DRAFT
ENVIRONMENTAL IMPACT REPORT

EL DORADO COUNTY
AIR QUALITY MANAGEMENT DISTRICT

DST Output West Printing Capacity Expansion Project
(SCH # 2009082051)

October 2009

Quad Knopf

09-1424.A.1

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AIR QUALITY MANAGEMENT DISTRICT

DST Output West Printing Capacity Expansion Project
(SCH #2009082051)

Submitted to:

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Introduction

The project applicant, DST Output West, LLC, has proposed to add several new printing machines which will result in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy) to their existing printing facility at 5220 Robert J. Mathews Pkwy, El Dorado Hills. DST Output West is a firm specializing in integrated print-and-electronic billing, customer care, and customer communications solutions to financial services, communications, insurance, healthcare, and utility companies. The El Dorado County Air Quality Management District (El Dorado County AQMD) is the Lead Agency for the preparation of this EIR. The EIR is being prepared pursuant to SB 1662 Chapter 725 Statutes of 2008 Section 1 (c) requiring the El Dorado County AQMD to prepare and certify an EIR prior to authorizing a one time only transfer of emission reduction credits for the proposed project. This Draft Environmental Impact Report (EIR) has been prepared for the following discretionary actions:

- Transfer of 1.4 tons of VOC Emission Offset Credits from the Sacramento Metropolitan Air Quality Management District as permitted under SB 1662 and the Issuance of those Offset Credits to DST Output to operate up to three additional printers.

This DEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) statutes and guidelines and is an informational document intended to inform public-decision-makers, responsible or interested agencies and the general public of the potential environmental effects of the proposed project, and where applicable, mitigation measures that can be implemented to reduce or avoid the potential adverse environmental effects.

Project Description

The proposed project consists of the addition of several new printing machines which will result in additional VOC emissions of up to 0.7 tpy. The additional VOC emissions have the potential to exceed the El Dorado County AQMD 10 ton per year VOC emission threshold of significance. In order to provide for further expansion, acquisition of emissions offset credits is necessary. It is proposed that the VOC threshold exceedance brought on by the additional printers will be offset by the transfer of 1.4 tons of VOC emission offset credits (due to the applicable distance ratio of 2:1 the 1.4 tons of offset credits represents only 0.7 tons of emissions offsets) from a source located in the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD) as permitted under SB 1662.

Potential Areas of Controversy and Issues to be Resolved

The following issues have the potential to produce controversy in reviewing and considering the proposed project:

- Air Quality: Impacts to air quality from emissions generated by the proposed project printers.

- Global Climate Change: Although the proposed project in and of itself will actually have a mitigating effect on greenhouse gas precursor emissions that contribute to global climate change, in consideration of the worldwide environment, climate change is recognized throughout the world to be one of the most daunting and controversial subjects of our time.

Alternatives to the Project

Section 15126.6 of the State CEQA Guidelines requires the EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project, and to evaluate the comparative merits of the alternatives. Alternatives that would reduce or avoid significant impacts represent an environmentally superior alternative to the proposed project. However, if the environmentally superior alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Based upon the analysis contained and documented in this EIR, the Extended Operation Hours of Existing Printers alternative and the Proposed Project are the environmentally superior alternatives because they would both result in a 0.7 ton per year net reduction in VOC generation (a greenhouse gas precursor) in comparison with the No Project and Reduced Number of Printers alternatives.

The alternatives identified for consideration are as follows:

NO PROJECT ALTERNATIVE

The existing conditions within the project area are detailed in the Environmental Setting narratives in each of the subsections in Chapter Three of this EIR. The project site is currently occupied by the DST Output West facility. In accordance with Section 15126.6(e)(3)(B) of the CEQA Guidelines, the No Project alternative assumes a continuation of the existing DST Output West printing plant absent the addition of several new printing machines which will result in additional VOC emissions of up to 0.7 tpy or extension of operating time for existing printers. This alternative would not increase VOC emissions and therefore would not require the transfer of emissions offset credits. If the proposed project were not approved, existing plant operating conditions would remain in effect.

The No Project Alternative would not achieve any of the applicant's stated project goals/objectives.

REDUCED NUMBER OF EMISSION OFFSET CREDITS ALTERNATIVE

This alternative would include reduction of the number of emission offset credits received by DST Output West. Because the DST Output West plant has the potential to operate at, or near the VOC emissions limit set forth by the El Dorado County AQMD, this alternative would allow the facility to increase VOC emissions over the emission limits set forth by the El Dorado County AQMD resulting in a potentially significant impact.

The Reduced Number of Emission Offset Credits Alternative would achieve some, but not all, of the applicant's stated project goals/objectives.

EXTENDED OPERATION HOURS OF EXISTING PRINTERS ALTERNATIVE

This alternative would consist of increasing the operating time on existing printers to achieve production output equal to what would be achieved with the addition of several new printers. This alternative would also produce an increase in VOC emissions proportionate to the amount of increased printer operational time and would require the transfer of emissions offset credits.

This Extended Operation Hours of Existing Printers Alternative would allow the applicant to achieve the stated project goals/objectives.

Summary of Impacts and Mitigation Measures

Section 15123(b)(1) of the Guidelines for Implementation of the CEQA Guidelines provides that the summary shall identify each significant effect with proposed mitigation measures that would reduce or avoid that effect. This information is summarized in Table ES-1, Summary of Impacts and Mitigation Measures.

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Table ES-1
Summary of Impacts and Mitigation Measures

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.1 Aesthetics					
3.1-1	Have a substantial adverse effect on a scenic vista.	No Impact		No mitigation measures are required.	
3.1-2	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact		No mitigation measures are required.	
3.1-3	Substantially degrade the existing visual character or quality of the site and its surroundings.	No Impact		No mitigation measures are required.	
3.1-4	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	No Impact		No mitigation measures are required.	
3.2 Agriculture Resources					
3.2-1	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 Department of Conservation, to non-agricultural use.	No Impact		No mitigation measures are required.	
3.2-2	Conflict with existing zoning for agricultural use, or a Williamson Act contract.	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.2-3	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.	No Impact		No mitigation measures are required.	
3.3 Air Quality					
3.3-1	Conflict with or obstruct implementation of any applicable air quality plan.	Less Than Significant		No mitigation measures are required.	
3.3-2	Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation due to area source or operational emissions.	Less Than Significant		No mitigation measures are required.	
3.3-3	Violate any air quality standard or contribute substantially to an existing or projected air quality violation across air basins.	Less Than Significant		No mitigation measures are required.	
3.3-4	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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).	Less Than Significant		No mitigation measures are required.	
3.3-5	Expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.3-6	Create objectionable odors affecting a substantial number of people.	Less Than Significant		No mitigation measures are required.	
3.4 Biological Resources					
3.4-1	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 CDFG or USFWS.	No Impact		No mitigation measures are required.	
3.4-2	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 CDFG or USFWS.	No Impact		No mitigation measures are required.	
3.4-3	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	No Impact		No mitigation measures are required.	
3.4-4	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.	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.4-5	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	No Impact		No mitigation measures are required.	
3.4-6	Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan.	No Impact		No mitigation measures are required.	
3.5 Cultural Resources					
3.5-1	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	No Impact		No mitigation measures are required.	
3.5-2	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	No Impact		No mitigation measures are required.	
3.5-3	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	No Impact		No mitigation measures are required.	
3.5-4	Disturb any human remains, including those interred outside of formal cemeteries.	No Impact		No mitigation measures are required.	
3.6 Geology and Soils					
3.6-1	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
	ground failure including liquefaction, or landslides.				
3.6-2	Result in substantial soil erosion or the loss of topsoil.	No Impact		No mitigation measures are required.	
3.6-3	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.	Less Than Significant		No mitigation measures are required.	
3.6-4	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	Less Than Significant		No mitigation measures are required.	
3.6-5	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.	No Impact		No mitigation measures are required.	
3.7 Hazards and Hazardous Materials					
3.7-1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.7-2	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.	Less Than Significant		No mitigation measures are required.	
3.7-3	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less Than Significant		No mitigation measures are required.	
3.7-4	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.	Less Than Significant		No mitigation measures are required.	
3.7-5	Be located within an airport land use plan within two miles of a public airport or the vicinity of a private airstrip, creating a safety hazard for people residing or working in the project area.	No Impact		No mitigation measures are required.	
3.7-6	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.7-7	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	Less Than Significant		No mitigation measures are required.	
3.8 Hydrology and Water Quality					
3.8-1	Violate any water quality standards or waste discharge requirements.	Less Than Significant		No mitigation measures are required.	
3.8-2	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	Less Than Significant		No mitigation measures are required.	
3.8-3	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	No Impact		No mitigation measures are required.	
3.8-4	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.8-5	Create or contribute runoff which would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff.	No Impact		No mitigation measures are required.	
3.8-6	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.	No Impact		No mitigation measures are required.	
3.8-7	Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	No Impact		No mitigation measures are required.	
3.8-8	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	No Impact		No mitigation measures are required.	
3.8-9	Result in a significant risk of inundation by seiche, tsunami, or mudflow.	Less Than Significant		No mitigation measures are required.	
3.9 Land Use and Planning					
3.9-1	Physically divide an established community.	No Impact		No mitigation measures are required.	
3.9-2	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
	the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.				
3.9-3	Conflict with any applicable habitat conservation plan or natural community conservation plan.	No Impact		No mitigation measures are required.	
3.10 Mineral Resources					
3.10-1	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.	No Impact		No mitigation measures are required.	
3.10-2	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.	No Impact		No mitigation measures are required.	
3.11 Noise					
3.11-1	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less Than Significant		No mitigation measures are required.	
3.11-2	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Less Than Significant		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.11-3	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	Less Than Significant		No mitigation measures are required.	
3.11-4	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	Less Than Significant		No mitigation measures are required.	
3.11-5	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 expose people residing or working in the project area to excessive noise levels.	No Impact		No mitigation measures are required.	
3.11-6	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.	No Impact		No mitigation measures are required.	
3.12 Population and Housing					
3.12-1	Induce substantial 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).	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.12-2	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	No Impact		No mitigation measures are required.	
3.12-3	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	No Impact		No mitigation measures are required.	
3.13 Public Services					
3.13-1	Result in 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.	No Impact		No mitigation measures are required.	
3.14 Recreation					
3.14-1	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.	No Impact		No mitigation measures are required.	
3.14-2	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.15 Transportation/Traffic					
3.15-1	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections).	Less Than Significant		No mitigation measures are required.	
3.15-2	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.	Less Than Significant		No mitigation measures are required.	
3.15-3	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	No Impact		No mitigation measures are required.	
3.15-4	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No Impact		No mitigation measures are required.	
3.15-5	Result in inadequate emergency access.	No Impact		No mitigation measures are required.	
3.15-6	Result in inadequate parking capacity.	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
3.15-7	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).	No Impact		No mitigation measures are required.	
3.16 Utilities and Service Systems					
3.16-1	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	No Impact		No mitigation measures are required.	
3.16-2	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	No Impact		No mitigation measures are required.	
3.16-3	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	No Impact		No mitigation measures are required.	
3.16-4	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.	No Impact		No mitigation measures are required.	
3.16-5	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the	No Impact		No mitigation measures are required.	

Impact #	Impact	Significance	Mitigation #	Mitigation Measure	Significance After Mitigation
	project's projected demand in addition to the providers existing commitments.				
3.16-6	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	Less Than Significant		No mitigation measures are required.	
3.16-7	Comply with federal, state, and local statutes and regulations related to solid waste.	Less Than Significant		No mitigation measures are required.	
3.17 Global Climate Change					
3.17-1	The Project could potentially result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change.	Less Than Significant		No mitigation measures are required.	

CHAPTER ONE

INTRODUCTION

CHAPTER ONE
INTRODUCTION

The El Dorado County Air Quality Management District as Lead Agency on the proposed project pursuant to the California Environmental Quality Act (CEQA) has determined that a project level Environmental Impact Report (EIR) should be prepared for the proposed DST Output West Printing Capacity Expansion Project in accordance with SB 1662 Chapter 725 Statutes of 2008 Section 1 (c) (see Appendix A). This Draft Environmental Impact Report (Draft EIR) evaluates the potential environmental effects that might result from the proposed project and has been prepared in accordance with the California Environmental Quality Act (CEQA) Statutes and Guidelines.

In accordance with CEQA guidelines, this Draft EIR is an informational document intended to inform public decision-makers, responsible or interested agencies and the general public of the potential environmental effects of the proposed project. The environmental review process has been established to enable interested parties to evaluate a proposed project in terms of its environmental consequences, to examine and implement methods to eliminate or reduce potential adverse impacts and to consider a reasonable range of alternatives to the proposed project. While CEQA requires that major consideration be given to avoiding adverse environmental effects, the lead agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including the economic and social benefits of a proposed project, in determining whether a proposed project should be approved.

1.1 Procedures and Purpose

On August 20, 2009, the El Dorado County Air Quality Management District prepared and circulated a Notice of Preparation (NOP) to responsible, trustee, and local agencies for review and comment. A copy of the NOP and one comment letter received is included as Appendix B of this Draft EIR.

