Appendix C – Updated Tables and Figures

This appendix contains:

- Table 2-1 – Changed to show updated mitigation measures and to correct formatting error.
- Table 3-1 – Changed to update discussion of project consistency with County General Plan policies.
- Figure 3-2 – Changed to show location of existing flood storage area.
- Figure 15-2 – Replaced to correct formatting error.

Updated Table 2-1 Summary of Significant Impacts and Mitigation Measures

Summary of Impacts and Mitigation	Significance
Impact AES-1: The project would not have a substantial adverse effect on a scenic vista. Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Impact AES-2: The project could degrade existing visual character or quality. Mitigation: ***MM-AES-2: Litter Control*** *Z-Best shall augment its existing litter management activities to ensure that no increase in litter attributable to the increase in composting operations under the proposed project would be visible from SR-25.* *A. On-Site Litter Management Plan: Prior to the County LEA's approval of a revised Solid Waste Facilities Permit, the Applicant shall submit an updated on-site litter management plan for the LEA's review and approval that describes how project-generated litter will be managed to avoid visual impact. The plan shall include, but not be limited to, the following measures:* *1) Procedures for minimizing the generation of litter from on-site activities such as unloading/loading and screening.* *2) Regular inspections of the project site to identify and clean up any litter that may be generated by on-site operations.* *3) Increased frequency of current clean-up activities, such as trash removal from the litter fence and on-site street-sweeping to the extent needed to prevent any increase in the visibility from SR-25 of litter along the project frontage.* *4) The County LEA shall continue to conduct regular monitoring of Z-Best on-site litter management activities to ensure the updated on-site litter management plan is implemented.*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
B. *Off-Site Spillage and Litter Management Plan: The modified Use Permit conditions shall require the Applicant to comply with an off-site spillage and litter management plan. The Applicant shall submit a proposed spillage and litter management plan to the County Planning Department for review and approval. The plan shall include, but not be limited to, the following measures:* 1) *Procedures and penalties to discourage haul trucks arriving on site or transporting ~~non-compostable~~ materials from the facility from failing to properly secure their loads to minimize potential for generation of litter or material spillage in-transit to or from the facility. Note that State law requires vehicle contents to be covered so that nothing can spill or otherwise escape from the vehicle (Vehicle Code §§ 23114, 23115).* 2) *Regular inspections of the SR-25 right-of-way adjacent to the project site and extending at least a half-mile in either direction of the facility to identify and clean up any litter or spilled materials that may be generated by trucks hauling materials to or from the site.* 3) *Increased frequency of clean-up activities, such as trash removal from the project site frontage and street-sweeping within the Caltrans right-of-way to the extent needed to prevent any increase in litter or spilled materials along the project frontage.* 4) *Records of inspections and enforcement activities shall be maintained by the Applicant and submitted to the County Planning Department annually, or more frequently on request.*	
Impact AES-3: The Project would not introduce new sources of substantial light or glare that would adversely affect daytime or night-time views. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact AFR-1: The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Impact AFR-2: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Impact AFR-3: The project would not involve other changes in the existing environment which could result in conversion of Farmland to non-agricultural use. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact AIR-1: The project could generate potentially significant fugitive dust (PM_{10} and $PM_{2.5}$) emissions during construction	Before Mitigation: PS

Summary of Impacts and Mitigation	Significance
Mitigation: ***MM-AIR-1: Fugitive Dust Minimization Measures*** *Prior to issuance of a grading permit, the project Applicant shall ensure that the following measures are included on all construction documents. Additionally, these measures shall be implemented during construction:* • *All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.* • *All haul trucks transporting soil, sand, or other loose material off-site shall be covered.* • *All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.* • *All vehicle speeds on unpaved roads shall be limited to 15 mph.* • *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.* • *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.* • *All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.* • *Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.*	After Mitigation: LTSM
Impact AIR-2: Operational traffic would result in NO_X emissions in excess of applicable thresholds Mitigation: ***MM-AIR-2: Vehicle Idling Limits*** *The Applicant shall require that the engines of on-road trucks operating within the project site be shut off while queuing for loading and unloading for time periods longer than two minutes. This requirement shall be incorporated by the project Applicant into contract specifications for all operators of MSW, finished material, and waste haul trucks and the Applicant shall ensure that all contractors comply with this contractual requirement. The Applicant shall ensure appropriate signage and training for onsite workers is provided to support effective implementation of this limit.* No other feasible mitigation identified.	Before Mitigation: PS After Mitigation: S&U
Impact AIR-3: Operational vehicle trips would not expose sensitive receptors to substantial concentrations of carbon monoxide Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact AIR-4: Operational vehicle trips would not expose sensitive receptors to substantial concentrations of Toxic Air Contaminants. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A

Summary of Impacts and Mitigation	Significance
Impact AIR-5: Project site operations would not expose sensitive receptors to substantial concentrations of Toxic Air Contaminants. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact AIR-6: The project would not result in increased odor emissions affecting a substantial number of people. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact AIR-7: The project could result in increased bioaerosol emissions affecting a substantial number of people. Mitigation: ***MM-AIR-7a: Dust Monitoring*** *Prior to issuance of an operating permit, the project Applicant shall retain a qualified industrial hygienist to design and conduct a fence line dust monitoring program (as a proxy for the monitoring of bioaerosols) to establish baseline conditions at the site under normal (existing) operating conditions and under a range of meteorological conditions. Following installation of the new composting equipment and when the project is fully operational and at maximum composting volume, the industrial hygienist shall perform a second round of dust monitoring during typical project operations (and under a similar range of meteorological conditions to baseline monitoring) to determine if the new technology causes an increase in fugitive dust emissions (which may also indicate an increase in bioaerosol emissions). The monitoring plan shall be submitted to the County Planning Department for review and approval prior to implementation, and results shall be reported to the County Planning Department. If dust emissions under full project conditions are equal to or less than the baseline conditions, then no further monitoring is required. If dust emissions under full project conditions are greater than baseline conditions, then additional dust control measures or other operational practices shall be implemented to reduce dust and bioaerosol concentrations to the extent feasible, and additional monitoring, designed and undertaken by a qualified industrial hygienist, and reviewed and approved by County Planning Department, shall be undertaken to verify the effectiveness of the controls and to determine whether further control measures are warranted.* ***MM-AIR-7b: Equipment Maintenance and Biofilter Replacement*** *To prevent the growth of bacteria and fungi within the biofilter matrix, the matrix shall be maintained and properly replaced in accordance with manufacturer's specifications. All equipment within the ECS system, including monitoring that the proposed ECS system is attaining the appropriate pathogen reduction temperatures within the anticipated timeframe (i.e., 48 hours), and within multiple locations throughout each bunker, shall be checked by a qualified technician and determined to be running in proper condition prior to daily operation. Composted materials shall not be removed from the primary CASP bunkers until all temperature probes have reached a temperature of at least 55 degrees Celsius. Records of required daily monitoring and maintenance shall be retained by the Applicant and provided to the County Planning Department annually, or more frequently upon request.*	Before Mitigation: PS After Mitigation: S&U
Impact AIR-8: The project would be inconsistent with the Clean Air Plan due to NOx emissions from operational truck trips. Mitigation: **MM-AIR-2**: **Vehicle Idling Limits** (see Impact AIR-2 above for details of mitigation). No other feasible mitigation identified.	Before Mitigation: PS After Mitigation: S&U

