowing down to turn into or pull out of this potential facility will obviously make matters worse. Many of us on West Main have already experienced traffic accidents in front of our residences, in our fields, and actually in our front yards up against our houses.

ODOR- Standing piles of waste will definitely create major odor for all neighbors to smell for miles. It will be next to impossible to work outside or have an outdoor barbecue.

RODENTS AND INSECTS- Standing piles of waste are a known attractant for rodents and insects. No one needs to have to deal with this constantly.

DUST- There will obviously be a major influx of dust with all of the material coming in, the actual process to create compost, and the truck traffic in the yard.

LAND VALUES- Lastly, because of these major prior issues that we have stated, there surely would be a major drop in land values in our neighborhood. No one should have to suffer losses from that and any of these prior issues previously stated.

I see that the applicant believes that he can control the rodents, insects, and odor, but I doubt that that can be even partially accomplished.

To sum up this comment, this potential composting facility obviously needs to be in an area where there is not a population of families or a dangerous, busy road. It needs to be in an area where it will be by itself for several miles, so that no one will be affected by the numerous negative issues that go along with it.

Obviously Mr. Starkey and Mr. Machado do not want this facility close to their residences.

Please do not vote to approve this potential facility. It will cause lifelong havoc for us and our neighborhood and for future generations that will live in this area.

Sincerely,

Stanley and Joanne Bettencourt

942 West Main Street

Crows Landing, CA 95313

[redacted]

Signed 1/18/25

From: Dean Wilson
To: Teresa McDonald
Subject: Fw: Project ID: PLN 2021-0012 West Main Compost Facility
Date: Tuesday, April 1, 2025 9:34:03 AM

Teresa, e-mailed again, please respond to this email of acceptance.

Thanks, Dean R. Wilson

From: Dean Wilson <drwilson200@outlook.com>
Sent: Wednesday, January 22, 2025 3:26 PM
To: planning@stancounty.com <planning@stancounty.com>
Subject: Project ID: PLN 2021-0012 West Main Compost Facility

To: Teresa McDonald
From: Dean & Laura Wilson
Property Owners of 1512 & 1554 West Main Av.

Attached documents are our written concerns, comments, and suggestions to solve this troublesome issue within our community and surrounding businesses and residencies. Please feel free to contact us at any time for any questions, answers, advice, suggestions, etc.

Dean Wilson cell no. [redacted]
Laura Wilson cell no. [redacted]

Address: 1554 West Main Av.
Crows Landing, Ca. 95313

E-mail address: [redacted]

Sincerely,
Dean Wilson

To: Dept. of Planning & Community Development Page 1
From: Dean & Laura Wilson
Re: Project ID: PLN 2021-0012 West Main Compost Facility

I have been a resident at 1554 West Main for almost 49 years and my wife a combined 57 year resident at 1554 and 1512 West Main, this proposed Compost Site would be directly adjacent to our 2 parcels, approximately 300 and 600 feet from our dwellings.

Our first impression is why this area, this is like an accident looking for a happening, this prime agricultural ground is used for essential crops to feed beef cattle, goats, dairy cows and horses. This wrongful location is dangerous and an environmental hazard in regard to safety issues from heavy and high speed traffic, noise, air quality, stench, respiratory health issues and diseases (caused from mosquitos, insects, rodents and airborne spores being dispersed from generated and existing piles of mold.) To add insult to injuries there are ground and water contamination issues we've been dealing with for the past 40 years, we have to use special filtration for internal water usage and purchase our clean expensive drinking water from super markets or self-serve water stations, TID is constantly on our case due to improper drainage ditch maintenance from the excessive irrigation runoff, this of course is caused by the Starky and Garcia farms not ours so why would the County even consider this request when they haven't even taken care of the past and present water and ground contaminations issues, if this goes through then the County will have to add to their list of complaints the toxic air pollution problems.

This idea was not well thought out in regard to environmental impact, not 2,3, or 4miles away from occupied residents but just a mere 30 seconds down the road or approximately ½ mile east of this proposed site are 2 restaurants (indoor and outdoor seating), 1 community event center, 1 fire station, 1 community baseball field, 1 feed store with scale, 1 service station with food and drink sales, and 1 elementary school... so not if but when the stench from this site lurks into their domain how can they conduct everyday business & pleasure properly and guarantee a controlled healthy environment or a clean atmosphere that our students can breathe? Playing outside and eating their lunches with this foul stench and toxic air pollution is a health issue which is best described as foolish, dangerous, damaging and unreasonable, in other words, sacrificing the neighborhoods health, well-being and privacy for an insignificant and unnecessary Compost Site is preposterous. This is not the time or place to even consider this notion, this is a display of self-satisfaction and selfishness placed on our neighborhood by the Starky Farms.

Starky Farms has property on Carpenter Road that is far more compatible & suitable than our location so why don't they place this site on that property, our guess is they would have to contend with the same problems that we would so most likely that suggested situation wouldn't happen.

This facility will also depreciate the property values of the neighborhood and deter renters from occupying any rental housing, our rental house is a major source of income that allows us to exist financially, without rental revenue we couldn't survive even with our 3 supplemented sideline jobs and our meek Social Security Checks. We have a 10 year plan to enjoy our retirement and live out our Golden Years with good health and dignity, this proposed Compost Site would squash our hopes, dreams, and future well-being, at 75 years of age how could we transfer, relocate and settle down comfortably without being traumatized due to stress, physical/mental strain, and a financial deficit created by the relocating costs and loss revenue of depreciated sales from our estates.

I would like to see an Environmental Impact report that is required by law for any new business plus the minimum County acreage requirements for a Compost site. Please note! In our opinion this small business by Starky Farms is not a requirement or necessity for our County or Community, just a side line business to help bolster their financial well-being. If we look at the Compost Site on Jennings road adjacent to the San Joaquin River it is located approximately 3 miles from West Main Av. the neighborhood is very sparse with only 2 or possibly 3 living resident sites, and maybe 5 total residents within a 5 mile radius that's located downwind and yet they still have numerous complaints about the stench from their facility, we have numerous housing and businesses within a half mile radius so how can this be acceptable?

For your information the Gilton Solid Waste facility off Finch Rd. just South/East of the Modesto Airport had a Compost Site and Livestock feedlot located between the waste building drop off site and Tuolumne River, when they built downwind the "Ceres River Bluff Regional Park" for the kids soccer competitions they had several complaints from the parents who spectated and the children competing, apparently this foul, severe stench and hazardous air quality problem was unacceptable and hazardous to the people occupying this area so with formal complaints and government backing the cattle feedlot was wrongfully removed, however a few months later the complaints kept coming in, apparently it wasn't the cattle causing the air pollution it was in fact the Compost Site adjacent to the feedlot so again with formal complaints and even Senator Feinstein's assistant they managed to shut down both sites.

I'm sure with the assistance of District 2 Supervisor Vito Chiesa he will agree with our concerns and not allow any notion to honor this damaging request to build a Compost Site in the middle of our populated neighborhood.

I'm a firm believer of entrepreneurs and freedom of Enterprise, however the time and place must be taken into extreme consideration when locating a legal, proper and reasonable location for any business, this location maybe legal but certainly not proper or reasonable when it comes to the neighborhoods safety, health issues, personal well-being and financial stability of personal property.
So we would like to take this time to make a reasonable, effective, satisfying and agreeable suggestion that will please all, utilize our lands and keep peace within the community. By using common sense, logic, reasoning and rationalism, we suggest the Starky Farms relocate their Compost Site closer to Interstate 5 next to the foothills for easier access and regress and avoid any nearby residential complaints, for the Starky Farms it would be a very lucrative investment financially to capitalize on readily available equipped property that already has sufficient water wells, electrically hookups, (concrete, asphalt, & road base laydown areas), and standing buildings that could be used for equipment shelter and maintenance sheds, any additional residential buildings could also be used for office space and lunch room. Why spend hundreds of thousands of dollars in development when these extremely and highly expensive necessities are already present, the several and available properties for sale are none other than abandoned and bankrupted Dairies with contaminated ground and water issues, not suitable for human living but very accommodating for a Compost Site. The price of these properties are very cheap due to the issues describe above. If we think about this the County is already facing issues with insufficient dump sites for Compost because the Gilton site was shut down in 2006 and the Jennings Road facility is already experiencing full capacity issues so why not kill 2 birds with one stone, utilize these inhabitable and unsaleable living sites and acquire useful purpose for this land. Why settle for 140 tons of debris per day when this overabundance of grounds and equipped properties have the capabilities of expansion of up to 500 to 1,000 tons of debris per day, go big or go home is my philosophy. The Starky Farms become very wealthy, the County solves their Compost issues and our neighborhood lives in peace, let's think and work smarter rather than harder people, it's a win/win situation to all our problems, the balls in your court so let's make the right decision here.

Sincerely,
Dean and Laura Wilson
Estate owners of 1512 and 1554 West Main

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

AMENDED CEQA INITIAL STUDY

(New text is in bold and deleted text is in strikethrough)

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, January 1, 2020

1.	**Project title:**	Use Permit Application No. PLN2021-0012 – West Main Compost
2.	**Lead agency name and address:**	Stanislaus County 1010 10th Street, Suite 3400 Modesto, CA 9535
3.	**Contact person and phone number:**	Teresa McDonald, Associate Planner (209) 525-6330
4.	**Project location:**	1236 West Main Street, between S Carpenter Road and Crows Landing Road, in the Turlock area (APN:058-003-006).
5.	**Project sponsor's name and address:**	Machado and Sons, Inc. 1000 South Kilroy Road Turlock, CA 95380
6.	**General Plan designation:**	Agriculture
7.	**Zoning:**	General Agriculture (A-2-40)

8. Description of project:

Request to operate a composting facility on a 23.5±-acre portion of a 47.82±-acre parcel in the General Agriculture (A-2-40) zoning district. The facility will receive a maximum of 160 tons of feedstock material per-day, which will consist of a combination of landscape residue, vegetative food material, and green waste. The end product will consist of soil amendments which will be sold to local farms. Up to 43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendments are expected on-site at one time. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. Outside of normal operating hours, employees may be required to be on-site occasionally in the event of an emergency. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. On-site equipment, which will be portable but remain on-site, will be diesel powered and will consist of a grinder, two front end loaders, trommel screen, and water truck. A 960 square-foot modular office with restroom and two separate additional portable restrooms are proposed for the employees. No permanent structures are proposed as part of this request. Daily truck trips are expected to be up to 26 a day, consisting of 20 daily incoming truck deliveries of feedstock and three daily outgoing truckloads of finished compost. Additional trips will consist of contaminants to be hauled off via truck once per week, and servicing of the portable restrooms twice a week. Daily employee trips are expected to be up to seven. The feedstock will be separated at local municipal solid waste (MSW) haulers transfer stations in Stanislaus County, including Turlock Scavenger. Only feedstock originating in Stanislaus County will be accepted. The feedstock will be delivered by 20-yard dump trucks, which will be weighed and dumped for inspection at the feedstock unloading zone, which is anticipated to be on engineered fill. Loads that contain greater than 1% contamination by dry weight, based on a visual inspection prior to entering the grinder, will be rejected. Rejected loads will undergo additional mechanical separation on-site or will be diverted to the landfill if too contaminated to be separated. Once the feedstock has passed inspection, material unloaded, and any contaminants removed, it is fed into a grinder by a front-end loader and stockpiled for up to three days, before being formed into eight-foot-high aerated static pile (ASP) compost piles by front-end loader, located on a 56,000 square-foot concrete slab with embedded aeration piles and nozzle assemblies. Water will be added to the piles by water truck to achieve proper moisture content. Up to 16,500 cubic yards of active composting material is expected on the ASP slab at one time.

ASP compost piles are constructed over a network of aeration pipes and induce airflow into the pile using an electric blower that is operated in conjunction with a pile temperature control system, cycling air into the pile. After 45-60 days, the piles are moved to 40 curing piles each approximately, 12 x 370 square feet in size and eight-feet-high, located on engineered fill, for 60-90 days. Up to 51,682 square feet of material is expected to be curing at one time. Once the curing period is complete, the finished compost is filtered via portable diesel-powered screening equipment, amendments added, loaded onto trucks, and delivered to the end user. The operator has prepared a Nuisance Control Plan to address dust, odor, vectors, and litter. The project proposes one new well for fire suppression water and to utilize portable restrooms for the employees. No septic systems are proposed. Other proposed improvements include a chain link fence with fabric and oleander trees around the perimeter of the operation and a five-foot-tall berm with 3:1 slopes is proposed along the northern perimeter line. A composite lined storm water detention basin will handle all runoff and the water will be recycled and used on the ASP curing pile. The project site has access to County-maintained West Main Street.

9. Surrounding land uses and setting: Row crops, orchards, and scattered single-family dwellings are located in all directions. Dairies are located to the east and south of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):
Department of Public Works
Department of Environmental Resources
CalRecycle
San Joaquin Valley Air Pollution Control District
Central Valley Regional Water Quality Control Board

11. Attachments:

I. Environmental Noise Assessment, completed by Bollard Acoustical Consultants, Inc., dated December 29, 2023.

II. Nuisance Control Plan, prepared by applicant, dated December 2024.

III. Health Risk Assessment completed by Environmental Permitting Specialists, dated February 15, 2025

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

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

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

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

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

☐ **I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.**

☐ **I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.**

☐ **I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.**

Signature on File
Prepared by Teresa McDonald, Associate Planner

~~**December 20, 2024**~~ **March 20, 2025**
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

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

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

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

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

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) the significant criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES

I. AESTHETICS – Except as provided in Public Resources Code Section 21099, could the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?			**X**	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			**X**	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			**X**	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			**X**	

Discussion: The site itself is not considered to be a scenic resource or unique scenic vista. The only scenic designation in the County is along Interstate 5, which is not near the project site. The project proposed to develop a 23.5±-acre portion of the 47.82±-acre parcel with a composting operation. A chain link fence with fabric and oleander trees are proposed are around the perimeter of the operation and a 5-foot-tall berm with 3:1 slopes is proposed along the northern perimeter line. A modular office and restroom are proposed which will have lighting. No permanent structures are proposed. Standard conditions of approval will be added to this project to address glare from any on-site lighting. The site is surrounded by orchards, row crops, and scattered single-family dwellings. Dairy facilities are located on the adjacent properties to the east and the south.

No adverse impacts to the existing visual character of the site or its surroundings are anticipated.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance; Stanislaus County General Plan and Support Documentation[1]

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**

a)	**Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**			**X**	
b)	**Conflict with existing zoning for agricultural use, or a Williamson Act contract?**			**X**	
c)	**Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**			**X**	
d)	**Result in the loss of forest land or conversion of forest land to non-forest use?**			**X**	
e)	**Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**			**X**	

Discussion: The project site is currently enrolled in California Land Conservation Act ("Williamson Act") Contract No. 78-3106 and is classified as "Unique Farmland," and "Prime Farmland" by the California Department of Conservation's Farmland Mapping and Monitoring Program. The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that the project site is primarily comprised of Hilmar loamy sand (HkbA), slightly saline-alkali, zero to one percent slopes, with a grade of 3 and index rating of 54 and Dinuba sandy loam (DwA), slightly saline-alkali, zero to one percent slopes with a grade of 2 and index rating of 68. The California Revised Storie Index is a rating system based on soil properties that dictate the potential for soils to be used for irrigated agricultural production in California. This rating system grades soils with an index rating of 54 as fair and 68 as good. Stanislaus County considers land that meets at least one of the following requirements to be prime farmland under the Uniform Rules: parcels comprised of Grade 1 or 2 soils; irrigated pastureland which supports livestock used for the production of food and fiber; and land used for unprocessed agricultural plant production with an annual gross value of not less than eight hundred dollars per acre. The proposed project will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The project has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40). Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are "necessary for a healthy agricultural economy." The County allows commercial composting operations by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

The project as proposed is considered a Tier Two use. Within the A-2 zoning district, the County has determined Tier Two uses shall be evaluated on a case-by-case basis by the Planning Commission and/or Board of Supervisors to determine whether they are consistent with the principles of compatibility set forth in Section 21.20.045 of the County Code. During project review, this application was referred to the Department of Conservation (DOC) for review and input and no response has been received to date.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2-40) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of

Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the project is not subject to agricultural buffers. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. Therefore, staff believes the project can be considered low people-intensive, thus not subject to the County's Agricultural Buffer requirements.

The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval; and that if it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications

Based on the specific features and design of this project, it does not appear this project will impact the long-term productive agricultural capability of surrounding contracted lands in the A-2 zoning district. There is no indication this project will result in the removal of adjacent contracted land from agricultural use. No forest lands exist in Stanislaus County. The project will have less than significant impacts to Agriculture and Forest Resources.

Mitigation: None.

References: Application information; Natural Resources Conservation Service Soil Survey; Stanislaus Soil Survey (1957); California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Referral response from the Turlock Irrigation District, dated September 21, 2021; Stanislaus County General Plan and Support Documentation[1].

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?		**X**		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		**X**		
c) Expose sensitive receptors to substantial pollutant concentrations?			**X**	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		**X**		

Discussion: The project proposes to operate a composting facility on a 23.5±-acre portion of a 47.82±-acre parcel in the A-2-40 zoning district, with the end user being Starkey Farms and other local farms. Up to 43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendments are expected on-site at one time. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. On-site equipment, which will be portable but remain on-site and will be diesel powered, will consist of a grinder, two front end loaders, trommel screen, and water truck. A 960 square-foot modular office with restroom and two additional portable restrooms are proposed for the employees. No permanent structures are proposed as part of this request. Daily truck trips are expected to be up to 26, consisting of 20 daily incoming truck deliveries of feedstock and three outgoing truckloads of finished compost. The contaminants will be hauled off via truck once per week, and the restrooms will be serviced via truck twice a week. Daily vehicle trips are expected to be up to seven.

The proposed project is located within the San Joaquin Valley Air Basin (SJVAB) and, therefore, falls under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). In conjunction with the Stanislaus Council of Governments (StanCOG), the SJVAPCD is responsible for formulating and implementing air pollution control strategies. The SJVAPCD's most recent air quality plans are the 2007 PM10 (respirable particulate matter) Maintenance Plan, the 2008 PM2.5 (fine particulate matter) Plan, and the 2007 Ozone Plan. These plans establish a comprehensive air pollution control program leading to the attainment of state and federal air quality standards in the SJVAB, which has been classified as "extreme non-attainment" for ozone, "attainment" for respirable particulate matter (PM-10), and "non-attainment" for PM 2.5, as defined by the Federal Clean Air Act. The plans include control measures for each source of emissions. The plans rely on control measures adopted by the State for sources such as motor vehicle tail pipe emissions and consumer products. The SJVAPCD regulates industrial and commercial sources of emissions through permitting and prohibitory rules. The SJVAPCD also regulates indirect sources that attract motor vehicles. In addition, the SJVAPCD works with the regional transportation planning agencies in the San Joaquin Valley on transportation control measures to reduce trips and vehicle miles traveled (VMT). A project would be judged to conflict with or obstruct implementation of the applicable air quality plan if it would result in substantial new regional emissions not foreseen in the air quality planning process. The SJVAPCD has adopted thresholds of significance for regional criteria pollutant emissions in its Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) that if exceeded could conflict with the Air Quality Plan (AQP). The project may be required to comply with the following SJVAPCD rules and regulations that implement AQP control measures: Rule 4102—Nuisance, Rule 4566—Organic Material Composting Operations, and Regulation VIII—Fugitive PM10 Prohibitions. The project may be required to comply with other SJVAPCD rules not listed here. Compliance with the above listed regulations ensure the project conforms to the applicable control measures in the AQP.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Air Quality should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The proposed project will not exceed the screening criteria for VMT analysis with a total of 26 round-trip truck trips and seven employee vehicle trips per-day. As this is below the District's threshold of significance for vehicle and heavy truck trips, no significant impacts from vehicle and truck trips to air quality are anticipated.

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations within a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces. Construction activities associated with the proposed project may require use of heavy-duty construction equipment. ~~However, all construction activities will occur in compliance with all SJVAPCD regulations; therefore, construction emissions are anticipated to be less than significant without mitigation.~~ Operational emissions occur over the lifetime of the project. Emissions from composting operations are from several sources. These include motor vehicle trips related to transport of raw materials to be composted and export of finished compost to an end user, operation of offroad equipment to handle the compost material on-site, and motor vehicle trips from employee vehicles.

The project was referred to the SJVAPCD and the SJVAPCD requested a prioritization or Health Risk Assessment (HRA) be completed for the project to determine potential health on surrounding sensitive receptors (such as residences, businesses, etc.). In response, the applicant provided a HRA, which evaluated the emission rates of various Toxic Air Contaminates (TAC) generated the equipment and the composting operation. The TAC's evaluated included Diesel Particulate Matter (DPM), Ammonia, Propylene, Methanol, Isopropyl Alcohol, Naphthalene, and Acetaldehyde. The concentrations of each TAC were calculated using the AERMOD dispersion model. The HRA found that the residential and worker cancer risk associated with the project were a rate of 2.27 and 0.0393 in one million, respectively, which is under the SJVAPCD's threshold of significance of 20 in one million. The HRA found the maximum chronic hazard index for residential and worker to be 0.0643 and 0.0323, respectively and the maximum acute hazard index for residential and worker were 0.183 and 0.278, respectively, which are under the threshold of significance of 1. The SJVAPCD reviewed the HRA and confirmed the project is not expected to have a significant impact on nearby sensitive receptors.

Potential dust emissions from the facility are from the loading and unloading of trucks, grinding, screening, loading, and unloading the ASP system. In addition to reducing dust for operational needs and solid waste facility permit conditions, the facility is required to reduce dust, reducing visible particulate emissions in accordance with SJVAPCD regulations. While the project applicant prepared a Nuisance Control Plan (NCP) for the facility, which includes best management practices to reduce dust emissions, there is still potential for impacts to air quality due to dust emissions to be significant. If Additionally, two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing sensitive receptor. The second occurs when a new sensitive receptor locates near an existing source of odor. Composting facilities are land uses that the SJVAPCD identifies as potential odor sources that require additional assessment when located within one mile of sensitive receptors, such as residences, hospitals, day-care centers, and schools. These land uses warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. The project applicant prepared a Nuisance Control Plan (NCP) for the facility. The NCP states that the primary means of odor mitigation are the receipt of relatively benign feedstocks in small quantities away from a large volume of sensitive receptor and the use of an aerated static pile (ASP) composting system using a compost cap to reduce VOC and odor emissions. The NCP includes an odor monitoring protocol to follow in the event of the receipt of odor complaints and describes the design considerations that reduce potential odor impacts. While the proposed ASP technology will likely help address off-site nuisance odor impacts, there is a potential for odor impacts to occur if best practices for odor control are not implemented.

Mitigation Measure 1 described below is recommended to ensure that air impacts and off-site nuisance odor impacts are reduced to a less than significant level. Additionally, Mitigation Measure 2 requires a deposit to be paid to cover the cost for a consultant hired by the County to complete any analysis required to address the mitigation of nuisances.

~~The project was referred to the San Joaquin Valley Air Pollution Control District (SJVAPCD) as part of the Early Consultation prepared for the proposed project and the SJVAPCD responded with no comment.~~

Impacts to air quality are considered to be less-than significant with mitigation.

Mitigation:

1. The facility operator shall implement the dust, odor, vector, and litter control measures as described in the Nuisance Control Plan (NCP). If nuisances persist despite implementation of the NCP, the operator shall work with the Stanislaus County Department of Planning and Community Development (the Department) to revise the NCP within 30 days of being notified by the Department, and shall implement additional measures as deemed necessary by the Department, which may include, but not be limited to the following:
    - Ceasing operations when VDE exceed 20 percent opacity
    - Paving of drive aisles
    - Increasing frequency of water truck application
    - Application of chemical/organic dust suppressants
    - Installation of rumble strips or other improvements to prevent track-out onto the County right-of-way
    - Processing all incoming compostable feedstock materials into active aerated static pile (ASP) compost piles within 24 hours
    - Refusing new material
    - Altering moisture management operations
    - Decreasing pile sizes
    - Aeration of the stormwater retention basin
    - Use of microbial inoculants or lime on pad surfaces and water collection systems
    - Covering the entire ASP system with a one-inch biofilter consisting of a layer of unscreened compost
    - Best management practices (BMPs) to address insect, bird, rodent and other animal vectors will be implemented as needed
    - Additional screening and contaminant removal of material conducted off-site
    - Not contract with any agencies that accept non-organic materials (including biodegradable plastics and plastic-coated cardboard) that do not break down at the same rate as the other organic materials in the compost pile

- Installation of additional fencing
- Utilization of vacuum trucks

2. Should the Stanislaus County Department of Planning and Community Development (the Department) determine that analysis associated with nuisance mitigation requires review by a qualified consultant, the contract shall be procured by the Department, and paid for by the operator/property owner. A deposit based on the estimated cost of the work to be performed by the consultant and staff time and materials cost shall be made with the Department, by the operator/property owner, prior to any work being conducted. Staff costs and expenses will be billed at fully burdened weighted labor rates as provided by the County's Auditor's Office at the time services are rendered.

References: Application information; ~~Email~~ **Referral** response from the San Joaquin Valley Air Pollution Control District (SJVAPCD) dated ~~September 23, 2021~~ **January 23, 2025**; **Health Risk Assessment completed by Environmental Permitting Specialists, dated February 15, 2025;** San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; and the Stanislaus County General Plan and Support Documentation[1].

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			**X**	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			**X**	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			**X**	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			**X**	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			**X**	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			**X**	

Discussion: The project site is located within the Crows Landing of the California Natural Diversity Database. There are 11 species of plants or animals which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern, or listed as on a watch list within this quad. These species include Swainsons hawk cackling goose, tricolored blackbird, loggerhead shrike, California Ridgways rail, green sturgeon - southern DPS Sacramento splittail, steelhead - Central Valley DPS, Crotchs bumble bee, western pond turtle, and Delta button-celery. There are no reported siting's of any of the aforementioned species on the project site; however, nesting tricolored blackbirds

were observed in 2014 approximately 1.9± miles northwest of the project site according to the California Natural Diversity Database. There is a very low likelihood that these species are present on the project site as it has already been disturbed for agricultural purposes. The proposed project will take place on approximately the western half of the parcel.

An Early Consultation was referred to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and no response was received. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

Mitigation: None.

References: California Department of Fish and Wildlife's Natural Diversity Database Quad Species List; California Natural Diversity Database, Planning and Community Development GIS, accessed October 30, 2023; Stanislaus County General Plan and Support Documentation[1].

V. CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?			**X**	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			**X**	
c) Disturb any human remains, including those interred outside of formal cemeteries?			**X**	

Discussion: As this project is not a General Plan Amendment it was not referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. It does not appear this project will result in significant impacts to any archaeological or cultural resources. The project site is currently improved with row crops. As part of this request, 23.5 acres of a 47.82±-acre parcel will be utilized for a composting operation. No permanent structures are proposed.

Standard conditions of approval regarding the discovery of cultural resources during the construction process will be added to the project. No significant impacts to cultural resources are anticipated to occur as a result of this project.

Mitigation: None.

References: Application information; Central California Information Center Report for the project site, dated February 4, 2021; Stanislaus County General Plan and Support Documentation[1].

VI. ENERGY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			**X**	

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			**X**	

Discussion: The California Environmental Quality Act (CEQA) Guidelines Appendix F states that energy consuming equipment and processes, which will be used during construction or operation such as: energy requirements of the project by fuel type and end use, energy conservation equipment and design features, energy supplies that would serve the project, total estimated daily vehicle trips to be generated by the project, and the additional energy consumed per trip by mode, shall be taken into consideration when evaluating energy impacts. Additionally, the project's compliance with applicable state or local energy legislation, policies, and standards must be considered.

A response was received from the Turlock Irrigation District (TID) stating that if the project will require electric service to please contact the District's Electrical Engineering Department to apply for service. Conditions of approval reflecting TID's comments will be added to the project.

Energy consuming equipment and processes include construction equipment, the equipment used for the composting operation, trucks, and the employee vehicle. As discussed in Section III – Air Quality, these activities would not significantly increase Vehicle Miles Traveled (VMT), due to the number of vehicle trips not exceeding a total of 110 vehicle trips per-day.

The trucks and composting machinery will be the main consumers of energy associated with this project but will be subject to applicable Air District regulations, including rules and regulations that increase energy efficiency. ~~Consequently, emissions would be minimal. Therefore, consumption of energy resources would be less than significant without mitigation for the proposed project.~~

~~The project was referred to the San Joaquin Valley Air Pollution Control District (SJVAPCD) as part of the Early Consultation prepared for the proposed project and the District responded with no comment.~~

While no permanent structures are proposed, the modular office will be required to get a building permit, which will be subject to the planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). All on-site equipment proposed is portable, will remain on wheels, and is diesel powered. Conditions of approval will be added to the project requiring applicable building permits to be obtained from the Stanislaus County Building Permits Division prior to operation.