The Draft EIR will consider all potential environmental effects of the project to determine the level of significance of the environmental effect, and will analyze these potential effects to the degree of detail necessary to make a determination of significance. The EIR discussion of less-than-significant environmental effects will be limited to a brief explanation of why those effects are not considered potentially significant.

Section 15121(a) of the *Guidelines for Implementation of the California Environmental Quality Act* (CEQA Guidelines) defines an EIR as an informational document that will:

> …inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

As defined in Section 15378 of the CEQA Guidelines, a "project" is any action that "…has a potential for resulting in either a direct physical change in the environment, or a reasonably

foreseeable indirect physical change in the environment…" Section 15093 of the CEQA Guidelines requires decision-makers to balance the benefits of a proposed project against any unavoidable adverse environmental effects of the proposed project. If the benefits of the proposed project outweigh the unavoidable adverse environmental effects, then the decision-makers may adopt a statement of overriding considerations, finding that the environmental effects are acceptable in light of the proposed project's benefits to the public.

The CEQA process requires that the Lead Agency seriously consider input from other interested agencies, citizen groups, and individuals. CEQA provides for a public process requiring full public disclosure of the expected environmental consequences of the proposed action. The public must be given a meaningful opportunity to comment on the environmental document. CEQA also requires monitoring of the mitigation measures to ensure that they are in fact carried out.

CEQA requires a public review period for commenting on the Draft EIR. During the review period, any agency, group or individual may comment in writing on the Draft EIR, and the Lead Agency must respond to each comment on environmental issues in the Final EIR. According to Section 15202 of the CEQA Guidelines, CEQA does not require formal hearing at any stage of the environmental review process; however, it is typical to consider the EIR and its findings during a public meeting conducted in consideration of project approval.

All comments or questions regarding this Draft EIR should be addressed to:

Marcella McTaggart, Air Pollution Control Officer
El Dorado County Air Quality Management District
2850 Fairlane Court, Building C
Placerville, CA 95667
(530) 621-6662

1.2 Organization of the EIR

CHAPTER ONE

Chapter One briefly describes the procedures and purpose for environmental evaluation of the proposed project, the contents and organization of the Draft EIR, and a brief methodology discussions.

CHAPTER TWO

Chapter Two provides the project location, proposed action, project description, the project objectives, the uses of the EIR, and agency actions and permit requirements.

CHAPTER THREE

Chapter Three provides an environmental analysis evaluating each topical area. Each topical area is organized as follows:

Introduction. Each environmental topic is preceded by a description of the topic and a brief statement of the rationale for addressing the topic.

Environmental Setting. Description of the existing environment in and around the project area.

Regulatory Setting. A discussion of the regulatory environment that may be applicable to the proposed project.

Thresholds of Significance. The thresholds of significance are the standards or thresholds by which impacts are measured, with the objective being the determination of whether an impact will be significant or less than significant. The purpose is to establish the level at which an environmental impact will be considered significant.

Impacts. Each impact associated with an environmental topic is described and listed by number for reference.

Discussion/Conclusion. This is an analysis and concluding statement identifying whether the impact is significant or less-than-significant. If found to be significant, the conclusion states whether the impact can be avoided or reduced to an acceptable level through implementation of mitigation measures, or whether the impact is significant and unavoidable.

Mitigation Measures. Each feasible mitigation measure is described and listed by number. Existing regulations are described, but are not treated as mitigation measures that must be repeated in the EIR. Rather, they are assumed to be existing law with which the proposed project must comply.

CHAPTER FOUR

Chapter Four describes and evaluates alternatives to the proposed project. The proposed project is compared to each alternative, and the environmental ramifications of each are analyzed. Per requirements of CEQA Guidelines § 15126 [d][2], the "no project" alternative must be considered to compare the environmental consequences of the project as proposed to the consequences of taking no action.

CHAPTER FIVE

Chapter Five evaluates and describes the following CEQA required topics: impacts considered less-than-significant, significant and irreversible impacts, growth inducing effects, and significant and unavoidable environmental effects.

APPENDICES

References to published literature or technical reports cited in the text have been included at the end of the Draft EIR to facilitate full environmental review of the proposed project. Also

included are the names and agencies of individuals contacted for information during EIR preparation and a listing of the preparers of the EIR.

1.3 Methodology

The El Dorado County Air Quality Management District has determined that a project level EIR should be prepared for the proposed project. A project level EIR is described in Section 15161 of the State CEQA Guidelines as an EIR that examines the environmental impacts of a specific project. The proposed project is evaluated at a project level of detail in this EIR. This EIR is intended to provide the information and environmental analysis necessary to assist public agency decision-makers in considering the approvals necessary to implement the proposed project.

Although the emission offset credits will provide appropriate mitigation for the VOC emission increase, and few, if any other environmental impacts are anticipated from the proposed project, Section 1 (c) of SB 1662 Chapter 725 Statutes of 2008 requires the El Dorado County Air Quality Management District to prepare and certify an EIR prior to authorizing any emission reduction credits for the proposed project.

Because the addition of several new printing machines within the existing plant, resulting in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy), will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, it is not anticipated that analysis and mitigation will be required in the following environmental impact areas: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Mineral Resources, Noise, Public Services, Population and Housing, Recreation, Transportation/Traffic, Utilities and Service Systems. Analysis pertaining to Air Quality, Global Climate Change, and Hazards and Hazardous Materials, including mitigation if required, will be provided in the EIR. Mandatory Findings of Significance for project impacts will be included in the analysis when appropriate. The EIR will also analyze feasible alternatives to the proposed project in sufficient depth to afford readers an understanding of the different alternatives and environmental consequences.

CHAPTER TWO

PROJECT DESCRIPTION

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PROJECT DESCRIPTION

2.1 Project Location

The proposed project site is located at 5220 Robert J. Mathews Pkwy (Assessors Parcel Number 117-010-14), approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

2.2 Proposed Action

The project applicant, DST Output, is proposing to add several new printing machines within the interior of the existing plant which will result in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy). The EIR is being prepared pursuant to SB 1662 Chapter 725 Statutes of 2008 Section 1 (c) (reference Appendix A) requiring the El Dorado County Air Quality Management District (El Dorado County AQMD), as Lead Agency, to prepare and certify an EIR prior to authorizing a one time only transfer of emission reduction credits for the proposed project.

2.3 Project Description

The proposed project consists of the addition of several new printers within the existing DST Output West plant resulting in additional VOC emissions of up to 0.7 tpy. The additional VOC emissions have the potential to exceed the El Dorado County AQMD 10 tpy VOC emission threshold of significance. In order to provide for further expansion, acquisition of emissions offset credits is necessary. It is proposed that the potential to exceed the VOC threshold brought on by the additional printers will be offset by the transfer of 1.4 tons of VOC emission offset credits (due to the applicable distance ratio of 2:1, the 1.4 tons of offset credits to be obtained in the Sacramento Metropolitan Air Quality Management District (SMAQMD) represents only 0.7 tons of emissions offsets when transferred to El Dorado County AQMD) from a source located in the jurisdiction of the SMAQMD as permitted under SB 1662.

Proposed project site and surrounding land uses are summarized in Table 2-1.

Table 2-1
Surrounding Land Use

Location	Land Use	General Plan	Zoning
ONSITE	DST Output Facility	Research & Development	Research & Development – Design Control
NORTH:	Business Park Development	Research & Development	Research & Development – Design Control
EAST:	Business Park Development	Research & Development	Research & Development – Design Control

Location	Land Use	General Plan	Zoning
SOUTH:	Vacant/Research and Development Facility	Research & Development	Research & Development – Design Control
WEST:	Vacant/Grassland	Specific Plan	Carson Creek Specific Plan

Source: El Dorado County Planning Department; Quad Knopf, 2009

2.4 Project Goals and Objectives

The goals of the project proponent for this project are as follows:

1. To ensure that existing jobs are retained as the result of added productivity within the existing plant operation.

2. To enhance production efficiency and output through cost effective use of floor space within the existing plant.

3. To achieve net VOC reduction within the combined SMAQMD and El Dorado County AQMD due to the distance ratio requirement of 2:1 (1.4 tons of reduction within the SMAQMD is required to off-set 0.7 tons of emissions within the El Dorado County AQMD resulting in a net reduction of 0.7 tons of VOC s being generated into the atmosphere annually).

4. To increase profitability and strengthen the El Dorado County economy.

2.5 Uses of the EIR and Required Agency Actions and Permits

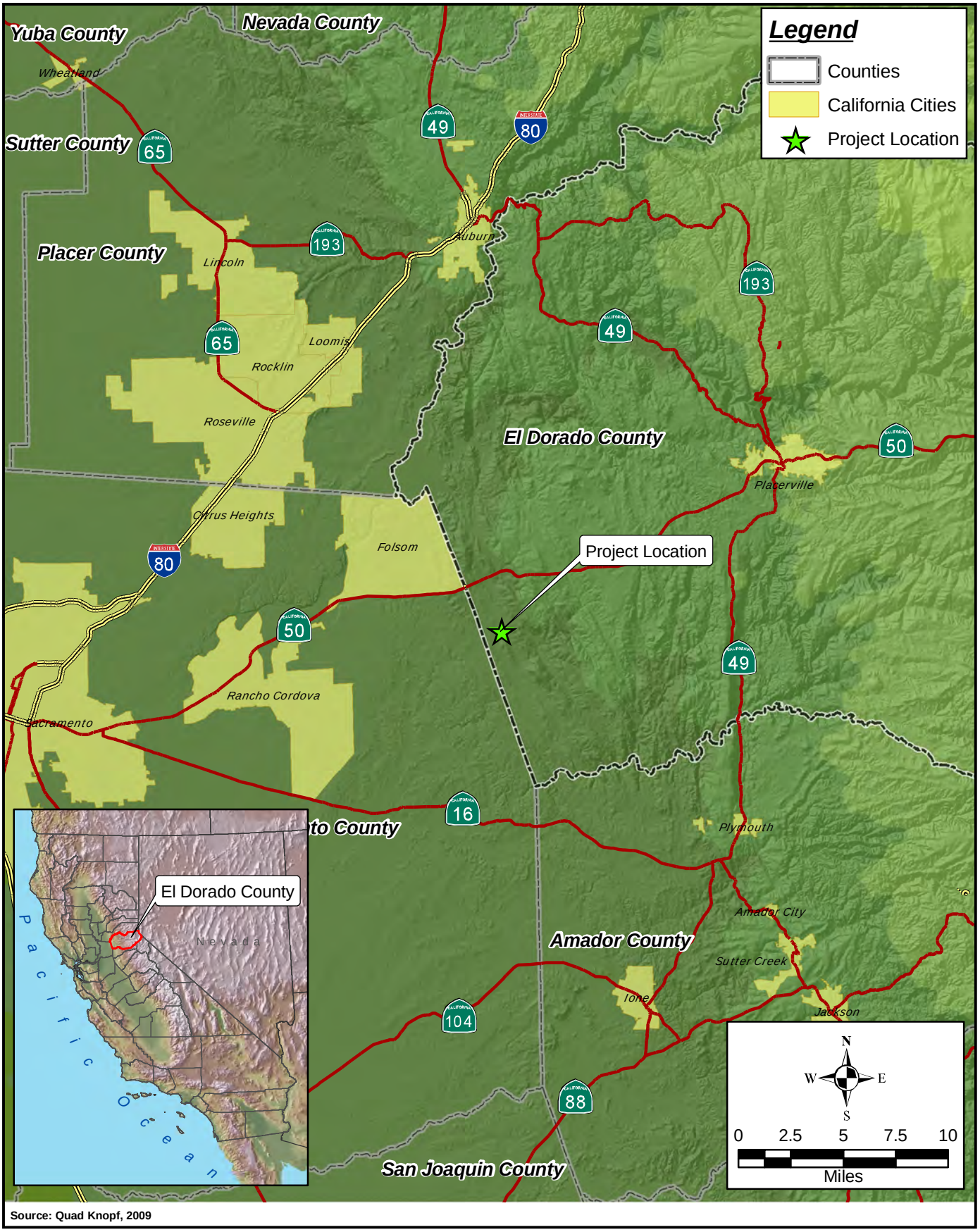
This EIR will be used to satisfy the requirements of CEQA and SB 1662 Chapter 725 Statutes of 2008 Section 1 (c) with regards to the proposed project. The El Dorado County AQMD, acting as Lead Agency, will oversee the preparation and adoption of the EIR, and will be responsible for EIR availability and use by the public and other interested agencies and parties.

Table 2-2 includes information required by Section 15124 of the CEQA Guidelines summarizing the approvals required for the proposed project.