Summary of Impacts and Mitigation	Significance
Impact BIO-1: The project could result in loss or disturbance of special-status wildlife species (California red-legged frog). Mitigation: ***MM-BIO-1: California Red Legged Frog Avoidance and Minimization Measure*** *A. Prior to issuance of a grading permit, the Applicant shall consult with the U.S. Fish and Wildlife Service (USFWS) to determine if potential project impacts to California red-legged frog require authorization from USFWS. If such authorization is required, the Applicant shall obtain a Biological Opinion and take permit from USFWS and implement all avoidance, minimization, and/or compensatory mitigation measures required by the Biological Opinion and take permit. At a minimum, whether or not a Biological Opinion or take permit is required, the Applicant shall implement all of the following avoidance and minimization measures to reduce potential impacts to California red-legged frog:* • *A qualified consulting biologist shall conduct preconstruction surveys following the guidance documented in the Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (USFWS 2005) no more than two weeks (14 days) prior to the start of construction activities. All areas of disturbance from the project, including Area 1, the existing Detention Basin #1, the flood storage expansion area in Area 2, and the access road and SR-25 impact areas shall be surveyed for potential migratory and/or upland activity.* • *A qualified biologist shall be on site during all activities within 200 feet from the outer edge of potential habitat areas that may result in take of the California red-legged frog, including any drainage ditches within Area 1 of the compost facility and within the impact areas along SR-25.* • *All ground-disturbing work within 200 feet from the outer edge of potential habitat (any drainage ditches within Area 1 of the compost facility and within the impact areas along SR-25) shall be avoided between November 1 and March 31, the time period when California red-legged frogs are most likely to be moving through upland areas. No construction activities shall occur within 200 feet from the outer edge of potential habitat (any drainage ditches within Area 1 of the compost facility and within the impact areas along SR-25) during rain events or within 24-hours following a rain event.* • *To minimize harassment, injury, death, and harm in the form of temporary habitat disturbances, all project-related vehicle traffic shall be restricted to established roads, construction areas, equipment staging, storage, parking, and stockpile areas.* • *If a California red-legged frog is encountered, all activities which have the potential to result in the harassment, injury, or death of the individual shall be immediately halted. A qualified biologist shall then assess the situation and select a course of action that shall avoid or minimize adverse effects to the animal.* • *Uneaten human food and trash attracts crows, ravens, coyotes, and other predators of the California red-legged frog. A litter control program shall be instituted at each construction site. All construction workers and operational staff shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash are deposited in covered or closed trash containers. The trash containers shall be removed from the site at the end of each working day.*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
• *Loss of soil from run-off or erosion shall be prevented with straw bales, straw wattles, or similar means provided they do not have the potential to entangle or block escape or dispersal routes of the California red-legged frog.* • *No insecticides or herbicides listed by the Environmental Protection Agency as potentially harmful to California red-legged frog shall be used within 60 feet of aquatic habitat, such as drainage ditches, wetlands, or ponds within the compost facility or within the impact areas along SR-25 during construction or project operation.* • *No pets shall be permitted at the construction site, to avoid and minimize the potential for harassment, injury, and death of the California red-legged frog.* • *For on-site storage of pipes, conduits, and other materials that could provide shelter for special-status species, an open-top trailer shall be used to elevate the materials above ground to reduce the potential for animals to climb into the conduits and other materials.* • *No night-time grading or construction shall occur between dusk and dawn, which is when the California red-legged frog is most actively moving and foraging.* • *No plastic monofilament netting (erosion control matting), loosely woven netting, or similar material in any form shall be used at the project site because California red-legged frogs can become entangled and trapped in them. Materials utilizing fixed weaves (i.e., strands cannot move), polypropylene, polymer, or other synthetic materials shall not be used. Acceptable substitutes would include coconut coir matting or tackifying hydroseeding compounds.* • *To prevent inadvertent entrapment of California red-legged frog during construction, all excavated, steep-walled holes or trenches more than 1 foot deep will be covered with plywood or similar materials at the close of each working day, or will be equipped with one or more escape ramps constructed of earth fill or wooden planks.* • *Before the start of work each day, the qualified biologist shall check for animals under any equipment such as vehicles and stored pipes within active construction zones. The qualified biologist shall also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If a California red-legged frog is observed within an active construction zone, all work within 100 feet of the individual shall be halted and all equipment turned off until the individual frog has left the construction area.* B. *Prior to any grading or construction activity at the project site, a qualified biologist shall conduct a training session for all construction personnel involved in ground-disturbing activities throughout the duration of construction. All new construction personnel shall also undergo this mandatory environmental awareness training. This training shall be documented in training records and the Applicant shall submit evidence of completion of this training to the County Planning Department prior to any ground-disturbing activities. The training shall include the following, at a minimum:* • *Description of the California red-legged frog and their habitat;* • *General measures that shall be implemented to conserve species as they relate to the project;* • *Boundaries within which construction activities will occur; and* • *Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session.*	