It does not appear that this project will result in significant impacts to the wasteful, inefficient, or unnecessary consumption of energy resources. Accordingly, the potential impacts to Energy are considered to be less than significant.

Mitigation: None.

References: Application information; CEQA Guidelines; Referral response from Turlock Irrigation District (TID), dated September 21, 2021; ~~Email response from the San Joaquin Valley Air Pollution Control District (SJVAPCD), dated September 23, 2021;~~ San Joaquin Valley Air Pollution Control District – Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Governor's Office of Planning and Research Technical Advisory, December 2018; Title 16 of County Code; CA Building Code; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation[1].

VII. GEOLOGY AND SOILS -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			**X**	

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**	
ii) Strong seismic ground shaking?			**X**	
iii) Seismic-related ground failure, including liquefaction?			**X**	
iv) Landslides?			**X**	
b) Result in substantial soil erosion or the loss of topsoil?			**X**	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			**X**	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			**X**	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	

Discussion: The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that the parcel is primarily comprised of Hilmar loamy sand (HkbA), slightly saline-alkali, zero to one percent slopes, with a grade of 3 and index rating of 54 and Dinuba sandy loam (DwA), slightly saline-alkali, zero to one percent slopes with a grade of 2 and index rating of 68. As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. No permanent structures are proposed to be constructed as part of this project. No expansion of a septic tank or alternative wastewater disposal system is proposed; however, if any future request is submitted for these, they would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. Conditions of approval regarding these standards will be applied to the project and will be triggered when a grading permit is requested.

The project was referred to DER, which responded with standard conditions of approval regarding compliance with LAMP standards, that proposed work to an existing or proposed on-site wastewater treatment system (OWTS) shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate. A condition of approval will be placed on the project reflecting their comment. The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area. Impacts to Geology and Soils are anticipated to be less than significant.

Mitigation: None.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; Referral response from the Department of Environmental Resources (DER), dated September 14, 2021; Stanislaus County General Plan and Support Documentation[1].

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			**X**	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			**X**	

Discussion: The principal Greenhouse Gasses (GHGs) are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e). In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32), which requires the California Air Resources Board (ARB) design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. Two additional bills, SB 350 and SB32, were passed in 2015 further amending the states Renewables Portfolio Standard (RPS) for electrical generation and amending the reduction targets to 40 percent of 1990 levels by 2030.

The facility will receive a maximum of 160 tons of feedstock material per-day, which will consist of a combination of landscape residue, vegetative food material, and green waste. Up to 43,350 cubic yards of feedstock, 16,500 cubic yards of in-process active compost, 51,682 cubic yards of curing compost, 3,700 cubic yards of finished product, and 40 cubic yards of soil amendments are expected on-site at one time. The facility will operate Monday through Saturday from 7:00 am to 5:00 pm. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. On-site equipment, which will be portable but remain on-site, will consist of a grinder, two front end loaders, trommel screen, and water truck. A 960 square-foot modular office with restroom and two additional portable restrooms are proposed for the employees. No permanent structures are proposed as part of this request. Daily truck trips are expected to be up to 26, consisting of 20 daily incoming truck deliveries of feedstock, three daily outgoing truckloads of finished compost, the contaminants will be hauled off via truck once per week, and the restrooms will be serviced via truck twice a week. Daily vehicle trips are expected to be up to seven. A condition of approval will be added to the project requiring a building permit for the modular office to be obtained from the Stanislaus County Building Permits Division prior to operation.

The short-term emissions of GHGs during construction, primarily composed of CO2, CH4, and N2O, would be the result of fuel combustion by construction equipment and motor vehicles. The other primary GHGs (HFCs, PFCs, and SF6) are typically associated with specific industrial sources and are not expected to be emitted by future construction at this project site. The installation of the modular office will be subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). Construction activities associated with this project are considered to be less than significant as they are temporary in nature and are subject to meeting San Joaquin Valley Air Pollution Control District (SJVAPCD) standards for air quality control.

Direct emissions of GHGs from the operation of the proposed project are primarily due to 26 daily truck trips, seven daily vehicle trips, and by the operation of the equipment, which will be diesel generated. As required by California Environmental Quality Act (CEQA) Guidelines section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. Total vehicle trips as a result of this project will not exceed 110 trips per-day. As discussed above, the proposed project will generate a maximum total of 32 round-trips per-day.

This project was referred to the San Joaquin Valley Air Pollution Control District (SJVAPCD), and the SJVAPCD ~~responded with no comment. Staff will include a condition of approval requiring the applicant to comply with all appropriate SJVAPCD rules and regulations regarding the operation of the digester and associated equipment on the project site. Consequently, GHG emissions associated with this project are considered to be less than significant.~~ **requested a prioritization or Health Risk Assessment (HRA) be completed for the project to determine potential health on surrounding sensitive receptors (such as residences, businesses, etc.). In response, the applicant provided a HRA, which evaluated the emission rates of various Toxic Air Contaminates (TAC) generated the equipment and the composting operation. The TAC's evaluated included Diesel Particulate Matter (DPM), Ammonia, Propylene, Methanol, Isopropyl Alcohol, Naphthalene, and Acetaldehyde, and found the emissions rates to be under the SJVAPCD's threshold of significance. The SJVAPCD reviewed the HRA and confirmed the project is not expected to have a significant impact.**

Mitigation: None.

References: Application information; San Joaquin Valley Air Pollution Control District ~~email~~ **referral** response, dated **January 23, 2025;** ~~September 23, 2021~~; **Health Risk Assessment completed by Environmental Permitting Specialists, dated February 15, 2025;** Stanislaus County General Plan and Support Documentation[1].

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		**X**		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			**X**	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			**X**	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				**X**
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				**X**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			**X**	

Discussion: The County Department of Environmental Resources (DER) is responsible for overseeing hazardous materials. A referral response from the Hazardous Materials Division of the Stanislaus County Department of Environmental Resources (DER) is requiring the applicant to contact the Department regarding appropriate permitting requirements for hazardous materials and/or wastes. The applicant is required to use, store, and dispose of any hazardous materials in accordance with all applicable federal, state, and local regulations. The Hazardous Materials Division also requested that the developer conduct a Phase I or Phase II study prior to the issuance of a grading or building permit. Additionally, the Hazardous Materials Division requested that they be contacted should any underground storage tanks, buried chemicals, buried refuse, or contaminated soil be discovered during grading or construction. The applicant will also be required to contact the Hazardous Materials Division for information regarding regulatory requirements for hazardous materials and/or wastes. These comments will be reflected through the application of a condition of approval. The project was referred to DER, which responded with standard conditions of approval regarding compliance with LAMP standards, that proposed work to an existing or proposed on-site wastewater treatment system (OWTS) shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks and be designed according to type and/or maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate. A condition of approval will be placed on the project reflecting their comment. These comments will be applied as conditions of approval.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater from drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the project is not subject to agricultural buffers. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. Employees may be on-site outside of normal operating hours in the event of an emergency. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. Therefore, staff believes the project can be considered low people intensive, thus not subject to the County's Agricultural Buffer requirements.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Mountain View Fire Protection District. The project was referred to the District, and no comments have been received to date. The project site is not within the vicinity of any airstrip or wildlands.

Spontaneous combustion is a common cause of fires at compost facilities. It is a result of a chain reaction of several heat-generating processes and is common in industries where organic materials are stockpiled. If the organic material is not properly managed, it can create a combustible dust cloud that, when exposed to an ignition source, can result in a fire or explosion. The facility proposes to utilize an aerated static pile compost system which will reduce the chance of fire.

Stanislaus County recognizes nuisance flies as an environmental hazard. Nuisance flies are known to cause significant economic losses in the form of reduced agricultural yields, increased damage to livestock, and higher production costs. Additionally, nuisance flies have been shown to carry a large number of disease-causing pathogens such as Salmonella bacteria and Trachoma virus (bovine pink eye) and may be responsible for infecting animals or humans. DER is responsible for implementing and enforcing fly abatement measures countywide. Under the Right-to-Farm notice (Stanislaus County Code Section 9.32.050), Stanislaus County requires that residents near agricultural land recognize and be prepared to accept nuisances common to agricultural practices, including flies. Agricultural operations are not considered to be a nuisance if they are consistent with accepted customs and standards; however, flies may be a nuisance if they are present above normally acceptable levels. While the applicant has prepared a Nuisance Control Plan (NCP), which includes best management practices to control vectors, vectors may still be an area of concern. Accordingly, Mitigation Measures 1 and 2 previously listed in Section III – Air Quality are being applied to the project to reduce vectors to a level less than significant. requires a deposit to be paid to cover the cost for a consultant hired by the County to complete any analysis required to address the mitigation of nuisances.

Mitigation: **Refer to Section III – Air Quality**

References: Application information; Referral response from the Department of Environmental Resources Hazardous Materials Division, dated September 7, 2021; Referral form the Department of Environmental Resources Wastewater Division, dated September 14, 2021; Department of Toxic Substances Control's data management system (EnviroStor); County General Plan and Support Documentation[1].

X. HYDROLOGY AND WATER QUALITY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			**X**	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			**X**	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			**X**	
i) result in substantial erosion or siltation on- or off-site;			**X**	
ii) substantially increase the rate of amount of surface runoff in a manner which would result in flooding on- or off-site.			**X**	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			**X**	
iv) impede or redirect flood flows?			**X**	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			**X**	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			**X**	

Discussion: Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2 percent annual chance floodplains. The project proposes to handle stormwater via an on-site drainage basin. A grading, drainage, and erosion/sediment control plan for the project will be submitted for the grading permit, which is subject to Public Works review and Standards and Specifications, as well as the submittal of a Storm Water Pollution Prevention Plan (SWPPP) prior to the approval of any grading plan. Accordingly, runoff associated with the construction at the proposed project site will be reviewed as part of the grading review process and be required to be maintained on-site. These requirements will be applied as conditions of approval. Additionally, any construction requiring a building permit will be reviewed under the Building Permit process and must be reviewed and approved by the Department of Environmental Resources (DER) and adhere to current Local Agency Management Program (LAMP) standards. LAMP standards include minimum setback from wells to prevent negative impacts to groundwater quality. No new septic systems are proposed as part of this request. One new well for fire prevention water is proposed. Any future new wells constructed on-site will be subject to review under the County's Well Permitting Program, which will determine whether a new well will require environmental review. The project was referred to DER, which responded with standard conditions of approval regarding compliance with LAMP standards, that proposed work to an existing or proposed on-site wastewater treatment system (OWTS) shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks, and be designed according to type and/or

maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate. A condition of approval will be placed on the project addressing DER's comments.

The Sustainable Groundwater Management Act (SGMA) was passed in 2014 with the goal of ensuring the long-term sustainable management of California's groundwater resources. SGMA requires agencies throughout California to meet certain requirements including forming Groundwater Sustainability Agencies (GSA), developing Groundwater Sustainability Plans (GSP), and achieving balanced groundwater levels within 20 years. The site is located in the West Turlock Subbasin GSA. The East Turlock Subbasin GSA and West Turlock Subbasin GSA collaboratively developed one GSP to manage groundwater sustainably through at least 2042. The GSAs adopted the Turlock Subbasin GSP on January 6, 2022, and submitted the GSP to the California Department of Water Resources (DWR) on January 28, 2022. DWR has until the end of 2024 to review the plan. The GSAs jointly prepared their second annual report for the Turlock Subbasin addressing groundwater and surface water conditions during Water Year (WY) 2022 and submitted the report to DWR on March 29, 2023. Total groundwater extractions in the Turlock Subbasin during WY 2022 were approximately 554,400 acre-feet (AF). This total is based on both direct measurements by local water agencies and estimates for private agricultural and domestic pumping. During WY 2022, agricultural groundwater extraction accounts for 93 percent (516,200 AF) of the total pumping in the Turlock Subbasin, while urban groundwater extraction accounts for the remaining seven percent (38,200 AF). The proposed composting operation would be subject to the requirements of the GSP for the region, when adopted, which would further minimize impacts to groundwater supplies.

The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval; and that if it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. A condition of approval will be added to the project addressing TID's requirements. The primary regulatory program for implementing water quality standards is the federal National Pollutant Discharge Elimination System (NPDES) Program. The United States Environmental Protection Agency (EPA) has delegated NPDES enforcement and administration to the State of California Regional Water Quality Control Board (RWQCB). The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) are State regulatory boards within the California EPA. The SWRCB allocates rights to the use of surface water and, with the RWQCBs, protects surface, ground, and coastal waters throughout the state. The RWQCBs issue permits which govern and restrict the amount of pollutants that can be discharged into the ground or a water body. The Central Valley RWQCB administers the federal NPDES program for composting operations within Stanislaus County.

Composting operations have the potential to result in violations of water quality standards or waste discharge requirements. The SWRCB and RWQCB are required to protect the quality and beneficial uses of the waters of the state. The California Water Code requires that anyone who discharges waste that could affect waters of the state must submit a report of waste discharge. Current practice is to issue individual waste discharge requirements (WDRs), general WDRs, or waivers of WDRs. A conditional waiver for "green waste-only" composting facilities was in effect from 1994 until 2003, when a change in law required all waivers to be either renewed or replaced with WDRs. The State Water Board developed General Waste Discharge Requirements for Composting Operations (Composting General Order) that address water quality protection at composting facilities. The State Water Board certified the associated Environmental Impact Report (EIR) and adopted the Composting General Order on August 4, 2015, and was amended on April 7, 2020.

The project was referred to the Central Valley RWQCB which responded with comments requiring the project as proposed obtain coverage under the Construction Storm Water General Permit, Industrial Storm Water General Permit, Dewatering Permit (if the proposed project includes construction or groundwater dewatering to be discharged to land), and National Pollutant Discharge Elimination System (NPDES) permit (if the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system). These comments will be applied as conditions of approval. With conditions in place it is anticipated impacts to hydrology and water quality will be less than significant.

Mitigation: None.

References: Application information; Referral response from Public Works, dated September 8, 2021; Referral response from the Department of Environmental Resources Wastewater Division, dated September 14, 2021; Referral response from Turlock Irrigation District (TID), dated September 21, 2021; Referral response from the Central Valley Regional Water

Quality Control Board (RWQCB), dated September 13, 2021; State Water Resources Control Board Composting General Order (Order WQ 2020-0012- DWQ); Stanislaus County General Plan and Support Documentation[1].

XI. LAND USE AND PLANNING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Physically divide an established community?			**X**	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			**X**	

Discussion: The project has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40). Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are "necessary for a healthy agricultural economy." The County allows commercial composting operations by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2) zoning district and are required to be designed to physically avoid conflicts between agricultural and non-agricultural uses. General Plan Amendment No. 2011-01 – *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. As this is a Tier Two use, if not considered people-intensive by the Planning Commission, the project is not subject to agricultural buffers. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week.

The project will not physically divide an established community nor conflict with any habitat conservation plans.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation[1].

XII. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			**X**	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			**X**	

Discussion: The location of all commercially viable mineral resources in Stanislaus County has been mapped by the State Division of Mines and Geology in Special Report 173. There are no known significant resources on the site, nor is the project site located in a geological area known to produce resources.

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation[1].

XIII. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			**X**	
b) Generation of excessive groundborne vibration or groundborne noise levels?			**X**	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			**X**	

Discussion: The proposed facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. The primary noise-generating components of the project will consist of a horizontal grinder, a trommel screen, up to two wheel loaders, and two blowers. No permanent structures are proposed as part of this request. Daily truck trips are expected to be up to 26. Daily vehicle trips are expected to be up to seven.

The Stanislaus County General Plan identifies noise levels up to 75 dB Ldn (or CNEL) as the normally acceptable level of noise for agricultural uses. The Stanislaus County General Plan identifies noise levels for residential or other noise-sensitive land uses of up to 55 hourly Leq, dBA and 75 Lmax, dBA from 7 a.m. to 10 p.m. and 45 hourly Leq, dBA and 65 Lmax, dBA from 10 p.m. to 7 a.m. Pure tone noises, such as music, shall be reduced by five dBA; however, when ambient noise levels exceed the standards, the standards shall be increased to the ambient noise levels.

An environmental noise assessment was prepared for the project by Bollard Acoustical Consultants, Inc., dated December 29, 2023, to evaluate potential noise impacts that may occur from the project. The noise assessment quantified noise generation of the proposed project operations at the nearest residences, to compare those levels against the applicable Stanislaus County noise standards for acceptable noise exposure. A total of six receiver locations were selected to represent noise-sensitive residences in the immediate and general project vicinity. The data collected indicates that noise generated by on-site noise sources (trommel, grinder, blowers, wheel loaders) is predicted to comply with the County's 45 dBA Leq nighttime and 55 dBA Leq daytime noise level standard for stationary sources at the nearest sensitive receivers. It also indicates that the same noise sources maximum noise levels would comply with both the County's 75 dBA Lmax daytime and 65 dBA Lmax nighttime noise standards for stationary sources. In addition, predicted noise levels would be at or below measured baseline ambient conditions at the nearest residences. With all primary noise sources, the predicted maximum noise would comply with the County's stationary daytime and nighttime maximum noise standards. Accordingly, no mitigation measures are required to comply with the County's noise standards.

Mitigation: None.

References: Application information; Environmental Noise Assessment conducted by Bollard Acoustical Consultants, Inc., dated December 29, 2023; Stanislaus County General Plan and Support Documentation[1].

XIV. POPULATION AND HOUSING -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			**X**	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			**X**	

Discussion: The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5th cycle Regional Housing Needs Allocation (RHNA) for the county and will therefore not impact the County's ability to meet their RHNA. No population growth will be induced nor will any existing housing be displaced as a result of this project.

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation[1].

XV. PUBLIC SERVICES --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project result in the substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			**X**	
Police protection?			**X**	
Schools?			**X**	
Parks?			**X**	
Other public facilities?			**X**	

Discussion: The County has adopted Public Facilities Fees, as well as Fire Facility Fees on behalf of the appropriate fire district, to address impacts to public services. School Districts also have their own adopted fees. All facility fees are required to be paid at the time of building permit issuance.

The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval and if it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an irrigation improvements agreement for the required irrigation facility modifications; and that any work on irrigation facilities can only be performed during the non-irrigation season.

This project was circulated to all applicable school, fire, police, irrigation, and public works departments and districts including Chatom Union School District, Turlock Unified School District, Mountain View Fire Protection District, Stanislaus County Sheriff's Office, Turlock Irrigation District and the Stanislaus County Public Works Department during the Early Consultation referral period and no concerns were identified with regard to public services.

Mitigation: None.

References: Application information; Referral response received from Turlock Irrigation District, dated September 21, 2021; Referral response from Public Works, dated September 8, 2021; Stanislaus County General Plan and Support Documentation[1].

XVI. RECREATION --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			**X**	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			**X**	

Discussion: This project will not increase demands for recreational facilities, as such impacts typically are associated with residential development.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation[1].

XVII. TRANSPORTATION -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			**X**	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			**X**	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			**X**	
d) Result in inadequate emergency access?			**X**	

Discussion: The site has access to County-maintained West Main Street which is classified as a 135-foot-wide expressway.

Section 15064.3 of the CEQA Guidelines establishes specific considerations for evaluating a project's transportation impacts. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. A technical advisory on evaluating

transportation impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December of 2018 clarified the definition of automobiles as referring to on-road passenger vehicles, specifically cars and light trucks. While heavy trucks are not considered in the definition of automobiles for which VMT is calculated for, heavy duty truck VMT could be included for modeling convenience. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week. On-site equipment, which will be portable but remain on-site and will be diesel powered, will consist of a grinder, two front end loaders, trommel screen, and water truck. A 960 square-foot modular office with restroom and two additional portable restrooms are proposed for the employees. No permanent structures are proposed as part of this request. Daily truck trips are expected to be up to 26, consisting of 20 daily incoming truck deliveries of feedstock, three daily outgoing truckloads of finished compost, the contaminants will be hauled off via truck once per week, and the restrooms will be serviced via truck twice a week. Daily vehicle trips are expected to be up to seven. The VMT increase associated with the proposed project is less-than significant as the number of vehicle trips will not exceed 110 per-day.

The project was referred to the Stanislaus County Environmental Review Committee (ERC), which requested that the applicant pay a fee per ton of material entering or leaving the property to offset traffic impacts to West Main Street. The project was also referred to the Stanislaus County Department of Public Works, which requested conditions of approval requesting to address driveway approaches installed according to Public Works' Standards and Specifications, restrictions on loading, parking, unloading within the County right-of-way, requirement of a grading, drainage, and erosion/sediment control plan, and the need for road dedications of 27.5-feet of West Main Street.

Transportation impacts associated with the project are considered to be less than significant.

Mitigation: None.

References: Application information; Referral response from the Environmental Review Committee (ERC), dated September 22, 2021; Referral response from the Department of Public Works, dated September 8, 2021; Stanislaus County General Plan and Support Documentation[1].

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Included**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is:			**X**	
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			**X**	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			**X**	

Discussion: It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project site is already developed with row crops. In accordance with SB 18 and AB 52, this project was not referred to the tribes listed with the Native American Heritage Commission (NAHC) as the project is not a General Plan Amendment and no tribes have requested consultation or project referral noticing. If any resources are found during future construction, construction activities would halt until a qualified survey takes place and the appropriate authorities are notified.

No significant impacts to Tribal Cultural resources are anticipated to occur as a result of this project.

Mitigation: None.

References: Application information; Stanislaus County General Plan and Support Documentation[1].

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			**X**	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			**X**	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			**X**	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			**X**	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	

Discussion: Limitations on providing services have not been identified. No septic facilities are existing or proposed as part of the project. One new well for fire suppression water is proposed. The project site is located within the boundaries of the Turlock Irrigation District (TID). The project was referred to TID which responded with the following requirements: that the developer submit plans detailing the existing irrigation facilities, relative to the proposed site improvement, in order for the District to determine specific impacts and requirements; that the District shall review and approve all maps and plans of the project; that any improvements that impact irrigation or drainage facilities on the project site be subject to the District's approval and if it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an irrigation improvements agreement for the required irrigation facility modifications; and that any work on irrigation facilities can only be performed during the non-irrigation season. A condition of approval will be added to the project addressing TID's requirements. The project was referred to the Central Valley RWQCB which responded with comments requiring the project as proposed obtain coverage under the Construction Storm Water General Permit, Industrial Storm Water General Permit, Dewatering Permit (if the proposed project includes construction or groundwater dewatering to be discharged to land), and National Pollutant Discharge Elimination System (NPDES) permit (if the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system). A condition of approval will be placed on the project that reflecting Regional Water's comments and that the applicant contact Regional Water in order to apply for and obtain any applicable permits from their department.

The project was also referred to PG&E and AT&T and no response has been received to date.

The installation of any future wells or septic systems must be reviewed and approved by the Department of Environmental Resources (DER) and must adhere to current Local Agency Management Program (LAMP) standards. LAMP standards include minimum setbacks from wells to prevent negative impacts to groundwater quality. The project was referred to DER, which responded with standard conditions of approval regarding compliance with LAMP standards, that proposed work to an existing or proposed on-site wastewater treatment system (OWTS) shall meet all applicable County Local Agency Management Program (LAMP) standards and required setbacks, and be designed according to type and/or maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate. A condition of approval will be placed on the project reflecting their comment.

Impacts to utilities and services are considered to be less than significant.
Mitigation: None.

References: Application information; Referral response from Turlock Irrigation District, dated September 21, 2021; Referral response from Central Valley Regional Water Quality Control Board, dated September 13, 2021; Referral response from the Stanislaus County Department of Environmental Resources, dated September 14, 2021; Stanislaus County General Plan and Support Documentation[1].

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			**X**	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			**X**	
c) Require the installation of maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			**X**	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			**X**	

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The terrain of the site is relatively flat, and the site has access to County-maintained West Main Street. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Mountain View Fire Protection District. The project was referred to the District, and no comments have been received to date. California Building and Fire Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and burning embers. Any required building permits for the equipment will be reviewed by the County's Building Permits Division and Fire Prevention Bureau to ensure all State of California Building and Fire Code requirements are met prior to construction. Wildfire risk and risks associated with postfire land changes are considered to be less-than significant.

Mitigation: None.

References: Application information; California Fire Code Title 24, Part 9; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation[1].

XXI. MANDATORY FINDINGS OF SIGNIFICANCE --	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion: The project has a General Plan designation of Agriculture and zoning designation of General Agriculture with a 40-acre minimum (A-2-40). Within the A-2 zoning district, the County has determined that certain uses related to agricultural production are "necessary for a healthy agricultural economy." The County allows commercial composting operations by obtaining a Tier Two Use Permit if specific criteria can be met and if specific findings can be made. Those findings include that the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity; that the use is necessary and desirable for such establishment to be located within the agricultural area as opposed to areas zoned for commercial or industrial usage; and that it will not create a concentration of commercial and industrial uses in the vicinity. There are limits to the number of employees that are involved in the operation under a Tier Two Use Permit; no more than ten full-time employees, or 20 seasonal employees are permitted to be involved in the operation. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. The facility will operate Monday through Saturday from 7:00 a.m. to 5:00 p.m. The applicant anticipates five full time employees on one shift, one mechanic on-site two days a week, and one manager on-site one day a week.

The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project site has already been disturbed. Standard conditions of approval regarding the discovery of cultural resources during any future construction resulting from this request will be added to the project.

The project will not physically divide an established community. The surrounding area is composed of scattered single-family dwellings, large agricultural parcels and dairies directly to the east and the south. Any development of the surrounding area would be subject to the permitted uses of the A-2 Zoning District or would require additional land use entitlements and environmental review. Additionally, the majority of the surrounding parcels located within Stanislaus County are restricted by Williamson Act Contracts and are limited to the uses found to be compatible with the Williamson Act. Any uses beyond those uses permitted in the A-2 zoning district would require a General Plan Amendment and rezoning of the property which would be evaluated through additional environmental review which would take into consideration impacts from the loss of

farmland and the potential for farmland conversion and cumulative impacts to the surrounding area. Any additional request for expansion of alteration of the facility may be subject to further land use entitlement review. The closest parcels to the project site not in planted in orchards or row crops are improved with diaries, which is considered agriculture. The nearest non-agricultural use to the project site is Mountain View Middle School, located .61± miles to the east.

Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.

References: Initial Study; Stanislaus County General Plan and Support Documentation[1].

[1]Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. ***Housing Element*** adopted on April 5, 2016.

Environmental Noise Assessment

West Main Green Waste Recycling & Composting

Stanislaus County, California

BAC Job # 2022-061

Prepared For:

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Sean Kilgrow
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Prepared By:

Bollard Acoustical Consultants, Inc.

Paul Bollard, President

December 29, 2023

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Introduction

The West Main Green Waste Recycling & Composting project (project) is located at 1236 West Main Avenue in Crows Landing (Stanislaus County), California. The project proposes the development of a green waste recycling and compositing facility on an approximate 12-acre site within a larger 48-acre parcel. The project site is bordered by agricultural land uses to the west, West Main Ave to the north, agriculture to the east, and a dairy farm to the south. Figure 1 shows the project location and nearest noise-sensitive receptors (residences). Figure 2 shows the project site plan.

Due to the proximity of the project site to existing residences, Bollard Acoustical Consultants, Inc. (BAC) was retained by the project applicant to prepare this noise assessment. Specifically, the purposes of this assessment are to quantify noise generation of the proposed project operations at the nearest residences, to compare those levels against the applicable Stanislaus County noise standards for acceptable noise exposure, and to recommend noise mitigation measures where needed to achieve satisfaction with those standards. This report contains BAC's evaluation.

Project Description

The proposed project operation would process up to 140 tons of green waste per day (25,000 tons per year) with aerated static piles (ASP). Trucks would access the site from West Main Avenue and exit from the same road as shown in Figure 2. A maximum of 40 truckloads would arrive at the site daily. The primary noise-generating equipment on site includes two wheel loaders, a horizontal grinder, a trommel screen, and two blowers.

The project proposes to operate the heavy equipment (grinder, trommel, wheel loaders) from 7:00 AM to 5:00 PM, Monday through Friday. Other site equipment, such as the blowers for the ASP, would operate continuously.