Table 2-2
Approval Requirements

Agency	Requirement
El Dorado Air Quality Management District	SB 1662 Section 1 (c) Chaptered in 2008 requiring the El Dorado County AQMD to prepare and certify an EIR prior to authorizing a one time only transfer of emission reduction credits for the proposed project

Source: Quad Knopf, Inc. 2009



Source: Quad Knopf, 2009

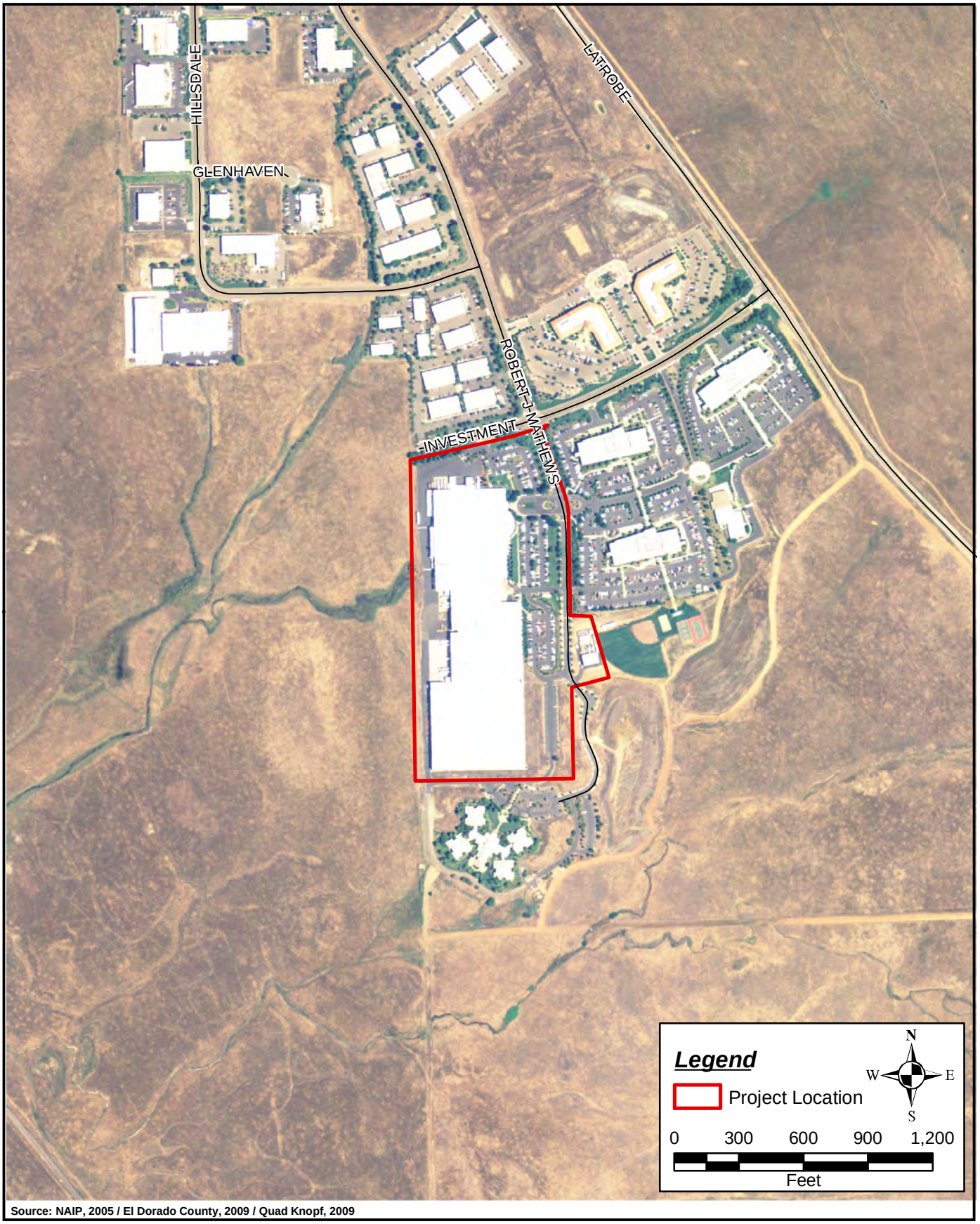
Quad Knopf

DST OUTPUT WEST
PRINTING CAPACITY EXPANSION PROJECT
REGIONAL LOCATION MAP

Figure 2-1

Job No.: 090154

09-1424.A.34



Source: NAIP, 2005 / El Dorado County, 2009 / Quad Knopf, 2009

Quad Knopf

DST OUTPUT WEST
PRINTING CAPACITY EXPANSION PROJECT
VICINITY MAP

Figure 2-2

Job No.: 090154

09-1424.A.35

CHAPTER THREE

ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

CHAPTER THREE
ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

3.1 Aesthetics

This section addresses the aesthetics impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with aesthetics will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding aesthetic impacts.

3.1.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy). The proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North – Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to aesthetics applicable to the proposed project.

STATE

There are no specific state regulations pertaining to aesthetics applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to aesthetics applicable to the proposed project.

3.1.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.3 IMPACTS AND MITIGATION MEASURES

Impact #3.1-1: Have a substantial adverse effect on a scenic vista.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant and the proposed project will not have a substantial adverse effect on a scenic vista. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.1-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant and the proposed project will not

substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.1-3: Substantially degrade the existing visual character or quality of the site and its surroundings.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant and the proposed project will not substantially degrade the existing visual character or quality of the site and its surroundings. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.1-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant and the proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

3.2 Agriculture Resources

This section addresses the agricultural resource impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with agricultural resources will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding agricultural resource impacts.

3.2.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to agricultural resources applicable to the proposed project.

STATE

There are no specific state regulations pertaining to agricultural resources applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to agricultural resources applicable to the proposed project.

3.2.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- 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 Department of Conservation, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

3.2.3 IMPACTS AND MITIGATION MEASURES

Impact #3.2-1: 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 Department of Conservation, to non-agricultural use.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not 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 Department of Conservation, to non-agricultural use. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.2-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any

modification to the land surrounding the plant. The proposed project will not conflict with existing zoning for agricultural use, or a Williamson Act contract. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.2-3: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.3 Air Quality

This section includes a summary of applicable regulations, existing air quality conditions, and an analysis of potential short-term and long-term air quality impacts from implementation of the proposed project. This section describes the climate and air pollution climatology of the Mountain Counties Air Basin (MCAB) and the Sacramento Valley Air Basin (SVAB), United States Environmental Protection Agency (US EPA) criteria pollutants, and the air basin's attainment status for each, as well as current regional air quality.

Emissions from project implementation are analyzed and mitigation measures are presented. This analysis relies on a report prepared for DST Output by SECOR International Incorporated (SECOR), *Emissions Inventory Report for DST Output West, LLC* (Appendix C), and Air Permitting Specialists, *Air Quality Impacts Associated with Interbasin Transfer of Reactive Organic Compounds* (Appendix D). During the Notice of Preparation (NOP) period, no comments were received regarding air quality impacts.

3.3.1 SETTING

Environmental Setting

The project site is located in the central portion of the MCAB adjacent to the SVAB (see Figure 3.3-1). The MCAB includes the following counties: Plumas, Sierra, Nevada, Placer, El Dorado, Amador, Calaveras, Tuolumne, and Mariposa. The Sacramento Valley Air Basin includes the following counties: Butte, Colusa, Glenn, Placer, Sacramento, Shasta, Solano, Sutter, Tehama, Yolo, and Yuba. The MCAB is located in the western foothills of the Sierra Nevada mountain range. The MCAB extends from as far north as Lake Almanor to the town of Mariposa at its southern extent.

The mountainous terrain influences the air movements throughout the air basin, with prevailing winds traveling north-south at lower elevations and northeast-southwest from higher elevations. As a result of the diurnal air movement in the vicinity of the project, pollution from neighboring San Joaquin Valley counties is transported into the air basin during the day when temperatures are at their peak and the pollution then returns back to the Sacramento and San Joaquin Valleys during the night when the temperature falls. During the summer, the MCAB experiences daytime inversions at elevations from 2,000 to 2,500 feet, and during the winter, inversions occur at elevations from 500 to 1,000 feet.

The Sacramento Federal Nonattainment Region for ozone is comprised of five air districts in the southern portion of the SVAB and the Western portion of the MCAB. The Sacramento Federal Nonattainment Region air districts include all of Sacramento and Yolo Counties, and portions of El Dorado, Placer, Sutter and Solano Counties. With two exceptions, this area is in attainment for all state and national ambient air quality standards (AAQS). However, the Sacramento Federal Nonattainment Region is designated a "severe" nonattainment area for the federal eight hour AAQS for ozone, and is also a "severe" nonattainment area for the state one hour ozone standard.

CRITERIA POLLUTANTS

The US EPA uses six criteria pollutants as indicators of air quality and has established for each of them a maximum concentration above which adverse effects on human health may occur. Table 3.3-1 summarizes the general characteristics, health effects, and major sources of each criteria pollutant.

Table 3.3-1
US EPA Criteria Pollutants

Pollutant	Characteristics	Health Effects	Major Sources
Ozone (O_3)	A highly reactive photochemical pollutant created by the action of sunshine on ozone precursors (primarily reactive hydrocarbons and oxides of nitrogen). Often called photochemical smog.	Eye irritation. Respiratory function impairment.	Combustion sources such as factories and automobiles as well as evaporation of solvents and fuels.
Carbon Monoxide (CO)	An odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels.	Impairment of oxygen transport in the bloodstream. Aggravation of cardiovascular disease. Fatigue, headache, confusion, dizziness. Can be fatal in the case of very high concentrations.	Automobile exhaust, combustion of fuels, combustion of wood in woodstoves and fireplaces.
Nitrogen Dioxide (NO_2)	Reddish-brown gas that discolors the air, formed during combustion.	Increased risk of acute and chronic respiratory disease.	Automobile and diesel truck exhaust, industrial processes, and fossil-fueled power plants.
Sulfur Dioxide (SO_2)	A colorless gas with a pungent, irritating odor.	Aggravation of chronic obstruction lung disease. Increased risk of acute and chronic respiratory disease.	Diesel vehicle exhaust, oil-powered power plants, and industrial processes.

Pollutant		Characteristics	Health Effects	Major Sources
Particulate Matter (PM)	Suspended Particulate Matter (PM_{10})	Solid and liquid particles of dust, soot, aerosols, and other matter that are less than 10 microns in diameter.	Aggravation of chronic disease and heart/lung disease symptoms.	Combustion, automobiles, field burning, factories, and unpaved roads. Also a result of photochemical processes.
	Fine Particulate Matter ($PM_{2.5}$)	Solid and liquid particles of dust, soot, aerosols, and other matter that are less than 2.5 microns in diameter.	Aggravation of chronic disease and heart/lung disease symptoms.	Fuel combustion, atmospheric chemical reaction.
Lead (Pb)		A metal that occurs both naturally in the environment and in manufactured products.	Organ damage Reproductive disorders Osteoporosis	Industrial processes

Source: California Air Resources Board, 2007

Ozone (O_3)

Ozone (O_3) is a photochemical oxidant and the major component of smog. While O_3 in the upper atmosphere is beneficial to life by shielding the earth from harmful ultraviolet radiation from the sun, high concentrations of O_3 at ground level are a major health and environmental concern. O_3 is not emitted directly into the air but is formed through complex chemical reactions between precursor emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) in the presence of sunlight. These reactions are stimulated by sunlight and temperature so that peak O_3 levels occur typically during the warmer times of the year. Both VOCs and NOx are emitted by transportation and industrial sources. VOCs are emitted from sources as diverse as autos, chemical manufacturing, dry cleaners, printers, paint shops, and other sources using solvents.

The reactivity of O_3 causes health problems because it damages lung tissue, reduces lung function, and sensitizes the lungs to other irritants. Scientific evidence indicates that ambient levels of O_3 affect not only people with impaired respiratory systems, such as asthmatics, but also healthy adults and children. Exposure to O_3 for several hours at relatively low concentrations has been found to significantly reduce lung function and induce respiratory inflammation in normal, healthy people during exercise. This decrease in lung function generally is accompanied by symptoms that include chest pain, coughing, sneezing, and pulmonary congestion.

Major ozone precursors include mobile sources such as cars; light-duty and heavy-duty trucks; and stationary emission sources such as industrial facilities, home furnaces, wood-burning appliances, and waste disposal and treatment facilities.

Carbon Monoxide (CO)

Carbon monoxide (CO) is a colorless, odorless, and poisonous gas produced by incomplete burning of carbon in fuels. When CO enters the bloodstream, it reduces the delivery of oxygen to the body's organs and tissues. Health threats are most serious for those who suffer from cardiovascular disease, particularly those with angina or peripheral vascular disease. Exposure to elevated CO levels can cause impairment of visual perception, manual dexterity, learning ability, and performance of complex tasks. The primary source of carbon monoxide is automobile use.

Nitrogen Dioxide (NO_2)

Nitrogen dioxide (NO_2) is a brownish, highly reactive gas that is present in all urban atmospheres. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections. Nitrogen oxides are an important precursor both to ozone (O_3) and acid rain and may affect both terrestrial and aquatic ecosystems.

The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO). NOx plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NOx forms when fuel is burned at high temperatures. The two major emission sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

Sulfur Dioxide (SO_2)

Sulfur dioxide (SO_2) affects breathing and may aggravate existing respiratory and cardiovascular disease in high doses. Sensitive populations include asthmatics, individuals with bronchitis or emphysema, children, and the elderly. SO_2 is also a primary contributor to acid deposition, or acid rain, which causes acidification of lakes and streams and can damage trees, crops, historic buildings, and statues. In addition, sulfur compounds in the air contribute to visibility impairment in large parts of the country. This is especially noticeable in national parks. Ambient SO_2 results largely from stationary sources such as coal and oil combustion, steel mills, refineries, pulp and paper mills, and nonferrous smelters.

Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter includes dust, dirt, soot, smoke, and liquid droplets directly emitted into the air by sources such as factories, power plants, cars, construction activity, fires, and natural windblown dust. Particles formed in the atmosphere by condensation or the transformation of emitted gases such as SO_2 and VOCs are also considered particulate matter.

Based on studies of human populations exposed to high concentrations of particles (sometimes in the presence of SO_2) and laboratory studies of animals and humans, there are major effects of

Source: California Air Resources Board, 2009 / Quad Knopf, 2009

Quad Knopf

DST OUTPUT WEST
PRINTING CAPACITY EXPANSION PROJECT
CALIFORNIA AIR BASINS

Figure 3.3-1

Job No.: 090154

09-1424.A.47

concern for human health. These include effects on breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular disease, alterations in the body's defense systems against foreign materials, damage to lung tissue, carcinogenesis, and premature death. The major subgroups of the population that appear to be most sensitive to the effects of particulate matter include individuals with chronic obstructive pulmonary or cardiovascular disease or influenza, asthmatics, the elderly, and children. Particulate matter also soils and damages materials and is a major cause of visibility impairment.

Lead (Pb)

Lead (Pb) exposure can occur through multiple pathways, including inhalation of air and ingestion of Pb in food, water, soil, or dust. Excessive Pb exposure can cause seizures, mental retardation, and/or behavioral disorders. Low doses of Pb can lead to central nervous system damage. Recent studies have also shown that Pb may be a factor in high blood pressure and in subsequent heart disease.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Unlike criteria pollutants, no safe levels of exposure to TACs can be established. There are many different types of TACs, with varying degrees of toxicity. Source of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations as well as accidental releases of hazardous materials during upset conditions. The health effects of TACs include cancer, birth defects, neurological damage, and death.

Diesel exhaust is a TAC of growing concern in California. The California Air Resources Board (CARB) in 1998 identified diesel engine particulate matter as a TAC. The exhaust from diesel engines contains hundreds of different gaseous and particulate components, many of which are toxic. Many of these compounds adhere to the particles, and because diesel particles are so small, they penetrate deep into the lungs. Diesel engine particulate has been identified as a human carcinogen. Mobile sources, such as trucks, buses, automobiles, trains, ships and farm equipment, are by far the largest source of diesel emissions.

ATTAINMENT STATUS

Federal and state air quality laws require identification of areas not meeting the ambient air quality standards. These areas must develop regional air quality plans to eventually attain the standards. Under both the federal and state Clean Air Acts, El Dorado County is a nonattainment area (standards have not been attained) for ozone and under the state Clean Air Act for particulate matter (PM_{10}). The air basin is either attainment or unclassified for other ambient standards. Table 3.3-2 summarizes the County's attainment status for each standard.

Table 3.3-2
El Dorado County Designations

Pollutant	Designation/Classification	
	Federal Standards	State Standards
Ozone -- One hour	No Federal Standard (See note below)	Nonattainment
Ozone -- Eight hour	Nonattainment	Nonattainment
PM_{10} (Particulate matter 10 micrometers in diameter)	Unclassified	Nonattainment
$PM_{2.5}$ (Particulate matter 2.5 micrometers in diameter)	Unclassified/Attainment	Unclassified Nonattainment*
Carbon Monoxide	Unclassified/Attainment	Unclassified
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified	Attainment
Lead (Particulate)	Unclassified	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified
Note: The Federal One-Hour Ozone National Ambient Air Quality Standard was revoked on June 15, 2005. *The Western Portion of El Dorado County has been proposed and will be designated as nonattainment for $PM_{2.5}$ (formal nonattainment designation for this area should be published in late 2009)		

Source: California Air Resources Board, 2007 and U.S. EPA, 2009

AMBIENT AIR QUALITY

The California Air Resources Board (CARB) and the United States Environmental Protection Agency (EPA) currently focus on the following air pollutants as indicators of ambient air quality: Ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM), and lead. Because these are the most prevalent air pollutants known to be deleterious to human health and extensive health-effects criteria documents are available, they are commonly referred to as "criteria air pollutants."

The EPA has established primary and secondary National Ambient Air Quality Standard (NAAQS) for the following criteria air pollutants: O_3, CO, NO_2, SO_2, PM_{10}, fine particulate matter ($PM_{2.5}$), and lead. The primary standards protect the public health and the secondary standards protect the public welfare. In addition to the NAAQS, CARB has established California Ambient Air Quality Standard (CAAQS) for the following criteria air pollutants: sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulate matter. In most cases the CAAQS are more stringent than the NAAQS. The NAAQS and CAAQS as discussed further in the regulatory section below.

The California Air Resource Board currently operates monitoring stations in El Dorado County at Placerville-Gold Nugget Way and in Sacramento County at Folsom-Natomas Street. A summary of available air quality data for 1992-2008 from these monitoring sites are shown in Table 3.3-3. Table 3.3-3 shows that the federal/state standards for ozone are occasionally exceeded in the project area. PM_{10} standards have only been exceeded at the State level. At these sites, inhalable PM_{10} samplers are operated every sixth day, year-round. The highest

concentrations of PM_{10} typically occur during the forest fire season, which generally starts in August and lasts until the fall rains begin.

Continuous sampling of ground-level ozone is conducted year round. When an exceedance of the state standard for ozone is predicted, the CARB issues media announcements which urge the state to reduce or alter driving habits to lessen the predicted impact of this photochemically produced pollutant.

Table 3.3-3
Ambient Air Quality

Year	Folsom-Natomas Street					Placerville-Gold Nugget Way				
	State Ozone	Federal Ozone	State PM_{10} [1]	Federal PM_{10} [1]	Federal $PM_{2.5}$ [2]	State Ozone	Federal Ozone	State PM_{10} [1]	Federal PM_{10} [1]	Federal $PM_{2.5}$ [2]
2008	38	5	*	*	*	16	2	6.1	0	*
2007	13	1	*	*	*	4	0	0	0	*
2006	31	1	*	*	*	32	0	0	0	*
2005	23	0	*	*	*	17	0	0	0	*
2004	30	3	*	*	*	21	1	0	0	*
2003	27	3	*	*	*	19	0	0	0	*
2002	27	2	*	*	*	17	0	6.1	0	*
2001	17	1	*	*	*	19	0	*	0	*
2000	22	4	*	*	*	21	2	0	0	*
1999	31	10	*	*	*	22	2	0	0	*
1998	19	1	*	*	*	13	0	5.8	0	*
1997	0	0	*	*	*	31	1	*	0	*
1996 [3]	35	7	*	*	*	31	1	*	0	*
1995 [3]	33	7	*	*	*	32	1	6.1	0	*
1994 [3]	31	6	*	*	*	26	2	0	0	*
1993 [3]	24	3	*	*	*	10	0	5.7	0	*
1992 [3]	42	9	*	*	*	29	0	*	*	*

(1) Measurements of PM_{10} are made every sixth day. Data is the estimated number of days that the standard would have been exceeded had measurements been collected every day.
(2) National 2006 24-Hour $PM_{2.5}$ Standard
(3) Folsom-Natomas Street reading are from the Folsom-City Corporation Yard
*There was insufficient (or no) data available to determine the value.

Source: Air Resources Board Aerometric Data Analysis and Management System (ADAM)

SENSITIVE RECEPTORS

"Sensitive Receptors" are defined as facilities where sensitive population groups (children, the elderly, the acutely ill, and the chronically ill) are likely to be located. These land uses include residences, schools, playgrounds, child care centers, retirement homes, convalescent homes, hospitals, and medical clinics.

The project itself would not be considered a sensitive receptor. There are no other sensitive receptors in the immediate vicinity of the proposed project. The nearest sensitive receptors are existing and future homes on the east side of Latrobe Road, The Phoenix School, El Dorado Hills I and II Campus located at the Corner of Robert J Mathews Parkway and Hillsdale Circle and

Golden Hills School located at the Corner of Suncast Lane and Golden Foothill Pkwy, all more then a half-mile from the project site.

Regulatory Setting

FEDERAL

Federal Clean Air Act

The Federal Clean Air Act (FCAA) was first signed into law in 1970. In 1977, and again in 1990, the law was substantially amended. The FCAA is the foundation for a national air pollution control effort, and it is composed of the following basic elements: national ambient air quality standards for criteria air pollutants, hazardous air pollutant standards, state attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions.

The US Environmental Protection Agency (EPA) is responsible for administering the FCAA. The FCAA requires the EPA to set National Ambient Air Quality Standards (NAAQS) for several problem air pollutants based on human health and welfare criteria. Two types of NAAQS were established: primary standards, which protect public health, and secondary standards, which protect the public welfare from non-health-related adverse effects such as visibility reduction.

The FCAA recognizes the importance for each state to locally carry out the Clean Air Act, as special consideration of local industries; geography, housing patterns, etc. are needed to have full comprehension of the local pollution control problems. As a result, the EPA requires each state to develop a State Implementation Plan (SIP) that explains how each state will implement the FCAA within their jurisdiction. A State Implementation Plan (SIP) is a collection of rules and regulations that a particular state will implement to control air quality within their jurisdiction. The CARB is the state agency that is responsible for preparing the California SIP.

National Emissions Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart M)

The NESHAPs are emissions standards set by the US EPA for an air pollutant not covered by National Ambient Air Quality Standards that may cause an increase in fatalities or in serious, irreversible, or incapacitating illness. The standards for a particular source category require the maximum degree of emission reduction that the EPA determines to be achievable, which is known as the Maximum Achievable Control Technology (MACT).

STATE

California Clean Air Act

The California Clean Air Act (CCAA) was first signed into law in 1988. The CCAA provides a comprehensive framework for air quality planning and regulation, and spells out in statute the state's air quality goals, planning and regulatory strategies, and performance. The CARB is the agency responsible for administering the CCAA. CARB established ambient air quality

standards pursuant to the California Health and Safety Code (CH&SC) [§39606(b)], which are similar to the federal standards.

Ambient Air Quality Standards

National ambient air quality standards are determined by the Environmental Protection Agency. The standards include both primary and secondary ambient air quality standards. Primary standards are established with a safety margin. Secondary standards are more stringent than primary standards and are intended to protect public health and welfare. States have the ability to set standards that are more stringent than the federal standards. As such, California established more stringent ambient air quality standards.

Federal and state ambient air quality standards have been established for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, suspended particulates (PM_{10}) and lead. In addition, California has created standards for pollutants that are not covered by federal standards including sulfates and hydrogen sulfide. The federal and state primary standards for major pollutants are shown in Table 3.3-4 below.

Table 3.3-4
Federal and State Air Quality Standards

Pollutant	Average Time	California Standards[a] Concentration[c]	Federal Standards[b] Primary[c, d]
Ozone (O_3)	1 hour	0.09 ppm (180µg/m^3)	—
	8 hours	0.07 ppm (137 mg/m^3)	0.08 ppm (157 µg/m^3
Respirable Particulate Matter (PM_{10})	24 hours	50 µg/m^3	150 µg/m^3
	Annual arithmetic mean	20 µg/m^3	50 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	24 hours	35 µg/m^3	35 µg/m^3
	Annual arithmetic mean	12 µg/m^3	15 µg/m^3
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 µg/m^3)	9 ppm (10 mg/m^3)
	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)
Nitrogen Dioxide (NO_2)*	Annual arithmetic mean	0.030 pp, (57µg/m^3)	0.053 ppm (100 µg/m^3)
	1 hour	0.18 ppm (339 µg/m^3)	—
Sulfur Dioxide (SO_2)	Annual arithmetic mean	—	0.030 ppm (80 µg/m^3)
	24 hours	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)
	1 hour	0.25 ppm (655 µg/m^3)	—
Lead (Pb)[e]	30-day average	1.5 µg/m^3	—
	Calendar quarter	—	1.5 µg/m^3
Visibility Reducing Particles	8 hours	[f]	—
Sulfates	24 hours	25 µg/m^3	—
Hydrogen Sulfide	1 hour	0.03 ppm (42 µg/m^3)	—
Vinyl Chloride[e]	24 hours	0.010 ppm (26 µg/m^3)	—

Pollutant	Average Time	California Standards[a] Concentration[c]	Federal Standards[b] Primary[c, d]

ppm = Parts Per Million
$\mu g/m^3$ = micrograms per cubic meter
mg/m^3 = milligrams per cubic meter

* The Nitrogen Dioxide ambient air quality standard was amended on February 22, 2007, to lower the 1-hr standard to 0.18 ppm and establish a new annual standard of 0.030 ppm. These changes become effective after regulatory changes are submitted and approved by the Office of Administrative Law, expected later this year.

[a] California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter – PM_{10}, $PM_{2.5}$, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration of 150 $\mu g/m^3$) is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact US EPA for further clarification and current federal policies.

[c] Concentrations expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[f] Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.