Summary of Impacts and Mitigation	Significance
Impact BIO-2: The project could result in loss or disturbance of special-status wildlife species (nesting raptors and migratory birds) Mitigation: ***MM-BIO-2: Nesting Bird Avoidance and Minimization Measures*** *Any tree removal, pruning, grading, grubbing, or demolition within the compost facility or within the access road and SR-25 impact areas shall be conducted outside of the bird nesting season (January 15 through September 15) to the maximum extent feasible ~~and with express prior approval from the County Planning Department~~. If these types of activities, or noise resulting from construction activities, will occur~~s~~ during the bird nesting season, then prior written approval from the County Planning Department shall be obtained, and a qualified biologist shall conduct pre-construction surveys for nesting birds to ensure that no active nests would be disturbed during project activities.* *If project-related work is scheduled during the nesting season (January 15 through September 15), or if construction activities are suspended for at least 15 days and recommence during the nesting season, a qualified biologist shall conduct additional nesting bird surveys before any construction activities recommence. Two surveys for active nests of such birds shall occur within 15 days prior to the start of construction, with the second survey conducted within 48 hours prior to the start of construction. Appropriate minimum survey radii surrounding each work area are 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys shall be conducted at the appropriate times of day, as determined by the qualified biologist, to observe nesting activities when birds are most active. Off-site locations where access is not available may be surveyed from within the site or from public areas. A report documenting survey results and plan for active bird nest avoidance (if active nests are found) shall be completed by the qualified biologist and submitted to the County Planning Department prior to initiation of construction activities.* *If the qualified biologist documents active nests within the survey areas, an appropriate buffer between each nest and construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize normal bird behavior and establish a buffer distance that allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, all construction work in the area shall cease until the young have fledged and the nest is no longer active.* *Any modifications to this measure, such as encroachment of construction activities into established buffer zones, must be coordinated with CDFW.*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
Impact BIO-3: The project could result in loss or disturbance of special-status wildlife species (western mastiff bat and pallid bat) Mitigation: ***MM-BIO-3: Roosting Bat Avoidance and Minimization Measures*** *The Applicant shall retain a qualified biologist to conduct a bat habitat assessment in all project areas that require tree removal. The qualified biologist shall identify and document the location of potentially suitable bat roosting habitat prior to construction activities. If no suitable bat habitat is observed, the biologist shall inform the County Planning Department, the Applicant and its Construction Contractor, and no further measures are required. If bat roosting habitat is observed, the locations of all such habitat areas shall be provided to the County Planning Department, the Applicant and its Construction Contractor, and all of the following requirements shall be implemented throughout the construction period:* • *Removal of trees that provide suitable bat roosting habitat shall be conducted outside of the bat maternity season (April 15 to August 31) and overwintering season (October 16 to January 15) to the maximum extent feasible and with express prior approval from the County Planning Department.* • *Bat presence/absence surveys shall be conducted 2 to 3 days prior to removal of any trees in suitable bat habitat, at any time of year. If presence/absence surveys are negative, work may proceed with no restrictions. If presence/absence surveys detect bats within trees planned for removal, work should proceed in accordance with all of the following restrictions:* - *If a maternity colony of bats is observed during maternity season (April 15 to August 31), tree removal shall not occur until August 31 or when maternity season has ended as confirmed based on surveys conducted by a qualified biologist.* - *If bats are observed during overwintering season (October 16 to January 15), tree removal shall not occur until January 15 or until bats are no longer present as confirmed based on surveys conducted by a qualified biologist.* - *If bats are present outside of maternity or overwintering seasons, construction shall follow a two-phase tree removal system conducted over 2 consecutive days. On the first day (in the afternoon), any limbs and branches shall be removed using chainsaws or other hand tools. Limbs with cavities, crevices, or deep bark fissures shall be avoided, and only branches or limbs without those features may be removed. On the second day, the entire tree shall be removed.* *Any modifications to this measure, such as bat eviction, must be coordinated with CDFW.*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
Impact BIO-4: The project could result in loss of potential state or federally protected wetlands. Mitigation: ***MM-BIO-4: Delineation of Aquatic Features, Permit Acquisition, and Compliance with Permit Conditions*** *Prior to initiation of ground disturbance or construction activities within the new access driveway, SR-25 impact areas, and Detention Basin #1, the Applicant shall retain a qualified biologist to delineate the extent of drainage ditches, potential wetlands, and other waters of the United States regulated by the USACE and RWQCB. If there are jurisdictional features that would be modified by the project, the Applicant shall obtain a Clean Water Act Section 404 Nationwide Permit or Individual Permit from USACE and obtain a Clean Water Act Section 401 Water Quality Certification from the RWQCB.* *To compensate for temporary and/or permanent impacts to wetlands and other waters of the U.S. that would be impacted as a result of the proposed project, compensation shall be provided as required by the conditions of the regulatory permits. Compensation shall be provided through one of the following mechanisms:* • *A Wetland Mitigation and Monitoring Plan shall be developed that outlines mitigation and monitoring obligations for temporary impacts to wetlands and other jurisdictional waters from the project. The Wetland Mitigation and Monitoring Plan shall include thresholds of success, monitoring and reporting requirements, and site-specific plans to compensate for wetland losses resulting from the project. The Wetland Mitigation and Monitoring Plan shall be submitted to the appropriate regulatory agencies for review and approval during the Section 404/401 permit application process.* • *To compensate for permanent impacts, the dedication of land to provide suitable wetland restoration or creation shall ensure no net loss of wetland values or functions. For compensation lands or improvements on the project site, the Applicant shall comply with all terms and conditions of the regulatory permits, including measures to protect and maintain water quality, restore work sites, and compensatory mitigation to offset temporary and permanent wetland impacts. The Applicant shall prioritize onsite compensation, and dedication of offsite compensation shall only be considered if the County Planning Department determines that onsite compensation is infeasible. The Applicant shall develop, as necessary, a mitigation and monitoring plan, which will include success criteria for waters enhancement or creation on- or off-site. The Applicant shall be responsible for securing funding for the implementation and management of compensatory mitigation prior to issuance of a grading permit, with oversight by the County of Santa Clara.* • *For improvements within the Caltrans right-of-way, the Applicant shall comply with terms and conditions of the permits, including measures to protect and maintain water quality, restore work sites, and compensatory mitigation to offset temporary and/or permanent wetland impacts. The Applicant shall be responsible for implementation of this mitigation measure prior to issuance of an encroachment permit from Caltrans.*	Before Mitigation: PS After Mitigation: LTSM
Impact CUL-1: The project could result in significant impacts to historical resources or unique archaeological resources. Mitigation: ***MM-CUL-1: Accidental Discovery Protocols*** *A. Prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist to implement archaeological awareness training for all construction personnel involved with earthmoving or grading activities. The training shall include information regarding the possibility of encountering buried cultural resources (including tribal*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
cultural resources), the appearance and types of resources likely to be seen during construction, notification procedures, and proper protocol to be followed should resources be encountered. This training shall be provided to all workers involved in ground-disturbing activities throughout the duration of construction and shall be documented in training records that shall be submitted to the County prior to those workers undertaking any ground-disturbing activities at the site. *B. A qualified archaeologist shall be on site to monitor project-related ground-disturbing activities. The contract for this work shall be provided to the County prior to issuance of a grading permit. The frequency of monitoring shall be determined by the archaeologist based on the rate of excavation and grading activities, the materials being excavated, the depth and location of excavation, and, if found, the abundance and type of archaeological resources encountered.* *C. If buried historic or prehistoric cultural resources or suspected resources (such as chipped stone or groundstone, shell middens, historic debris such as trash dumps, building foundations, or old roadways) are inadvertently discovered during ground-disturbing activities, work shall stop within a 100-foot radius of the find, and the County Planning Department shall be notified, and the qualified archaeologist shall evaluate the find to determine if it meets the definition of a historical, unique archaeological, and/or tribal cultural resource, and all of the following shall be required:* • *If the find(s) does not meet the definition of a historical resource or unique archaeological resource, no further study or protection is necessary prior to resuming project implementation.* • *If the find(s) does meet the definition of a historical resource or unique archaeological resource, then it shall be avoided by project activities. If avoidance is not feasible, as determined by the County Planning Department, the qualified archaeologist, shall make appropriate recommendations regarding the treatment and disposition of such find(s), and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, and evidence of such mitigation shall be submitted to the County Planning Department, prior to resuming any construction activities within the 100-foot radius of the find(s).* • *If the find(s) is potentially a tribal cultural resource, then tribal representatives shall be consulted. If, after consultation with tribal representatives, it is determined that the find(s) is a tribal cultural resource, then the find(s) shall be avoided by project activities. If avoidance is not feasible, as determined by the County Planning Department, the qualified archaeologist, in consultation with tribal representatives, shall make appropriate recommendations regarding the treatment and disposition of such finds and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, and evidence of such mitigation submitted to the County, prior to resuming construction activities within the 100-foot radius.* • *If the find(s) are human remains or grave goods, the requirements of Public Resources Code Section 5097.98 and County Ordinance Code Sections B6-18 through B6-20 shall be followed.*	
Impact CUL-2: The project would not result in significant impacts to human remains. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A