Legend

- Project Site Boundary (Approximate)
- Long-Term Noise Measurement Locations
- Noise-Sensitive Receiver Locations

N

Scale (Feet)

0 250 500

Project Vicinity & Receivers

West Main Composting
Stanislaus County, California

Figure 1

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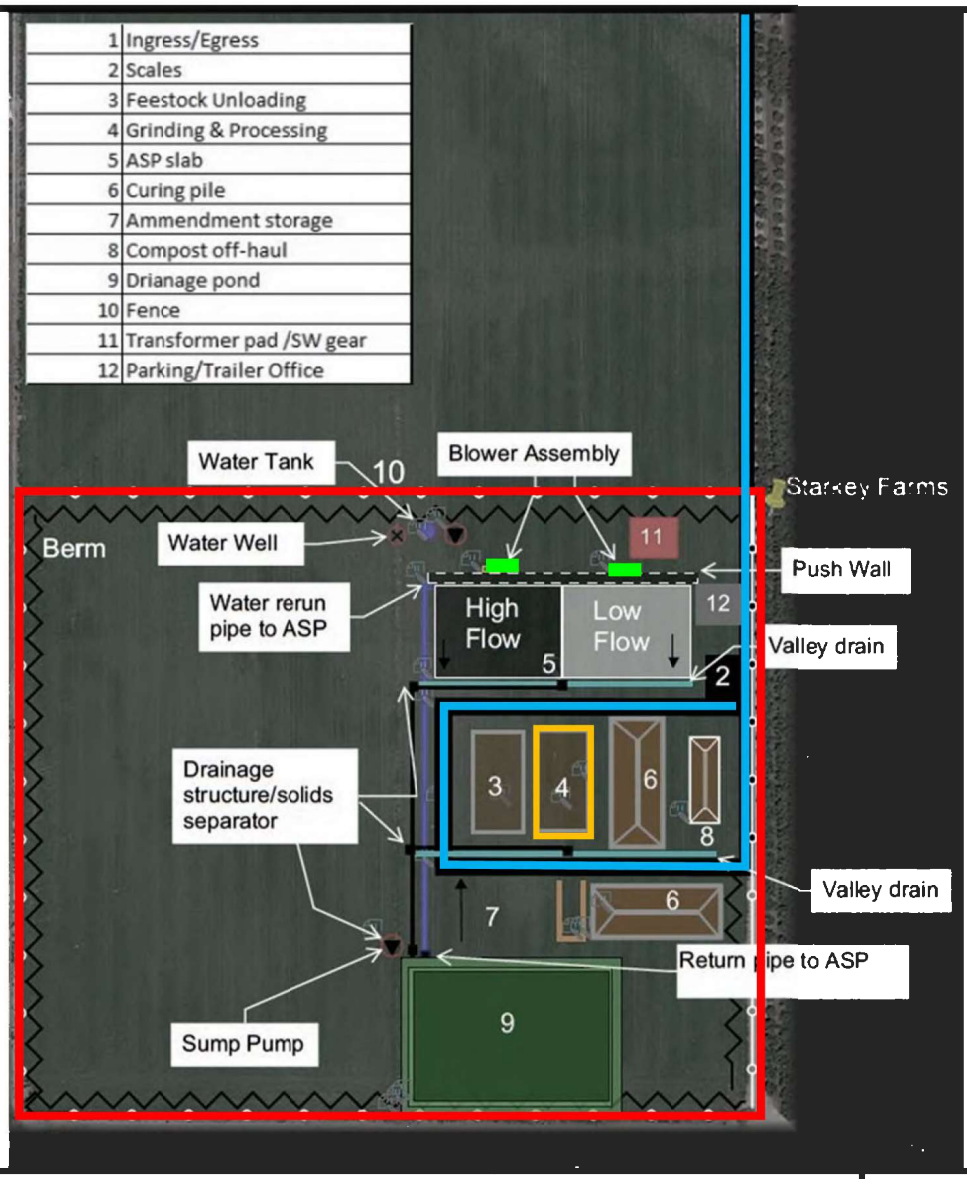
Acoustical Consultants

70



Legend

- Project Site Boundary (approx. Wheel Loader Boundary)
- Trommel Screen & Horizontal Grinder Area
- Blower
- Truck Path

N

Scale (Feet)

0 100 200

Site Plan

West Main Composting
Stanislaus County, California

Figure 2

BOLLARD Acoustical Consultants

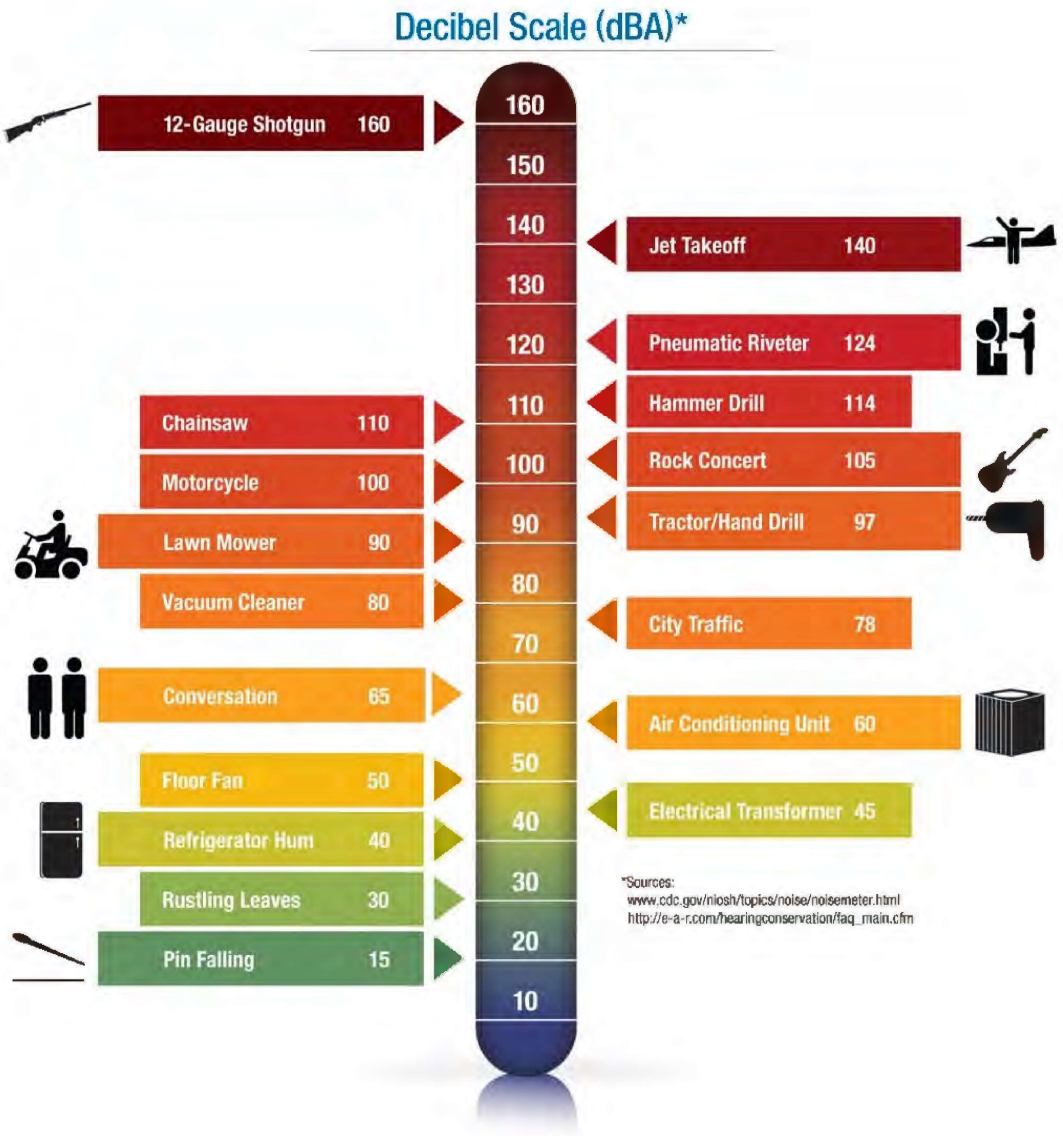
Noise Fundamentals and Terminology

Noise is often described as unwanted sound. Sound is defined as any pressure variation in air that the human ear can detect. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard, and thus are called sound. Measuring sound directly in terms of pressure would require a very large and awkward range of numbers. To avoid this, the decibel scale was devised. The decibel scale allows a million-fold increase in pressure to be expressed as 120 dB. Another useful aspect of the decibel scale is that changes in levels (dB) correspond closely to human perception of relative loudness. Appendix A contains definitions of Acoustical Terminology. Figure 3 shows common noise levels associated with various sources.

The perceived loudness of sounds is dependent upon many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by weighing the frequency response of a sound level meter by means of the standardized A-weighing network. There is a strong correlation between A-weighted sound levels (expressed as dBA) and community response to noise. For this reason, the A-weighted sound level has become the standard tool of environmental noise assessment. All noise levels reported in this section are in terms of A-weighted levels in decibels.

Community noise is commonly described in terms of the “ambient” noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (L_{eq}) over a given time period (usually one hour). The L_{eq} is the foundation of the Day-Night Average Level noise descriptor, L_{dn} or DNL, and shows very good correlation with community response to noise.

Figure 3
Typical A-Weighted Sound Levels of Common Noise Sources



The Day-Night Average Level (DNL) is based upon the average noise level over a 24-hour day, with a +10-decibel weighting applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were twice as loud as daytime exposures. Because DNL represents a 24-hour average, it tends to disguise short-term variations in the noise environment. DNL-based noise standards are commonly used to assess noise impacts associated with traffic, railroad, and aircraft noise sources.

Criteria for Acceptable Noise and Vibration Exposure

Standards for acceptable noise exposure in Stanislaus County are contained within the County's General Plan and County Code (Noise Ordinance). The County's noise standards which would be applicable to this project are presented below.

Stanislaus County General Plan

The Stanislaus County General Plan Noise Element establishes acceptable noise level limits for both transportation and non-transportation noise sources. The primary objective of the Noise Element is to prescribe policies that lead to the preservation and enhancement of the quality of life for the residents of Stanislaus County by securing and maintaining an environment free from excessive noise. The specific policies which are generally applicable to this project are reproduced below:

Policy 1 It is the policy of Stanislaus County to utilize the noise exposure information contained within the General Plan to identify existing and potential noise conflicts through the Land Use Planning and Project Review processes.

IM-1.1 Areas within Stanislaus County shall be designated as noise-impacted if exposed to existing or projected future noise levels exterior to buildings exceeding the standards in Figure IV-2 [Table 1 in this report] or the performance standards described by Table IV-2 [Table 2 in this report]. Maps showing existing and projected future noise exposures exceeding 60 Ldn or CNEL for the major noise sources are depicted in Figure IV-1, and Table IV-1.

Policy 2 It is the policy of Stanislaus County to develop and implement effective measures to abate and avoid excessive noise exposure in the unincorporated areas of the County by requiring that effective noise mitigation measures be incorporated into the design of new noise generating and new noise sensitive land uses.

IM-2.1 New development of noise-sensitive land uses will not be permitted in noise-impacted areas unless effective mitigation measures are incorporated into the project design to reduce noise levels to the following levels:

a. For transportation noise sources such as traffic on public roadways, railroads, and airports, 60 L_{dn} (or CNEL) or less in outdoor activity areas of single-family residences, 65 L_{dn} (or CNEL) or less in community outdoor space for multi-family residences, and 45 L_{dn} (or CNEL) or less within noise-sensitive interior spaces. Where it is not possible to reduce exterior noise due to these sources to the prescribed level using a practical application of the best available noise-reduction technology, an exterior noise level of up to 65 L_{dn} (or CNEL) with the windows and doors closed in residential uses.

b. For other noise sources such as local industries or other stationary noise sources, noise levels shall not exceed the performance standards contained within Table IV-2 [Table 2 in this report].

IM-2.2 New development of industrial, commercial, or other noise generating land uses will not be permitted if resulting noise levels will exceed 60 L_{dn} (or CNEL) in noise-sensitive areas. Additionally, the development of new noise-generating land uses, which are not preempted from local noise regulation, will not be permitted if resulting noise levels will exceed the performance standards contained within Table IV-2 (Table 2 in this report] in areas containing residential or other noise sensitive land uses.

IM-2.3 Prior to the approval of a proposed development of noise-sensitive land uses in a noise impacted area, or the development of industrial, commercial or other noise-generating land use in an area containing noise-sensitive land uses, an acoustical analysis shall be required. Where required, an acoustical analysis shall:

a. Be the responsibility of the applicant.

b. Be prepared by a qualified acoustical consultant experienced in the fields of environmental noise assessment and architectural acoustics.

c. Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions.

d. Include estimated noise levels in terms of L_{dn} (or CNEL) and the standards of Table 6 (if applicable) for existing and projected future (10-20 years hence) conditions, with a comparison made to the adopted polices of the Noise Element.

e. Include recommendations for appropriate mitigation to achieve compliance with the adopted policies and standards of the Noise Element.

f. Include estimates of noise exposure after the prescribed mitigation measures have been implemented. If compliance with the adopted standards and policies of the Noise Element will not be achieved, a rationale for acceptance of the project must be provided.

Policy 3 It is the objective of Stanislaus County to protect areas of the County where noise-sensitive land uses are located.

IM-3.1 Require the evaluation of mitigation measures for projects that would cause the L_{dn} at noise sensitive uses to increase by 3 dBA or more and exceed the normally acceptable level, cause the L_{dn} at noise-sensitive uses to increase 5 dBA or more and remain normally acceptable, or cause new noise levels to exceed the noise ordinance limits (after adoption).

Table 1
Normally Accepted Community Noise Environments
Stanislaus County Noise Element of the General Plan

Land Use Category	Exterior Noise Exposure (DNL or CNEL) [dBA]			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential – Low Density Single Family, Duplex, Mobile Homes	< 60	60 to 70	70 to 75	> 75
Multi-family Residential	< 65	65 to 70	70 to 75	> 75
Hotels, Motels	< 65	65 to 70	70 to 80	> 80
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches	< 70	--	70 to 80	> 80
Auditoriums, Concert Halls, Amphitheaters	--	< 70	--	> 70
Sports Arena, Outdoor Spectator Sports	--	< 75	--	> 75
Playgrounds, Neighborhood Parks	< 70	--	70 to 75	> 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	< 75	--	75 to 80	> 80
Office Buildings, Business, Commercial, Professional	< 70	70 to 75	> 75	--
Industrial, Manufacturing, Utilities, Agriculture	< 75	--	75 to 80	> 80

Notes

1. Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
2. Conditionally Acceptable – Specified land use may be permitted only after detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.
3. Normally Unacceptable – New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
4. Clearly Unacceptable – New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies

Source: Stanislaus County General Plan, Noise Element, Figure IV-2: Normally Accepted Community Noise Environments

Table 2
Maximum Allowable Noise Exposure for Stationary Noise Sources[1]
Stanislaus County Noise Element of the General Plan

	Daytime Standard (7 a.m.-10 p.m.)	Nighttime Standard (10 p.m.-7 a.m.)
Hourly L_{eq} [dB]	55	45
Maximum Level (L_{max}) [dB]	75	65

Notes

1. As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receiver side of noise barriers or other property line noise mitigation measures.
2. Each of the noise level standards specified in Table IV-2 shall be reduced by five (5) dBA for pure tone noises, noise consisting primarily of speech or music, or for recurring impulsive noises. The standards in Table IV-2 should be applied at a residential or other noise-sensitive land use and not on the property of a noise-generating land use. Where measured ambient noise levels exceed the standards, the standards shall be increased to the ambient levels.

Source: Stanislaus County General Plan, Noise Element, Table IV-2: Maximum Allowable Noise Exposure – Stationary Noise Sources

Stanislaus County Code

The Noise Control Section of the Stanislaus County Code establishes acceptable noise level criteria for non-transportation noise sources. The County Code standards are very similar to the General Plan standards except that L_{50} is substituted for L_{eq}, and other time-based standards are applied. Because the General Plan and County Code standards are essentially equivalent, this evaluation utilizes the General Plan standards which are commonly applied to new projects within the County.

Environmental Setting

Identification of Existing Noise-Sensitive Receivers (Residences)

BAC utilized aerial imagery and site inspections to identify the locations of the nearest representative potentially affected sensitive receivers to the project area. It is important to note that it is not necessary to evaluate impacts at every residence or sensitive receiver in the project vicinity. Rather, sensitive receivers with similar noise exposure are typically grouped, with one or more representative receiver(s) selected to be applicable to the larger group. This approach was applied to this analysis.

Since sound decreases with distance, it is also normally unnecessary to model receivers at considerable distances from the project area, particularly if there are closer receivers in the same general direction which are to be analyzed. If no noise impacts are identified at closer receivers, it can normally be concluded that a similar finding would occur at the more distant receivers. Conversely, if impacts are identified at closer receivers, often times mitigation implemented for those closer receivers would benefit the more distant receivers as well, depending on the type of mitigation.

Exceptions to this general rule occur when there are considerable differences in topographic screening between the closer and more distant receivers. In such cases, a closer receiver which is topographically shielded could have a lower project noise exposure than a more distant unshielded receiver. Another exception would occur if the mitigation was receiver specific, rather than project specific.

For this project, a total of six receiver locations were selected to represent noise-sensitive residences in the immediate and general project vicinity. The receivers analyzed in this study are depicted graphically on Figure 1.

Existing Ambient Noise Environment within the Project Vicinity

The existing ambient noise environment at the project site is defined primarily by traffic on West Main Avenue to the north, traffic on Ruble Road, and agriculture and dairy production to the south. To quantify the existing ambient noise level environment at the project site, BAC conducted a long-term (96-hour) noise level survey from November 3 through November 6, 2023, at the two locations shown in Figure 1. Long-term noise measurement site LT-1 was selected to quantify noise generated by West Main Avenue. LT-2 was selected to quantify noise generated by Ruble Road and the dairy operations. Photographs of the noise survey locations are provided in Appendix B.

Larson-Davis Laboratories (LDL) Model LxT precision integrating sound level meters were used to complete the ambient noise level survey. The meters were calibrated immediately before and after use with an LDL Model CAL200 acoustical calibrator to ensure the accuracy of the measurements. The equipment used meets all pertinent specifications of the American National Standards Institute for Type 1 sound level meters (ANSI S1.4).

The long-term ambient noise level survey results are summarized in Table 3. The detailed results of the ambient noise survey are contained in Appendix C in tabular format and graphically in Appendix D.

Table 3
Summary of Long-Term Noise Survey Measurement Results[1]

				Average Hourly Noise Levels [dBA]			
				Daytime[3]		Nighttime[4]	
Site[2]	Description	Date	DNL [dBA]	Leq	Lmax	Leq	Lmax
LT-1	100' from W Main Ave C/L	11/3/2023	69	66	82	62	78
		11/4/2023	68	65	81	61	81
		11/5/2023	66	64	80	58	78
		11/6/2023	68	65	81	60	77
		Average	**68**	**65**	**81**	**60**	**79**
LT-2	75' from Ruble Rd C/L	11/3/2023	58	54	75	51	72
		11/4/2023	59	58	79	50	70
		11/5/2023	56	53	74	48	69
		11/6/2023	57	54	76	50	74
		Average	**57**	**55**	**76**	**50**	**71**

Notes
3. Detailed summaries of the noise monitoring results are provided in Appendices C and D.
4. Long-term noise survey locations are identified on Figure 1.
5. Daytime hours: 7:00 a.m. to 10:00 p.m.
6. Nighttime hours: 10:00 p.m. to 7:00 a.m.

Source: Bollard Acoustical Consultants, Inc. (2023)

Table 3 indicates that the measured day-night average noise levels (DNL) at LT-1, near West Main Avenue, averaged 68 dB—above the County 60 dB DNL exterior noise level standard applicable to residential uses. The measured DNL at LT-2, near the dairy farm, averaged 57 dB—which is below the County's 60 dB DNL exterior noise level standard. The average daytime hourly Leq at LT-2 was 65 dB—above the County's 55 dB DNL daytime stationary noise level.

On-Site Noise Generation of the Proposed Project

On-site Project Noise Sources

The primary noise-generating components of the project will consist of a horizontal grinder, a trommel screen, up to two wheel loaders, and two blowers. The following sections evaluate noise impacts related to these noise sources.

Location of Project Noise Sources

Figure 2 shows the proposed site plan. The wheel loaders would likely operate anywhere inside the project site boundary. Both the horizontal grinder and trommel screen would be located approximately within Area 4 shown on Figure 2. The two blowers are identified on Figure 2 as "blower assembly".

Reference Noise Levels for Project Noise Sources

The wheel loader proposed is a Kawasaki KCM 70Z7 with a gross power of 129kW. BAC utilized FHWA Construction Noise Handbook, Table 9.1, noise level data for a similar size wheel loader. Based on that source, the sound power level (PWL) for the wheel loaders is 112 dB with a maximum noise level (Lmax) of 80 dB at 50 feet.

The proposed horizontal grinder is a Vermeer HG4000 powered by a 536-horsepower (399.7-kW) CAT C13B T4F/Stage V engine. Manufacturer's data specifies the sound power level for this grinder as 112 dB.

The proposed trommel screen is a Vermeer TR5300 powered by a Deutz TD2.9L Tier 4 Final (Stave IV) engine. BAC was unable to locate noise level performance data for this particular model. As a result, noise level data collected in 2021 for a screen trommel of similar power from the Florin Perkins Public Recycle Facility (BAC project number 2020-040) was utilized. The reference noise level for that trommel was measured to be 72 dBA Leq and 81 dBA Lmax at a distance of 100 feet from the operating trommel.

The proposed blowers are two Greenheck 36-inch centrifugal fans. The sound power level for one Greenheck 36BIDW, operating at 100% Wide Open Volume (WOV), and 1200 RPM is reported as 108 dB.

Prediction of Project-Related Daytime Noise Levels at Nearest Residences

With the exception of the two blowers, all primary noise-generating equipment will operate during daytime hours (7 AM – 10 PM). The noise modelling of project noise levels at nearby residences assumes continuous and simultaneous operation of the primary equipment.

To predict project-generated noise levels at the nearest residences, the noise prediction model utilized the reference noise levels provided in the previous section, the locations of the equipment as shown in Figure 2, shielding provided by proposed intervening structures, and shielding provided by the 5-foot-tall berm proposed around the site perimeter. For a conservative approach to the assessment of potential project noise impacts, the wheel loader was modelled at the project site boundaries nearest to each receiver. The predicted noise level for the blowers takes into account the noise generated by both blowers operating simultaneously.

Table 4 and Table 5 show the predicted noise levels from all four primary noise sources at the nearest receivers in terms of hourly average Leq and hourly maximum Lmax, respectively. The predicted projected-generated "total project" noise level at each residence combines all primary four noise sources.

Table 4
Predicted Project-Generated Daytime Noise Levels, Hourly Average

Receiver[1]	Noise Source[2], Leq[3] [dBA]					Daytime Noise Standard, Leq [dBA]
	Trommel Screen	Horizontal Grinder	Blowers (2x)	Wheel Loader	Total Project	
R1	45	42	42	42	**49**	55
R2	49	46	45	46	**53**	55
R3	41	37	33	42	**45**	55
R4	42	38	34	39	**45**	55
R5	45	42	41	46	**50**	55
R6	47	43	43	47	**52**	55

Notes
1. Receiver locations are shown on Figure 1.
2. Noise source locations are identified on Figure 2.
3. Predicted noise levels take into account shielding provided by the intervening 5-foot-tall berm and the ASP push wall — dependent on noise source location and receiver location.

Source: BAC (2023).

Table 5
Predicted Project-Generated Noise Levels, Hourly Maximum

Receiver[1]	Noise Source[2], Lmax[3] [dBA]					Nighttime[4] Noise Standard, Lmax [dBA]
	Trommel Screen	Horizontal Grinder	Blowers (2x)	Wheel Loader	Total Project	
R1	54	42	42	48	**56**	65
R2	58	46	45	52	**59**	65
R3	50	37	33	48	**52**	65
R4	51	38	34	45	**52**	65
R5	54	42	41	52	**56**	65
R6	56	43	43	53	**58**	65

Notes
1. Receivers shown on Figure 1.
2. Noise source identified on Figure 2.
3. Predicted noise levels take into account shielding provided by the intervening 5-foot-tall berm and the ASP push wall — dependent on noise source location and receiver location.
4. Nighttime standards are shown as they are the most restrictive. Daytime standard is 75 dBA Lmax.

Source: BAC (2023).

Analysis of Project-Related Daytime Noise Levels at Nearest Residences

The Table 4 data indicates that noise generated by on-site noise sources (trommel, grinder, blowers, wheel loaders) is predicted to comply with the County's 55 dBA Leq daytime noise level standard for stationary sources at the nearest sensitive receivers. Table 5 also indicates that the same noise sources maximum noise levels would comply with both the County's 75 dBA Lmax daytime and 65 dBA Lmax nighttime noise standards for stationary sources (Table 2). In addition, predicted noise levels would be at or below measured baseline ambient conditions at the nearest residences. As a result, no further mitigation measures are required to comply with the County's daytime stationary noise standards.

Prediction of Project-Related Nighttime Noise Levels at Nearest Residences

The main operations of the facility are proposed to be within daytime hours. However, other equipment is expected to operate continuously throughout nighttime hours. The primary noise source during nighttime hours (10 PM – 7 AM) would be the ASP blowers.

The noise modelling procedure for nighttime hours is the same as for daytime hours with the removal of the trommel, grinder, and wheel loaders as contributing noise sources. Table 6 shows the predicted noise levels from the two blowers at the nearest receivers in terms of hourly average Leq.

Table 6
Predicted Project-Generated Nighttime Noise Levels, Hourly Average

	Noise Source[2,4] Leq[3] [dBA]					Nighttime Noise Standard, Leq [dBA]
Receiver[1]	Trommel Screen	Horizontal Grinder	Blowers (2x)	Wheel Loader	Total Project	
R1	0	0	42	0	**42**	45
R2	0	0	45	0	**45**	45
R3	0	0	33	0	**33**	45
R4	0	0	34	0	**34**	45
R5	0	0	41	0	**41**	45
R6	0	0	43	0	**43**	45

Notes
1. Receivers shown on Figure 1.
2. Noise source identified on Figure 2.
3. Predicted noise levels take into account shielding provided by the intervening 5-foot-tall berm and the ASP push wall — dependent on noise source location and receiver location.
4. The trommel, grinder, and wheel loaders are not proposed to operate during nighttime hours.

Source: BAC (2023).

Analysis of Project-Related Nighttime Noise Levels at Nearest Residences

The Table 6 data indicates that noise generated by on-site noise sources during nighttime hours (blowers) is predicted to comply with the County's 45 dBA Leq nighttime stationary noise standard at the nearest residences. As a result, no further mitigation measures are required to comply with the County's daytime stationary noise standards.

However, Table 6 also indicates that the predicted noise level at receiver R2 is at the maximum allowable hourly average. As previously noted, the reference sound power level for one blower is 108 dBA. Therefore, any final blower chosen should have an inlet sound power level rating of 108 dBA or less. Should the ASP system design call for a louder blower, additional mitigation measures should be evaluated. Such mitigation measures could include a taller berm, sound wall, or sound baffles.

Note that it has already been shown in Table 5 that with all primary noise sources, the predicted maximum noise would comply with the County's stationary daytime and nighttime maximum noise standards.

Traffic Noise Generation of the Proposed Project

Prediction of Project Traffic Noise Levels

As noted in the project description, the project would generate a maximum of 40 daily truck loads (80 total daily trips) per day along West Main Avenue. To assess the impacts relative to increases in traffic noise levels resulting from the project, the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used. Appendix E shows the traffic noise prediction model results. The total project-generated noise level is 48 dBA DNL at the nearest residence to West Main Avenue – receiver R2.

Analysis of Project Traffic Noise Levels

According to the County's transportation noise standards shown in Table 1, the *Normally Acceptable* noise level criteria is less than 75 dBA DNL for agricultural land use and less than 60 dBA DNL for residential land use. However, the noise survey summarized in Table 3, indicates that the measured day-night average levels average 68 dBA DNL at 100 feet from West Main Avenue centerline.

Given the predicted project-generated truck traffic is 48 dBA DNL at the nearest residence (R2), and existing traffic noise exposure was measured to be 68 dBA DNL, noise generated by project truck traffic would be both in compliance with County noise standards and insignificant compared to the existing traffic conditions. As a result, no project traffic noise mitigation measures are required for this project.

Cumulative Noise Impacts

The noise generation of the proposed project would not increase over time because the facility processing is limited by permit, including the truck passbys and the frequency of those passbys. Although background ambient noise levels will inevitably increase over time, that increase will provide a higher ambient background against which the noise generation of the project would be overlaid, thereby resulting in reduced significance of project noise over time. As a result, the worst-case noise impacts of the project would not occur relative to future (cumulative) conditions, but against existing baseline conditions. Therefore, cumulative noise impacts of the project are similarly anticipated to be less than significant.

Conclusions

This analysis concludes that project-generated noise exposure at the nearest noise-sensitive receivers is predicted to be acceptable pursuant to the Stanislaus County transportation (Table 1) and stationary (Table 2) noise level standards. As a result, consideration of additional noise mitigation measures would not be warranted for this project.

These conclusions are based on the BAC noise level data described herein, the manufacturer provided sound level data, the proposed hours of operations, and the project site plan shown on Figure 2. Deviations from the above-mentioned resources could cause future project-generated noise levels to differ from those predicted in this assessment.

This concludes BAC's environmental noise assessment of the West Main Green Waste Recycling & Composting project in Stanislaus County, California. Please contact BAC at (530) 537-2328 or paulb@bacnoise.com any comments or questions regarding this report.

Appendix A
Acoustical Terminology

Acoustics The science of sound.