Source: California Air Resources Board, November 17th, 2008

State Implementation Plan

The State Implementation Plan (SIP) is the blueprint for meeting federal air quality standards by the applicable deadlines set in the Federal Clean Air Act. California's SIP is a compilation of region-specific plans that detail how each area will meet the air quality standards. The plan includes an estimate of the emission reductions needed to meet each air quality standard based on air monitoring results, data on emission sources, and complex air quality modeling. It reflects the benefits of the pollution control program adopted by air agencies at all levels, and may also include commitments to implement new strategies. Together, these elements must reduce emissions by an amount sufficient to meet the air quality standard in each region. Once the local element of the plan is adopted by the air district(s) and other responsible local agencies, it is sent to the CARB for adoption and then formally submitted to the Environmental Protection Agency for approval as a revision to the California SIP.

SB 1662 Chapter 725 Statutes of 2008

SB 1662 allows one stationary source located in the El Dorado County Air Quality Management District (El Dorado County AQMD), to be determined by the El Dorado County AQMD, to offset increases in emissions by a one time transfer of emission reductions credited to any stationary source located in the Sacramento Metropolitan Air Quality Management District if both stationary sources are in the Sacramento Metro federal nonattainment area.

The requirements of Section 40709.6 of the Health and Safety Code, except subdivision (a) of that section, shall apply to any offsetting of emissions pursuant to this section. However, before authorizing any offsetting of emissions pursuant to SB 1662, the El Dorado County AQMD shall prepare and certify an environmental impact report pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code, including an analysis of, and mitigation for, the environmental impacts. The El Dorado County AQMD will be allowed to select one and only one stationary source located in the District that shall be able to offset emission reductions pursuant to SB 1662. That stationary source shall only be allowed to offset emissions pursuant to this section until January 1, 2010. However, any credits acquired pursuant to this section may be applied in future years, at the discretion of the El Dorado County AQMD.

LOCAL

El Dorado County General Plan

The Health, Safety and Nose Element of the *2004 El Dorado County General Plan* contains goals, policies and implementation measures to ensure that the residents and visitors to El Dorado County are not exposed to unsafe conditions resulting from air quality within the County. Table 3.3-5 lists local policies and implementation measures that apply to implementation of the proposed project.

Table 3.3-5
General Plan Policies – Air Quality

Policy Number	Policy
6.7.2.1	Develop and implement a public awareness campaign to educate community leaders and the public about the causes and effects of El Dorado County air pollution and about ways to reduce air pollution.
6.7.7.1	The County shall consider air quality when planning the land uses and transportation systems to accommodate expected growth, and shall use the recommendations in the most recent version of the El Dorado County Air Quality Management District (El Dorado County AQMD) *Guide to Air Quality Assessment: Determining Significance of Air Quality Impacts Under the California Environmental Quality Act*, to analyze potential air quality impacts (e.g., short-term construction, long-term operations, toxic and odor-related emissions) and to require feasible mitigation requirements for such impacts. The County shall also consider any new information or technology that becomes available prior to periodic updates of the Guide. The County shall encourage actions (e.g., use of light-colored roofs and retention of trees) to help mitigate heat island effects on air quality.

3.3.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.

3.3.3 IMPACTS AND MITIGATION MEASURES

Impact #3.3-1: Conflict with or obstruct implementation of any applicable air quality plan.

Discussion/Conclusion: In compliance with the 1990 Amendments to the Federal Clean Air Act, the 1994 Sacramento Regional Clean Air Plan (also called the State Implementation Plan or SIP) was developed cooperatively with all the districts in the Sacramento Federal Non-Attainment Region (El Dorado County AQMD, Feather River AQMD, Placer County APCD, SMAQMD, and Yolo-Solano AQMD). At the time of Plan adoption, the Sacramento Federal Non-Attainment Region could not show that they would meet the federal one-hour ozone standard within the U.S. Environmental Protection Agency defined region by 1999 and as a result the Region accepted a designation of “severe nonattainment” for the federal one-hour ozone standard, with additional emission requirements on stationary sources, in exchange for moving the compliance deadline to 2005. As a "severe nonattainment" area, the Sacramento Federal Non-Attainment Region was required to submit a rate-of-progress milestone evaluation per Section 182(g) of the Federal Clean Air Act. This report was developed cooperatively with participation by all of the Districts within the U.S. Environmental Protection Agency defined Sacramento Federal Non-Attainment Region. The 1999 Milestone Report included a compliance demonstration that the milestone requirement had been met for the Sacramento Federal Non-Attainment Region as did the 2002 Milestone Report. Additionally the 2006 Milestone report was submitted to the EPA in 2006 and in April of 2009 the Sacramento Federal Non-Attainment Region submitted the 2009 SIP.

The U.S. Environmental Protection Agency designated the Sacramento Federal Non-Attainment Region, comprised of the County of Sacramento and Yolo and portions of Placer, El Dorado, Solano and Sutter Counties, as a non-attainment area for the federal 8-hour ozone air quality

standard. The Air Quality Management and Pollution Control Districts within the Sacramento Federal Non-Attainment Region comprise the Sacramento Regional 8-Hour Ozone Planning area. The Districts have come together to reach attainment for the 8-hour ozone air quality standard and prepared a Regional 8-Hour Ozone Plan known as the *2009 Sacramento Metropolitan Area 8-Hour Ozone Attainment Plan (SIP)*, for the purpose of achieving and maintaining healthful air quality throughout the Region. The SIP proposes strategies necessary to attain the California ambient air quality standard for the 8-hour ozone standard at the earliest practicable date. The Plan identifies the air pollution problems which are to be cooperatively addressed on as many fronts as possible in order to make the region a healthier place to live now and in the future. This Plan demonstrates how existing and new control strategies will provide the necessary future emission reductions to meet the federal Clean Air Act requirements for reasonable further progress and attainment of the 1997 8-hour ozone NAAQS for the Sacramento Federal Non-Attainment Region. In addition, this Plan includes an updated emission inventory, sets new motor vehicle emission budgets for transportation and general conformity purposes, provides photochemical modeling results, and documents the implementation of reasonably available control measures.

In addition to the above referenced regional Air Quality plans, the El Dorado County AQMD has developed the *Reasonable Available Control Technology State Implementation Plan (RACT SIP)* and the *2003 Triennial Assessment and Plan Update*. These plans have been developed and updated accordingly to identify feasible emission control measures to provide expeditious progress toward achieving attainment status for nonattainment criteria pollutants. The proposed project will comply with the El Dorado County AQMD and any applicable Sacramento Regional Clean Air Plan rules and regulations, as applicable, and will obtain all required El Dorado County AQMD permits and offset credits. This impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.3-2: Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation due to area source or operational emissions.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant or require additional employees to operate the printers, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Calculations were prepared by SECOR (Appendix C) to summarize the assumptions, emission factors, and calculations used to estimate the existing nine printers within the plant potential to emit (PTE) regulated pollutants, as well as a theoretical scenario for the facility's to show the PTE of regulated pollutants. The theoretical scenario includes the existing nine printers plus three new printers. PTE is defined in El Dorado County AQMD Rule 522.2.W as ". . . the

maximum capacity of the unit to emit a regulated air pollutant or Hazardous Air Pollutant (HAP) considering the unit's physical and operational design." The data used in estimating the facility's PTE were developed utilizing process, raw material, and production information from the DST Output West facility.

Table 3.3-6 contains the production and process rates that serve as the throughput basis for the emissions estimates. The second column in Table 3.3-6 contains total ink usage, as well as total images printed during a representative 4-month period of May through August 2006. During this period the existing inkjet printers were operating at full production. The total area printed was estimated assuming 60% of the total number of images printed was on 6 5/8" x 9 1/3" sheets of paper and 40% was on 8 ½" x 11" sheets of paper. The third column contains the estimated PTE annual rates for the existing nine printers. These estimates were based on the previous PTE production scenario of 12 billion images printed per year. The last column contains the estimated new PTE annual rates for the existing nine printers plus three new printers. These estimates were based on the PTE production scenario of 14.34 billion images printed per year, provided by DST Output West.

Table 3.3-6
Production and Process Rates

	Actual 2006 May - August Rates	Previous Estimated PTE Annual Rates (nine printers) (1)	New Estimated PTE Annual Rates (previous nine printers plus three new printers) (5)
Total Images Printed	1,628,143,898 images(2)	12,000,000,000 images(3)	14,340,000,000 images (3)
Estimated Total Area Printed	71,882,553,097 SF(4)	529,800,000,000 SF	633,111,000,000 SF
Ink Usage			
Kodak FD1034 Black	5.3 gallons (2)	39 gallons	47 gallons
Kodak FV1501 Black	7,807.9 gallons(2)	57,547 gallons	68,768 gallons
Kodak FV2001 Process Cyan (blue)	375.1 gallons (2)	2,765 gallons	3,304 gallons
Kodak FV2002 Process Magenta	348.7 gallons (2)	2,570 gallons	3,071 gallons
Kodak FV2003 Process Black	1,978.1 gallons (2)	14,579 gallons	17,422 gallons
Kodak FV2014 Process Yellow	253.6 gallons (2)	1,869 gallons	2,234 gallons
Collins Orange SWO-4576	55.5 gallons (2)	409 gallons	489 gallons
Collins Red SWR-4911	29.1 gallons (2)	214 gallons	256 gallons
Collins Orange SWO-5173	29.1 gallons (2)	214 gallons	256 gallons
Collins Black SWK-5190	3,571.6 gallons (2)	26,324 gallons	31,457 gallons
Collins Ink Red SWR-5197	6.7 gallons (2)	50 gallons	59 gallons
Kodak FR1014 Replenisher	7.5 gallons (2)	55 gallons	66 gallons
Kodak FF1042 Replenisher	909.8 gallons (2)	6,706 gallons	8,013 gallons
Kodak FF1044 Flush	174.4 gallons (2)	1,285 gallons	1,536 gallons
Kodak FF2006 Shutdown	243.0 gallons (2)	1,791 gallons	2,141 gallons

References:
(1) Printers include #29 Model 5,000 Permit #10-1432, #31 Model 5,000 Permit #10-1431, #83 Model 5,000 #10-1430, #84 Model 5,000 Permit #10-1387, #85 Model 5,000 Permit #10-1408, #87 Model 3,700 Permit #10-

	Actual 2006 May - August Rates	Previous Estimated PTE Annual Rates (nine printers) [1]	New Estimated PTE Annual Rates (previous nine printers plus three new printers) [5]

1426, #88 Model 3,700 Permit #10-1426, #89 Model 3,700 Permit #10-1425, and #90 Model 3,700 Permit #10-1424.

[2] Provided by DST Output West, LLC, El Dorado Hills, California facility. Rates are the sum of the production values from May, June, July, and August 2006.

[3] Provided by DST Output West, LLC, El Dorado Hills, California facility, August 2006.

[4] Area Printed based on an estimate of 60% printed on 6 5/8" X 9 1/3" and 40% printed on 8 1/2" X 11" paper. Area quantities are in square feet (SF).

[5] PTE production scenario of the nine previously permitted printers, plus three new model 5,000 printers (#80 Model 5,000 Permit #10-1450, #81 Model 5,000 Permit #10-1451, #82 Model 5,000 Permit #10-1452).

Table 3.3-7 contains the estimated VOC PTE emissions for the existing nine printers. These calculations were based on the VOC content of each ink used. This data was either obtained from the Material Safety Data Sheet (MSDS) on file with the applicant or from conversations with the vendors.

Table 3.3-7
Estimated Previous PTE Annual VOC Emissions for the Previous Nine Printers

Product	Raw material components [1]			Estimated PTE Annual Rates [2] (gallons/yr)	Current PTE Annual Emissions (tons/yr)
	Density (lbs/gal)	VOC	Amount in Product		
FD1034 Black Ink Kodak Versamark, Inc.	8.50	Total VOC	0.260 lbs/gal	39	0.0051 [a]
FV1501 Black Ink Kodak Versamark, Inc.	8.55	Total VOC	0.020 lbs/gal	57,547	0.58 [a]
FV2001 Process Cyan (Blue) Ink Kodak Versamark, Inc.	8.41	Total VOC	0.060 lbs/gal	2,765	0.08 [a]
FV2002 Process Magenta Ink Kodak Versamark, Inc.	8.40	Total VOC	0.060 lbs/gal	2,570	0.08 [a]
FV2003 Process Black Ink Kodak Versamark, Inc.	8.51	Total VOC	0.060 lbs/gal	14,579	0.44 [a]
FV2014 Process Yellow Ink Kodak Versamark, Inc.	8.40	Total VOC	0.250 lbs/gal	1,869	0.23 [a]
Orange SWO-4576 Collins Ink Corporation	8.76	Total VOC	0.043 lbs/gal	409	0.01 [a]
Red SWR-4911 Collins Ink Corporation	8.76	Total VOC	0.050 lbs/gal	214	0.01 [a]
Orange SWO-5173 Collins Ink Corporation	8.76	Total VOC	0.022 lbs/gal	214	0.00 [a]
Black SWK-5190 Collins Ink Corporation	8.76	Total VOC	0.010 lbs/gal	26,324	0.13 [a]
Red SWR-5197 Collins Ink Corporation	8.76	Total VOC	0.049 lbs/gal	50	0.0012 [a]
FR1014 Replenisher Kodak Versamark, Inc.	8.32	Total VOC	0.010 lbs/gal	55	0.0003 [a]
FR1042 Replenisher Fluid Kodak Versamark, Inc.	8.32	Total VOC	0.010 lbs/gal	6,706	0.03 [a]

Product	Raw material components [1]			Estimated PTE Annual Rates [2] (gallons/yr)	Current PTE Annual Emissions (tons/yr)
	Density (lbs/gal)	VOC	Amount in Product		
FF1044 Flush Fluid Kodak Versamark, Inc.	8.40	Total VOC	0.010 lbs/gal	1,285	0.006 [a]
FF2006 Shutdown Fluid Kodak Versamark, Inc.	8.39	Total VOC	0.330 lbs/gal	1,791	0.30 [a]
Total VOC					1.894

Notes:
(a) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallon/yr]) x (VOC content [lbs/gal])) / 2,000 [lbs/ton]
References:
(1) From manufacturer's MSDS, product information sheet, or telephone conversation with manufacturer.
(2) See Table 3.3-6, Production and Process Rates.