Summary of Impacts and Mitigation	Significance
Impact CUL-3: The project could result in significant impacts to tribal cultural resources. Mitigation: ***MM-CUL-1: Accidental Discovery Protocols*** *(see Impact CUL-1 above for details of mitigation)*	Before Mitigation: PS After Mitigation: LTSM
Impact GHG-1: The project would not result in a net increase in greenhouse gas emissions. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact GHG-2: The project would not conflict with applicable plans to reduce greenhouse gas emissions. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact HYD-1: The project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Mitigation: ***MM-HYD-1A: Demonstrate Sufficient Pump Capacity*** *During the grading permit application process, the Applicant shall submit details and calculations to the County Planning Department demonstrating that the proposed pump capacity will be sufficient to transfer stormwater runoff from Area 1 into Detention Basin #1 during a 25-year, 24-hour storm event without causing localized flooding which inundates the southeast corner of the green waste compost area. Note that approximately ~~8.7~~ 7.1 million gallons of stormwater runoff is expected from Area 1 during the 25-year, 24-hour storm event (from ~~5.8~~ 4.75 inches of precipitation).* ***MM-HYD-1B: Increase Detention Basin Capacity*** *During the grading permit application process, the Applicant shall submit a revised site plan, design details, and supporting calculations to the County Planning Department for review and approval showing modifications to increase the capacity of Detention Basin #1 and/or Detention Basin #2, such that the combined detention capacity is sufficient to hold at least ~~22.8~~ 22.4 million gallons of water ~~without discharging~~ whilst ~~and~~ maintaining a freeboard of at least 2 feet. In addition, the Applicant shall demonstrate compliance with the Composting General Order (or at least as stringent conditions of an individual permit) to detain the 25-year, 24-hour peak storm, assuming normal operating volumes during wet years, or obtain approval from the RWQCB for an equivalent alternative.* *If the modified basin design would require changes to the engineered alternative liner design for Detention Basin #1 (as previously approved by the RWQCB on May 22, 2023), or would result in the potential for Detention Basin #2 to hold water at an elevation above the level of the existing Detention Basin #2 liner (i.e., above 150 feet NAVD 88) the Applicant shall demonstrate compliance with the Composting General Order hydraulic conductivity requirements or at least as stringent conditions of an individual permit, as required by the RWQCB.* *If the modified basin design would require additional fill below the base-flood elevation, consideration must also be given to a corresponding increase in the size of the additional flood storage basin in Area 2, as needed to comply with the County's Floodplain Management Ordinance (see also MM-HYD-4) ~~such that no net loss of floodplain shall occur compared to existing conditions~~.* *If the modified basin design and/or corresponding changes to the flood storage basin would decrease the area of the facility draining to the detention basins, the required detention volume specified in the first paragraph of this measure may be reduced accordingly, provided adequate supporting documentation is provided to the County Planning Department for review and approval. The documentation shall demonstrate that the revised design is sufficient to hold*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
direct precipitation and facility runoff from a 25-year, 24-hour storm event in addition to normal operating volumes during wet years, whilst maintaining ~~the required~~ 2 feet of freeboard. ***MM-HYD-1C: Investigate and Remediate Contaminated Soils in Detention Basin #1*** *Prior to issuance of grading permits, the Applicant shall retain a qualified environmental consultant to prepare and implement a soil investigation plan, that shall be submitted for review and approval by the County Planning Department. The plan shall detail procedures for collection and analysis of soil samples from existing sediments in the floor of Detention Basin #1. Samples shall be analyzed, and concentrations compared to background levels and industry-standard screening levels for groundwater protection (e.g., regional screening levels and/or environmental screening levels). If existing sediments at the bottom of Detention Basin #1 are found to be contaminated, these soils shall be removed prior to new construction activities at Detention Basin #1. Excavated soils shall be re-composted at the facility or hauled off from the site for disposal at an appropriately licensed facility, in accordance with federal, state, and local regulations.*	
Impact HYD-2: The project would not decrease groundwater supplies in a manner that would impede sustainable groundwater management of the basin Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact HYD-3: The project would not decrease groundwater recharge potential in a manner that would impede sustainable groundwater management of the basin Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact HYD-4: The project would not alter existing on-site drainage patterns in a manner that would impede or redirect flood flows. Mitigation: ~~none required~~ ***MM-HYD-4: Update Floodplain Storage Analysis*** *Prior to issuance of grading permits, the Applicant shall prepare and submit a revised floodplain storage analysis to the County, based on final project design. The analysis shall specify the project components included in the modeling and shall not consider excavated areas that are below typical groundwater levels as contributing to flood storage capacity. If the County determines that the revised analysis does not demonstrate compliance with the County's Floodplain Management Ordinance requirement that the project would not, when combined with other development within the floodplain, result in the water surface elevation of the 100-year base flood increasing by more than 1 foot, then the project shall be revised to provide additional floodplain storage capacity or other design changes, until compliance can be demonstrated to the County's satisfaction.*	Before Mitigation: ~~LTS~~PS After Mitigation: ~~N/A~~LTSM

Summary of Impacts and Mitigation	Significance
Impact HYD-5: The project could result in release of pollutants due to flood inundation. Mitigation: ***MM-HYD-5: Increase Berm Height for Detention Basin #2*** *The Applicant shall increase the berm height of Detention Basin #2 to at least 150.5 feet (NAVD 88)~~150.41 feet~~, so that at least 2 feet freeboard above the 100-year base flood elevation of 148.5 feet (NAVD 88) is maintained. Plans for the redesigned detention basin shall be submitted to the County Planning Department for review and approval prior to issuance of grading permits for the project. The Applicant shall also modify or replace the basin liner, as required by the RWQCB, in compliance with the Composting General Order requirements for hydraulic conductivity (or at least as stringent conditions of an individual permit).*	Before Mitigation: PS After Mitigation: LTSM
Impact HYD-6: The project could conflict with or obstruct implementation of the Water Quality Control Plan. Mitigation: ***MM-HYD-1A: Demonstrate Sufficient Pump Capacity*** *(see Impact HYD-1 for details of mitigation)* ***MM-HYD-1B: Increase Detention Basin Capacity*** *(see Impact HYD-1 for details of mitigation)* ***MM-HYD-1C: Investigate and Remediate Contaminated Soils in Detention Basin #1*** *(see Impact HYD-1)* ***MM-HYD-4: Update Floodplain Storage Analysis*** *(see Impact HYD-4)* ***MM-HYD-5: Increase Berm Height for Detention Basin #2*** *(see Impact HYD-5 for details of mitigation)*	Before Mitigation: PS After Mitigation: LTSM
Impact HYD-7: The proposed project would not conflict with or obstruct implementation of a Sustainable Groundwater Management Plan. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact NOI-1: Project construction would not substantially increase ambient noise levels at the nearest sensitive receptor. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact NOI-2: On-site operations would not substantially increase ambient noise levels at the nearest sensitive receptor Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact NOI-3: Project-related traffic would not substantially increase ambient noise levels. Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A
Impact NOI-4: The project would not result in substantial ground-borne noise or vibration Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Impact TRA-1: The project would conflict with CEQA Guidelines Section 15064.3 by exceeding the applicable VMT threshold. Mitigation: no feasible mitigation identified.	Before Mitigation: PS After Mitigation: S&U