Ambient Noise The distinctive acoustical characteristics of a given space consisting of all noise sources audible at that location. In many cases, the term ambient is used to describe an existing or pre-project condition such as the setting in an environmental noise study.

Attenuation The reduction of an acoustic signal.

A-Weighting A frequency-response adjustment of a sound level meter that conditions the output signal to approximate human response.

Decibel or dB Fundamental unit of sound. A Bell is defined as the logarithm of the ratio of the sound pressure squared over the reference pressure squared. A Decibel is one-tenth of a Bell.

CNEL Community Noise Equivalent Level. Defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by a factor of three and nighttime hours weighted by a factor of 10 prior to averaging.

Frequency The measure of the rapidity of alterations of a periodic signal, expressed in cycles per second or hertz.

IIC Impact Insulation Class (IIC): A single-number representation of a floor/ceiling partition's impact generated noise insulation performance. The field-measured version of this number is the FIIC.

L_{dn} Day/Night Average Sound Level. Similar to CNEL but with no evening weighting.

L_{eq} Equivalent or energy-averaged sound level.

L_{max} The highest root-mean-square (RMS) sound level measured over a given period of time.

Loudness A subjective term for the sensation of the magnitude of sound.

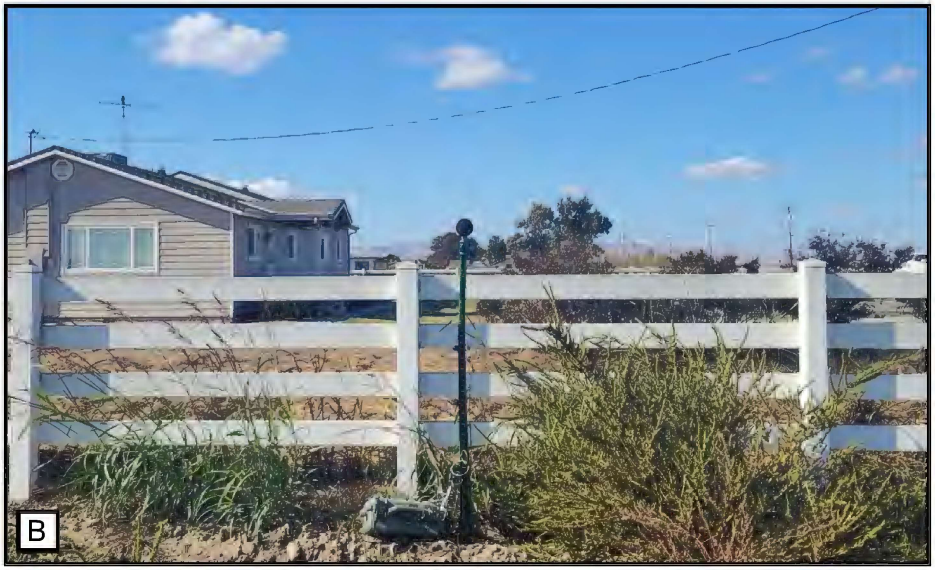
Masking The amount (or the process) by which the threshold of audibility is for one sound is raised by the presence of another (masking) sound.

Noise Unwanted sound.

Peak Noise The level corresponding to the highest (not RMS) sound pressure measured over a given period of time. This term is often confused with the "Maximum" level, which is the highest RMS level.

RT_{60} The time it takes reverberant sound to decay by 60 dB once the source has been removed.

STC Sound Transmission Class (STC): A single-number representation of a partition's noise insulation performance. This number is based on laboratory-measured, 16-band (1/3-octave) transmission loss (TL) data of the subject partition. The field-measured version of this number is the FSTC.



Legend

A Site LT-1 Facing North

B Site LT-1 Facing West

C Site LT-2 Facing South

D Site LT-2 Facing East

Noise Survey Photographs

West Main Composting
Stanislaus County, California

Appendix B

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Appendix C-1
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Friday, November 3, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	56	75	35	31
1:00 AM	57	76	36	31
2:00 AM	58	77	40	32
3:00 AM	61	76	46	35
4:00 AM	63	79	53	40
5:00 AM	64	80	56	43
6:00 AM	65	81	59	49
7:00 AM	67	83	63	51
8:00 AM	66	84	62	52
9:00 AM	64	77	54	45
10:00 AM	65	79	55	43
11:00 AM	65	79	57	41
12:00 PM	65	81	58	41
1:00 PM	65	77	58	41
2:00 PM	65	87	59	45
3:00 PM	66	83	63	51
4:00 PM	69	97	65	52
5:00 PM	68	82	66	54
6:00 PM	65	77	62	49
7:00 PM	65	80	61	51
8:00 PM	63	78	57	46
9:00 PM	64	80	57	47
10:00 PM	62	78	54	40
11:00 PM	60	76	49	39

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	69	63	66	65	56	62
Lmax (Maximum)	97	77	82	81	75	78
L50 (Median)	66	54	60	59	35	48
L90 (Background)	54	41	47	49	31	38

Computed DNL, dB	69
% Daytime Energy	82%
% Nighttime Energy	18%

GPS Coordinates
37°29'34.33"N
121° 0'45.87"W

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Appendix C-2
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Saturday, November 4, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	61	90	43	36
1:00 AM	58	81	43	37
2:00 AM	56	79	40	36
3:00 AM	58	76	42	37
4:00 AM	62	92	48	39
5:00 AM	61	79	50	40
6:00 AM	63	76	54	46
7:00 AM	63	78	57	47
8:00 AM	64	78	59	51
9:00 AM	64	80	57	48
10:00 AM	65	83	60	48
11:00 AM	65	84	59	49
12:00 PM	67	79	64	54
1:00 PM	66	85	62	50
2:00 PM	66	85	60	46
3:00 PM	65	79	59	46
4:00 PM	65	88	60	46
5:00 PM	66	81	61	45
6:00 PM	65	78	61	50
7:00 PM	65	80	60	49
8:00 PM	64	78	60	49
9:00 PM	64	79	57	43
10:00 PM	62	76	55	42
11:00 PM	62	83	50	36

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	67	63	65	63	56	61
Lmax (Maximum)	88	78	81	92	76	81
L50 (Median)	64	57	60	55	40	47
L90 (Background)	54	43	48	46	36	39

Computed DNL, dB	68
% Daytime Energy	81%
% Nighttime Energy	19%

GPS Coordinates
37°29'34.33"N
121° 0'45.87"W

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Appendix C-3
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Sunday, November 5, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	61	81	45	34
1:00 AM	57	78	42	34
2:00 AM	56	78	39	34
3:00 AM	55	77	39	35
4:00 AM	58	75	44	36
5:00 AM	57	77	41	34
6:00 AM	58	76	45	35
7:00 AM	61	78	52	41
8:00 AM	63	85	51	43
9:00 AM	62	77	51	39
10:00 AM	64	79	53	37
11:00 AM	64	84	54	39
12:00 PM	65	78	60	42
1:00 PM	65	85	57	38
2:00 PM	64	80	55	41
3:00 PM	63	76	53	39
4:00 PM	65	86	55	42
5:00 PM	64	77	58	45
6:00 PM	66	83	61	50
7:00 PM	64	82	59	48
8:00 PM	63	76	56	42
9:00 PM	61	76	54	43
10:00 PM	61	76	50	41
11:00 PM	59	82	46	35

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	66	61	64	61	55	58
Lmax (Maximum)	86	76	80	82	75	78
L50 (Median)	61	51	55	50	39	43
L90 (Background)	50	37	42	41	34	35

Computed DNL, dB	66
% Daytime Energy	85%
% Nighttime Energy	15%

GPS Coordinates
37°29'34.33"N
121° 0'45.87"W

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Appendix C-4
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Monday, November 6, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	57	77	39	32
1:00 AM	54	75	36	32
2:00 AM	57	77	39	34
3:00 AM	57	75	41	32
4:00 AM	61	77	45	37
5:00 AM	64	79	52	38
6:00 AM	64	80	55	44
7:00 AM	65	78	59	48
8:00 AM	66	79	62	51
9:00 AM	66	78	59	48
10:00 AM	65	78	59	48
11:00 AM	65	88	57	42
12:00 PM	64	78	53	39
1:00 PM	64	78	56	40
2:00 PM	65	82	58	41
3:00 PM	66	88	60	45
4:00 PM	66	78	62	48
5:00 PM	67	77	65	54
6:00 PM	66	81	63	49
7:00 PM	65	79	57	43
8:00 PM	62	76	51	41
9:00 PM	65	89	53	39
10:00 PM	61	79	47	34
11:00 PM	60	78	45	33

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	67	62	65	64	54	60
Lmax (Maximum)	89	76	81	80	75	77
L50 (Median)	65	51	58	55	36	44
L90 (Background)	54	39	45	44	32	35

Computed DNL, dB	68
% Daytime Energy	84%
% Nighttime Energy	16%

GPS Coordinates
37°29'34.33"N
121° 0'45.87"W

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Acoustical Consultants

Appendix C-5
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Friday, November 3, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	46	74	41	39
1:00 AM	46	74	43	41
2:00 AM	46	67	44	42
3:00 AM	48	61	46	43
4:00 AM	51	74	47	44
5:00 AM	55	79	50	48
6:00 AM	55	76	51	48
7:00 AM	59	76	56	53
8:00 AM	56	73	54	51
9:00 AM	54	74	50	48
10:00 AM	53	78	46	45
11:00 AM	54	77	45	43
12:00 PM	51	75	41	40
1:00 PM	57	85	44	41
2:00 PM	53	78	44	41
3:00 PM	53	76	42	40
4:00 PM	53	77	47	42
5:00 PM	57	86	47	43
6:00 PM	48	72	43	41
7:00 PM	50	74	47	44
8:00 PM	49	72	47	45
9:00 PM	47	54	46	44
10:00 PM	49	72	47	45
11:00 PM	48	72	45	43

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	59	47	54	55	46	51
Lmax (Maximum)	86	54	75	79	61	72
L50 (Median)	56	41	47	51	41	46
L90 (Background)	53	40	44	48	39	44

Computed DNL, dB	58
% Daytime Energy	79%
% Nighttime Energy	21%

GPS Coordinates
37°29'9.70"N
121° 0'32.10"W

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Appendix C-6
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Saturday, November 4, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	47	72	45	44
1:00 AM	51	74	48	45
2:00 AM	48	58	48	43
3:00 AM	49	61	49	44
4:00 AM	50	74	47	44
5:00 AM	51	69	50	47
6:00 AM	52	78	48	47
7:00 AM	61	89	52	49
8:00 AM	64	84	57	52
9:00 AM	62	81	52	49
10:00 AM	61	81	51	46
11:00 AM	58	78	47	44
12:00 PM	52	75	45	41
1:00 PM	51	75	44	41
2:00 PM	54	77	46	44
3:00 PM	55	79	44	42
4:00 PM	57	82	46	41
5:00 PM	56	75	46	41
6:00 PM	51	77	42	40
7:00 PM	52	76	47	44
8:00 PM	51	77	46	44
9:00 PM	49	77	45	43
10:00 PM	47	70	45	43
11:00 PM	48	72	44	42

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	64	49	58	52	47	50
Lmax (Maximum)	89	75	79	78	58	70
L50 (Median)	57	42	47	50	44	47
L90 (Background)	52	40	44	47	42	44

Computed DNL, dB	59
% Daytime Energy	92%
% Nighttime Energy	8%

GPS Coordinates
37°29'9.70"N
121° 0'32.10"W

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Appendix C-7
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Sunday, November 5, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	49	74	45	42
1:00 AM	49	74	46	42
2:00 AM	45	56	45	42
3:00 AM	46	55	45	43
4:00 AM	51	75	47	44
5:00 AM	49	74	46	42
6:00 AM	50	74	47	45
7:00 AM	54	67	51	46
8:00 AM	55	74	52	49
9:00 AM	53	74	49	46
10:00 AM	48	74	43	41
11:00 AM	56	78	46	43
12:00 PM	50	77	44	41
1:00 PM	54	76	46	42
2:00 PM	52	76	45	41
3:00 PM	49	71	42	40
4:00 PM	54	77	46	42
5:00 PM	53	75	46	43
6:00 PM	53	78	46	41
7:00 PM	49	71	44	40
8:00 PM	48	71	45	44
9:00 PM	48	73	45	43
10:00 PM	46	70	44	43
11:00 PM	46	71	43	42

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	56	48	53	51	45	48
Lmax (Maximum)	78	67	74	75	55	69
L50 (Median)	52	42	46	47	43	45
L90 (Background)	49	40	43	45	42	43

Computed DNL, dB	56
% Daytime Energy	82%
% Nighttime Energy	18%

GPS Coordinates
37°29'9.70"N
121° 0'32.10"W

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Appendix C-8
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Monday, November 6, 2023

Hour	Leq	Lmax	L50	L90
12:00 AM	49	76	43	41
1:00 AM	50	75	44	42
2:00 AM	52	78	44	42
3:00 AM	48	71	46	42
4:00 AM	47	73	45	42
5:00 AM	48	69	45	42
6:00 AM	50	75	48	45
7:00 AM	56	68	52	49
8:00 AM	57	80	53	49
9:00 AM	54	75	51	47
10:00 AM	53	77	46	44
11:00 AM	56	78	47	45
12:00 PM	55	77	44	42
1:00 PM	53	78	43	39
2:00 PM	53	73	44	41
3:00 PM	52	73	45	41
4:00 PM	54	78	47	42
5:00 PM	54	75	47	45
6:00 PM	57	81	47	43
7:00 PM	50	75	45	42
8:00 PM	48	74	46	44
9:00 PM	53	75	44	42
10:00 PM	51	74	43	41
11:00 PM	53	76	44	42

	Statistical Summary					
	Daytime (7 a.m. - 10 p.m.)			Nighttime (10 p.m. - 7 a.m.)		
	High	Low	Average	High	Low	Average
Leq (Average)	57	48	54	53	47	50
Lmax (Maximum)	81	68	76	78	69	74
L50 (Median)	53	43	47	48	43	45
L90 (Background)	49	39	44	45	41	42

Computed DNL, dB	57
% Daytime Energy	81%
% Nighttime Energy	19%

GPS Coordinates
37°29'9.70"N
121° 0'32.10"W

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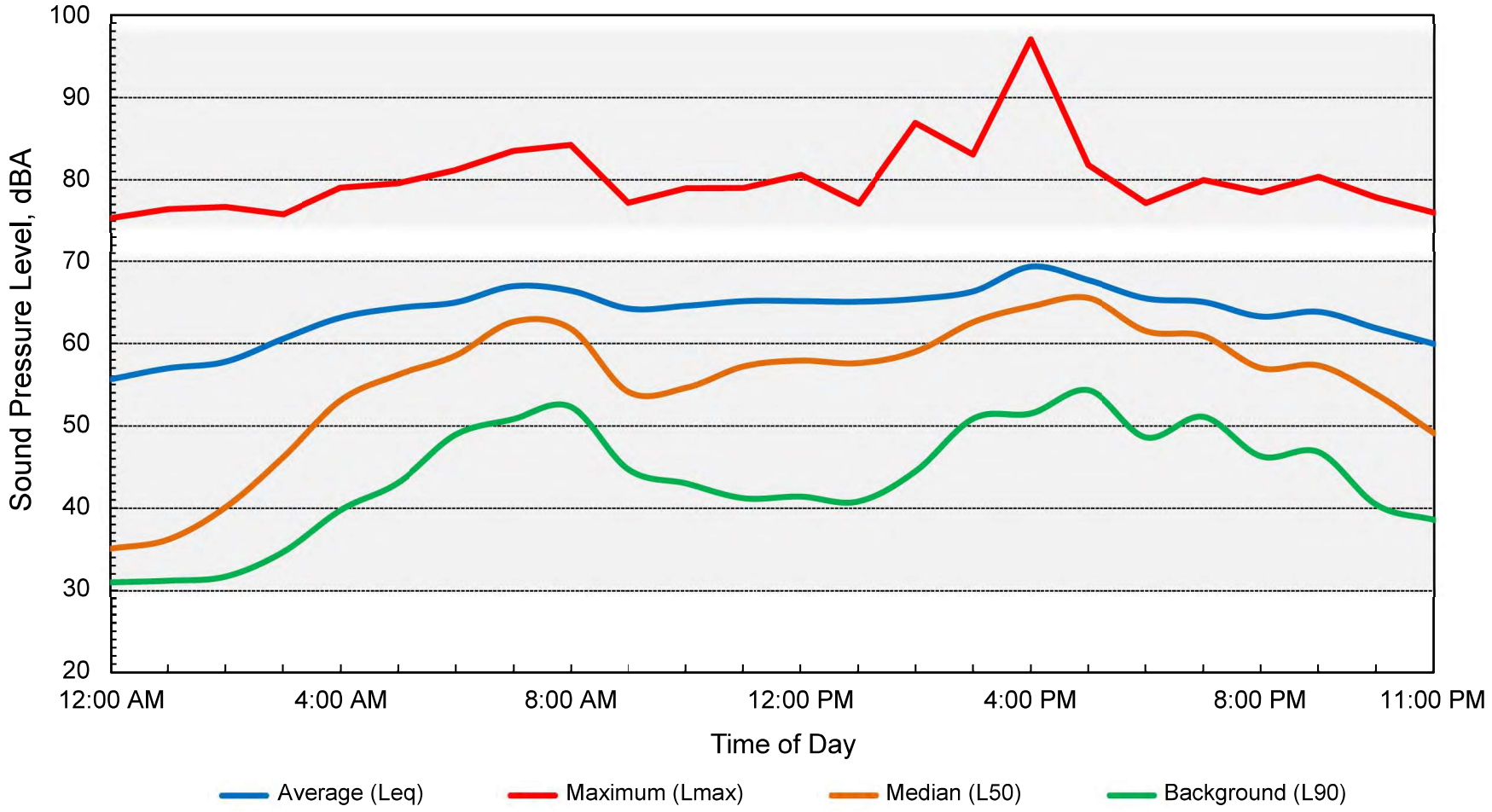
Appendix D-1
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Friday, November 3, 2023



Computed DNL = 69 dB

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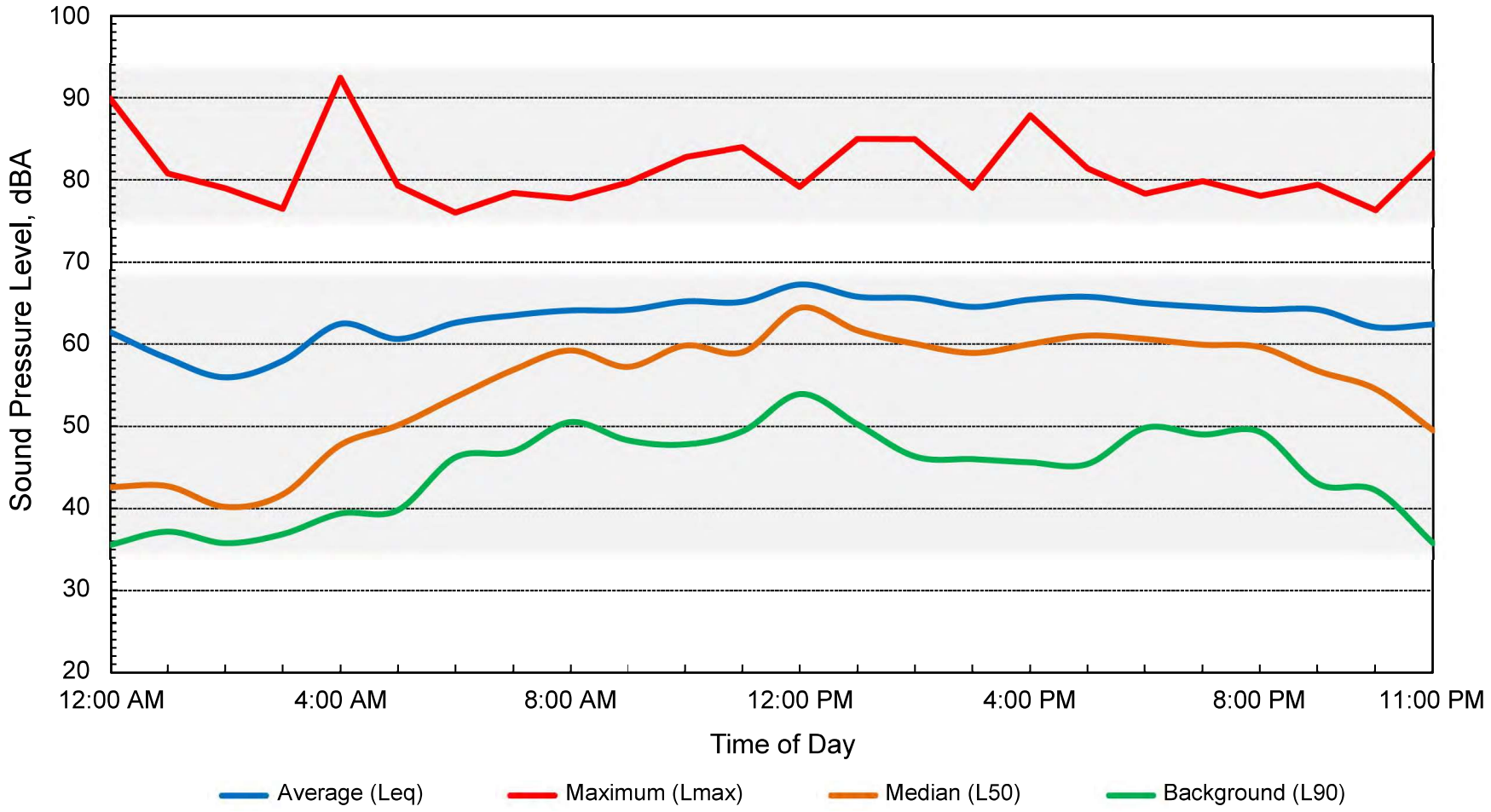
Appendix D-2
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Saturday, November 4, 2023



Computed DNL = 68 dB

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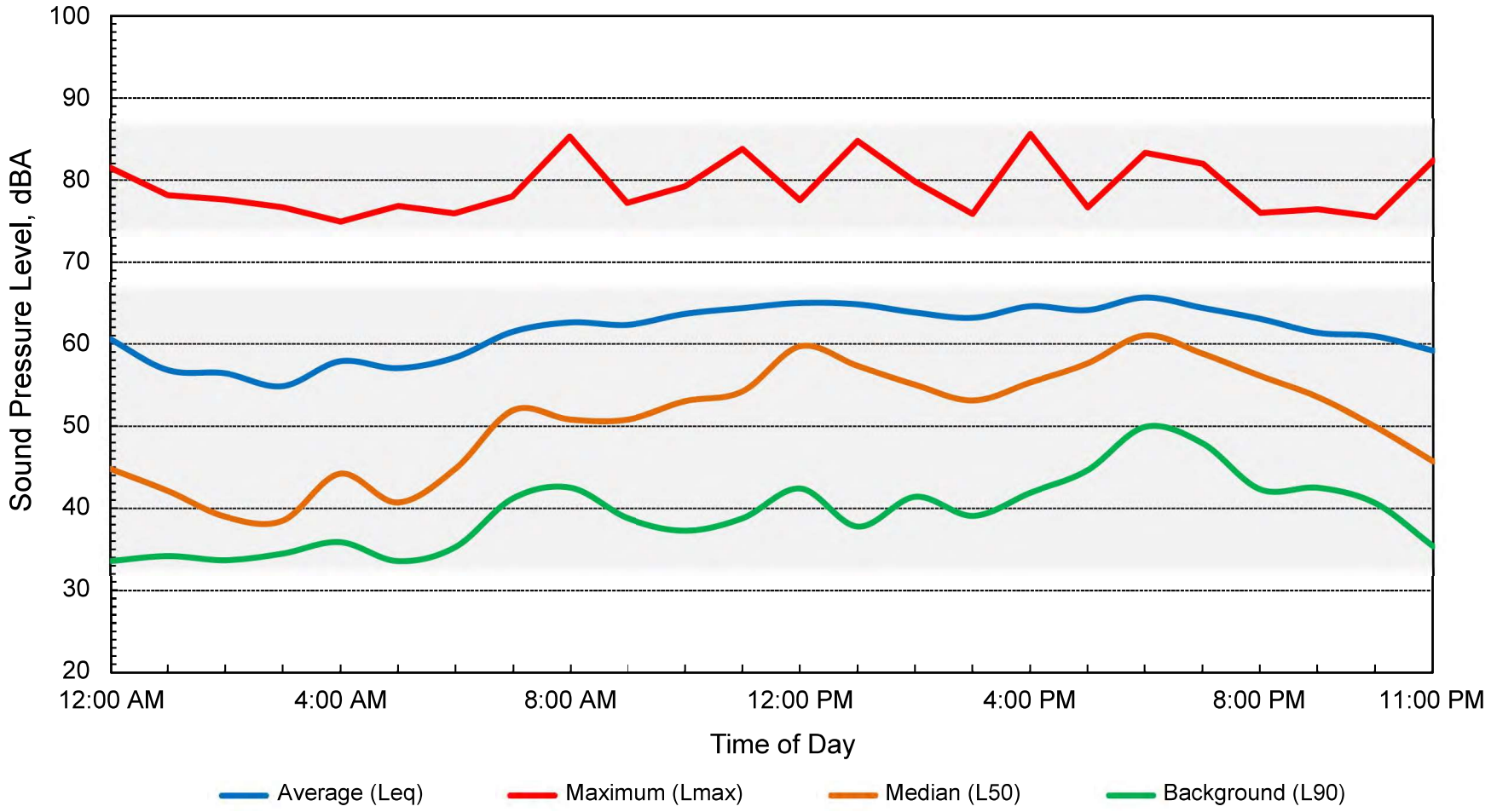
Appendix D-3
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Sunday, November 5, 2023



Computed DNL = 66 dB

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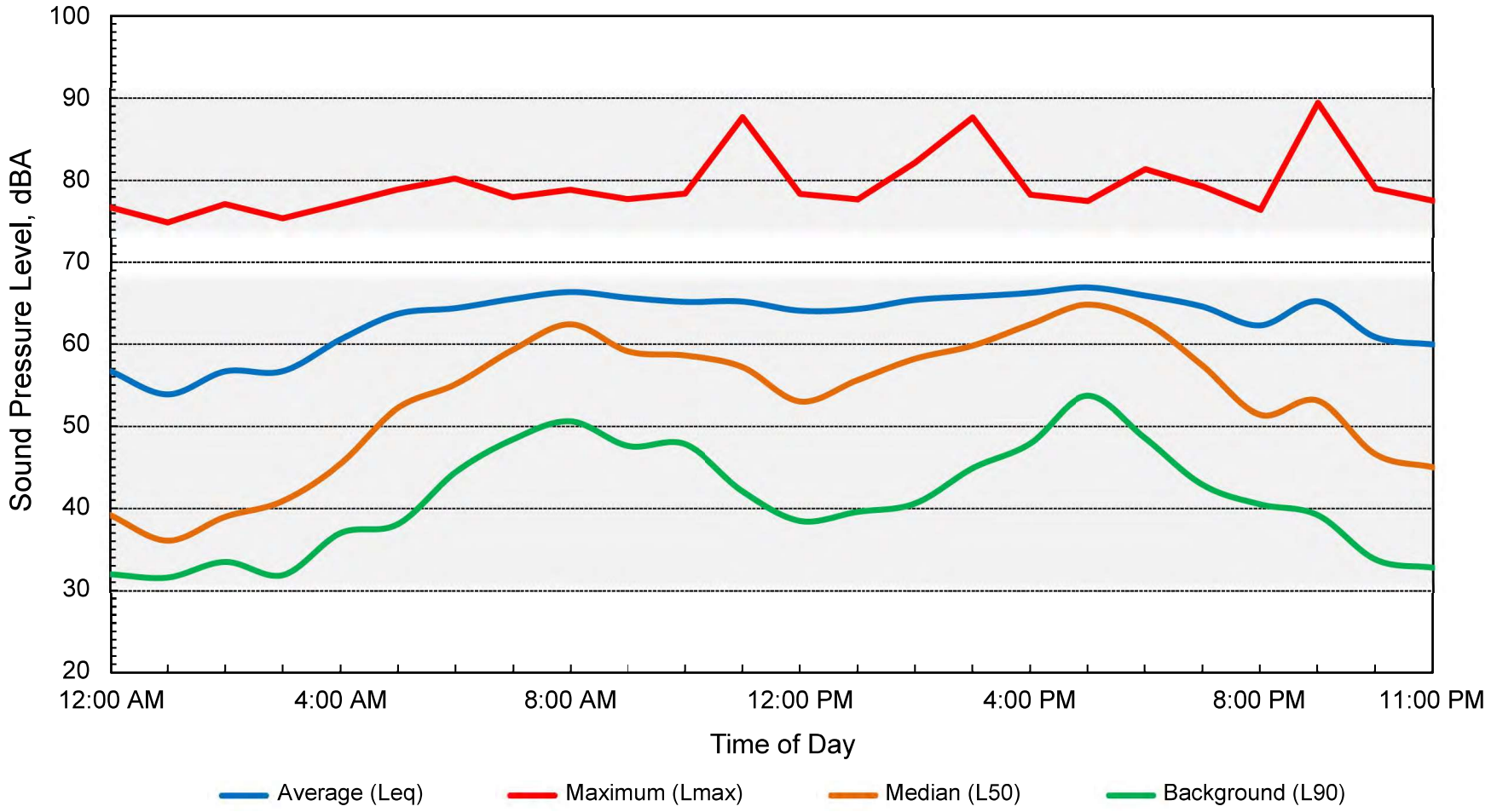
Appendix D-4
Long-Term Ambient Noise Monitoring Results, LT-1
West Main Composting - Stanislaus County, California
Monday, November 6, 2023