Table 3.3-8 contains the estimated VOC PTE emissions for the existing nine printers plus three new printers. These calculations were based on the VOC content of each ink used. This data was either obtained from the MSDS or from conversations with the vendors.

Table 3.3-8
Estimated New PTE Annual VOC Emissions for the Previous Nine Printers and Three New Printers

Product	Raw material components [1]			Estimated PTE Annual Rates [2] (gallons/yr)	Proposed PTE Annual Emissions (tons/yr)
	Density (lbs/gal)	VOC	Amount in Product		
FD1034 Black Ink Kodak Versamark, Inc.	8.50	Total VOC	0.260 lbs/gal	47	0.0060 [a]
FV1501 Black Ink Kodak Versamark, Inc.	8.55	Total VOC	0.020 lbs/gal	68,768	0.69 [a]
FV2001 Process Cyan (Blue) Ink Kodak Versamark, Inc.	8.41	Total VOC	0.060 lbs/gal	3,304	0.10 [a]
FV2002 Process Magenta Ink Kodak Versamark, Inc.	8.40	Total VOC	0.060 lbs/gal	3,071	0.09 [a]
FV2003 Process Black Ink Kodak Versamark, Inc.	8.51	Total VOC	0.060 lbs/gal	17,422	0.52 [a]
FV2014 Process Yellow Ink Kodak Versamark, Inc.	8.40	Total VOC	0.250 lbs/gal	2,234	0.28 [a]
Orange SWO-4576 Collins Ink Corporation	8.76	Total VOC	0.043 lbs/gal	489	0.01 [a]
Red SWR-4911 Collins Ink Corporation	8.76	Total VOC	0.050 lbs/gal	256	0.01 [a]
Orange SWO-5173 Collins Ink Corporation	8.76	Total VOC	0.022 lbs/gal	256	0.00 [a]
Black SWK-5190 Collins Ink Corporation	8.76	Total VOC	0.010 lbs/gal	31,457	0.15 [a]
Red SWR-5197 Collins Ink Corporation	8.76	Total VOC	0.049 lbs/gal	59	0.0015 [a]
FR1014 Replenisher Kodak Versamark, Inc.	8.32	Total VOC	0.010 lbs/gal	66	0.0003 [a]
FR1042 Replenisher Fluid Kodak Versamark, Inc.	8.32	Total VOC	0.010 lbs/gal	8,013	0.04 [a]
FF1044 Flush Fluid Kodak Versamark, Inc.	8.40	Total VOC	0.010 lbs/gal	1,536	0.008 [a]

Product	Raw material components [1]			Estimated PTE Annual Rates [2] (gallons/yr)	Proposed PTE Annual Emissions (tons/yr)
	Density (lbs/gal)	VOC	Amount in Product		
FF2006 Shutdown Fluid Kodak Versamark, Inc.	8.39	Total VOC	0.330 lbs/gal	2,141	0.35 [a]
Total VOC					2.263

Notes:
(a) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallon/yr]) x (VOC content [lbs/gal])) / 2,000 [lbs/ton]
(b) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallons/yr]) x (density [lbs/gal]) x (VOC content [wt %] / 100)) / (2000 lbs/ton)
References:
(1) From manufacturer's MSDS, product information sheet, or telephone conversation with manufacturer.
(2) See Table 3.3-6, Production and Process Rates.

SECOR has not reduced the estimated emissions due to the disposal of the ink and solvent wastes in sealed containers. The current practice is to place ink and solvent wastes into a sealed container and have it removed from the facility as non-hazardous waste by a waste hauling vendor. SECOR believes that it is legitimate to subtract the average VOC content of the ink and solvent waste from future emissions tracking recordkeeping.

According to Table 3.3-7 and Table 3-3-8, operation of an additional three new printers will produce an additional 0.37 tons of VOC a year. According to the El Dorado County AQMD, the existing plant has the potential to operate at a maximum emission capacity of 5,000 pounds of VOC emissions per quarter, or 10 tons per year (District's offset provisions in its New Source Review Rule 523) plus an additional 2.4 tons of NOx (applied as VOC credits) emission offset credits acquired from within El Dorado County. Therefore, current total potential to emit VOC emissions are 12.4 tons per year. The total potential to emit VOC emissions of 12.4 tons per year covers the existing cogeneration plant that has the potential to emit just over 9 tons of VOCs a year, and the existing nine printers currently operating at the DST Output West facility. In order to facilitate further expansion within the plant, acquisition of additional emissions offset credits would be necessary to operate additional printers if the facility were to operate at maximum emission potential.

Based on the previous information, the existing facility has the potential to operate above the VOC emissions per quarter limit if the cogeneration plan and all nine printers were operating at maximum capacity, however with NOx emissions offset credits applied as VOC credits from with El Dorado County, the facility when operating at maximum capacity, operates close to, but below the maximum emissions of 10 tons per year for the District. Operation of additional printers, as proposed by DST Output West would again push the facility over the emissions limits set forth by the El Dorado County AQMD resulting in a ***potentially significant*** impact. However, the VOC threshold exceedance brought on by any additional printers will be offset by the transfer of 1.4 tons of VOC emission offset credits as permitted under SB 1662 from a source located within the SMAQMD, this impact is ***less than significant.*** It is important to note that due to the required distance ratio of 2:1, the 1.4 tons of offset credits originating in the SMAQMD represents only 0.7 tons of emissions offset credits within the El Dorado County AQMD due to

the distance from the source location in the SMAQMD to the DST Output West facility within the El Dorado County AQMD.

Mitigation Measures

No mitigation measures are required.

Impact #3.3-3: Violate any air quality standard or contribute substantially to an existing or projected air quality violation across air basins.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant and will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Air Permitting Specialists (APS) was retained by DST Output West to evaluate the air quality implications associated with interbasin transfer of emission reduction credits (ERCs) (Appendix D). This evaluation was prepared in support of a permit application submitted by DST Output West to El Dorado County AQMD for the installation and operation of additional printing equipment at their facility in El Dorado Hills, California. In reviewing the permit application the El Dorado County AQMD determined that as a condition of approval, DST Output West must provide offsets totaling 1.4 tons of reactive organic compounds (ROCs)/volatile organic compounds (VOCs).

El Dorado County AQMD rules require that offsets be secured either within the District boundary (County of El Dorado) or within the air basin (Mountain County Air Basin). The boundaries of the Mountain Counties and other air basins are shown in Figure 3.3-1.

Analysis by El Dorado County AQMD staff and DST Output West indicated that ROC/VOC offsets (emission reduction credits) are not available within El Dorado County or within the Mountain Counties Air Basin. As a result, DST has obtained ROC offsets in the City of Sacramento within the Sacramento Valley Air Basin adjacent to, and west of, El Dorado County and the Mountain Counties Air Basin.

IMPACT OF ROC EMISSIONS ON AIR QUALITY

Unlike other criteria air pollutants such as carbon monoxide (CO), oxides of nitrogen (NOx) or fine particulate matter (PM_{10}) that are subject to ambient air quality standards (See Table 3.3-4), there are no ambient air quality stands for ROCs/VOCs. However, ROCs/VOCs are precursor compounds that lead to the formation of ozone (smog) and ozone does have ambient air quality standards. Since El Dorado County has been designated as a nonattainment area for the State's one hour ozone standard (0.08 parts per million), reducing ROC/VOC emissions is an important part of the County's efforts to attain the state's l-hour and 8-hour ozone standards.

In addition to ROCs/VOCs, the other main precursor compound that leads to ozone formation is NOx. In the presence of sunlight, NOx and ROCs/VOCs chemically react to form ozone and

other compounds. Several characteristics distinguish ozone from other criteria air pollutants such as CO, SO2 and PM_{10}:

1) Ozone is a Secondary Air Pollutant - Unlike other air pollutants, including ROCs/VOCs, ozone is not directly released into the atmosphere. It is a result of chemical reactions in the atmosphere involving NOx and ROCs/VOCs in the presence of sunlight. In order to reduce ozone, one must reduce the amount of NOx and/or ROCs/VOCs released into the atmosphere.

2) Numerous studies have concluded that it takes several hours to form ozone. As shown in Figure 1 of Appendix D, there is a time lag of several hours between the time NOx and ROCs/VOCs are emitted into the atmosphere and peak concentrations of ozone. In this figure, ROCs are labeled as VOC (volatile organic compounds). The time lag between precursor emissions and ozone formation is important because the location of high ozone concentration may not coincide with location(s) where NOx or ROCs/VOCs are emitted. For example, winds could transport NOx and ROCs/VOCs into other geographic areas while these compounds are chemically reacting to form ozone. This is discussed below.

3) The Spatial Scale for Ozone Impacts is Regional (20 to 50 or more miles) - CO, SO2 and other primary air pollutants show the highest pollutant concentrations occur near the emission source. This concentration decreases with distance from the emission source. As a result, air quality impacts from primary air pollutants are localized near emission sources.

Ambient measurements of ozone concentrations at many locations indicate that ozone is a regional air pollutant. Extensive measurements in the past 30 years in Los Angeles, San Francisco Bay Area and the California's Central Valley confirm that high ozone concentrations occur within counties and geographic regions sharing similar air flow patterns.

The ozone concentration data further indicate that highest concentrations of ozone often occur at locations where relative lower amounts of precursor compounds are released. For example, highest concentrations of ozone in Southern California occur in San Bernardino and Riverside Counties even though the highest emissions occur in Los Angeles and Orange Counties. (See Appendix D Figure 2). In Northern California, the highest ozone concentrations are reported in the Livermore Valley while the main sources of emissions are located in Richmond and Martinez. Similarly, the highest ozone concentrations are reported in the eastern portions of Sacramento Valley and western portions of El Dorado County while most of the emissions occur in the City of Sacramento.

The most recent (2006) ROG emission estimates by CARB indicate that 67 tons of ROCs/VOCs are released daily in Sacramento County. This is roughly three times higher than the 18 tons/day released in El Dorado County. In spite of large differences in emissions, peak ozone concentrations in the two counties are virtually identical. For 2006, the peak 1- hour ozone concentrations forecast by CARB for Sacramento and El Dorado counties are 0.138 and 0.134 ppm respectively.

In summary, ozone is a secondary air pollutant that differs from other (primary) air pollutants in three important ways: it is regional, it takes several hours to produce ozone from NOx and ROCs/VOCs and the location of highest ozone concentrations do not always coincide with location of highest emissions.

IMPACTS OF ROC REDUCTIONS IN SACRAMENTO COUNTY ON AIR QUALITY IN EL DORADO COUNTY

It was noted previously that El Dorado County has similar ozone concentrations as Sacramento County and the Sacramento Valley Air Basin even though emissions in El Dorado County are a fraction of those in Sacramento County. The principal reason for this anomaly is the transport of precursor emissions and ozone from the Sacramento region into El Dorado County. As shown in Figure 3 of Appendix D, the predominant wind flow is from the West (from Sacramento region) towards El Dorado County.

The interbasin transport of emissions and ozone from one region to another has been verified by CARB and is the basis of several state regulations specifically aimed at reducing emissions in upwind regions. For example, Title 17, Article 6, Section 70600 of the California Code of Regulations stipulates emission control requirements in upwind districts in order to reduce ozone impacts in downwind areas.

The ozone transport phenomena indicate that the best way to reduce ozone impacts in downwind areas is to reduce precursor emissions in upwind areas. This means that reduction in ozone precursors in the Sacramento region would lead to reduced ozone concentrations in El Dorado County.

In terms of the location of ROC/VOC emission offsets for DST Output West, the ideal location for such offsets would not be locally in El Dorado Hills, but in the Sacramento region. Such offsets would yield the most benefit to El Dorado County in terms of reduced ozone impacts.

SUMMARY

A review of ozone chemistry, the spatial distribution of NOx and ROC/VOC emissions in the Sacramento Region and El Dorado County as well as local wind and topographical data indicates that the principal source of high ozone concentrations in El Dorado County is through interbasin transport. Given these characteristics, a reduction in ROC/VOC and NOx emissions in the Sacramento region would lead to reduced ozone concentrations in El Dorado County.