Summary of Impacts and Mitigation	Significance
Impact TRA-2: Project operation could substantially increase traffic hazards. Mitigation: ***MM-TRA-2: Installation of Traffic Controls or Retention of Driveway in Existing Location*** *A. The Applicant shall modify its proposed design for the SR-25 improvements and driveway relocation to include the installation of traffic signals at the intersection of SR-25/Bolsa Road/relocated driveway, if agreed to by Caltrans. The Applicant shall obtain an encroachment permit from Caltrans to implement the modified design and shall comply with all conditions of the permit and/or modifications to the design requested by Caltrans as part of their permit review and approval process, including maintenance of a clear recovery zone and compliance with Caltrans' stormwater management standards. The Applicant shall be fully responsible for the cost of all project site improvements to mitigate impacts to traffic operations and safety. The Applicant's funding contribution to the cost of SR-25 improvements, either in full or in part, shall be determined by Caltrans. ~~The Applicant shall contribute its fair share of the cost of the traffic signals, as determined by Caltrans, with the remaining portion to be funded by Caltrans.~~* *B. The Applicant shall not increase processing capacity of the facility (and associated increase in haul-truck and employee traffic) at the site until either (1) the signalized intersection is operational in accordance with MM-TRA-2A above, or (2) alternative improvements are made to the existing project site driveway in accordance with Alternative 3 and mitigation measure MM-TRA-2-Alt3 and no relocation of the project site driveway occurs until the signalized operation is operational in accordance with MM-TRA-2A. The Applicant shall obtain an encroachment permit from Caltrans to implement the modified design and shall comply with all conditions of the permit and/or modifications to the design requested by Caltrans as part of their permit review and approval process. The Applicant shall be fully responsible for the cost of all project site improvements to mitigate impacts to traffic operations and safety. The Applicant's funding contribution to the cost of SR-25 improvements, either in full or in part, shall be determined by Caltrans.*	Before Mitigation: PS After Mitigation: LTSM

Summary of Impacts and Mitigation	Significance
Impact TRA-3: Project construction could substantially increase traffic hazards.	Before Mitigation: PS
Mitigation: ***MM-TRA-3: Construction Traffic Management Plan*** *The Applicant or their contractor shall prepare a Construction Traffic Management Plan (CMP), in accordance with MUTCD requirements and the Caltrans Transportation Management Plan Guidelines. The CMP shall be subject to review and approval by Caltrans and the County Department of Roads and Airport, prior to issuance of a grading permit. The plan shall be implemented during construction and shall include, but not be limited to, the following:* • *Schedule of construction showing each phase of the project, construction hours, and anticipated method of handling traffic for each phase, including drawings identifying lane configurations, haul routes, road and lane closures, detour routes, work areas, staging areas, and worker parking areas. The location of signs, barricades, codes, etc., to warn, direct, and guide traffic shall be shown on the plan, as well as any supplementary traffic control devices that might be required.* • *The repair and restoration of any damaged or deteriorated roadway rights-of-way according to Caltrans requirements after construction is completed.* • *Provide for the appropriate control measures, including barricades, warning signs, speed control devices, flaggers, and other measures to mitigate potential traffic hazards;* • *Ensure coordination with emergency response providers to provide sufficient emergency response access for the surrounding area;* • *Maintain emergency access to the project site throughout construction and maintain vehicular, bicycle, and pedestrian access through the State Route 25 corridor throughout construction;* • *Prohibit heavy vehicle traffic to and from the project site during the commute hours of 7:00-9:00 AM and 4:00-6:00 PM;* • *Identify the need (if any) for transportation permits for oversized or excessive load vehicles on State roadways from Caltrans, and include any permit conditions as part of the CMP;* • *Implement truck haul routes for construction trucks deemed acceptable by Caltrans and the County Department of Roads and Airport with SR-25 and U.S Highway 101 as the assumed routes to and from the north; and* • *Store construction equipment on the project site and outside the Caltrans right-of-way during the construction phase of the project.*	After Mitigation: LTSM
Impact TRA-4: The project could result in inadequate emergency access. Mitigation: **MM-TRA-3: Construction Traffic Management Plan** (see Impact TRA-3 above for details of mitigation).	Before Mitigation: PS After Mitigation: LTSM
Effects Found Not Significant (Energy): The project would not: • Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation • Conflict with or obstruct a state or local plan for renewable energy or energy efficiency Mitigation: none required	Before Mitigation: LTS After Mitigation: N/A

Summary of Impacts and Mitigation	Significance
Effects Found Not Significant (Geology, Soils, and Paleontological Resources): The project would not: • Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic hazards • Result in substantial soil erosion or the loss of topsoil • 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 • Be located on expansive soil, creating substantial direct or indirect risks to life or property • Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater • Directly or indirectly destroy a unique paleontological resource or unique geologic feature Mitigation: none required	Before Mitigation: NI or LTS After Mitigation: N/A
Effects Not Found Significant (Hazards and Hazardous Materials): The project would not: • Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials • 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 • Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school • 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, create a significant hazard to the public or the environment • 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 a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area • Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan • Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fire Mitigation: none required	Before Mitigation: NI or LTS After Mitigation: N/A
Effects Not Found Significant (Mineral Resources): The project would not: • Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state • Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan Mitigation: none required	Before Mitigation: NI After Mitigation: N/A

Summary of Impacts and Mitigation	Significance
Effects Not Found Significant (Population and Housing): The project would not: • Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) • Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Effects Not Found Significant (Public Services): The project would not: • Result in substantial adverse physical impacts associated with the provision of or 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 fire or police protection services, schools, parks, or other public facilities. Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Effects Not Found Significant (Public Services): The project would not: • 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 • Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment Mitigation: none required	Before Mitigation: NI After Mitigation: N/A
Effects Not Found Significant (Utilities and Service Systems): The project would not: • Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects • Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years • Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments • 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 • Comply with federal, state, and local management and reduction statutes and regulations related to solid waste Mitigation: none required	Before Mitigation: NI After Mitigation: N/A

Summary of Impacts and Mitigation	Significance
Effects Not Found Significant (Wildfire): The project would not: • Substantially impair an adopted emergency response plan or emergency evacuation plan • 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 wildfire • Require the installation or 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 • 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 Mitigation: none required	Before Mitigation: NI After Mitigation: N/A

Notes:
~~(USFWS 2005)~~
BAAQMD = Bay Area Air Quality Management District
CCR = California Code of Regulations
Caltrans = California Department of Transportation
CDFW = California Department of Fish and Wildlife
CEQA = California Environmental Quality Act
CMP = Construction Management Plan
County = Santa Clara County
ECS = Engineered Composting System
LEA = local enforcement agency
LTS = Less than significant
LTSM = less than significant with mitigation
mph = miles per hour
MSW = Municipal Solid Waste
N/A = not applicable
NI = no impact
NO_X = nitrogen oxide
PM_{10} = particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 2.5 microns
PS = potentially significant
RWQCB = Regional Water Quality Control Board
S&U = significant and unavoidable
SR-25 = State Route 25
USFWS = U.S. Fish and Wildlife Service
USACE = U.S. Army Corps of Engineers
VMT = vehicle miles traveled