Computed DNL = 68 dB

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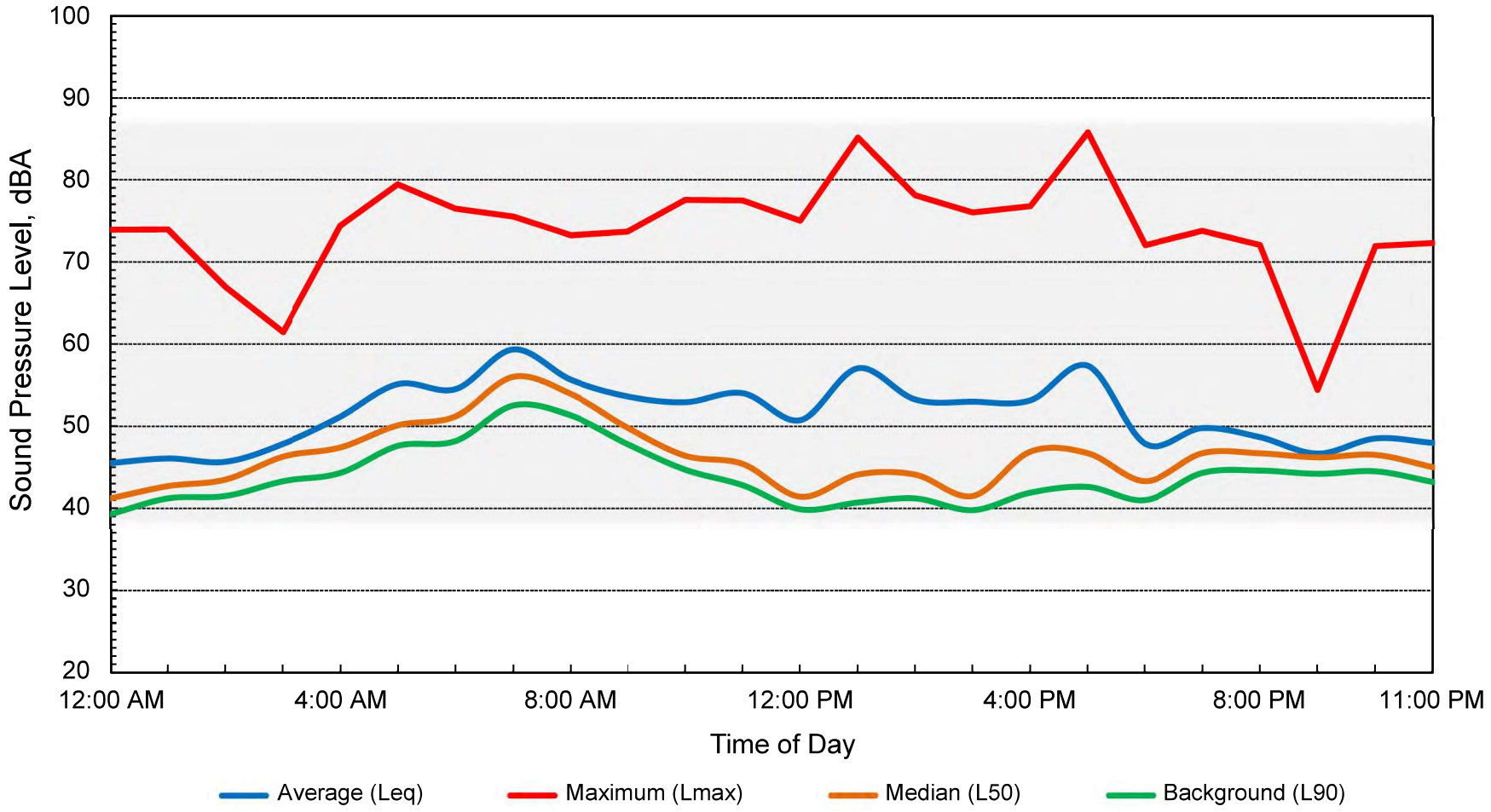
Appendix D-5
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Friday, November 3, 2023



Computed DNL = 58 dB

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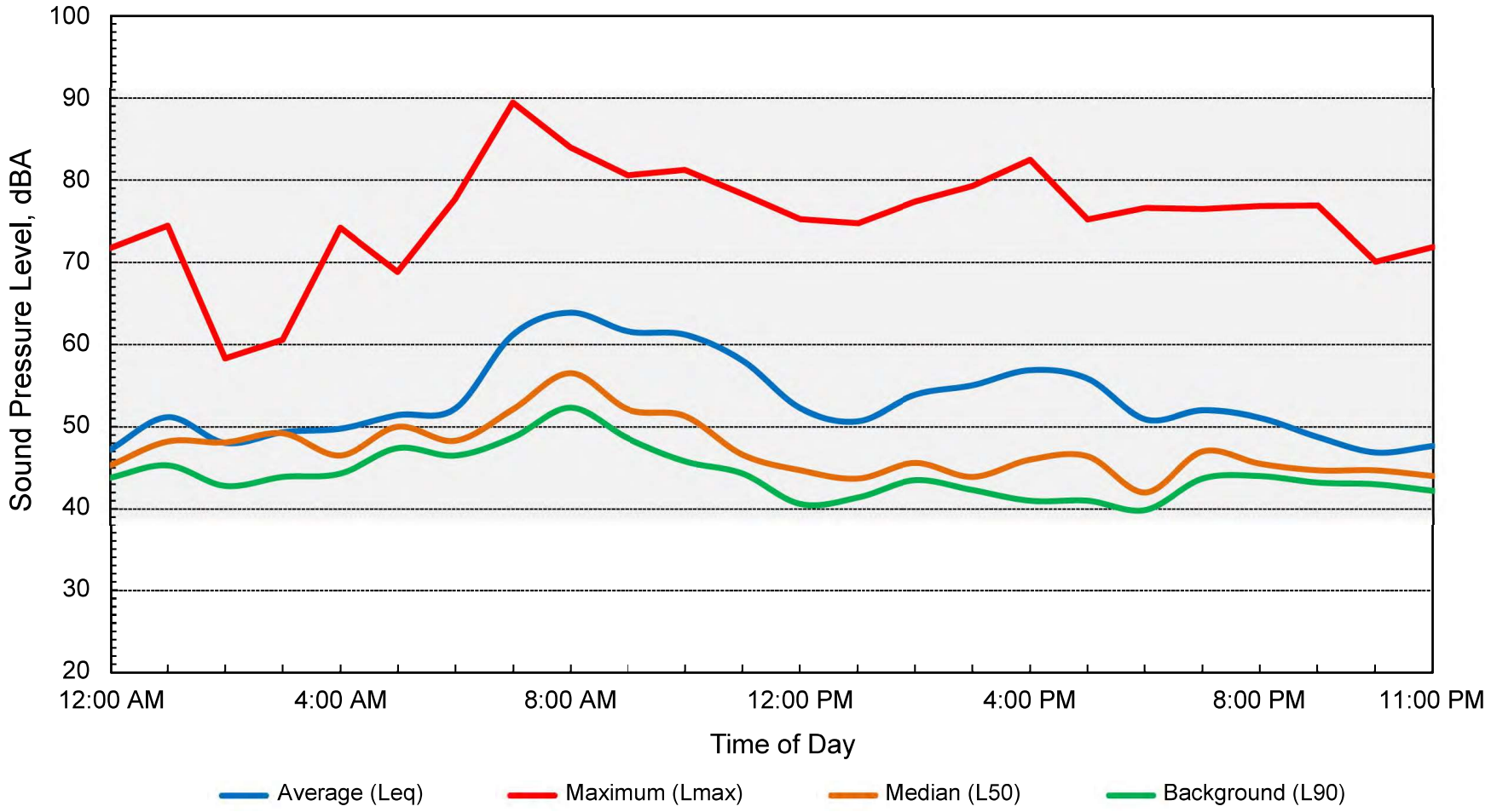
Appendix D-6
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Saturday, November 4, 2023



Computed DNL = 59 dB

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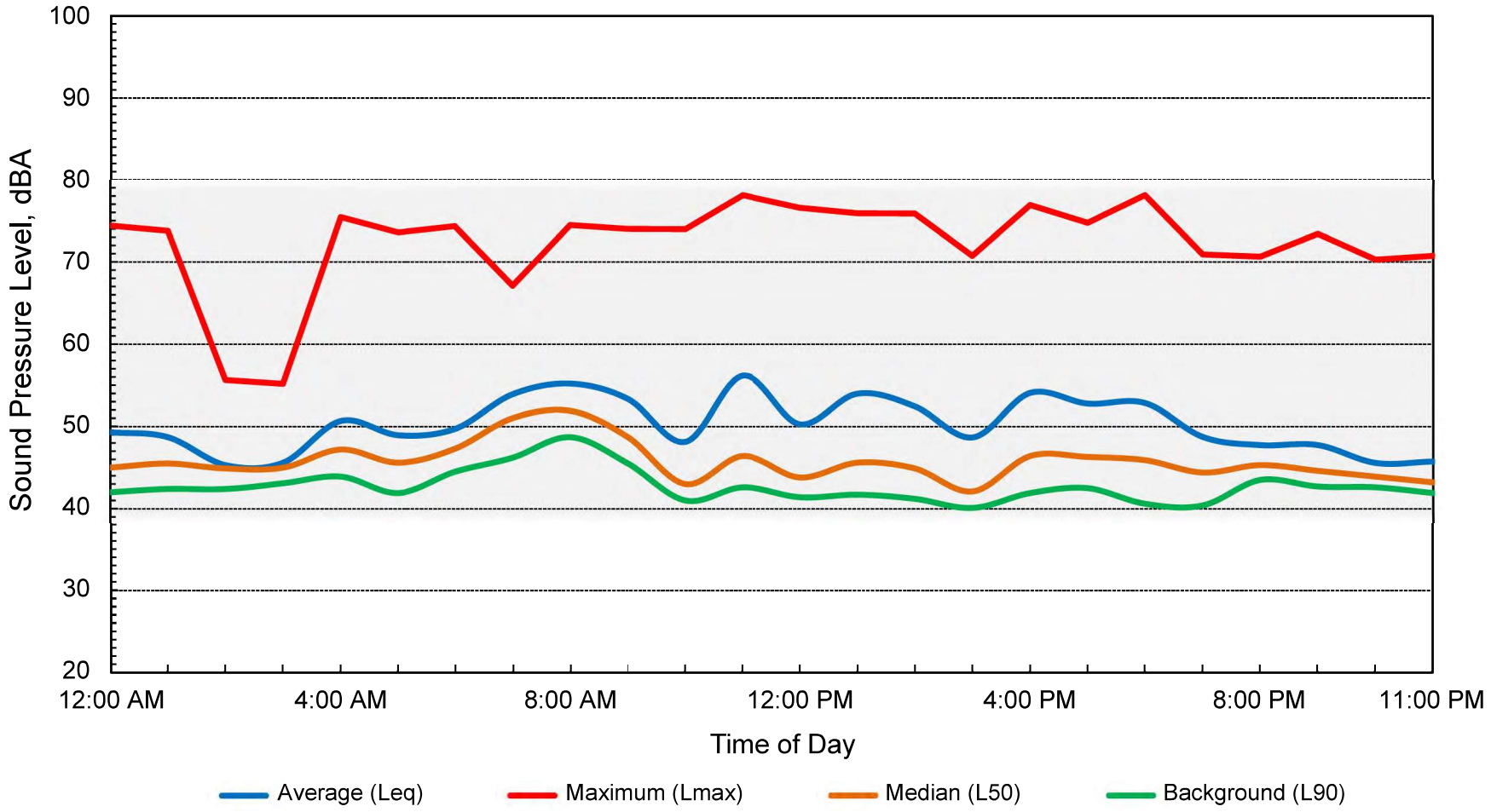
Appendix D-7
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Sunday, November 5, 2023



Computed DNL = 56 dB

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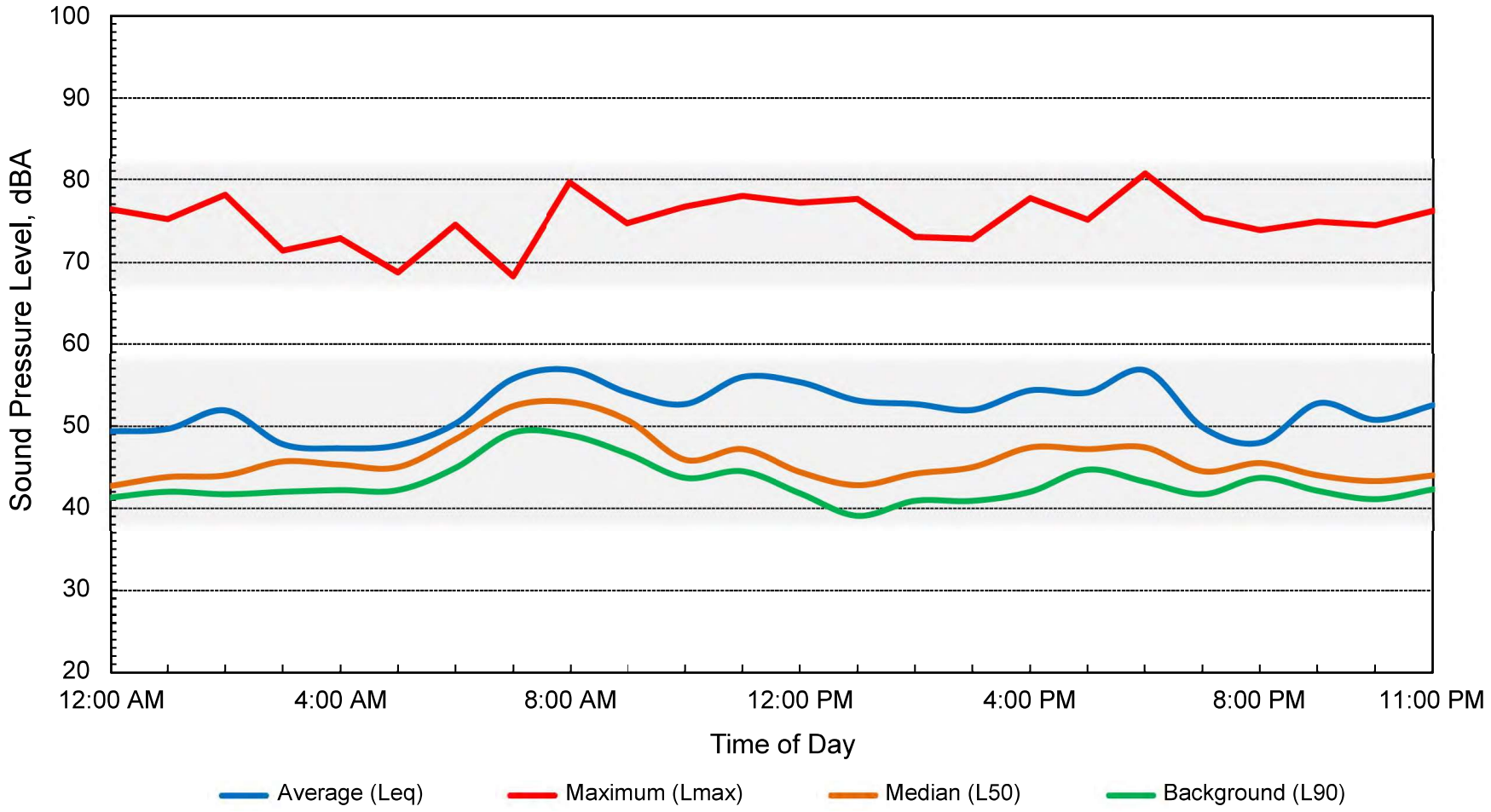
Appendix D-8
Long-Term Ambient Noise Monitoring Results, LT-2
West Main Composting - Stanislaus County, California
Monday, November 6, 2023



Computed DNL = 57 dB

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Appendix E
FHWA Traffic Noise Prediction Model (FHWA-RD-77-108)
Noise Prediction Worksheet

Project Information:

Job Number: 2022-061
Project Name: West Main Composting
Roadway Name: W Main Ave

Traffic Data:

Year: Future
Average Daily Traffic Volume: 80
Percent Daytime Traffic: 100
Percent Nighttime Traffic: 0
Percent Medium Trucks (2 axle): 0
Percent Heavy Trucks (3+ axle): 100
Assumed Vehicle Speed (mph): 45
Intervening Ground Type (hard/soft): **Soft**

Traffic Noise Levels:

				DNL (dB)			
Location	Description	Distance	Offset (dB)	Autos	Medium Trucks	Heavy Trucks	Total
R2	Nearest receiver to W Main Ave	120		0	0	48	48

Traffic Noise Contours (No Calibration Offset):

DNL Contour (dB)	Distance from Centerline (ft)
75	2
70	4
65	10
60	21

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Nuisance Control Plan

West Main
Composting Facility

DECEMBER 2024

Submitted to:

Stanislaus County

Prepared for:

Machado & Sons Construction
Turlock, California

Contents

NUISANCE CONTROL PLAN (NCP)

The following Nuisance Control Plan (NCP) describes mitigations developed for the proposed West Main Composting Facility being developed in Stanislaus County. This NCP describes mitigations in the areas of litter control, dust control, vector control and odor control. Table 1 summarizes the odor mitigations immediately after the descriptive text. Table 2 summarizes the vector control mitigation after the descriptive text. The agency verifying compliance with the plan will be Stanislaus County Planning. CalRecycle will also be inspecting the facility for compliance separately as part of their enforcement of the Solid Waste Facility Permit (SWFP) conditions.

Odor Control

The primary means of odor mitigation shall be the receipt of feedstocks, in small quantities, away from off-site sensitive receptors. In addition, the facility will utilize an aerated composting system using a “compost cap” to reduce VOC and odor emissions. At all times, the facility shall implement the following design and operational protocols as a means of avoiding odor generation.

Each day the operator shall evaluate on-site odors and evaluate planned operations for potential release of objectionable odors. Operational practices will be implemented, as needed, to minimize the release of objectionable odors and will include good composting practices as described below:

- Maintaining an appropriate C:N ratio starting at 30:1, through sufficient blending of high carbon bulking agents (like processed green waste with any source-separated food scraps.

- Maintaining sufficient moisture content. The facility will strive to start each compost pile with 50 percent or greater moisture content and maintain that until the later stages of the process.

- Adequate aeration and/or turning. The facility will measure bulk density and strive for a mix that is less than 1,000 pounds per cubic yard. This will ensure adequate aeration levels.

- To minimize the production and persistence of odors, other good housekeeping measures will be practiced, including:

    - Regular clearing of spilled materials (consisting of compost feedstocks) between compost piles.

    - Eliminating areas where water could pond.

    - Maintaining reasonably sized stockpiles of feedstock and finished compost as described in the SWFP and the Report of Composting Site Information (RCSI).

The use of the ASP system will go a long way toward minimizing odors; in addition, the facility will operate under an enforceable Odor Impact Minimization Plan that CalRecycle inspects for compliance monthly.

The facility will have a stormwater retention pond, which could, under the right conditions, become a source of odor. To minimize this, sediment entering the pond will be minimized using berms and solids traps/separators as necessary.

Under the General Order for Composting Operations from the State Water Resources Control Board, the facility will be required to maintain a dissolved oxygen concentration in the upper zone (one foot) of at least 1.0 milligrams per liter (mg/L). This is a well-established threshold for pond odors.

Off-site odors shall be limited to earthly, non-putrid, smells associated with finished composting as customarily present at the point of sale to the general public.

Table 1 Summary of Nuisance Mitigations

ODORS		
Facility Area	Mitigation	Management Approach
Composting Practice	Maintaining an appropriate starting C:N ratio of 30:1 or greater	Sufficient blending of high carbon bulking agents (like processed green waste) with any source-separated food scraps.
Composting Practice	Maintaining sufficient moisture content.	The facility will strive to start each compost pile with 50 percent or greater moisture content and maintain that until the later stages of the process.
Composting Practice	Adequate aeration and/or turning.	The facility will measure bulk density and strive for

		a mix that is less than 1,000 pounds per cubic yard. This will ensure adequate aeration levels.
Whole Facility	Good Housekeeping	Daily clearing of spilled materials between compost piles, eliminating areas where water could pond. Maintaining reasonably sized stockpiles of feedstock and finished compost.
Composting System	Use of a mechanical aeration system	An ASP system will deliver more oxygen to the piles and provide more reliability.
Whole Site	Written and enforceable Odor Plan	The facility will operate according to an Odor Impact Minimization Plan, enforced, and inspected monthly by CalRecycle.
Retention Pond	Minimize sediment transport into the pond	Use of berms, sediment traps or filters to trap sediment before it enters pond.
Retention Pond	Maintain high levels of dissolved oxygen in the top foot of the pond.	Maintain a dissolved oxygen concentration in the upper zone (one foot) of at least 1.0 milligrams per liter (mg/L).

Odor Complaint Response Protocol

Facility management will use the following protocol to respond to odor complaints.

Response to Odor Complaints

If the facility receives a complaint (either from the original complainant, Stanislaus County, CalRecycle, or the Air District), they will follow the following protocol:

1. The Operator will document the complaint(s) in the Site Operations Log.
2. The operator will use an olfactometer device to determine if the odor is detectable both at the complaint location and on-site at the facility border in the area of the prevailing wind direction within 24 hours of receiving the complaint or by close of business of the first business day after a complaint received on a weekend or holiday.
3. The Operator will assess the complaint and the nature of the source of the odor complaint and will make a recommendation to the owner within 48 hours of receiving the complaint or by close of business of the second business day after a complaint is received on a weekend or holiday.
4. The Operator will implement one or more of the management practices described in Table 1.
5. The Operator will contact the complainant within two weeks to assess the original problem and result after each complaint.
6. Results and actions will be documented in the Site Operations Log, which serves as the Facility's permanent record, and provided to Stanislaus County Planning.

Litter Control

The facility shall only accept source-separated feedstocks from known and trusted sources so litter generation at the site is minimal. The site will not accept any feedstock containing compostable plastics. To the greatest extent possible, the contamination in feedstock that might contribute to litter will be removed at off-site processing facilities before being delivered to the facility. Litter control measures built-in to facility design include:

1. Avoiding acceptance of litter-rich feedstocks by inspecting loads as they are unloaded in the receiving area.
2. No acceptance of compostable plastics.
3. Patrolling of aisles, processing areas, access roads, and the site perimeter at a minimum of twice per day, in the morning and in the evening, to remove any accumulated litter.

Litter receptacles shall be placed strategically throughout the facility (like at the green waste unloading area). Other litter containers will be placed in consultation with Stanislaus County and CalRecycle.

Dust Control

Potential dust emissions from the facility are from the loading and unloading of trucks, grinding, screening, loading, and unloading of the ASP system, and from road traffic. In addition to reducing dust for operational needs and solid waste facility permit conditions, the facility is required to reduce dust, reducing visible particulate emissions in accordance with San Joaquin Valley Air Pollution Control District regulations.

The operator shall implement the following tools as needed to minimize dust generation at the facility:

- An operable water truck will be maintained onsite at all times.
- Maintaining in-process compost moisture content between 45 and 60 percent.
- Curtailing, grinding, turning, screening, forming, turning, or breaking down piles when winds exceed 20 mph or any weather conditions that may carry dust off-site.
- Watering piles using a water truck spray mechanism or sprinklers twice daily or as conditions dictate to maintain ASP pile moisture control and to avoid dust forming on the surface of the ASP piles.
- Controlling facility surface dust through twice daily application of water from a water truck. Weather or site conditions may dictate that no dust control effort is required.
- Consulting predicted weather (especially wind speed and direction) prior to screening finished products,

Vector Control

The most significant vector of concern is flies; however, rats and other vectors could be of concern. Typically, the heat of the composting process and frequent turnings are adequate to prevent a nuisance level fly problem from developing. Specific fly control measures to be implemented at the sources of possible fly attraction include, but are not limited to, the following management approach:

Table 2 Vector Control

Facility Area	Vector attraction	Management Approach
Feedstock receiving	Material sitting too long prior to processing	Expedite material processing in compliance with Solid Waste Facility Permit.
Aisles	Uncomposted material in aisles	Daily cleaning aisles of spilled materials.
Piles	Materials are not well mixed.	Review the mixing procedure.
Curing piles	Materials are not thoroughly composted	Do not add material to curing pile until fully composted.
Waste bins	Flies attracted to contaminants removed from feedstock	Remove and properly dispose of any removed contaminants in compliance with Solid Waste Facility Permit.
Ponding water	Ponding water can create breeding sites for insects	Ponded water will be absorbed with green material and loaded into an actively composting pile to minimize insect breeding. Maintain surfaces to avoid ponded water, correct divots, and low spots.

The primary method of fly control at the compost facility will be to maintain good composting practices, which include:

1. Starting with an appropriate Carbon to Nitrogen (C:N) ratio (between 25:1 – 30:1 or higher)
2. Starting with and maintaining sufficient moisture content of at least 40%.
3. Maintaining adequate aeration and temperature (130 to 160 degrees F) to interrupt the fly cycle, etc.

The operator will routinely monitor fly activity, and if significant numbers of flies are being attracted to the facility, detected both on and off-site, the following steps shall be implemented:

1. The operator will utilize parasitic wasps that parasitize the flies, significantly reducing fly emergence.
2. If parasitic wasps are used and a fly problem persists, the operator shall install traps and other attract and kill methods.
3. If all other measures fail, the operator will contract with a commercial pest control firm to manage flies and will modify the feedstock accepted at the facility.

To avoid the breeding of flies associated with ponding water, ponding water shall be absorbed with appropriate fill material (consisting of aggregate backfill, sand, or shredded green material), the entire area scraped to remove the pond and refilled with pad material. Ponding water shall be handled within 3 to 5 days of the ponding to interrupt the flies' mating cycle.

Should the presence of rats or other vectors become verified (by facility staff, County staff, CalRecycle, or other responsible or permitting agency), the facility shall employ trapping and eradication methods as needed.

Plan/Process Revision

Amendments to the Litter, Dust, Vector, and Odor Control Plan may be made in consultation with the County Planning Department and subject to the approval of the Planning Director.

ENVIRONMENTAL PERMITTING SPECIALISTS
Air Quality • Permitting • OHSA • RMP/PSM

DRAFT TECHNICAL MEMORANDUM

To: Matt Crow
Air Quality Specialist
SJVAPCD

Date: February 15, 2025

Copies: Teresa McDonal – Stanislaus County, Planning and Development
Sean Kilgrow – Machado and Sons Construction

From: Ray Kapahi RK
Tel: 916-806-8333
E-Mail: ray.kapahi@gmail.com

Subject: Analysis of Health Risks from Proposed West Main Composting Project
District CEQA Reference: 20241415

1. INTRODUCTION AND SUMMARY OF FINDINGS

Environmental Permitting Specialists (EPS) has completed a health risks assessment (HRA) associated with the operation of the proposed composting facility. The facility would be located in Crows Landing (Stanislaus County). The site address is 1236 West Main Street (Figure 1).

The HRA is one of the items noted in the January 23, 2025 letter from San Joaquin Valley Air Pollution Control District (District) to Teresa McDonald at Stanislaus County Planning and Community Development Department. This HRA addresses the need to complete the HRA.

Public health risks are defined as cancer and non-cancer risk resulting from exposure to toxic air contaminants (TACs). Consistent with the San Joaquin Valley Air Pollution Control District (SJVAPCD) 2015 CEQA Guidelines, three types of health risks were evaluated. The distribution of risks is shown in Figures 3-6 and summarized in Table 1-1 along with their thresholds of significance.

Table 1-1 Summary of Health Risks		
Risk Type	**Risk Value**	**Threshold of Significance**
Maximum Residential Cancer Risk (70 year)	2.27	20
Maximum Worker Cancer Risk (40 year)	0.0393	20
Maximum Chronic Hazard Index Residential Worker	 0.0643 0.0323	1
Maximum Acute Hazard Index Residential Worker	 0.183 0.278	1

The main source of cancer risk is diesel particulate matter (DPM) from the wood grinder, screen and frontend loaders. The main source of chronic and acute health risks are propylene, naphthalene and ammonia. These are released from the composting piles.

This Technical Memorandum details the methodology, assumptions and results of the risk analysis.

