

NOP of Draft EIR for Forest Resiliency Demonstration Project
December 2022

California Environmental Protection Agency

CalRecycle 
Department of
Resources Recycling and Recovery

Gavin Newsom
California Governor

Amelia Yana Garcia Gonzalez
Secretary for Environmental Protection
Rachel Machi Wagoner
CalRecycle Director

December 19, 2022

Mr. Brian Briggs
Golden State Finance Authority
Attn: GSNR Scoping Comment
1215 K Street, Suite 1650
Sacramento, CA 95814



Subject: SCH No. 2022110466 – Notice of Preparation of a Draft Environmental Impact Report for the Golden State Natural Resources Forest Resiliency Demonstration Project –Lassen County and Tuolumne County

Dear Mr. Briggs:

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

Project Description

The Golden State Finance Authority (GSFA), acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed project is a response to the growing rate of wildfires in California, which has been exacerbated by hazardous excess fuel loads in forests, and the need to promote economic activity within California's rural counties. The proposed project would improve the resiliency of California's forestlands by sustainably procuring and processing excess biomass into a pelletized fuel source for use in renewable energy generation overseas. The proposed project components include the vegetation treatment activities (feedstock source); the transportation and storage of feedstock, and subsequent processing at two pellet processing facilities (one in the foothills of the

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Central Sierra Nevada Mountain range (Tuolumne facility) and one in the Modoc Plateau of Northern California (Lassen facility); and the transportation of the finished product to a storage and shipping facility to be constructed at a suitable deepwater port in California for export to international markets.

The proposed Tuolumne wood pellet processing site is located at 12001 La Grange Road approximately 9 miles southwest of the community of Jamestown in Central Sierra (Tuolumne), California and in the western foothills of the Sierra Nevada Mountain Range. The Tuolumne site consists of APNs 063-190-056, 063-350-004, and 063-350-005. The site was previously used as a bark facility by Sierra Pacific Industries.

The proposed Lassen wood pellet processing site is located in Nubieber, California (Lassen County), approximately 3 miles southwest of the census-designated place of Bieber in northwestern Lassen County. The Lassen site is located immediately at 551000 Rosevelt Avenue (sometimes spelled Roosevelt Avenue), Nubieber, CA within Assessor's Parcel Number (APN) 001-270-080- 000. The site is a portion of a larger property that included a mill site (which is not part of the proposed project site) and an area used by the mill operators to load rail cars.

Comments

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the Draft EIR, in addition to the specific location noted.

Comments for the NOP of a Draft EIR are summarized below:

Project Location, Page 3

Storage of feedstock prior to processing will occur at the production facility site or in yards located within a 10-mile radius of the proposed facilities. Approximately 50-200 acres of storage space will be required for each facility. Specific sites under consideration include Lassen County APNs 001-370-05-11, 001-400-02- 11, 001-400-03-11, 001-130-11, 001-130-47, 001-130-61, 001-130-62, 001-130-73, 001-130-74, 001- 150-24, 001-150-33, 001-150-34, 001-270-026-11, 013-040-13-11, 001-270-29-11, 001-270-81-11, 001-270-79, 001-270-32, 001-270-33, 001-270-34, and 001-270-57-11, and any storage yard sites ultimately selected will have physical and regulatory characteristics similar to foregoing.

Comment

Biological decomposition of organic material can be both a naturally occurring or artificially controlled process. The storage and accumulation of the project's feedstock (organic material) prior to processing at the proposed project locations poses a potential for inadvertent composting. Title 14 (T14) of the California Code of Regulations (CCR),

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Division 7, Chapter 3.1 establishes standards and regulatory requirements for intentional and inadvertent composting resulting from the handling of compostable materials, including but not limited to feedstock, compost, or chipped and ground materials as defined in section 17852. The project proponent should review these regulatory requirements to ensure all applicable requirements are met.

Solid Waste Regulatory Oversight

The Lassen County Environmental Health Department and the Tuolumne County Environmental Health Division are the Local Enforcement Agencies (LEA) for Lassen County and Tuolumne County; and responsible for providing regulatory oversight of solid waste handling activities, including inspections. Please contact the LEA at 530.251.8528 (Lassen County LEA) and 209.533.5633 (Tuolumne County LEA) to discuss the regulatory requirements for the proposed project.

Conclusion

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

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6427 or by e-mail at eric.kiruja@CalRecycle.ca.gov

Sincerely,



Eric Kiruja, Senior Environmental Scientist
Permitting & Assistance Branch – North Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Christine Karl, Environmental Scientist
Isabelle Maalouf, Environmental Scientist
Permitting & Assistance Branch – North Unit

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Brad Banner, Director
Tuolumne County Environmental Health Division - LEA

Doug Ames, EHS
Lassen County Environmental Health Department - LEA