Updated Table 3-1 Santa Clara County General Plan Policy Consistency Review

General Plan Policy	Consistency Determination
Policy R-GD 20 Grading and terrain alteration to conduct lawful activities and use of property should conserve the natural landscape and resources, minimize erosion impacts, protect scenic resources, habitat, and water resources. Grading should not exacerbate existing natural hazards, particularly geologic hazards.	**Consistent.** Grading would occur within the existing facility site in areas already disturbed by prior grading and development. Similarly, grading for the proposed new facility entrance and SR-25 widening activities would be in areas already modified by prior disturbance. Erosion control measures would be required consistent with Chapter IV, Article 8, Part 6, Erosion Control in the Santa Clara County Code of Ordinances, and with the Storm Water Pollution Prevention Program (to be updated after project approval) in place at the Z-Best facility.
Policy R-GD 21 For grading, terrain alteration, or other work that is subject to a grading permit, the grading approval shall be required concurrently with any other required land use authorization or discretionary, conditional permit review process. Grading approval shall not precede other requisite land use or development approvals, including building permit issuance.	**Consistent.** The application for grading approval is accompanying the remaining project applications and therefore, would not precede other requisite land use or development approvals.
Policy R-GD 22 The amount, design, location, and the nature of any proposed grading may be approved only if determined to be: (a) appropriate, justifiable, and reasonably necessary for the establishment of an allowable use; (b) the minimum necessary given the various site characteristics, constraints, and potential environmental impacts that may be involved, and, I that which causes minimum disturbance to the natural environment, slopes, and other natural features of the land.	**Consistent.** The proposed grading is necessary for project implementation. Grading would occur in areas already disturbed by prior grading and development. Erosion control measures would be required consistent with Chapter IV, Article 8, Part 6, Erosion Control in the County of Santa Clara Ordinance Code, and with the Storm Water Pollution Prevention Program (to be updated after project approval) in place at the Z-Best facility.
Policy R-GD 23 Proposals to balance cut and fill amounts where such grading would exceed that which is deemed minimally necessary and reasonable for the site may be considered based on environmental impacts, the ability of the site to accommodate the additional fill without causing additional adverse impacts, the remoteness of the site, the overall amount of material that would otherwise need to be removed from the site, and the impacts of any truck traffic that could be involved, including travel distances, local road impacts, safety, noise, dust, and similar issues.	**Consistent.** The project has been designed to balance cut and fill on site. Soils excavated from the expanded flood storage area would be used to raise the Area 1 ECS pad (minor cut/significant fill), detention basin #1 modifications (significant fill), entrance relocation and access road improvements (minor fill). Excavated soil from the expanded flood storage area would also be used for previously permitted but not yet fully-constructed earth fill within Area 2 that would otherwise be required to import clean fill. The environmental effects of grading are evaluated as part of the project's overall construction phase effects. Construction vehicle miles traveled and safety are addressed in Section 13, Transportation; noise is addressed in Section 12, Noise, and dust is addressed in Section 7, Air Quality. Mitigation measures are included for those impacts that were determined to be significant.
Policy R-GD 25 Grading associated with roads, bridges, retaining walls, or similar improvements related to access requirements should not create a significant visual scar or impact to the environment. (a) Grading proposals for driveways and roads should generally follow natural terrain and contours to maximum extent feasible. Requirements and conditions for erosion control, landscaping or plantings, retaining wall design, and other design features may be imposed	**Consistent.** Grading associated with the new entrance and SR-25 widening activities would not be excessive and would take place on terrain that is level. Erosion control measures would be required consistent with Chapter IV, Article 8, Part 6, Erosion Control in the Santa Clara County Code of Ordinances, and with the Storm Water Pollution Prevention Program (to be updated after project approval) in place at the Z-Best facility.

General Plan Policy	Consistency Determination
where necessary to ensure that completed work blends as harmoniously as possible with the natural environment and landscape. (b) Use of native and drought tolerant species for the above purposes should be employed for at least 50% or more of the design.	
Policy R-TR 11 New development which would significantly impact private or public roads, should be allowed only when safety hazards and roadway deterioration will be mitigated to a less than significant level.	**Consistent.** The Applicant is proposing to construct a new on-site entrance that would represent a new fourth leg of the existing three-legged State Route 25/Bolsa Road intersection. The new entrance would be stop controlled. Acceleration and deceleration lanes are planned on SR-25, with widening of the segment along the project site frontage required to accommodate the new lanes. The purpose of the improvements is to better accommodate truck ingress and egress to the project site and reduce through traffic delays from turning movements into and out of the site. The proposed new driveway entrance and the SR-25 widening activity proposed to enable installation of acceleration and deceleration lanes into and out of the new entrance, have been reviewed for their operational and turning movement effects on SR-25 and Bolsa Road, and their predicted effect on crash frequency. See Section 13, Transportation.
Policy R-TR 14 Environmental impacts of roadway construction and expansion should be mitigated to a less than significant level.	**Consistent.** Environmental effects of the proposed SR-25 frontage improvements, including biological resources, cultural resources, aesthetics, traffic, noise, air quality, and GHGs are addressed in this EIR. Mitigation measures are identified where needed, and/or through implementation of uniformly applied development standards and regulations, impacts would be less than significant with mitigation incorporated. See Section 13, Transportation.
Policy C-RC 60 Hillsides, ridgelines, scenic transportation corridors, major county entryways, and other areas designated as being of special scenic significance should receive additional consideration and protections due to their prominence, visibility, or symbolic value.	**Consistent.** The project site is not within or adjacent to an area or transportation corridor or county entryway identified in the General Plan as being of special scenic significance. However, scenic views from SR-25 are available over the project site, and the project site is at an SR-25 entryway to San Benito County. Visual impacts to scenic resources are addressed in Section 5, Aesthetics. Due to a potential increase in litter within the site associated with increased feedstock intake and increased potential for litter to escape from trucks traveling to and from the site, a mitigation measure is presented requiring the project to augment existing litter control activities. With implementation of this mitigation measure, the project would be consistent with this policy.
Policy C-RC 65 All solid waste management services and facilities shall conform to applicable federal, state, and local regulations and standards.	**Consistent.** Many of the regulations and standards that apply to solid waste management facilities are designed to mitigate environmental impacts of such facilities. Related federal, state, and local (County) regulations that serve this purpose are summarized in the Regulatory Setting sections of each individual environmental topic evaluated in this EIR and discussed as the mechanisms to mitigate environmental

General Plan Policy	Consistency Determination
	effects of the proposed project. The proposed project is required to comply with the regulations and standards.
Policy C-RC 72 Decision-making regarding the siting of new landfills, the expansion of existing sites, and the location of other solid waste management facilities shall balance the need for such facilities with the full range of environmental quality issues involved.	**Consistent.** The proposed project is to modify the operations in order to expand the capacity of an existing composting facility, without increasing the size of the site. The proposal is being driven in part by state goals and implementing legislation for increasing waste diversion from landfills. This EIR evaluates the environmental impacts associated with the proposed project. The decision makers would be required to balance the need for the expansion with the environmental impacts of the project.
Policy C-RC 73 Santa Clara County acknowledges the need for long term disposal capacity and will strive to maintain 20 to 30 years of ongoing collective disposal capacity.	**Consistent.** The proposed project is to modify operations to expand the existing composting facility, which would allow for additional municipal solid waste to be composted rather than disposed of at a landfill. This will allow for existing landfill capacity to be utilized for other future disposal needs.
Policy C-RC 74 Expansion of existing landfill sites should be encouraged and explored thoroughly in preference to siting new landfills.	The proposed project is not a landfill or expansion of an existing landfill and therefore, this policy is not applicable to the proposed project.
Policy R-RC 96 The general approach to scenic resource preservation for the rural unincorporated areas consists of the following strategies: 1. Minimize scenic impacts in rural areas through control of allowable development densities. 2. Limit development impacts on highly significant scenic resources, such as, ridgelines, prominent hillsides, streams, transportation corridors and county entranceways.	**Consistent.** The proposed project would not significantly alter the existing visual character of the site or surrounding areas. The developed footprint of the site would not change and the proposed improvements would not create a significant discernable change in visual conditions as viewed from SR-25, the nearest public viewpoint. The project would not increase the physical footprint of existing developed uses and would not affect hillsides or stream corridors. Impacts to scenic resources and other aesthetic impacts are addressed in Section 5 of this EIR.
Policy R-RC 101 Roads, building sites, structures and public facilities shall not be allowed to create major or lasting visible scars on the landscape.	
Policy R-RC 5 Public and private development projects shall be evaluated and conditioned to assure they are environmentally sound, do not degrade natural resources, and that all reasonable steps are taken to mitigate potentially adverse impacts.	**Consistent.** This EIR evaluates the potential impacts of the proposed project and includes mitigation measures and/or compliance with uniformly applied development standards that serve to lessen environmental impacts. The proposed project would be conditioned to comply with all mitigation measures and must be consistent with the identified development standards.
Policy C-RC 19 The strategies for maintaining and improving water quality on a countywide basis, in addition to ongoing point source regulation, should include: a. effective non-point source pollution control; b. restoration of wetlands, riparian areas, and other habitats which serve to improve Bay water quality; and c. comprehensive Watershed Management Plans and "best management practices" (BMPs).	**Consistent.** The proposed project is, in part, being designed to comply with the 2015 Composting General Order promulgated by the State Water Resources Control Board. The Composting General Order includes new requirements specifically for composting operations that are designed to improve both surface and groundwater quality conditions. Of particular note is the requirement that detention facilities must be lined to prevent percolation of storm water runoff to groundwater. The project includes this improvement for the modified Detention Basin #1, which would result in improved groundwater quality relative to existing conditions. See Section 11, Hydrology and Water Quality. Although the proposed project may require an individual permit from the Regional Water Quality Control Board (RWQCB), rather than coverage under the
Policy R-RC 8 The strategies for assuring water quantity and quality for the rural unincorporated areas shall include: 1. Require adequate water quantity and quality as a pre-condition of development approval.	