2. METHODOLOGY

The evaluation of health risks is based on a protocol submitted to the District February 4, 2025 and the comments received from the District. Copy of the protocol is attached. The calculation of health risks involves three steps:

1. Determine the emission rates of various TACs.
2. Calculate the exposure concentrations of each TAC
3. Calculate the health risks from exposure to various TACs

These steps are described below.

Estimate of Emissions

Emissions from Equipment

There are three types of equipment that will be used at the site. Each of these releases DPM. These are listed in Table 2-1.

Table 2-1 List of Equipment		
Equipment	Humber	Horsepower
Wood Grinder	1	540
Trommel Screen	1	74
Loader	2	140

The annual emission rate of DPM depends on the engine size (hp), load factor (LF), engine emission factor (EF) and the number of annual operating hour.

Annual DPM Emissions = engine hp x EF x load factor x annual operating hours

EF: Emission factor from engine manufacturer or CARB executive orders

LF: load factor tabulated in CalEEMOD[1] emissions model user's Guide Appendix G, Table G-4. The load factor accounts for the fact that the engine does not operate at maximum horsepower 100% of the time. The LF for construction equipment typically varies between 30% to 50%.

Tables 1 to 3 list the DPM emission rates for the various equipment listed in Table 1-1.

Emissions from Composting

Composting releases a variety of volatile organic compounds (VOCs) that contain TACs. These include ammonia, naphthalene, propylene and others.

EPS relied on emission factors developed by the District for ammonia and recent source tests at another covered aerated statis Pile (CASP) in Napa County[2]. This is the same composting system that will be used at the project site.

District staff (Johnathan Yoshimura Feb 16, 2022) calculated the appropriate VOC and ammonia emission factors as part of the permit evaluation. These are shown in Table 2-2.

For various of TACs, emission factors and emission estimate are shown in Table 2-3. These are based on source tests at Napa Recycling. Excerpts of the source test are provided in Attachment 1.

[1] CalEEMOD (2022): Emissions Model User's Guide. April 2022. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf

[2] Napa Recycling and Waste Services (2021), Source Test Report for CASP Composting System. January 6-7, 2021.

Table 2-2
District Emission Factors

Current District Emission Factor

VOC	3.58	lb/ton (total cycle)
NH3	0.78	lb/ton (total cycle)

Napa Emission Factor

VOC	0.032	lb/ton (total cycle)
NH3	0.026	lb/ton (total cycle)

Revised Emission Factor

VOC	1.6	lb/ton (total cycle)
NH3	0.49	lb/ton (total cycle)

Active EF (90% of emissions)

Active Phase - VOC	1.44	lb/ton
Active Phase - NH3	0.441	lb/ton

Curing EF (10% of emissions)

Curing Phase - VOC	0.16	lb/ton
Curing Phase - NH3	0.049	lb/ton

Compost

Daily Thpt	5,610	ton/day
Annual Thpt	43,680	ton/yr

Stockpile

Daily Thpt	140	ton/day
Annual Thpt	43,680	ton/yr

Stockpile Storage Time

Storage time	2 days

Table 2-3
TAC Emissions from Composting Based on Napa Recycling Source Tests Jan 6-7, 2021

Pollutant		EF lb/ton	Emissions lbs/hr	Emissions lbs/yr
Ammonia		4.90E-01	3.27E+00	2.45E+04
Propylene		2.01E-04	1.34E-03	1.01E+01
Methanol		3.65E-05	2.43E-04	1.83E+00
Isopropanol		6.84E-05	4.56E-04	3.42E+00
Naphthalene		2.15E-04	1.43E-03	1.08E+01
Acetaldehyde		5.01E-05	3.34E-04	2.51E+00

NOTES				
EF from Napa Source Test Jan 6-7, 2021				
Throughput		160	tons/day	
		6.67	tons/hr	
		50,000	tons/yr	

3. CALCULATE CONCENTRATIONS (Dispersion Modeling)

The second step involves calculating the concentration of each TAC based on the local wind patterns, topography and source emission rate and geometry. The results of the dispersion analysis is used to create concentration plot files that are exported into the risk model (Step 3). The parameters and data used to calculate the concentration files are summarized in Table 3-1.

Table 3-1
Summary of Dispersion Modeling Parameters

Modeling Element	Description	Comments
Model Selection	AERMOD Version 24142	
Emission Sources and Source Geometry	Composting – Elevated Area Source. Originally, the composting windrows were to be modeled as a volume source. However, an elevated area source is more representative Grinder – Stationary Point Source Screen – Stationary Point Source Front End Loader – Stationary Point Source	Equipment operates between 5 am and 6 pm
Modeling Grid	2,475 meters x 2,475 meters with a 25 meter spacing. Total 10,000 receptors evaluated	See attached layout (Figure 2)
Sensitive Receptors	Nearest Residences. All schools, hospitals, senior centers and day care centers within 1 kilometer of project site	
Meteorological Data	5 years of U-Star Adjusted 2018 to 2022 from Modesto Airport. Station ID: 23258. Assume Base Elevation: 22.3 meters	The meteorological station is located 11 miles to the northeast. There are no topographical features or water bodies between the project site and the met station. Therefore, the data are considered representative of the project location.
Model Options	The following options will be used - Non-Regulatory Option to Allow use of U-Star adjusted met data - Terrain option - Rural Setting	

4. CALCULATE CONCENTRATIONS (Modeling)

The last step in calculating health risks involves using the concentration plot files with toxicity and exposure data. EPS used the ADMRT risk modeling tool (Version 22118) to calculate each of the 3 health risks around the project site. The procedure used in the current analysis follows the OEHHA Guidelines[3] and District's Guidance[4] APR-1906 for preparing health risk assessments.

The results are summarized previously in Table 1-1 and are shown in Table 4-1.

[3] February (2015): "Air Toxics Hotspots Program Risk Assessment Guidelines". Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

[4] SJVAPCD (2015): "Framework for Performing Health Risk Assessments". Revised Feb 12, 2020.

Table 4-1 Summary of Health Risks		
Risk Type	**Risk Value**	**Threshold of Significance**
Maximum Residential Cancer Risk (70 year)	2.27	20
Maximum Worker Cancer Risk (40 year)	0.0393	20
Maximum Chronic Hazard Index Residential Worker	 0.0643 0.0323	1
Maximum Acute Hazard Index Residential Worker	 0.183 0.278	1

These results demonstrate that the project would not lead to significant public health risks and no further mitigation is needed.

Copies of the modeling files are attached.

Figure 1

Project Site

Figure 2

Modeling Grid

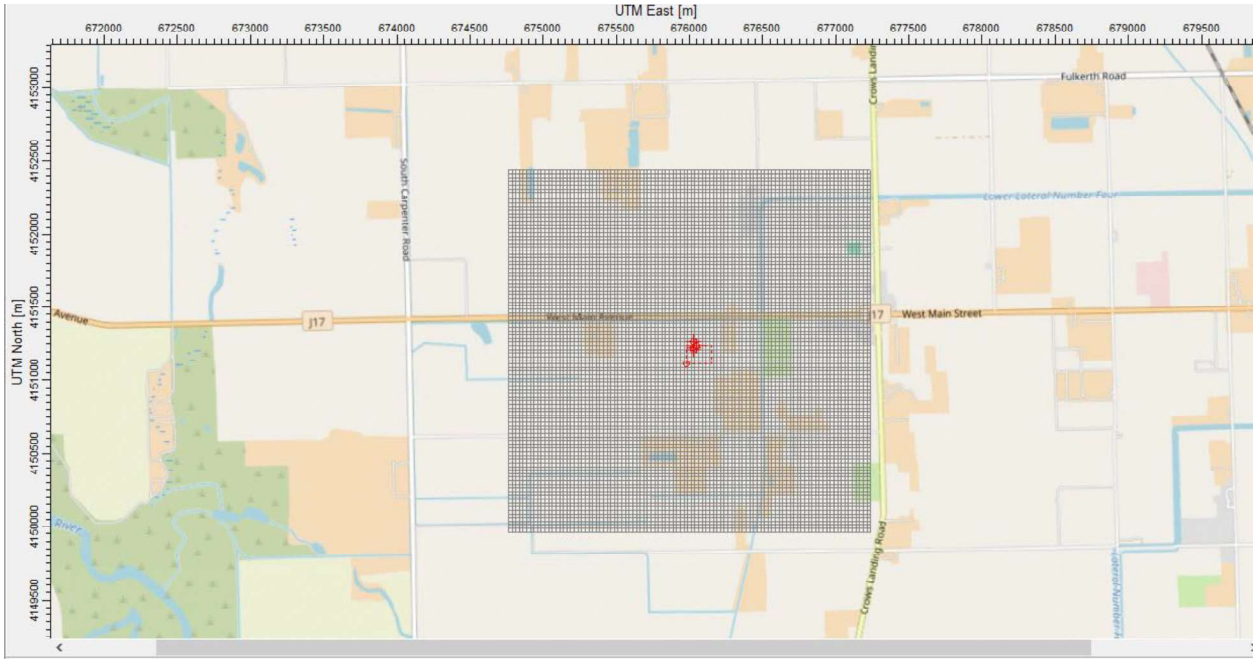
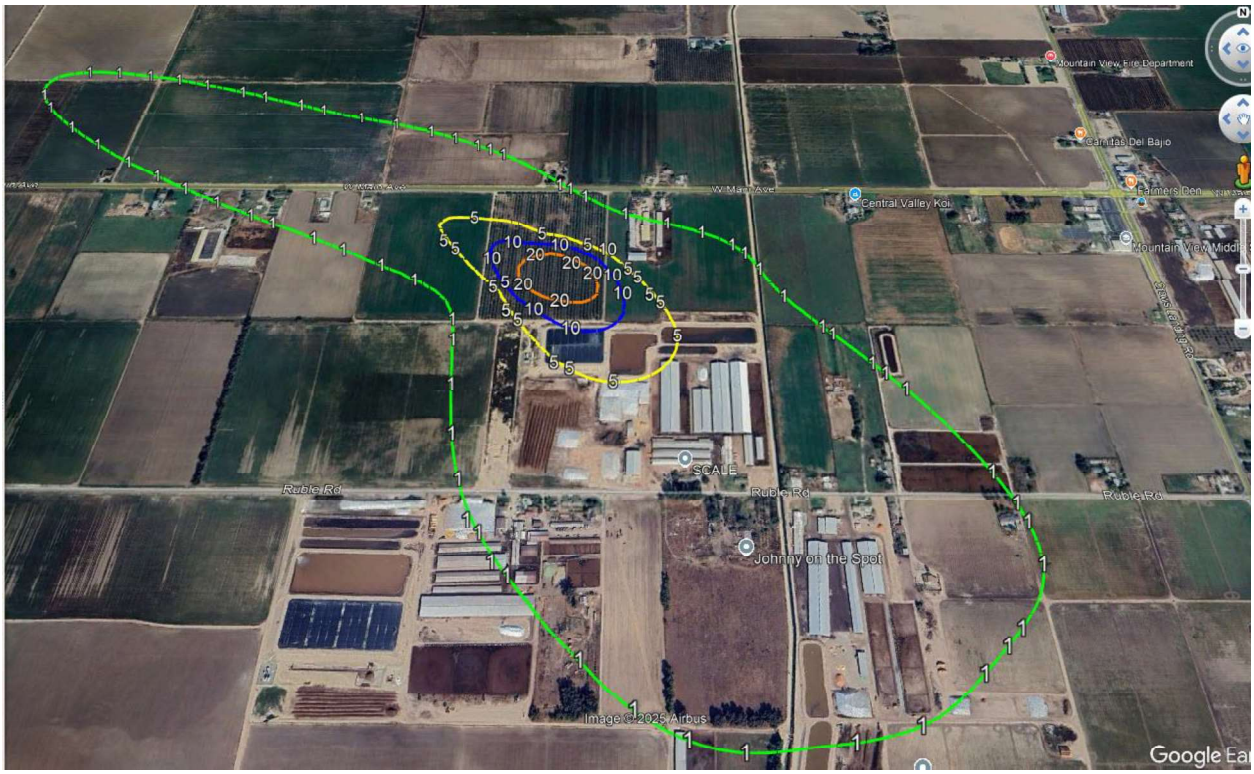


Figure 3

Residential Cancer Risk

(in cancers per million)

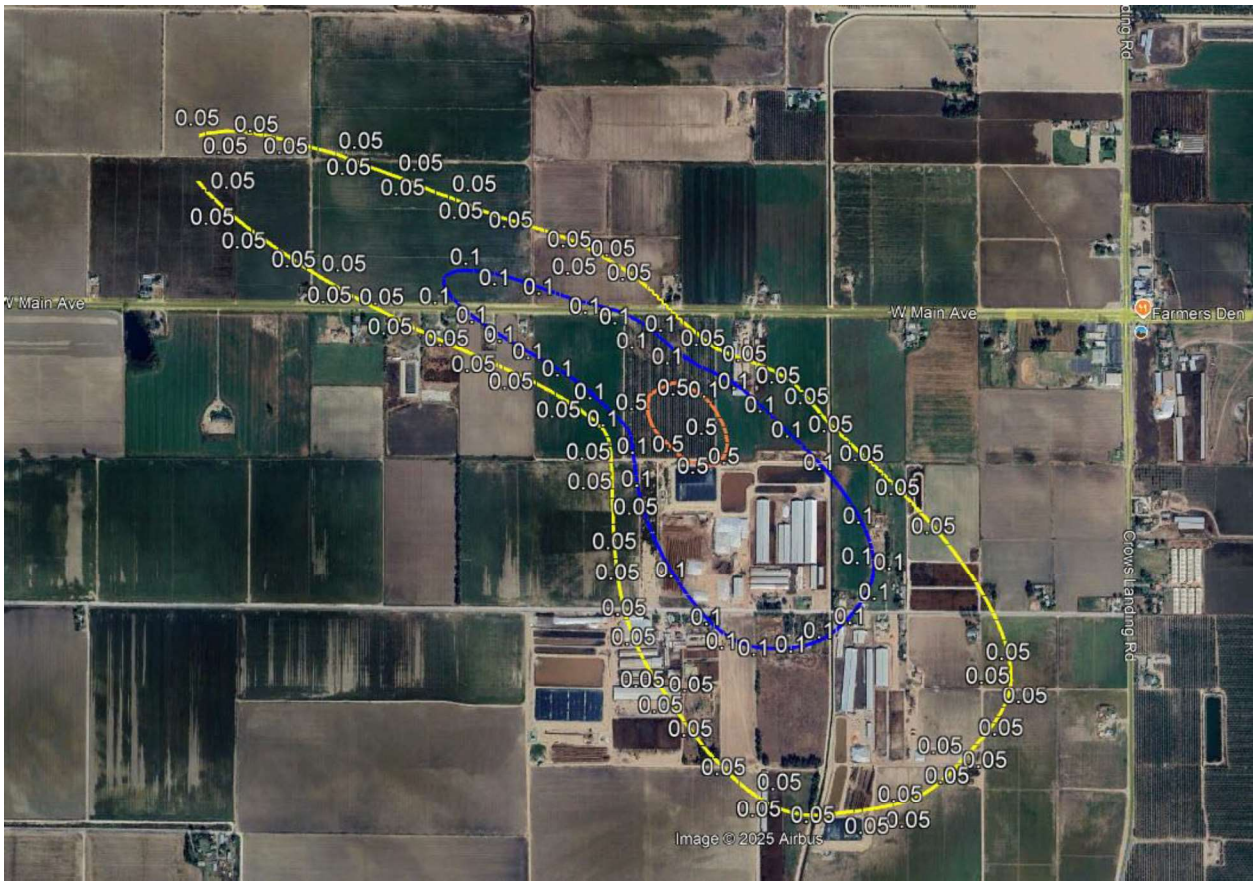


(A risk above 10 signifies significant health risk)

Figure 4

Workplace Cancer Risk

(in cancers per million)



(A value above 20 signifies significant health risk)

Figure 5

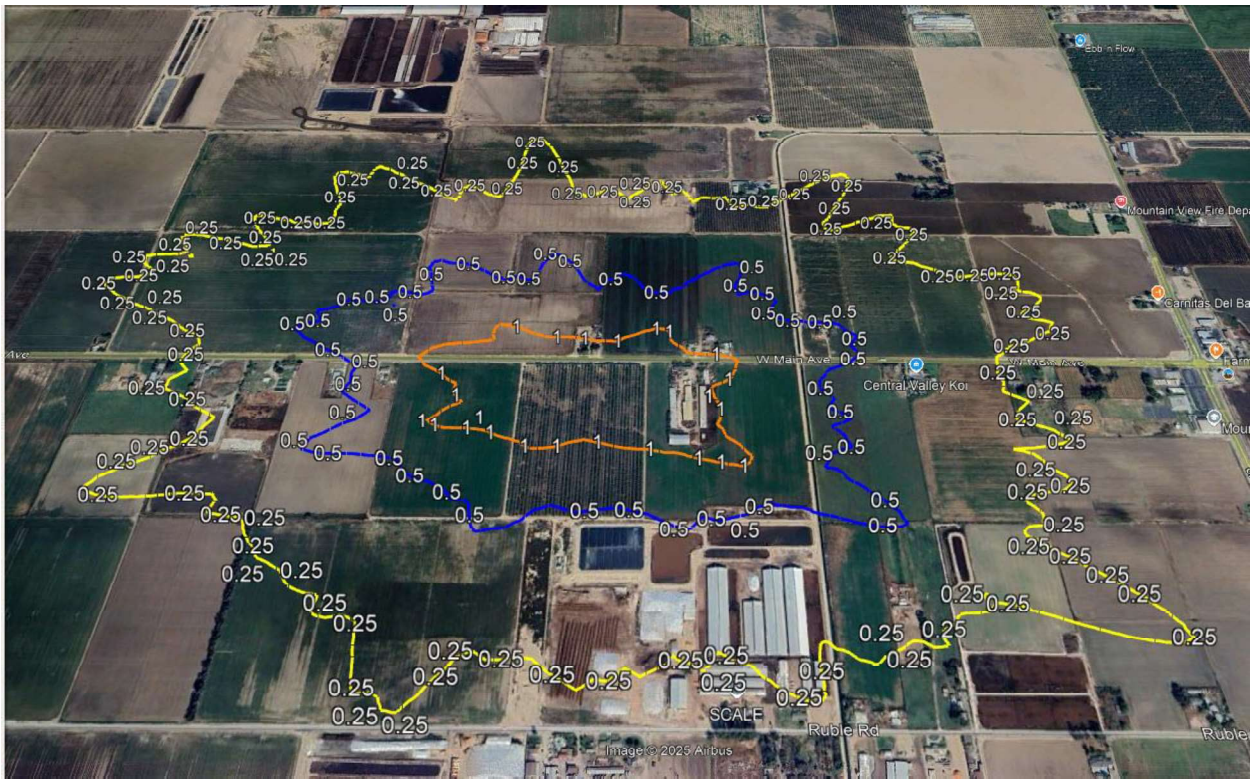
Distribution of Chronic Hazard Index

(A value above 1 signifies significant health risk)

Figure 6

Distribution of Acute Hazard Index

(A value above 1 signifies significant health risk)



ATTACHMENTS

1. Excerpts of Napa Recycling Source Test
2. Copy of Modeling Protocol

ATTACHMENT 1

Excerpts of Napa Recycling Source Test

SOURCE TEST REPORT
2021 QUARTERLY COMPOST EMISSIONS TESTING - 1ST QUARTER
NAPA RECYCLING & WASTE SERVICES, INC.
CASP COMPOSTING SYSTEM
AMERICAN CANYON, CALIFORNIA

Prepared For:

Napa Recycling & Waste Services, Inc.
820 Levitin Way
American Canyon, CA 94503

For Submittal To:

Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, California 94105

Prepared By:

Montrose Air Quality Services, LLC
2825 Verne Roberts Circle
Antioch, CA 94509

Document Number:	**W005AS-005315-RT-1334R1 (NST-6253)**
Test Dates:	**January 6 & 7, 2021**
Submittal Date:	**March 4, 2021**

TABLE 4-6
EMISSION FACTOR RESULTS
NH3, POC, PROPYLENE, METHANOL

Age, days		Ammonia, lb/hr	POC, lb/hr		Propylene, lb/hr		Methanol, lb/hr
0		0	0		0		0
1		0.003	0.006	DLL	2.39E-05	<	3.20E-05
2		0.007	0.013	DLL	5.57E-05	<	7.46E-05
3	**DLL**	**0.012**	**0.023**	**DLL**	**9.56E-05**	**<**	**1.28E-04**
4		0.010	0.021	DLL	8.42E-05	<	1.10E-04
5		0.009	0.019	DLL	7.28E-05	<	9.26E-05
6		0.008	0.017	DLL	6.14E-05	<	7.50E-05
7		0.007	0.016	DLL	5.01E-05	<	5.74E-05
8		0.006	0.014	DLL	3.87E-05	<	3.98E-05
9		0.005	0.012	DLL	2.73E-05	<	2.22E-05
10		**0.004**	**0.010**	**DLL**	**1.59E-05**	**<**	**4.57E-06**
11		0.008	0.011		2.93E-05	<	6.29E-06
12		0.013	0.012		4.27E-05	<	8.02E-06
13		0.018	0.013		5.60E-05	<	9.74E-06
14		0.023	0.013		6.94E-05	<	1.15E-05
15		0.028	0.014		8.28E-05	<	1.32E-05
16		**0.033**	**0.015**		**9.62E-05**	**<**	**1.49E-05**
17		0.031	0.015		9.29E-05	<	1.49E-05
18		0.029	0.015		8.97E-05	<	1.49E-05
19		0.027	0.015		8.65E-05	<	1.49E-05
20		0.025	0.015		8.33E-05	<	1.49E-05
21		0.023	0.015		8.00E-05	<	1.49E-05
22		0.022	0.016		7.68E-05	<	1.49E-05
Active CASP							
lb/hr[1]	DLL	0.015	0.012	DLL	3.21E-05	<	1.79E-05
lb/cycle	DLL	7.7	6.6	DLL	1.69E-02	<	9.47E-03
lb/ton	DLL	0.020	0.017	DLL	4.43E-05	<	2.48E-05
CASP Curing							
lb/hr[1]	<	0.003	0.016		4.46E-05	<	5.54E-06
lb/cycle	<	3.2	15.7		4.28E-02	<	5.31E-03
lb/ton	<	0.008	0.041		1.12E-04	<	1.39E-05
Static Curing							
lb/hr[1]	<	0.001	0.001		2.44E-05	<	1.66E-06
lb/cycle	<	0.8	1.3		2.34E-02	<	1.59E-03
lb/ton	<	0.006	0.009		1.66E-04	<	1.13E-05
Average Curing[2]							
lb/ton	<	0.006	0.015		1.57E-04	<	1.17E-05
Total Emission Factor							
lb/ton		0.026	0.032	DLL	2.01E-04	<	3.65E-05

1 Trends with data points below reporting limit were calculated using one-half of the reporting limit.
2 Emission Factors from curing zones were calculated as a weighted average based on number of zones.
"<" denotes that results were non-detects and reported at analytical reporting limit.
"DLL" denotes that one or more samples were non-detects. Results were calculated using ½ of the non-detected value.
Data in bold was test data from this mobilization and was used to generate the trends.

West Main Compost
Crows Landing, California
HRA Modeling Protocol

INTRODUCTION

This HRA Modeling Protocol outlines the procedures that will be used at West Main Compost located at in Crows Landing (Stanislaus County), California. The facility occupies 23.5 acres of a 47.82 acre site. The facility will accept a maximum of 160 tons of feedstock per day with a maximum of 50,000 tons per year.

District CEQA Reference #: 20241415

Facility #: N-9923.

Address: 1236 West Main Street
Crows Landing, CA 95313

EMISSION SOURCES AND EMISSIONS

The following sources at the facility will be included in the HRA.

Source #	Description	Emissions
1	Composting Operation Includes feedstock storage, windrows, curing and finished piles	Ammonia, Propylene, Methanol, Isopropyl Alcohol, Naphthalene, Acetaldehyde
2	450 hp Tier 4 diesel engine with grinder 2,000 operating hours per year	Diesel Particulate Matter (DPM)
3	74 hp Tier 4 diesel engine with screen 2,000 operating hours per year	DPM
4	2 x 168 hp Tier 4 diesel engine front end loaders 2,500 operating hours per year total	DPM

EMISSION CALCULATIONS

For Compost Operations

Use the ammonia and VOC emission factors used in the District's Engineering Evaluation. See next page.

- Annual emissions = Emission Factor (lb/ton) x tons/year of compost
- Hourly emissions = [Emission Factor (lb/ton) x maximum tons/day of compost]/24

Current District Emission Factor

VOC	3.58	lb/ton (total cycle)
NH3	0.78	lb/ton (total cycle)

Napa Emission Factor

VOC	0.032	lb/ton (total cycle)
NH3	0.026	lb/ton (total cycle)

Revised Emission Factor

VOC	1.6	lb/ton (total cycle)
NH3	0.49	lb/ton (total cycle)

Active EF (90% of emissions)

Active Phase - VOC	1.44	lb/ton
Active Phase - NH3	0.441	lb/ton

Curing EF (10% of emissions)

Curing Phase - VOC	0.16	lb/ton
Curing Phase - NH3	0.049	lb/ton

Compost

Daily Thpt	5,610	ton/day
Annual Thpt	43,680	ton/yr

Stockpile

Daily Thpt	140	ton/day
Annual Thpt	43,680	ton/yr

Stockpile Storage Time

Storage time	2 days

For other air toxic contaminants (TACs) use the emission factors based on source tests at the Napa Recycling in American Canyon. See attached Table 1-3 from the Napa Source Test Report and summarized below:

Toxic Air Contaminant	**Emission Factor (lbs/ton)** *(Averaged over 4 Quarters)*
Propylene	1.26E-04
Methanol	2.07E-04
Isopropyl Alcohol	3.83E-04
Naphthalene	1.09E-03
Acetaldehyde	2.81E-04

DPM Emission Rate

Emission Rate (lbs/yr) = Engine HP x Emission Factor x Load Factor x Annual Operating hours per year

Emission Factors: from CARB Executive Orders

Load Factors: Default values in CalEEMOD User's Guide, Appendix G, (Table G-12).