With the transfer of the 1.4 tons of credits at a 2:1 ratio from the Sacramento Valley Air Basin to the Mountain County Air Basin, meeting the terms of Rule 523.3 and SB 1662 Chapter 725 Statutes of 2008 this impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.3-4: 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Discussion/Conclusion: The project site is located in the Mountain Counties Air Basin (MCAB), and is under the jurisdiction of the El Dorado County AQMD. Both the State of California and the federal government have established ambient air quality standards for pollutants. El Dorado County is in attainment or unclassified for the federal standards for particulate matter less than 2.5 micrometers in diameter ($PM_{2.5}$), particulate matter less than 10 micrometers in diameter (PM_{10}), carbon monoxide (CO), and nitrogen dioxide (NO_2), sulfur dioxide, sulfates, hydrogen sulfides, and Lead. In addition, the California Air Resources Board (CARB) shows El Dorado County as is in attainment or unclassified with State standards for $PM_{2.5}$, CO, NO_2, sulfur dioxide, sulfates, hydrogen sulfides and Lead.

The addition of several new printing machines operating inside the existing DST Output West facility will result in emissions of ozone precursors ROCs/VOCs and NOx, which form ozone under certain conditions. The impact is considered ***potentially significant***. However, with the transfer of 1.4 tons of offset credits at a 2:1 ratio from the Sacramento Valley Air Basin to the Mountain County Air Basin, meeting the terms of Rule 523.3 and SB 1662 Chapter 725 Statutes of 2008, this impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.3-5: Expose sensitive receptors to substantial pollutant concentrations.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, change the exterior appearance of the plant, or require any modification to the land surrounding the plant.

"Sensitive Receptors" are defined as facilities where sensitive population groups (children, the elderly, the acutely ill, and the chronically ill) are likely to be located. These land uses include residences, schools, playgrounds, child care centers, retirement homes, convalescent homes, hospitals, and medical clinics. The proposed project does not include uses that are considered sensitive receptors nor are there sensitive receptors within the vicinity of the project (see Figure 2-2). The proposed project will not expose sensitive receptors to substantial pollutant concentrations. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.3-6: Create objectionable odors affecting a substantial number of people.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West Facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. Currently the plant does not create objectionable odors affecting a substantial number of people. As stated the proposed project will not increase the amount of odor generated from the facility, therefore the proposed project will not create objectionable odors affecting a substantial number of people. This impact is ***less than significant***.

Mitigation Measure

No mitigation measures are required.

3.4 Biological Resources

This section addresses the biological impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with biological resources will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding biological impacts.

3.4.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to biological resources applicable to the proposed project.

STATE

There are no specific state regulations pertaining to biological resources applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to biological resources applicable to the proposed project.

3.4.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project will have a significant impact on the environment if it will:

- 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 CDFG or USFWS;

- 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 CDFG or USFWS;

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- 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;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

- Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.4.3 IMPACTS AND MITIGATION MEASURES

Impact #3.4-1: 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 CDFG or USFWS.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project will not directly alter existing habitat and will not have a substantial adverse effect 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 (CDFG) or United States Fish and Wildlife Service (USFWS). There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.4-2: 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 CDFG or USFWS.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project will not 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 CDFG or USFWS. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.4-3: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.4-4: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project will not 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. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.4-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project does not consist of new development and will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.4-6: Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project does not consist of new development and will not conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.5 Cultural Resources

This section addresses cultural resources impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with cultural resources will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding cultural resources impacts.

3.5.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to cultural resources applicable to the proposed project.

STATE

There are no specific state regulations pertaining to cultural resources applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to cultural resources applicable to the proposed project.

3.5.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project will have a significant impact on the environment if it will:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.

3.5.3 IMPACTS AND MITIGATION MEASURES

Impact #3.5-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.5-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not cause a substantial

adverse change in the significance of an archaeological resource pursuant to §15064.5. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.5-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.5-4: Disturb any human remains, including those interred outside of formal cemeteries.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not directly or indirectly disturb any human remains, including those interred outside of formal cemeteries. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.6 Geology and Soils

This section addresses the geology and soils impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with geology and soils will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding geology and soils impacts.

3.6.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to geology and soils applicable to the proposed project.

STATE

There are no specific state regulations pertaining to geology and soils applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to geology and soils applicable to the proposed project.

3.6.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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;
  - Strong seismic ground shaking;
  - Seismic-related ground failure, including liquefaction; or
  - Landslides.
- 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, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or
- 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.

3.6.3 IMPACTS AND MITIGATION MEASURES

Impact #3.6-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not expose people or

structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides beyond that which people are already exposed to working in the facility. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.6-2: Result in substantial soil erosion or the loss of topsoil.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not result in substantial soil erosion or the loss of topsoil. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.6-3: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is not 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 beyond which is already experienced by the existing facility. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.6-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project does not propose any new development on a soil that is defined in Table 18-1-B of the Uniform Building Code (1994) to be an expansive soil, therefore creating substantial risks to life or property beyond that which is already experienced by the existing facility. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.6-5: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project does not propose the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water on a soil incapable of adequately supporting the infrastructure. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.7 Hazards and Hazardous Materials

This section addresses the potential for the proposed project to create hazards to the public or residents of the area as a result of the transport, use, or disposal of hazardous materials, the exposure of persons to existing onsite hazardous materials or soil contamination, or exposure to potential wild land fires. During the Notice of Preparation (NOP) period, no comments were received regarding hazards and hazardous materials impacts.

3.7.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

DATABASE REVIEW

A review of the California Department of Toxic Substances Control historical records data was conducted for the proposed project site including properties and facilities within two miles of the proposed project. Table 3.7-1 provides the site name and location of the only listing identified in the Department of Toxic Substances Control historical records data base.

Table 3.7-1
California Department of Toxic Substances Control

Site Name	Location	Distance to Project Site
Wetsel-Oviatt Lumber	2000 Wetsel-Oviatt Rd, El Dorado Hills, CA	1 mile

Source: California Department of Toxic Substances Control, 2009

Regulatory Setting

FEDERAL

Resource Conservation and Recovery Act (RCRA)

Under the Resource Conservation and Recovery Act (RCRA) of 1976 (42 U.S.C s/s 6901 et seq.), individual states may implement their own hazardous waste programs in lieu of the RCRA as long as the state program is at least as stringent as federal RCRA requirements. The EPA must approve state programs intended to implement federal regulations. In California, the California Environmental Protection Agency (Cal EPA) and the Department of Toxic Substances Control (DTSC), a department within Cal EPA, regulate the generation, transportation, treatment, storage, and disposal of hazardous waste. The EPA approved California's RCRA program, called the Hazardous Waste Control Law (HWCL), in 1992. DTSC has primary hazardous material regulatory responsibility, but can delegate enforcement responsibilities to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the HWCL.

The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe the management of hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in ordinary landfills. Hazardous waste generators must retain hazardous waste manifests for a minimum of three years. These manifests provide a description of the waste, its intended destination, and regulatory information about the waste. A copy of each manifest must be filed with the state. The generator must match copies of hazardous waste manifests with receipts from treatment, storage, and disposal facilities.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The Comprehensive Environmental Response, Compensation, and Liability Act and associated Superfund Amendments provide the US Environmental Protection Agency with the authority to identify hazardous sites, to require site remediation, and to recover the costs of site remediation from polluters. California has enacted similar laws intended to supplement the federal program. The DTSC is primarily responsible for implementing California's Superfund Law.

STATE

California Code of Regulations, Title 22, §66261.20-24

Soils having concentrations of contaminants higher than certain acceptable levels must be handled and disposed of as hazardous waste when excavated. The California Code of Regulations, Title 22, §66261.20-24 contains technical descriptions of characteristics that would cause a soil to be classified as a hazardous waste.

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act)

The Business Plan Act requires that any business that handles hazardous materials prepare a business plan, which must include the following:

- Details, including floor plans, of the facility and business conducted at the site.
- An inventory of hazardous materials that are handled or stored on site.
- An emergency response plan.
- A safety and emergency response training program for new employees with annual refresher courses.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program)

In January 1996, the Cal EPA adopted regulations implementing the Unified Program. The program has six elements: hazardous waste generators and hazardous waste on-site treatment; underground storage tanks; aboveground storage tanks; hazardous materials release response plans and inventories; risk management and prevention programs; and Uniform Fire Code hazardous materials management plans and inventories. The plan is implemented at the local level. The local agency that is responsible for the implementation of the Unified Program is called the Certified Unified Program Agency (CUPA), and the San Joaquin County Environmental Health Division is designated the CUPA.

Hazardous Materials Transportation Regulations (26 CCR)

The State of California has also adopted US Department of Transportation (DOT) regulations for the intrastate movement of hazardous materials. State regulations are contained in 26 CCR. In addition, the State of California regulates the transportation of hazardous waste originating in the state and passing through the state (26 CCR). Both regulatory programs apply in California. The two state agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans).

California Vehicle Code § 32000

Common carriers are licensed by the CHP, pursuant to California Vehicle Code § 32000. This section requires the licensing of every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time, and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards.

California Emergency Services Act

Pursuant to the California Emergency Services Act, the state has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local governmental agencies and private persons. Response to hazardous materials incidents is one part of this plan. The plan is administered by the state Office of Emergency Services (OES). The OES coordinates the responses of other agencies, including the Cal EPA, CHP, the California

Department of Fish and Game (CDFG), the Regional Water Quality Control Boards (RWQCBs), the local air pollution control districts, and local agencies.

California Accidental Release Prevention Program (CalARP)

CalARP regulations became effective January 1, 1997, replacing the California Risk Management and Prevention Program. CalARP was created to prevent the accidental release of regulated substances. It covers businesses that store or handle certain volumes of regulated substances at their facilities. A list of regulated substances is found in § 2770.5 of the CalARP regulations. If a business has more than the listed threshold quantity of a substance, an accidental release prevention program must be implemented and a risk management plan may be required. The California Office of Emergency Services is responsible for implementing the provisions of CalARP.

LOCAL

2004 El Dorado County General Plan (July 19, 2004)

The Health, Safety and Nose Element of the *2004 El Dorado County General Plan* contains goals, policies and implementation measures to ensure that the residents and visitors to El Dorado County are not exposed to unsafe conditions resulting from hazard and hazardous material within and transported through the county. Table 3.7-2 lists local policies and implementation measures that apply to development of the proposed project.

Table 3.7-2
General Plan Policies – Hazards and Hazardous Materials

Policy Number	Policy
6.1.1.1	The El Dorado County Multi-jurisdictional Local Hazard Mitigation Plan (LHMP) shall serve as the implementation program for the coordination of hazard planning and disaster response efforts within the County and is incorporated by reference into this Element. The County will ensure that the LHMP is updated on a regular basis to keep pace with the growing population.

El Dorado County Multi-jurisdictional Local Hazard Mitigation Plan (November, 2004)

The purpose of this Plan is: to protect life, safety and property by reducing the potential for future damages and economic losses that result form natural hazards; to qualify for additional grant funding, in both the pre-disaster and post-disaster environment; to speed recovery and redevelopment following future disaster events; to demonstrate a firm local commitment to hazard mitigation principles; and to comply with both State and Federal legislative requirement for local hazard mitigation plans.

This Plan was developed to be in accordance with current rules and regulations governing local hazard mitigation plans and has been adopted by the El Dorado County Board of Supervisors. The Plan is routinely monitored to maintain compliance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended by the Disaster Mitigation Act of 2000 (Public Law 106-390-October 30, 2004); and all related laws and regulations.

3.7.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- 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, would it 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 public use airport, would the project result in a safety hazard for people residing or working in the project area;

- For a project within the vicinity of a private airstrip, would the project result in a safety hazard 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; or

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

3.7.3 IMPACTS AND MITIGATION MEASURES

Impact #3.7-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant or require additional employees to operate the printers. Additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. DST Output West regularly employs the use, transport, or disposal of

hazardous materials or waste. However, it is not expected that quantities of such materials used in association with the additional printers will result in an environmental hazard.

Transportation, handling, and use of any hazardous materials associated with DST Output West plant operation must comply with all related federal, state, and local regulations with respect to hazardous materials And no hazardous materials would be disposed of onsite. Additionally, the DST Output West facility has a Hazardous Materials Business Plan on file with the El Dorado County Environmental Management Solid Waste & Hazardous Materials Division (Appendix E). The Business Plan includes information regarding material handing, safety organization, release containment procedures, equipment used to prevent, monitor and control cleanup, evacuation procedures, a training plan, and a list of all employee responders for non-hazardous and hazardous spills. Therefore, this is a ***less than significant*** impact.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-2: 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.

Discussion/Conclusion: As stated in the Impact #3.7-1 discussion, the proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. DST Output West regularly employs the use, transport, or disposal of hazardous materials or waste. However, it is not expected that quantities of such materials used in association with the additional printers will result in an environmental hazard.

Transportation, handling, and use of any hazardous materials must comply with all related federal, state, and local regulations with respect to the hazardous materials. No hazardous materials would be disposed of onsite. Off site release of hazardous materials, in consideration of the distance of the facilities listed in Table 3.7-1, would result in no significant adverse impact to the site. Therefore, it is unlikely that any onsite, or offsite, occurrences would result in foreseeable release of hazardous materials related to the operation of additional printers within the plant. There is a ***less than significant*** impact.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Discussion/Conclusion: There are two private schools within 1.25 mile of the project site. Golden Hills School is located at 1060 Suncast Lane, El Dorado Hills and The Phoenix Schools,

El Dorado Hills I and II Campus, at 4958 and 4940 Robert J Mathews Pkwy, El Dorado Hills. As the school is not within one-quarter mile of the project site and no schools are proposed to be located within that distance, activities associated with the proposed project are not anticipated to emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or waste in quantities that could affect schools. The impact is considered ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-4: 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.