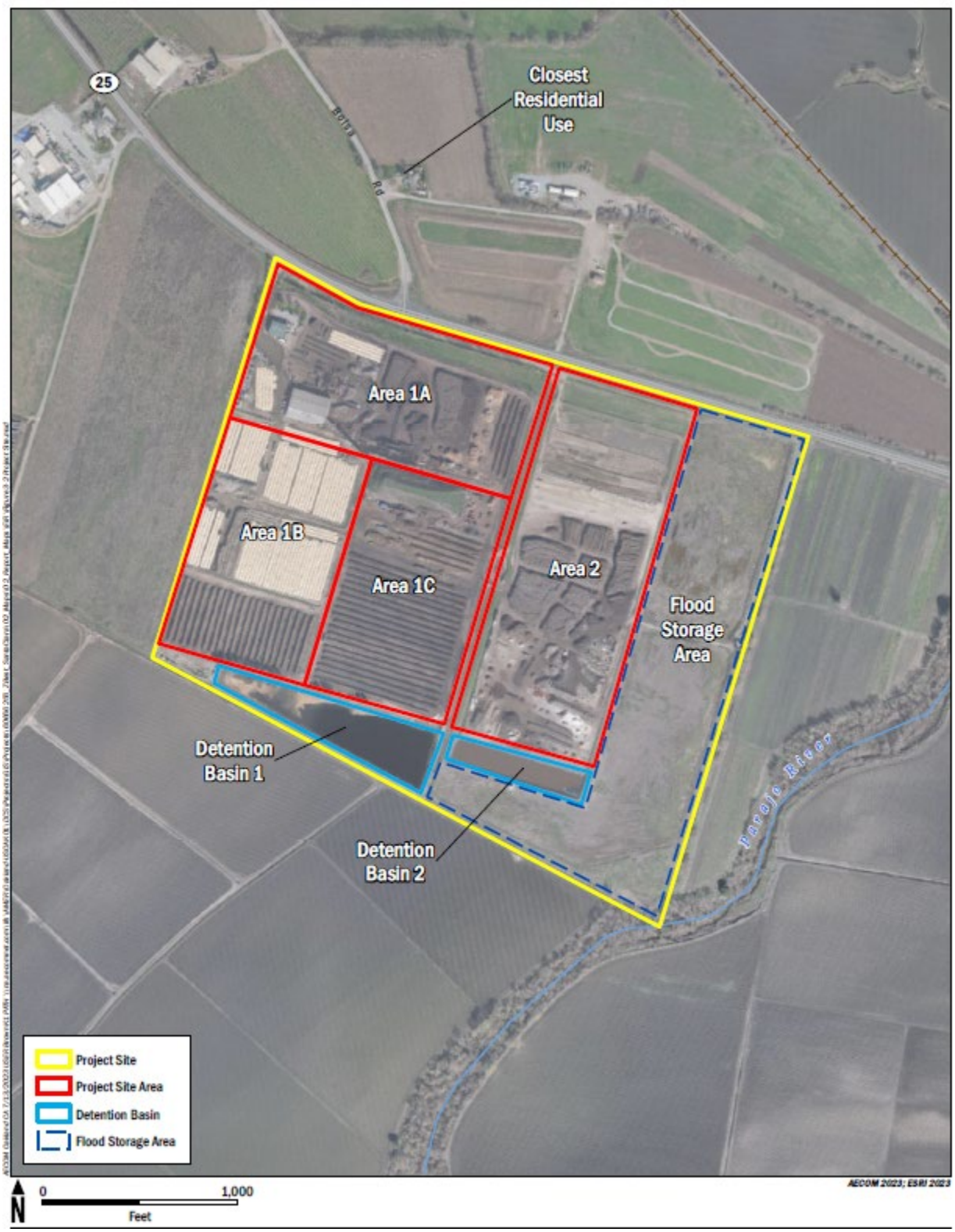
General Plan Policy	Consistency Determination
2. Reduce the water quality impacts of rural land use and development. 3. Develop comprehensive watershed management plans.	Composting General Order, the conditions of an individual permit issued by the RWQCB would be at least as protective of water quality as the Composting General Order requirements. See Section 4.1.2 for more discussion of the Composting General Order applicability to the proposed project.
Policy R-RC 9 Development in rural unincorporated areas shall be required to demonstrate adequate quantity and quality of water supply prior to receiving development approval.	Based on the results of a water balance analysis submitted to the County and referenced in this EIR, the proposed project would result in increased groundwater demand. Z-Best currently utilizes water supply from existing wells to augment supply detained in its existing Detention Basin #1. Based on the most recent information available, the groundwater basin from which water would be extracted is not adjudicated, nor in overdraft condition. Therefore, water supply is not expected to be a constraint for the project. See Section 11, Hydrology and Water Quality.
Policy R-RC 13 Sedimentation and erosion shall be minimized through controls over development, including grading, quarrying, vegetation removal, road and bridge construction, and other uses which pose such a threat to water quality.	**Consistent.** Grading would occur in areas already disturbed by prior grading and development. Erosion control measures would be required consistent with Chapter IV, Article 8, Part 6, Erosion Control in the Santa Clara County Code of Ordinances, and with the Storm Water Pollution Prevention Program (to be updated after project approval) in place at the Z-Best facility consistent with National Pollutant Discharge Elimination System requirements.
Policy R-RC 15 Commercial and industrial uses such as automobile dismantlers, waste transfer disposal facilities, light industries, uses requiring septic systems, and other uses that have the greatest potential for pollution shall not be located within the vicinity of streams, reservoirs, or percolation facilities where contaminants could easily come in contact with flood waters, high groundwater, flowing streams, or reservoirs. Such uses shall be required to reduce any threat of contamination to an insignificant level as a condition of approval.	**Consistent.** Though the Z-Best facility is already permitted for operation adjacent to the Pajaro River, the proposed project includes measures that would improve groundwater quality relative to current operations, such as lining of the modified Detention Basin #1 and improved leachate control. As described above, the proposed project is also being designed to comply with the State Water Resources Control Board's ~~2015 Composting General Order, which includes new~~ requirements for composting operations that are designed to improve both surface and groundwater quality conditions. See Section 11, Hydrology and Water Quality.
Policy C-RC 40 Long term land use stability and dependability to preserve agriculture shall be maintained and enhanced by the following general means: a. limiting the loss of valuable farmland from unnecessary and/or premature urban expansion and development; b. regulating non-agricultural uses in agricultural areas, and their intensity and impacts on adjacent lands; c. maintaining agriculturally-viable parcel sizes; and d. minimizing conflicts between adjacent agricultural and non-agricultural land uses, through such means as right-to-farm legislation and mediation of nuisance claims.	**Consistent.** The project does not result in direct loss of agricultural land. While the intensity of existing operations would increase with an increase in MSW throughput, indirect impacts on adjacent agricultural uses are not expected to be significant. New operations would be no nearer to existing adjacent farmlands than under existing conditions. Windblown debris would continue to be caught in the existing litter screen and collected, with monitoring by the LEA. Potential for debris/pathogen transmission from existing secondary, open windrow composting operations would be reduced, as these would occur within three-sided contained bunkers that would better contain such materials. Groundwater quality is expected to improve, as the project includes lining the (currently unlined) existing Detention Basin #1; therefore, groundwater contamination from leachate and other chemicals should decline over time. See Section 5, Agriculture and Forestry Resources.