HEALTH RISKS AND PATHWAY SELECTION

The following pathway(s) will be selected for the three types of risks that will be calculated:

Type of Risk	Pathways	Calculation Method
Cancer	Minimum Mandatory Pathways	OEHHA Derived
Chronic	Minimum Mandatory Pathways	OEHHA Derived
Acute	Inhalation Only	N/A

DISPERSION MODELING and RISK ASSESSMENT

Modeling Element	Description	Comments
Model Selection	AERMOD Version 19121	
Emission Sources and Source Geometry	Composting – Volume Source Grinder – Stationary Point Source Screen – Stationary Point Source Front End Loader – Stationary Point Source	Equipment operates between 5 am and 6 pm
Modeling Grid	2,500 meters x 2,500 meters with a 25 meter spacing	See attached layout
Sensitive Receptors	Nearest Residences. All schools, hospitals, senior centers and day care centers within 1 kilometer of project site	
Meteorological Data	5 years of U-Star Adjusted 2018 to 2022 from Modesto Airport. Station ID: 23258. Assume Base Elevation: 22.3 meters	The meteorological station is located 11 miles to the northeast. There are no topographical features or water bodies between the project site and the met station. Therefore, the data are considered representative of the project location.
Model Options	The following options will be used	

	- Non-Regulatory Option to Allow use of U-Star adjusted met data - Terrain option - Rural Setting	

Risk Calculation

Risk Calculation	Description	Comments
Risk Model	HARP2 - ADMRT	Version 22118
		Toxicity data and risk calculations will be performed per latest OEHHA risk management guidelines

TABLE 1-3
SUMMARY OF AVERAGE COMPLIANCE RESULTS

Parameter/Units	Q1: 01/2021 Maximum Emissions[1]	Q4: 11/2020 Maximum Emissions[1]	Q3: 08/2020 Maximum Emissions[1]	Q2: 06/2020 Maximum Emissions[1]	Emission Limits
Annual Throughput, tons/yr	--	--	--	--	63,590
Ammonia					
lb/ton	0.03	0.09	0.07	0.23	0.49
lb/yr	1,667	5,998	4,352	14,412	--
ton/yr	0.8	3.0	2.2	7.2	15.6
lb/hr	0.2	0.7	0.5	1.6	6.4
POC (TNMNEOCs)					
lb/ton	0.03	0.08	0.20	0.22	1.6
lb/yr	2,027	5,041	12,693	13,766	--
ton/yr	1.0	2.5	6.4	6.9	50
lb/hr	0.2	0.6	1.5	1.6	20
Propene (Propylene)[3]					
lb/ton	2.01E-04	1.38E-04	9.50E-05	6.82E-05	--
lb/yr	1.28E+01	8.77E+00	6.04E+00	4.34E+00	3.15E+02
ton/yr	6.40E-03	4.39E-03	3.02E-03	2.17E-03	--
lb/hr	1.46E-03	1.00E-03	6.90E-04	4.95E-04	6.56E-02
Methanol[2]					
lb/ton	3.65E-05	1.79E-04	3.42E-04	2.80E-04	--
lb/yr	2.32E+00	1.14E+01	2.17E+01	1.78E+01	1.83E+04
ton/yr	1.16E-03	5.70E-03	1.09E-02	8.90E-03	--
lb/hr	2.65E-04	1.30E-03	2.48E-03	2.03E-03	3.82E+00
Isopropanol[2]					
lb/ton	6.84E-05	3.36E-04	6.41E-04	4.87E-04	--
lb/yr	4.35E+00	2.14E+01	4.08E+01	3.10E+01	6.06E+04
ton/yr	2.18E-03	1.07E-02	2.04E-02	1.55E-02	--
lb/hr	4.97E-04	2.44E-03	4.65E-03	3.54E-03	1.26E+01
Naphthalene[4]					
lb/ton	2.15E-04	9.79E-04	2.10E-03	1.08E-03	--
lb/yr	1.37E+01	6.23E+01	1.34E+02	6.86E+01	7.16E+02
ton/yr	6.83E-03	3.11E-02	6.68E-02	3.43E-02	--
lb/hr	1.56E-03	7.11E-03	1.52E-02	7.83E-03	1.49E-01
Acetaldehyde[2]					
lb/ton	5.01E-05	2.47E-04	4.70E-04	3.57E-04	--
lb/yr	3.19E+00	1.57E+01	2.99E+01	2.27E+01	2.00E+02
ton/yr	1.59E-03	7.84E-03	1.49E-02	1.14E-02	--
lb/hr	3.64E-04	1.79E-03	3.41E-03	2.59E-03	4.18E-02

Layout of Modeling Grid

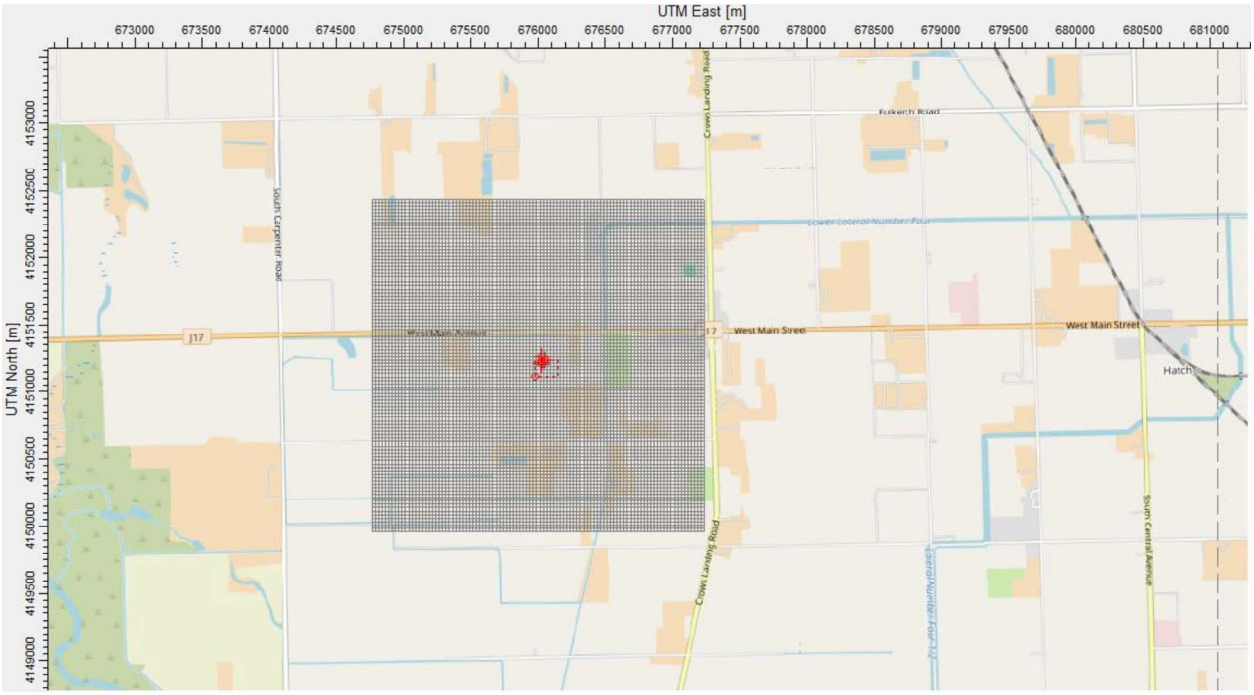
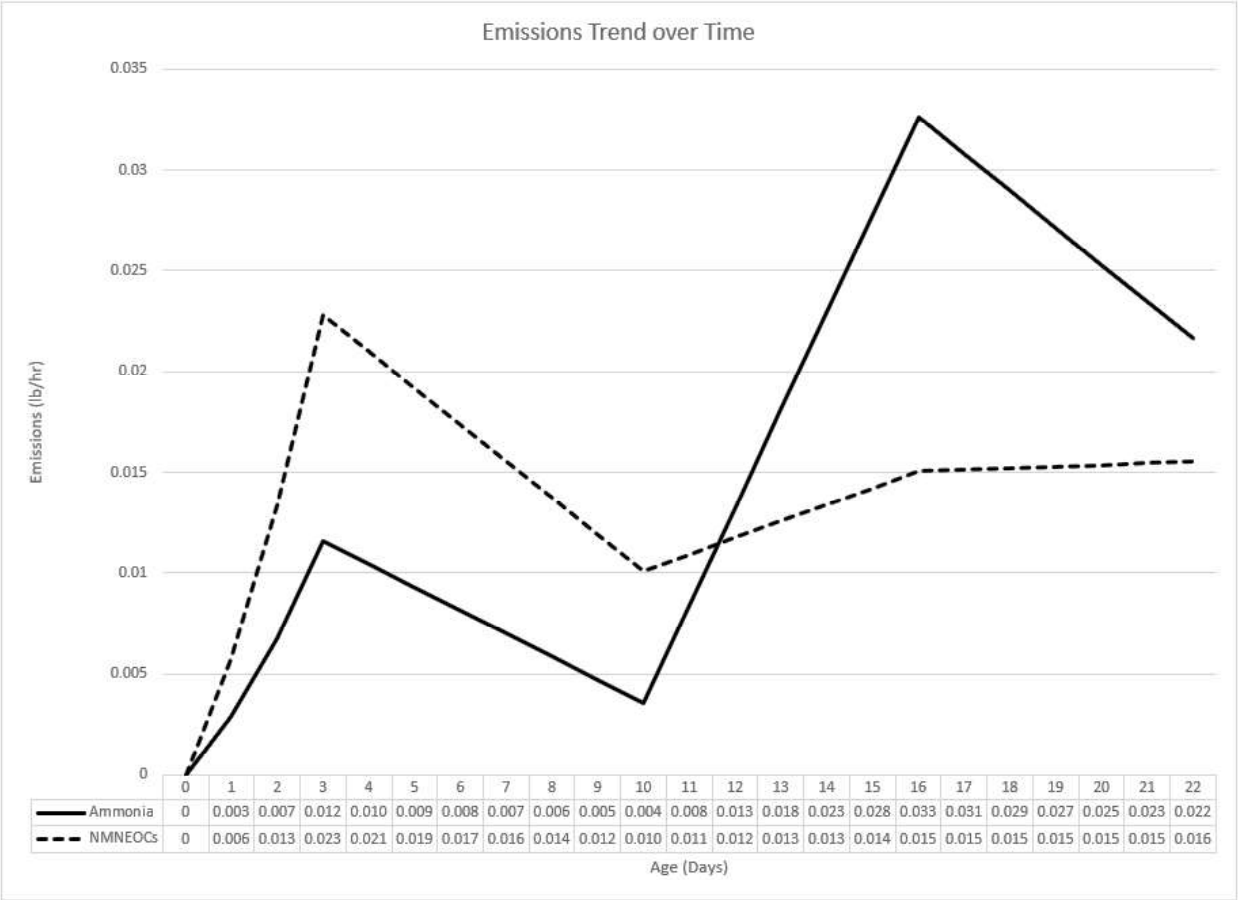


FIGURE 4-1
Ammonia & POC Emissions Trends



	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Ammonia	0	0.003	0.007	0.012	0.010	0.009	0.008	0.007	0.006	0.005	0.004	0.008	0.013	0.018	0.023	0.028	0.033	0.031	0.029	0.027	0.025	0.023	0.022
NMNEOCs	0	0.006	0.013	0.023	0.021	0.019	0.017	0.016	0.014	0.012	0.010	0.011	0.012	0.013	0.013	0.014	0.015	0.015	0.015	0.015	0.015	0.015	0.016

Notes:
POC limit is 6.4 lb/hr
Ammonia limit is 20 lb/hr

TABLE 4-7
EMISSION FACTOR RESULTS
ISOPROPANOL, NAPHTHALENE, ACETALDEHYDE

Age, days		Isopropanol, lb/hr		Naphthalene, lb/hr		Acetaldehyde, lb/hr
0		0		0		0
1	<	5.99E-05	DLL	1.08E-04	<	4.39E-05
2	<	1.40E-04	DLL	2.51E-04	<	1.03E-04
3	**<**	**2.40E-04**	**DLL**	**4.31E-04**	**<**	**1.76E-04**
4	<	2.07E-04	DLL	3.72E-04	<	1.52E-04
5	<	1.74E-04	DLL	3.13E-04	<	1.27E-04
6	<	1.41E-04	DLL	2.54E-04	<	1.03E-04
7	<	1.08E-04	DLL	1.95E-04	<	7.89E-05
8	<	7.46E-05	DLL	1.36E-04	<	5.47E-05
9	<	4.16E-05	DLL	7.72E-05	<	3.05E-05
10	**<**	**8.56E-06**	**<**	**1.83E-05**	**<**	**6.28E-06**
11	<	1.18E-05	<	2.52E-05	<	8.65E-06
12	<	1.50E-05	<	3.21E-05	<	1.10E-05
13	<	1.83E-05	<	3.90E-05	<	1.34E-05
14	<	2.15E-05	<	4.59E-05	<	1.58E-05
15	<	2.47E-05	<	5.28E-05	<	1.81E-05
16	**<**	**2.80E-05**	**<**	**5.97E-05**	**<**	**2.05E-05**
17	<	2.80E-05	<	5.97E-05	<	2.05E-05
18	<	2.80E-05	<	5.97E-05	<	2.05E-05
19	<	2.80E-05	<	5.97E-05	<	2.05E-05
20	<	2.80E-05	<	5.97E-05	<	2.05E-05
21	<	2.80E-05	<	5.97E-05	<	2.05E-05
22	<	2.80E-05	<	5.97E-05	<	2.05E-05
Active CASP						
lb/hr[1]	<	3.36E-05	<	1.22E-04	<	2.47E-05
lb/cycle	<	1.78E-02	<	6.43E-02	<	1.30E-02
lb/ton	<	4.64E-05	<	1.68E-04	<	3.40E-05
CASP Curing						
lb/hr[1]	<	1.04E-05	<	2.21E-05	<	7.61E-06
lb/cycle	<	9.97E-03	<	2.13E-02	<	7.31E-03
lb/ton	<	2.61E-05	<	5.56E-05	<	1.91E-05
Static Curing						
lb/hr[1]	<	3.10E-06	<	6.62E-06	<	2.28E-06
lb/cycle	<	2.98E-03	<	6.36E-03	<	2.18E-03
lb/ton	<	2.12E-05	<	4.51E-05	<	1.55E-05
Average Curing[2]						
lb/ton	<	2.20E-05	<	4.69E-05	<	1.61E-05
Total Emission Factor						
lb/ton	<	6.84E-05	<	2.15E-04	<	5.01E-05

1 Trends with data points below reporting limit was calculated using one-half of the reporting limit.
2 Emission Factor from curing zones were calculated as a weighted average based on number of zones.
"<" denotes that results were non-detects and reported at analytical reporting limit.
"DLL" denotes that one or more samples were non-detects. Results were calculated using ½ of the non-detected value.
Data in bold was test data from this mobilization and was used to generate the trends.

ATTACHMENT 2

Copy of Modeling Protocol

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

Memorandum

Date: 3/7/2025

To: Technical Services Department

From: Diana DeSouza, Senior AQS

Subject: District Health Risk Assessment Comments for CEQA Project (#1241415)

District Comments

The District reviewed the Health Risk Assessment (HRA) for the Project and has the following comments:

- The Project is expected to generate an additional 26 HHD truck trips per day to and from the project site for deliveries of feedstock and outgoing truckloads of finished compost. The diesel particulate matter (DPM) emissions from HHD truck trip travel should be included in the HRA.

  The project would generate a maximum of 8 truck trips per day travelling along Carpenter Road. . We have calculated the DPM emissions based on EMFAC 2014 for CY 2025 for T6 HD trucks. It is assumed 50% of the trucks will arrive from the West and 50% from the East, therefore, the emissions are split 50/50 between these two line segments.. See schematic showing the layout attached to the emissions tables.

- The trommel screen, grinder, active, curing, and finished compost storage piles are expected to generate air toxics from fugitive Particulate Matter (PM10) emissions. Fugitive air toxic emissions from the active, curing, and finished compost storage piles, trommel screen, and grinder should be included in the HRA.

  We have calculated fugitive dust emissions from the wood grinder, trommel screen and the loader. Dust emissions from the loader are related to transferring the material to and from the compost windrows.to the storage piles Note that the project will use aerated static piles, so no windrow turing is needed.

  We have relied on emission factors from AP42, Sacramento Metro AQMD and Oregon DEQ. Details are attached.

- The District was unable to verify the DPM emissions applied in the HRA from the two front end loaders, grinder, and trommel screen. The HRA memo should list all the process rates and emission factors used to estimate the Project's air toxic emissions in the HRA memo.

  Please see Tables 1-3 for calculation of DPM emissions.

- A point source with a stack height of about 13 meters was applied in the model to assess DPM emissions from the diesel powered trommel screen. Similar operation types are expected to have a stack height of 4 meters or lower. The stack height

applied in the model for the diesel powered trommel screen should be verified.

We have reduced the stack height to 14 ft

- Fraction time away from home (FAH) was applied in the risk assessment model. Due to the increased prevalence of teleworking and home schooling, adults and children may be home during the day. Unless proper justification is provided in the IS/MND, the District recommends FAH is unselected in the analysis.

It is not possible for staff to telecommute for this type of operation as staff need to be present on-site, therefore time away from home is a reasonable assumption.

Based on the deficiencies listed above, the District was unable to confirm the conclusions presented in the environmental document. Therefore, the District recommends the HRA be revised to ensure the analysis is representative and adequately reflects the Project's potential air quality impacts.

Comment of District Compost Speciation

The District compost speciation indicates the presence of arsenic, mercury, nickel, chromium and other heavy metals. The feedstock for the current project will not use treated lumber, painted urban demolition wood and other potentially hazardous materials. See attached lab analysis of the finished compost from another facility in Sacramento (Lopez Agricultural Services, Sacramento that composts greenwaste).This facility is required to conduct routine testing of the finished compost as part of their permit conditions. These tests show that many heavy metals are no detectible or are present in very small amounts.

Therefore, the toxics emissions profile for the current project would not contain these heavy metals or the amounts present would be significantly lower than those in the District's profile. Nevertheless, the revised emissions and risk calculations are based on the District's recommended toxics profile.

1

Sunland Analytical

11419 Sunrise Gold Circle, #10
Rancho Cordova, CA 95742
(916) 852-8557

Date Reported 12/06/2024
Date Submitted 12/03/2024

Lab analysis of finished Greenwaste compost at Lopez Agricultural Services, Sacramento

To: Alfred Lopez
Lopez Ag Service, Inc.
11499 Florin Rd.
Sacramento, CA 95830

From: Gene Oliphant, Ph.D. \ Ty Bui
General Manager \ Lab Manager

The reported analysis was requested for the following:
Location : ORGANIC COMPOST Site ID : BATCH W.
Thank you for your business.

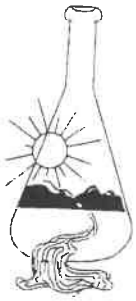
* For future reference to this analysis please use SUN # 93689-193717.

TOTAL NUTRIENT ANALYSIS FOR COMPOST

Physical Characteristics

pH	6.29	
Electrical Conductivity	4.54	mmho/cm
Total Disolved Salts	2905.60	ppm
Percent Moisture	22.89	% Sample analysis is based on dry weight
Bulk Density (Dry)	380	lb/cu.yd

Chemical Analysis	Analytical Results	Results in lb/ton (Dry)
Total-N	2.19 %	43.80
Ammonia-N	4.0 ppm	0.01
Phosphorus-P	0.14 %	2.80
Phosphorus-P2O5	0.32 %	6.41
Potassium-K	0.79 %	15.80
Potash-K2O	0.95 %	18.96
Sulfur-S	0.76 %	15.20
Magnesium	0.30 %	6.00
Calcium	1.24 %	24.80
Sodium	623.07 ppm	1.25
Copper-Cu	15.51 ppm	0.03
Iron-Fe	6135.09 ppm	12.27
Manganese-Mn	441.96 ppm	0.88
Zinc-Zn	84.57 ppm	0.17
% Organic Matter	54.1	
C/N Ratio	12.8	



Sunland Analytical

11419 Sunrise Gold Circle, #10
Rancho Cordova, CA 95742
(916) 852-8557

Date Reported 12/06/2024
Date Submitted 12/03/2024

To: Alfred Lopez
Lopez Ag Service, Inc.
11499 Florin Rd.
Sacramento, CA 95830

From: Gene Oliphant, Ph.D. \ Ty Bui
General Manager \ Lab Manager

The reported analysis was requested for the following location:
Location : ORGANIC COMPOST Site ID : BATCH W.
Thank you for your business.

* For future reference to this analysis please use SUN # 93689-193718.

PHYSICAL CONTIMINATION

Type of TEST	Result	Units
Moisture	22.89	%
Greater than 4mm	0.00	%
Contamination	0.00	%

ND = None Detected

Sunland Analytical

11419 Sunrise Gold Circle, #10
Rancho Cordova, CA 95742
(916) 852-8557

Date Reported 12/06/2024
Date Submitted 12/03/2024
Date Collected 12/03/2024

To: Alfred Lopez
Lopez Ag Service, Inc.
11499 Florin Rd.
Sacramento, CA 95830

From: Gene Oliphant, Ph.D. \ Ty Bui
General Manager \ Lab Manager

The reported analysis was requested for the following:
Location : ORGANIC COMPOST Site ID : BATCH W.
Your purchase order number is .
Thank you for your business.

* For future reference to this analysis please use SUN # 93690-193719.

ANALYSIS OF COMPOST FOR REGULATED METALS

Percent Moisture 22.9

* Sample analyzed as recieved and reported on a dry weight basis.

Regulated Limits ++		Values Determined +			Reporting Limits
41	Arsenic (As)	ND		*	1.1
39	Cadmium (Cd)	ND		*	4.
1200	Chromium (Cr)	ND		*	7.
1500	Copper (Cu)	13.8	mg/kg	******	6.
300	Lead (Pb)	6.0	mg/kg	******	4.
17	Mercury (Hg)	0.07	mg/kg	******	0.01
420	Nickel (Ni)	7.9	mg/kg	******	1.5
36	Selenium (Se)	ND		*	1.4
2800	Zinc (Zn)	62.7	mg/kg	******	2.

ND = value below detection limits

ND Below Limits | At Toxic Level

Element/Methods

Sb	As	Ba	Be	Cd	Cr	Cr-VI	Co	Cu	Digest.Method
7040	7060	7080	7090	7130	7190	7195	7200	7210	3050

Pb	Hg	Mo	Ni	Se	Ag	Tl	V	Zn
7420	7471	7480	7520	7740	7760	7840	7910	7950

Updated Emissions and Risk Data for West Main Composting Project

Attachments

Table 1
DPM Emissions Calculation
Wood Grinder Operating 2,000 Hours per Year

Emission Factor	Load	Engine Power		Annual Hours			DPM Emissions	
(g/KW-hr)	Factor	*(hp)*	*(kw)*			*(grams/hr)*	*(lb/hr)*	*(lb/yr)*
0.01	0.42	540	397	2,000		1.667	0.003673	9.18

CALCULATIONS

lbs/hr: EF (g/kw-hr) x Load Factor x Engine Power (kw)/454 grams per lb

lbs/yr: lbs/hr x annual hours

Emission factor based on CARB Executive Order: U-R-001-0547

RATED POWER CLASS	EMISSION STANDARD CATEGORY		EXHAUST (g/kw-hr)				
			NMHC	NOx	NMHC+NOx	CO	PM
130 ≤ kW ≤ 560	Tier 4 Final	STD	0.19	0.40	N/A	3.5	0.02
		FEL	N/A	N/A	--	N/A	0.01
		CERT	0.06	0.11	--	0.1	0.01

Table 2
DPM Emissions Calculation
Wood Screen Operating 2,000 hours per year

Emission Factor	Load	Engine Power		Annual Hours			DPM Emissions	
(g/kw-hr)	Factor	*(hp)*	*(kw)*			*(grams/hr)*	*(lb/hr)*	*(lb/yr)*
0.02	0.42	74	54.427	2,000		0.4571868	0.001007	2.52

CALCULATIONS

lbs/hr: EF (g/kw-hr) x Load Factor x Engine Power (hp)/454 grams per lb

lbs/yr: lbs/hr x annual hours

Emission factor based on CARB Executive Order: U-R-013-0553

RATED POWER CLASS	EMISSION STANDARD CATEGORY		EXHAUST (g/kW-hr)				
			NMHC	NOx	NMHC+NOx	CO	PM
37 ≤ kW < 56	Tier 4 Final	STD	N/A	N/A	4.7	5.0	0.03
		CERT	--	--	3.7	0.02	0.02

Table 3
DPM Calculation
Front End Loader Emissions Based on 2,000 Hours per year
Cummins 2023 Tier 4 Diesel Engine, 140 hp / 104 KW

CARB
Executive Order

U-R-002-0836	7/21/2022	7/21/2022	active	7/21/2022	2023	CUMMINS, INC.	PCEXL04.5AAH	75≤kW<130	121	173	4.5

xxHC - FEL	xxHC - CERT	NOx - STD	NOx - FEL	NOx - CERT	xxHC+NOx - STD	xxHC+NOx - FEL	xxHC+NOx - CERT	CO - STD	CO - CERT	PM - STD	PM - FEL	PM - CERT
	0.04		0.37	0.1					0.04			0.02

Emission Factor	Load	Engine Power		Annual Hours			DPM Emissions	
(g/kw-hr)	Factor	*(kw)*				*(grams/hr)*	*(lb/hr)*	*(lb/yr)*
0.02	0.37	104		2,000		0.7696	0.001695	4.24

150

CALCULATIONS

lbs/hr: EF(g/kw-hr) x Load Factor x Engine Power (kw) / 454 grams per pound

lbs/yr: lbs/hr x annual hours

Table 4
DPM Emissions from Truck Travel
Based on 8 Round Trips per Day, 6 Days/week, 52 Weeks/yr
Assume 50% of Trucks Arrive from the West and 50% from the East along Carpenter Road

EMFAC2014 (v1.0.7) Emission Rates
Region Type: Air District
Region: San Joaquin Valley Unified APCD
Calendar Year: 2025
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	CalYr	VehClass	MdlYr	Speed	Fuel	NOx_RUNE	NOx_IDLEX	PM10_RUNEX	PM10_IDLEX	PM10_PMTW	PM10_PMBW	PM2_5_RUNEX
San Joaqui	2025	T6 instate construction	Aggregated	Aggregate	DSL	1.36741	1.743435	0.003532774	0.00016042	0.012000003	0.130340037	0.003379948

Truck Travel Emissions	Annual VMT	EF (g/mile)	Emissions grams	Emissions lbs
DMP Emissions	1248.00	3.53E-03	4.41E+00	9.71E-03

Truck Idle Emissions				
			Min	Hrs
Assume 5 min Idle per truck x 2496 trips per year			24,960	416
EF		0.00016	grams/day/truck (day = 8hrs)	
		2.01E-05	grams/hr	
Annual Emissions = grams/hr x annual hrs			0.008342	grams/yr
* * * These Emissions are Negligible * * *				

Basis:		
Daily truck Trips	8	round trips/day
	16	one-way trips/day
	6	days/week
	52	weeks/yr
	4,992	trips/yr
Trip Length	0.25	mile
Annual VMT	1,248	VMT/yr

Table 5
Summary of Air Toxics Emissions from Composting Windrows

		EF	Emissions	
Pollutant		*lb/ton*	*lbs/hr*	*lbs/yr*
Ammonia		4.90E-01	3.27E+00	2.45E+04
Propylene		2.01E-04	1.34E-03	1.01E+01
Methanol		3.65E-05	2.43E-04	1.83E+00
Isopropanol		6.84E-05	4.56E-04	3.42E+00
Naphthalene		2.15E-04	1.43E-03	1.08E+01
Acetaldehyde		5.01E-05	3.34E-04	2.51E+00

NOTES				
EF from Napa Source Test Jan 6-7, 2021				
Throughput		160	tons/day	
		6.67	tons/hr	
		50,000	tons/yr	

Table 6
Fugitive Dust Emissions from Wood Grinding and Material Handling

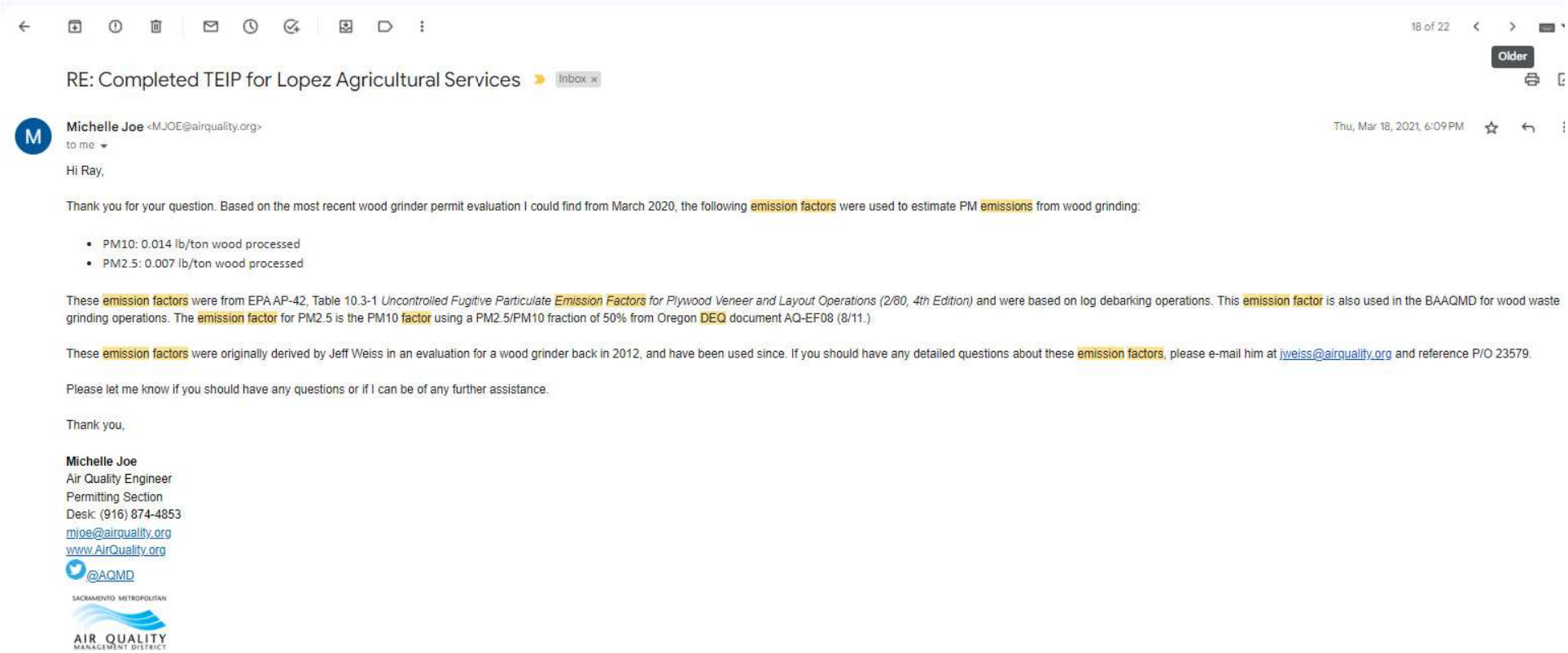
Equipment/Process		PM-10 lbs/hr	PM-10 lbs/day	PM-10 lbs/yr
	EF *(lb/ton)*			
Grinder	0.014			
Screen	0.0086			
Screen Cpnveyor	0.0011			
Loader	0.01			
Total	0.0337	0.5392	5.392	1,685

Basis				
Throughput	Hourly	16.00	*tons/hr*	[Assumes 10 hour work day]
	Daily	160	*tons/day*	
	Annual	50,000	*tons/yr*	
Emission Factors				
Grinder	From Sacramento Metro AQMD. See attached email			
Screen	From AP-42 Table 11.19.2-2			
Conveyor	From AP-42 Table 11.19.2-2			
Loader	From Oregon DEQ. See attached email and Efs recommended by the Oregon Department of Environmental Quality			

Table 7
Emissions of Air Toxics from Wood Grinder and Material Handling

Name	PM_{10} based Emissions from Operations generating Dust from Greenwaste Composting																		
Applicability	Use this spreadsheet when the emissions are from Green Waste Composting Operation PM_{10} sources and the PM_{10} rates are known (Green Waste Composting operations transfer points, loading, etc.). Entries required in yellow areas, output in gray areas.																		
Author or updater	Ray Kapahi		*Last Update*	March 5, 2025															
Facility:	West Main Composting																		
ID#:	PM10 Emissions from Table 6																		
Project #:																			
Inputs	lb/hr	lb/yr	**Formula**																
PM_{10} Rate	5.39E-01	1,685.0	Emissions are calculated by the multiplication of the PM_{10} Rates and Weight Fractions.																
Substances	**CAS#**	**Weight Fraction in Compost* lb/lb PM_{10}**	**LB/HR**	**LB/YR**															
Aluminum	**7429905**	1.30E-02	7.01E-03	2.19E+01															
Arsenic	**7440382**	6.20E-06	3.34E-06	1.04E-02															
Cadmium	**7440439**	2.00E-06	1.08E-06	3.37E-03															
Chromium	**7440473**	4.90E-05	2.64E-05	8.26E-02															
Cobalt	**7440484**	8.80E-06	4.74E-06	1.48E-02															
Copper	**7440508**	6.90E-05	3.72E-05	1.16E-01															
Hexavalent Chromium**	**18540299**	2.45E-06	1.32E-06	4.13E-03															
Lead	**7439921**	2.00E-04	1.08E-04	3.37E-01															
Manganese	**7439965**	4.40E-04	2.37E-04	7.41E-01															
Mercury	**7439976**	1.00E-06	5.39E-07	1.69E-03															
Nickel	**7440020**	9.50E-05	5.12E-05	1.60E-01															
Selenium	**7782492**	1.00E-06	5.39E-07	1.69E-03															
Zinc	**7440666**	1.70E-04	9.17E-05	2.86E-01															
References:																			
*Emission Factors are from Table 15, "Trace and Heavy Metals" (page 62) from the 2010 report, *Landfill-Based Anaerobic Digester-Compost Pilot Project at Yolo County Central Landfill.* The Maximum values from the Yolo Digester compost source test was used.																			
Pollutants required for toxic reporting. Current as of update date																			
**5% of Chromium considered Hexavalent Chromium (District Policy)																			


2 x 1/4 mile line
sources



18 of 22 Older

RE: Completed TEIP for Lopez Agricultural Services Inbox ×

Michelle Joe <MJOE@airquality.org> Thu, Mar 18, 2021, 6:09 PM
to me

Hi Ray,

Thank you for your question. Based on the most recent wood grinder permit evaluation I could find from March 2020, the following emission factors were used to estimate PM emissions from wood grinding:

- PM10: 0.014 lb/ton wood processed
- PM2.5: 0.007 lb/ton wood processed

These emission factors were from EPA AP-42, Table 10.3-1 *Uncontrolled Fugitive Particulate Emission Factors for Plywood Veneer and Layout Operations (2/80, 4th Edition)* and were based on log debarking operations. This emission factor is also used in the BAAQMD for wood waste grinding operations. The emission factor for PM2.5 is the PM10 factor using a PM2.5/PM10 fraction of 50% from Oregon DEQ document AQ-EF08 (8/11.)