General Plan Policy	Consistency Determination
Policy C-RC 28 The general approach to preserving and enhancing habitat and biodiversity countywide should include the following strategies: 1. Improve current knowledge and awareness of habitats and natural areas. 2. Protect the biological integrity of critical habitat areas. 3. Encourage habitat restoration. 4. Evaluate the effectiveness of environmental mitigations.	**Consistent.** Potential biological resources effects of the proposed project have been evaluated. The project has potential to adversely affect California red-legged frog, protected nesting birds, and wetlands. If the project is approved, the impacts would be mitigated to less than significant through implementation of mitigation measures. See Section 8, Biological Resources.
Policy R-RC 21 Critical habitat areas should be excluded from cities' Urban Service Areas unless retained in non-urban uses, and rural unincorporated development should be designed to avoid or mitigate impacts upon habitat and natural areas.	
Policy C-RC 50 Countywide, the general approach to heritage resource protection should include the following strategies: 1. Inventory and evaluate heritage resources. 2. Prevent or minimize adverse impacts on heritage resources. 3. Restore, enhance, and commemorate resources as appropriate.	**Consistent.** Heritage resources include cultural resources. The evaluation conducted as part of this EIR has found no evidence for the presence of significant historical resources or unique archaeological resources in areas surveyed for such resources, however known tribal cultural resources have been documented within half a mile of the project site. If cultural resources are uncovered during project activities, mitigation measures would be implemented to reduce the impacts to less than significant. Cultural resources are addressed in Section 9, Cultural Resources.
Policy C-RC 52 Prevention of unnecessary losses to heritage resources should be ensured as much as possible through adequate ordinances, regulations, and standard review procedures. Mitigation efforts, such as relocation of the resource, should be employed where feasible when projects will have significant adverse impact upon heritage resources.	
Policy R-RC 86 Projects in areas found to have heritage resources shall be conditioned and designed to avoid loss or degradation of the resources. Where conflict with the resource is unavoidable, mitigation measures that offset the impact may be imposed.	
Policy R-RC 88 For projects receiving environmental assessment, expert opinions and field reconnaissance may be required if needed at the Applicant's expense to determine the presence, extent, and condition of suspected heritage resources and the likely impact of the project upon the resources.	
Policy C-RC 63 Santa Clara County shall strive to reduce the quantity of solid waste disposed of in landfills and to achieve or surpass the requirements of state law (the law currently specifies 25% reduction of landfilled wastes by 1995, and 50% by 2000).	**Consistent.** The proposed project is designed in significant part to reduce the quantity of solid waste disposed of in landfills.
Policy C-HS 24 Environments for all residents of Santa Clara County free from noises that jeopardize their health and well-being should be provided through measures which promote noise and land use compatibility.	**Consistent.** Detailed analyses of construction phase, on-site operations and on-road sources of increased noise associated with the project have been evaluated in this EIR. The project would have less-than-significant impacts on noise-sensitive residential uses and noise-sensitive residential receptors. See Section 12, Noise.
Policy C-HS 25 Noise impacts from public and private projects should be mitigated.	
Policy R-HS 1 Significant noise impacts from either public or private projects should be mitigated.	

General Plan Policy	Consistency Determination
Policy SC 12.0 Since flooding affects substantial areas of South County, and the flood control projects now being constructed are designed to protect only existing developed and planned urban areas, land development should be managed by the three jurisdictions to mitigate flooding problems and minimize the need for local public funding for additional flood control and local drainage facilities. Flood damage in South County should be minimized through a combination of actions. In flood-prone areas, inappropriate development should be prevented through land use planning, urban development policies and land use regulations. Areas which are developed or planned for development should be protected by the construction of flood control facilities. Development should be managed through advanced planning and design standards to minimize off-site flooding and drainage problems.	**Consistent.** The project site is within a flood hazard area. Fill proposed within Area 1 would result in increased flood elevations if compensatory flood water storage capacity was not provided. Increased flood storage would be provided. The new flood storage capacity would be sufficient to ensure that any net rise in flood elevation under post-project conditions would be negligible (approximately 0.01 foot). See Section 11, Hydrology and Water Quality. The project also includes new storm drainage improvements for collecting and delivering storm water to the existing Detention Basin #1, which would be modified to protect it from a 100-year design flood. The Z-Best facility is a no-net storm water discharge facility. In addition, the Composting General Order stipulates that a technical report must be submitted to identify how qualifying facilities are complying with the Composting General Order. The technical report must include, among other things, a description of the hydrogeology, working surface design, water and wastewater management plan, inspection and maintenance program, monitoring, closure plan, and a proposed schedule for achieving compliance. Similar information would be required to be submitted as part of any application for an individual permit from the RWQCB for an MSW composting facility.
Policy SC 13.0 Local drainage problems in South County should be minimized by preventing inappropriate development in areas which are prone to drainage problems and by using design standards and advanced planning to manage development. Developers of individual projects should be required to mitigate off-site on-site impacts and, where appropriate, to install local drainage facilities which would contribute to an eventual area wide solution to the local drainage problems, preferably in the context of a master plan for local drainage which should be developed jointly by the Cities and the County.	
Policy SC 13.3 The County and Cities should require a storm water management plan for each development. This plan, which would be presented early in the development stage, would describe the design implementation and maintenance of the local drainage facilities.	

Notes:
BMP = best management practices.
County = County of Santa Clara
ECS = Engineered Composting System
EIR = Environmental Impact Report
GHG = greenhouse gas
LEA = local enforcement agency
MSW = Municipal Solid Waste
SR-25 = State Route 25
RWQCB = Regional Water Quality Control Board

Updated Figure 3-2 Aerial Photograph



Updated Figure 15-2 Conceptual Intersection Layout for Proposed Project and Project + Cumulative Scenarios