These emission factors were originally derived by Jeff Weiss in an evaluation for a wood grinder back in 2012, and have been used since. If you should have any detailed questions about these emission factors, please e-mail him at jweiss@airquality.org and reference P/O 23579.

Please let me know if you should have any questions or if I can be of any further assistance.

Thank you,

Michelle Joe
Air Quality Engineer
Permitting Section
Desk: (916) 874-4853
mjoe@airquality.org
www.AirQuality.org
@AQMD
SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Wood products EFs

1 message

JACOBS Patty * DEQ <Patty.JACOBS@state.or.us> Thu, Mar 18, 2021 at 1:53 PM
To: "ray.kapahi@gmail.com" <ray.kapahi@gmail.com>

Hi Ray,

Per our earlier discussion, Oregon DEQ's published EFs for Wood Product sources, and the PM2.5 fraction are found here on our website:

https://www.oregon.gov/deq/FilterPermitsDocs/AQ-EF02.pdf

https://www.oregon.gov/deq/FilterPermitsDocs/AQ-EF03.pdf

Some of our Western Region Wood product permits have used these factors for chip/sawdust pile emissions.

TV 22-6002: https://www.deq.state.or.us/AQPermitsonline/22-6002-TV-01_P_2020.PDF

Truck Load-out of Chips & Sawdust	PM	0.02	Lbs/BDT
	PM_{10}	0.01	Lbs/BDT
	$PM_{2.5}$	0.005	Lbs/BDT
Residual Wood Chips	VOC	0.05	Lbs/BDT chips
	VOC	0.165	Lbs/BDT sawdust

TV 22-2525: https://www.deq.state.or.us/AQPermitsonline/22-2525-TV-01_P_2020.PDF

	$PM_{2.5}$	0.213	Lbs/BDT
RWP-Residual Wood Products	VOC	0.165	Lbs/BDT sawdust
	VOC	0.05	Lbs/BDT chips
	VOC	0.15	Lbs/BDT shavings
KILNS 1-9B-Dry Kilns	PM	0.02	Lbs/M bd ft
	PM_{10}	0.02	Lbs/M bd ft
	$PM_{2.5}$	0.02	Lbs/M bd ft
	VOC	0.7679	Lbs/M bd ft
TLD-Truck Load-Out (sawdust, shavings, chips, & bark dust)	PM	0.02	Lbs/ton
	PM_{10}	0.01	Lbs/ton
	$PM_{2.5}$	0.005	Lbs/ton
PELLET--Dehydrator	PM	1.25	Lbs/BDT furnish

Also, NCASI tech bulletins have a lot of info, but we (DEQ) do not have access to them. If you can find a member, they might have some of the EF tables that they can share? https://www.ncasi.org/

Start with these, and if I can think of any other sources of info, or you find any, let's share. Thanks, Patty

Patty Jacobs, P.E.

Environmental Engineer 3

Oregon DEQ – NWR AQ

700 NE Multnomah St., Suite 600

Portland, OR 97232-4100

503-229-5425

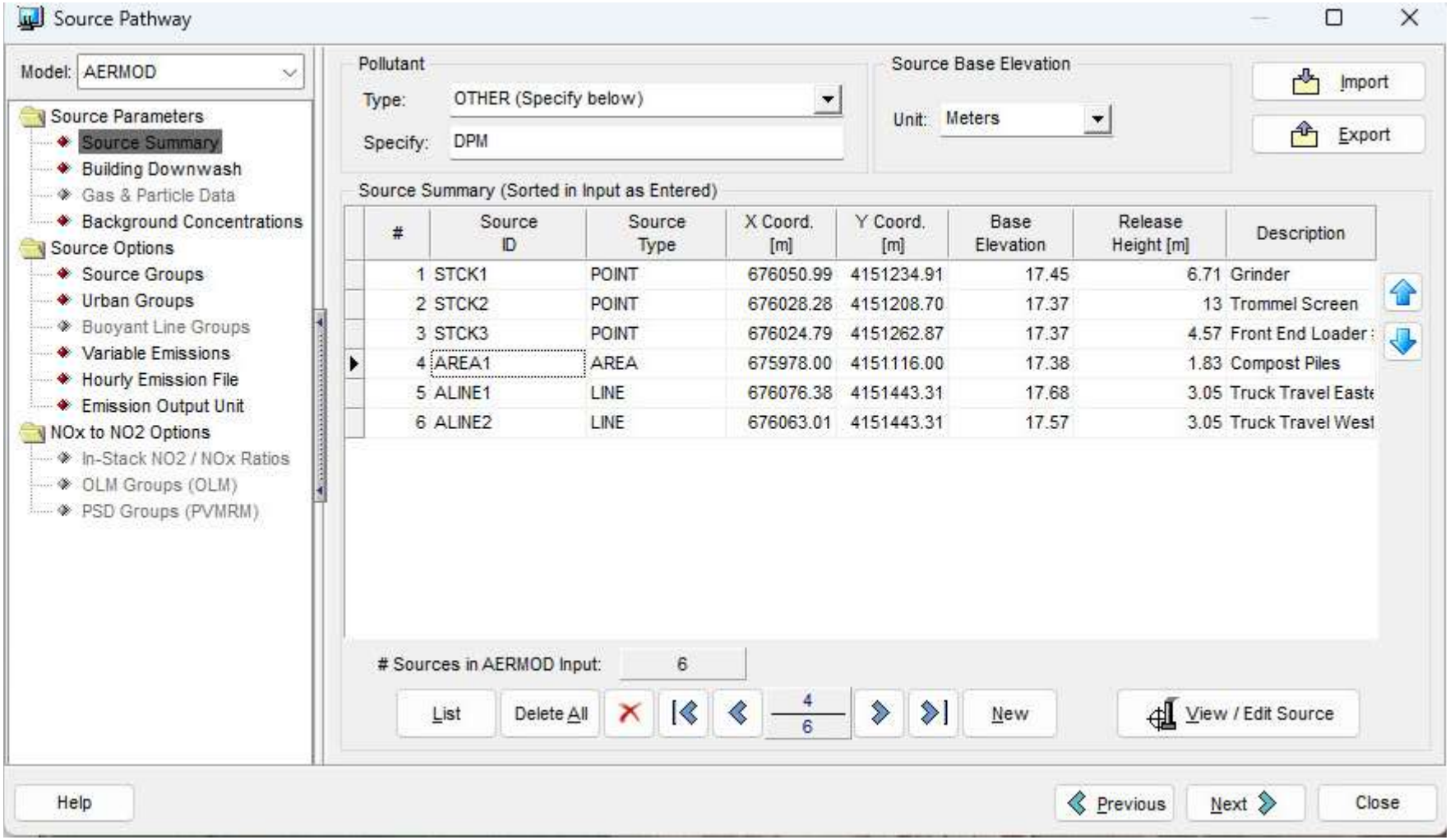
Jacobs.patty@deq.state.or.us

503-229-6945 (fax)

Emission Inventory

Add Import Export Delete All Options Filter: All All

	SrcID	StkID	ProID	PolID	PolAbbrev	Multiplier	Annual Ems (lbs/yr)	Max Hr Ems (lbs/hr)	MWAF
	STCK1	0	0	9901	DieselExhPM	1	9.18	0.1	1
	STCK2	0	0	9901	DieselExhPM	1	2.52	0.1	1
	STCK3	0	0	9901	DieselExhPM	1	4.24	0.01	1
	AREA1	0	0	7664417	NH3	1	24500	3.27	1
	AREA1	0	0	115071	Propylene	1	10.1	0.00134	1
	AREA1	0	0	67561	Methanol	1	1.83	0.000243	1
	AREA1	0	0	67630	Isopropyl Alcoh	1	3.42	0.000456	1
	AREA1	0	0	91203	Naphthalene	1	10.8	0.00143	1
	AREA1	0	0	75070	Acetaldehyde	1	2.51	0.000334	1
	ALINE1	0	0	9901	DieselExhPM	1	0.0048	0.01	1
▶	ALINE2	0	0	9901	DieselExhPM	1	0.0048	0.01	1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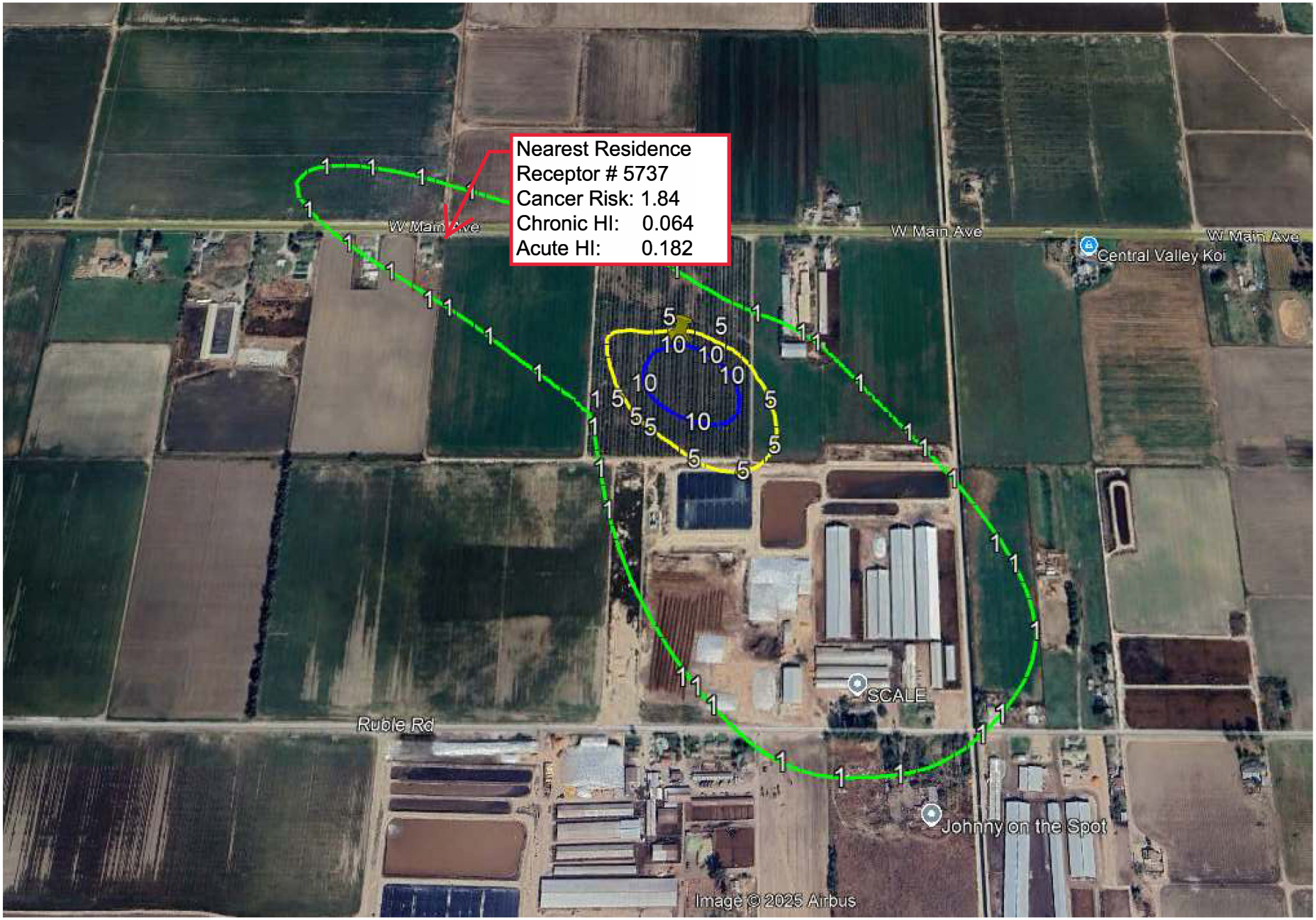
Model: AERMOD
Source Parameters
Source Summary
Building Downwash
Gas & Particle Data
Background Concentrations
Source Options
Source Groups
Urban Groups
Buoyant Line Groups
Variable Emissions
Hourly Emission File
Emission Output Unit
NOx to NO2 Options
In-Stack NO2 / NOx Ratios
OLM Groups (OLM)
PSD Groups (PVMRM)
Pollutant
Type: OTHER (Specify below)
Specify: DPM
Source Base Elevation
Unit: Meters
Import
Export
Source Summary (Sorted in Input as Entered)
Source ID Source Type X Coord. [m] Y Coord. [m] Base Elevation Release Height [m] Description
1 STCK1 POINT 676050.99 4151234.91 17.45 6.71 Grinder
2 STCK2 POINT 676028.28 4151208.70 17.37 13 Trommel Screen
3 STCK3 POINT 676024.79 4151262.87 17.37 4.57 Front End Loader
4 AREA1 AREA 675978.00 4151116.00 17.38 1.83 Compost Piles
5 ALINE1 LINE 676076.38 4151443.31 17.68 3.05 Truck Travel East
6 ALINE2 LINE 676063.01 4151443.31 17.57 3.05 Truck Travel West
Sources in AERMOD Input: 6
List
Delete All
4
6
New
View / Edit Source
Help
Previous
Next
Close


Nearest Residence
Receptor # 5737
Cancer Risk: 1.84
Chronic HI: 0.064
Acute HI: 0.182
W Main Ave
W Main Ave
W Main Ave
Central Valley Koi
SCALE
Ruble Rd
Johnny on the Spot
Image © 2025 Airbus

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10th Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

Stanislaus County

Planning and Community Development

Mitigation Monitoring and Reporting Program

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, January 1, 2020

December 20, 2024

1. Project title and location:	Use Permit Application No. PLN2021-0012 – West Main Compost 1236 West Main Street, between S Carpenter Road and Crows Landing Road, in the Turlock area. (APN:058-003-006).
2. Project Applicant name and address:	Machado and Sons, Inc. 1000 South Kilroy Road Turlock, CA 95380
3. Person Responsible for Implementing Mitigation Program (Applicant):	Manual Machado, Facility Operator/ Property Owner
4. Contact person at County:	Teresa McDonald, Associate Planner, (209) 525-6330

MITIGATION MEASURES AND MONITORING PROGRAM:

List all Mitigation Measures by topic as identified in the Mitigated Negative Declaration and complete the form for each measure.

III. AIR QUALITY / IX. HAZARDS AND HAZARDOUS MATERIALS

No.1 Mitigation Measure: The facility operator shall implement the dust, odor, vector, and litter control measures as described in the Nuisance Control Plan (NCP). If nuisances persist despite implementation of the NCP, the operator shall work with the Stanislaus County Department of Planning and Community Development (the Department) to revise the NCP within 30 days of being notified by the Department, and shall implement additional measures as deemed necessary by the Department, which may include, but not be limited to the following:

- Ceasing operations when VDE exceed 20 percent opacity
- Paving of drive aisles
- Increasing frequency of water truck application
- Application of chemical/organic dust suppressants
- Installation of rumble strips or other improvements to prevent track-out onto the County right-of-way
- Processing all incoming compostable feedstock materials into active aerated static pile (ASP) compost piles within 24 hours
- Refusing new material
- Altering moisture management operations

- Decreasing pile sizes
- Aeration of the stormwater retention basin
- Use of microbial inoculants or lime on pad surfaces and water collection systems
- Covering the entire ASP system with a one-inch biofilter consisting of a layer of unscreened compost
- Best management practices (BMPs) to address insect, bird, rodent and other animal vectors will be implemented as needed
- Additional screening and contaminant removal of material conducted off-site
- Not contract with any agencies that accept non-organic materials (including biodegradable plastics and plastic-coated cardboard) that do not break down at the same rate as the other organic materials in the compost pile
- Installation of additional fencing
- Utilization of vacuum trucks

Who Implements the Measure:	Facility Operator
When should the measure be implemented:	Ongoing
When should it be completed:	Ongoing
Who verifies compliance:	Stanislaus County Department of Planning and Community Development
Other Responsible Agencies:	San Joaquin Valley Air Pollution Control District, CalRecycle, Department of Environmental Resources

No.2 Mitigation Measure: Should the Stanislaus County Department of Planning and Community Development (the Department) determine that analysis associated with nuisance mitigation requires review by a qualified consultant, the contract shall be procured by the Department, and paid for by the operator/property owner. A deposit based on estimated cost of the work to be performed by the consultant and staff time and materials cost shall be made with the Department, by the operator/property owner, prior to any work being conducted. Staff costs and expenses will be billed at fully burdened weighted labor rates as provided by the County's Auditor's Office at the time services are rendered.

Who Implements the Measure:	Facility Operator
When should the measure be implemented:	At the request of the Stanislaus County Department of Planning and Community Development

When should it be completed:	Ongoing
Who verifies compliance:	Stanislaus County Department of Planning and Community Development
Other Responsible Agencies:	N/A

I, the undersigned, do hereby certify that I understand and agree to be responsible for implementing the Mitigation Program for the above listed project.

Signature on File	**December 18, 2024**
Signature	Date

Stanislaus County

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

MITIGATED NEGATIVE DECLARATION

NAME OF PROJECT: Use Permit Application No. PLN2021-0012 – West Main Compost

LOCATION OF PROJECT: 1236 West Main Street, between S Carpenter Road and Crows Landing Road, in the Turlock area.

PROJECT DEVELOPER: Manual Machado, Machado and Sons Construction, Inc.

DESCRIPTION OF PROJECT: Request to operate a composting facility on 23.5± acres of a 47.82± acre parcel in the General Agriculture (A-2) zoning district.

Based upon the Initial Study, dated December 20, 2024 (amended on **March 20, 2025**), the Environmental Coordinator finds as follows:

1. This project does not have the potential to degrade the quality of the environment, nor to curtail the diversity of the environment.

2. This project will not have a detrimental effect upon either short-term or long-term environmental goals.

3. This project will not have impacts which are individually limited but cumulatively considerable.

4. This project will not have environmental impacts which will cause substantial adverse effects upon human beings, either directly or indirectly.

The aforementioned findings are contingent upon the following mitigation measures (if indicated) which shall be incorporated into this project:

1. The facility operator shall implement the dust, odor, vector, and litter control measures as described in the Nuisance Control Plan (NCP). If nuisances persist despite implementation of the NCP, the operator shall work with the Stanislaus County Department of Planning and Community Development (the Department) to revise the NCP within 30 days of being notified by the Department, and shall implement additional measures as deemed necessary by the Department, which may include, but not be limited to the following:

    - Ceasing operations when VDE exceed 20 percent opacity
    - Paving of drive aisles
    - Increasing frequency of water truck application
    - Application of chemical/organic dust suppressants
    - Installation of rumble strips or other improvements to prevent track-out onto the County right-of-way
    - Processing all incoming compostable feedstock materials into active aerated static pile (ASP) compost piles within 24 hours
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- Decreasing pile sizes
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- Covering the entire ASP system with a one-inch biofilter consisting of a layer of unscreened compost
- Best management practices (BMPs) to address insect, bird, rodent and other animal vectors will be implemented as needed
- Additional screening and contaminant removal of material conducted off-site
- Not contract with any agencies that accept non-organic materials (including biodegradable plastics and plastic-coated cardboard) that do not break down at the same rate as the other organic materials in the compost pile
- Installation of additional fencing
- Utilization of vacuum trucks

2. Should the Stanislaus County Department of Planning and Community Development (the Department) determine that analysis associated with nuisance mitigation requires review by a qualified consultant, the contract shall be procured by the Department, and paid for by the operator/property owner. A deposit based on the estimated cost of the work to be performed by the consultant and staff time and materials cost shall be made with the Department, by the operator/property owner, prior to any work being conducted. Staff costs and expenses will be billed at fully burdened weighted labor rates as provided by the County's Auditor's Office at the time services are rendered.

The Amended Initial Study and other environmental documents are available for public review at the Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, California.

Initial Study prepared by: Teresa McDonald, Associate Planner

Submit comments to: Stanislaus County
Planning and Community Development Department
1010 10th Street, Suite 3400
Modesto, California 95354

SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS

PROJECT: USE PERMIT APPLICATION NO. PLN2021-0012 - WEST MAIN COMPOST

REFERRED TO:				RESPONDED		RESPONSE			MITIGATION MEASURES		CONDITIONS	
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
CA DEPT OF FISH & WILDLIFE	X	X	X		X							
CA DEPT OF CONSERVATION	X	X	X		X							
CA OPR STATE CLEARINGHOUSE	X	X	X		X							
CA RWQCB CENTRAL VALLEY REGION	X	X	X	X				X		X	X	
COOPERATIVE EXTENSION	X	X	X		X							
FIRE PROTECTION DIST: MOUNTAIN VIEW	X	X	X	X				X		X	X	
GSA: WEST TURLOCK SUBBASIN	X	X	X		X							
IRRIGATION DISTRICT: TURLOCK	X	X	X	X				X		X	X	
MOSQUITO DISTRICT: TURLOCK	X	X	X		X							
STAN COUNTY EMERGENCY MEDICAL SERVICES	X	X	X		X							
PACIFIC GAS & ELECTRIC	X	X	X		X							
SAN JOAQUIN VALLEY APCD	X		X	X		X				X	X	
SCHOOL DISTRICT 1: CHATOM UNION	X	X	X		X							
SCHOOL DISTRICT 2: TURLOCK UNIFIED	X	X	X		X							
STAN CO AG COMMISSIONER	X	X	X		X							
STAN CO BUILDING PERMITS DIVISION	X	X	X		X							
STAN CO CEO	X	X	X		X							
STAN CO DER	X	X	X	X				X		X	X	
STAN CO HAZARDOUS MATERIALS	X	X	X	X				X		X	X	
STAN CO PUBLIC WORKS	X	X	X	X				X		X	X	
STAN CO SHERIFF	X	X	X		X							
STAN CO SUPERVISOR DIST 2: CHIESA	X	X	X		X							
STAN COUNTY COUNSEL	X	X	X		X							
STANISLAUS FIRE PREVENTION BUREAU	X	X	X		X							
STANISLAUS LAFCO	X	X	X		X							
STATE OF CA SWRCB – DIV OF DRINKING WATER DIST. 10	X	X	X		X							
SURROUNDING LAND OWNERS		X	X	X				X		X		X
TELEPHONE COMPANY: AT&T	X	X	X		X							
US FISH & WILDLIFE	X	X	X		X							
CALRECYCLE	X	X	X	X						X	X	
DISPOSAL AGENCY: BERTOLOTTI; TURLOCK SCAVENGER		X	X		X							

COUNTY OF STANISLAUS CAMPAIGN CONTRIBUTION DISCLOSURE FORM
PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

Application Number: PL N0 21-0012
Application Title: West Main Compost
Application Address: 1236 W. Main Crows Landing, CA 95313
Application APN: 058-003 -006

Was a campaign contribution, regardless of the dollar amount, made to any member of a decision-making body involved in making a determination regarding the above application (i.e. Stanislaus County Board of Supervisors, Planning Commission, Airport Land Use Commission, or Building Code Appeals Board), hereinafter referred to as Member, during the 12-month period preceding the filing of the application, by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist?

Yes ☐ No ☒

If no, please sign and date below.

If yes, please provide the following information:

Applicant's Name: _____

Contributor or Contributor Firm's Name: _____

Contributor or Contributor Firm's Address: _____

Is the Contributor:

The Applicant	Yes ☐ No ☐
The Property Owner	Yes ☐ No ☐
The Subcontractor	Yes ☐ No ☐
The Applicant's Agent/ Lobbyist	Yes ☐ No ☒

Note: Under California law as implemented by the Fair Political Practices Commission, campaign contributions made by the Applicant and the Applicant's agent/lobbyist who is representing the Applicant in this application or solicitation must be aggregated together to determine the total campaign contribution made by the Applicant.

Identify the Member(s) to whom you, the property owner, your subcontractors, and/or agent/lobbyist made campaign contributions during the 12-month period preceding the filing of the application, the name of the contributor, the dates of contribution(s) and dollar amount of the contribution. Each date must include the exact month, day, and year of the contribution.

Name of Member: _____

Name of Contributor: _____

Date(s) of Contribution(s): _____

Amount(s): _____

(Please add an additional sheet(s) to identify additional Member(s) to whom you, the property owner, your subconsultants, and/or agent/lobbyist made campaign contributions)

By signing below, I certify that the statements made herein are true and correct. I also agree to disclose to the County any future contributions made to Member(s) by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist after the date of signing this disclosure form, and within 12 months following the approval, renewal, or extension of the requested license, permit, or entitlement to use.

3/26/25
Date

[redacted] Digitally signed by Manuel Machado Date: 2025.03.26 09:33:30 -07'00'
Signature of Applicant

Machado and Sons Construction Inc
Print Firm Name if applicable

Manuel Machado
Print Name of Applicant

EXHIBIT I

COUNTY OF STANISLAUS CAMPAIGN CONTRIBUTION DISCLOSURE FORM
PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

Application Number: PLN2021-0012

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Yes ☐ No ☒

If no, please sign and date below.

If yes, please provide the following information:

Applicant's Name: _____

Contributor or Contributor Firm's Name: _____

Contributor or Contributor Firm's Address: _____

Is the Contributor:

The Applicant	Yes ☐ No ☐
The Property Owner	Yes ☐ No ☐
The Subcontractor	Yes ☐ No ☐
The Applicant's Agent/ Lobbyist	Yes ☐ No ☒

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Name of Member: _____

Name of Contributor: _____

Date(s) of Contribution(s): _____

Amount(s): _____

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3/26/25

Date

[redacted]

Signature of Applicant

Machado and Sons Construction Inc

Print Firm Name if applicable

Sean Kilgrow

Print Name of Applicant