Discussion/Conclusion: The proposed project is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 according to the California Department of Toxic Substances Control. Additionally after review of the California Leaking Underground Storage Tanks Information System (LUFT) and the California Spills, Leaks, Investigation, and Cleanups sites (SLIC) it was conclude that the project site is not on a LUFT or SLIC site or within a half mile of one. Without the instance of any hazardous materials, LUFT or SLIC site within the vicinity of the proposed project, this impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-5: Be located within an airport land use plan within two miles of a public airport or the vicinity of a private airstrip, creating a safety hazard for people residing or working in the project area.

Discussion/Conclusion: The proposed project site is not located within an airport land use plan or within 2 miles of a public airport, nor is the project site located within the vicinity of a private airstrip that would create a safety hazard for the people residing or working in the project area beyond the hazards that already existing within the project area. Therefore there is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Discussion/Conclusion: The project site is located in an accessible area. Alternative routes for emergency access or evacuation exist in the project vicinity and the project would not create an

obstacle to any evacuation plan or emergency vehicle access. The proposed project would not impair implementation of any emergency response plan or emergency evacuation plan because it would not alter existing roadways or physically interfere with existing roadway patterns. Any impact would be ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.7-7: Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant or require additional employees to operate the printers. Additionally the proposed project will not change the exterior appearance of the plant or required any modification to the land surrounding the plant. The proposed project would not expose additional people or structures to a significant risk of loss, injury or death involving wildland fires. This impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

3.8 Hydrology and Water Quality

This section addresses the hydrology and water quality impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with hydrology and water quality will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding hydrology and water quality impacts.

3.8.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to hydrology and water quality applicable to the proposed project.

STATE

There are no specific state regulations pertaining to hydrology and water quality applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to hydrology and water quality applicable to the proposed project.

3.8.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Violate any water quality standards or waste discharge requirements;

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

- 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;

- Otherwise substantially degrade water quality;

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;

- Expose people or structure to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or

- Inundation by seiche, tsunami, or mudflow.

3.8.3 IMPACTS AND MITIGATION MEASURES

Impact #3.8-1: Violate any water quality standards or waste discharge requirements.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not create any additional runoff or additional wastewater that would violate any water quality standards or waste discharge requirements. This impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not require any additional water, therefore it will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table levels. This impact is ***less than significant***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not alter the surrounding land, therefore it will not substantially alter the existing drainage pattern of the site

or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-4: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not alter the surrounding land, therefore it will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-5: Create or contribute runoff which would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not alter the surrounding land or included any additional impervious services and will not create or contribute additional runoff which will exceed the capacity of planned storm drainage systems or provide substantial additional sources of polluted runoff. There is ***no impact***.

Impact #3.8-6: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Discussion/Conclusion: The proposed project is a commercial project within an existing facility and will therefore not place any housing units within a 100-year flood hazard area as mapped on

a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-7: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Discussion/Conclusion: The proposed project is within an existing facility and will therefore not place within a 100-year flood hazard area any structures which would impede or redirect flood flows. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-8: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not expose any additional people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam beyond existing conditions. There is ***no impact***.

Mitigation Measures

No mitigation measures are required.

Impact #3.8-9: Result in a significant risk of inundation by seiche, tsunami, or mudflow.

Discussion/Conclusion: Seiches, or waves generated in bodies of water similar to the back-and-forth sloshing of water in a tub, could possibly occur in natural lakes and reservoirs. Folsom Lake could be subject to seiches in the event of an earthquake. If the seiche overtops the dam, failure could result. Failure of the dam could potentially cause flooding at the proposed project site. Given the distance between the lakes, and any major faults, the risk of seiche is extremely low and this impact is considered ***less than significant.***

The proposed project site is not at risk from tsunami due to its inland location. Finally, the proposed project site is also not at risk of mudflows due to its relatively flat topography and

distance from any hillsides. Risk of inundation by seiche, tsunami or mudflow is a ***less than significant*** impact.

Mitigation Measures

No mitigation measures are required.

3.9 Land Use and Planning

This section addresses the land use and planning impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with land use and planning will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding land use and planning impacts.

3.9.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Proposed Project Site and surrounding land uses are summarized in Table 3.9-1.

Table 3.9-1
Surrounding Land Use

Location	Land Use	General Plan	Zoning
ONSITE	Existing DST Output Facility	Research & Development	Research & Development – Design Control
NORTH:	Commercial Development	Research & Development	Research & Development – Design Control
EAST:	Commercial Development	Research & Development	Research & Development – Design Control
SOUTH:	Vacant/Research and Development Facility	Research & Development	Research & Development – Design Control
WEST:	Vacant/Grassland	Specific Plan	Carson Creek Specific Plan

Source: El Dorado County Planning Department; Quad Knopf, 2009

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to land use and planning applicable to the proposed project.

STATE

There are no specific state regulations pertaining to land use and planning applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to land use and planning applicable to the proposed project.

3.9.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Physically divide an established community;

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

3.9.3 IMPACTS AND MITIGATION MEASURES

Impact #3.9-1: Physically divide an established community.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not physically divide an established community. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.9-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.9-3: Conflict with any applicable habitat conservation plan or natural community conservation plan.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not conflict with any applicable habitat conservation plan or natural community conservation plan. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.10 Mineral Resources

This section addresses the mineral resource impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with mineral resources will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding mineral resource impacts.

3.10.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to mineral resources applicable to the proposed project.

STATE

There are no specific state regulations pertaining to mineral resources applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to mineral resources applicable to the proposed project.

3.10.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project is normally considered to have a potentially significant impact on the environment if it will:

- 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; or

- 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.

3.10.3 IMPACTS AND MITIGATION MEASURES

Impact #3.10-1: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not 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. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.10-2: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not 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. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.11 Noise

This section addresses the noise impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with noise will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding noise impacts.

3.11.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to noise applicable to the proposed project.

STATE

There are no specific state regulations pertaining to noise applicable to the proposed project.

LOCAL

There are local regulations that regulate noise impacts from mobile and stationary sources, however, the proposed project will occur within the Existing DST Output West facility, which

provides an existing noise barrier to the outside world, therefore, no specific local regulations pertaining to noise are applicable to the proposed project.

3.11.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- 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 expose people residing or working in the Plan Area to excessive noise levels; or
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

3.11.3 IMPACTS AND MITIGATION MEASURES

Impact #3.11-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not expose persons to or cause the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.11-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not expose persons to or cause the generation of excessive groundborne vibration or groundborne noise levels. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.11-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.11-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.11-5: 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 expose people residing or working in the project area to excessive noise levels.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is not 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, therefore the proposed project would not expose people residing or working in the project area to excessive noise levels. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.11-6: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the Plan Area to excessive noise levels.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is not located within the vicinity of a private airstrip, therefore the proposed project would not expose people residing or working in the project area to excessive noise levels. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.12 Population and Housing

This section addresses the population and housing impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with population and housing will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding population and housing impacts.

3.12.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to population and housing applicable to the proposed project.

STATE

There are no specific state regulations pertaining to population and housing applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to population and housing applicable to the proposed project.

3.12.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed project is considered to have a potentially significant impact on the environment if it will:

- Induce substantial 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);

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or

- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

3.12.3 IMPACTS AND MITIGATION MEASURES

Impact #3.12-1: Induce substantial 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).

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The addition of the new printers will not require additional employees. The proposed project is an existing commercial operation and will not induce substantial population growth in an area, either directly or indirectly. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.12-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any

modification to the land surrounding the plant. The proposed project is an existing commercial operation and will not displace a substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.12-3: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is an existing commercial operation and will not displace a substantial numbers of people, necessitating the construction of replacement housing elsewhere. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.13 Public Services

This section addresses public service impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with public services will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding public service impacts.

3.13.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to public services applicable to the proposed project.

STATE

There are no specific state regulations pertaining to public services applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to public services applicable to the proposed project.

3.13.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Result in 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;
    - Police protection;
    - Schools;
    - Parks; or
    - Other public facilities?

3.13.3 IMPACTS AND MITIGATION MEASURES

Impact #3.13-1: Result in 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not result in 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 such as fire protection, police protection, schools, parks, or other public services. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.14 Recreation

This section addresses the recreational impact of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with recreation will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding recreational impacts.

3.14.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to recreation applicable to the proposed project.

STATE

There are no specific state regulations pertaining to recreation applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to recreation applicable to the proposed project.

3.14.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- 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; or

- 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.

3.14.3 IMPACTS AND MITIGATION MEASURES

Impact #3.14-1: 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.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is in an existing commercial facility and would not increase employment at the facility, therefore the proposed project will 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. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.14-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project is in an existing commercial facility and would not increase employment at the facility, therefore the proposed project does

not include recreational facilities or require the construction or expansion of existing recreational facilities which might have an adverse physical effect on the environment. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.15 Transportation/Traffic

This section of the Draft EIR addresses the transportation and traffic impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant, affect the land surrounding the plant, or require any additional employees that would increase traffic to the surround area, impacts associated with transportation and traffic will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding transportation and traffic impacts.

3.15.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to transportation and traffic applicable to the proposed project.

STATE

There are no specific state regulations pertaining to transportation and traffic applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to transportation and traffic applicable to the proposed project.

3.15.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections);

- Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways;

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;

- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);

- Result in inadequate emergency access;

- Result in inadequate parking capacity; or

- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

3.15.3 IMPACTS AND MITIGATION MEASURES

Near Term Impacts and Mitigation

Impact #3.15-1: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections).

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines result in additional VOC emissions of up to 0.7 tpy inside the existing DST Output facility. The proposed project will not significantly modify the existing plant operation or require any additional employees that would increase traffic to the surrounding area. The proposed project will require additional materials to be going to and leaving the facility, therefore, it can be expected that there will be an increase in additional truck traffic to handle

materials, recycling, solid waste, and outgoing deliverables shipments. It has been estimated by DST Output West that this will only require a minimal amount of additional truck traffic to and from the facility and it is not expect to be such a substantial increase in relation to existing traffic loads that would cause great congestion or vehicle trips. Additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant that would require additional traffic. Since the proposed project will not require any additional employees and only have a minimal increase in truck traffic to handle materials, recycling, solid waste, and outgoing deliverables shipments, it will not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections). This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-2: Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines result in additional VOC emissions of up to 0.7 tpy inside the existing DST Output facility. The proposed project will not significantly modify the existing plant operation or require any additional employees that would increase traffic to the surrounding area. IT can be expect that the proposed project will require a minimal increase in additional truck traffic to handle materials, recycling, solid waste, and outgoing deliverables shipments. Additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant requiring any additional traffic. Since the proposed project will not require any additional employees and only have a minimal increase in truck traffic, it will not exceed, either individually or cumulatively, a level of service standard established by the El Dorado County General Plan Circulation Element for designated roads or highways. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-3: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines result in additional VOC emissions of up to 0.7 tpy inside the existing DST Output facility. The proposed project will not significantly modify the existing plant operation or require any additional employees that would increase traffic to the surrounding area.

Additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. Since the proposed project will not require any additional employees requiring additional air traffic to the local area, the proposed project will not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-4: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land or transportation infrastructure surrounding the plant. Since the proposed project will not require any modification to the surrounding transportation infrastructure or land uses, it will not substantially increase hazards due to a design feature or incompatible uses. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-5: Result in inadequate emergency access.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land or transportation infrastructure surrounding the plant. Since the proposed project will not require any modification to the surrounding transportation infrastructure or land uses, it will not result in inadequate emergency access. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-6: Result in inadequate parking capacity.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation or require any additional employees that would increase traffic to the surrounding area.

Additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. Since the proposed project will not require any additional employees, it will not result in inadequate parking capacity. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.15-7: Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation or require additional employees that would result in increased traffic or affect the use of alternative transportation systems or facilities. Because the proposed project will not result in additional employees, alternative transportation systems and facilities will not be affected. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

3.16 Utilities and Service Systems

This section addresses the utilities and service system impacts of the proposed DST Output West Printing Capacity Expansion Project. Because the addition of several new additional printing machines within the existing plant will not significantly modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, impacts associated with utilities and service system will be less than significant. During the Notice of Preparation (NOP) period, no comments were received regarding utilities and service system impacts.

3.16.1 SETTING

Environmental Setting

The proposed project is located at 5220 Robert J. Mathews Pkwy, approximately 2.5 miles to the south of State Route 50 and ¼ mile west of Latrobe Road on the south side of Investment Blvd in the unincorporated community of El Dorado Hills. Figure 2-1 provides a regional vicinity map and Figure 2-2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing operation of the plant, additionally the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant.

Surrounding land uses to the proposed project area are summarized as follows:

- Onsite - Existing DST Output Facility
- North - Business Park Development
- East - Business Park Development
- South - Vacant/Research and Development Facility
- West - Vacant/Grassland

Regulatory Setting

FEDERAL

There are no specific federal regulations pertaining to utilities and service systems applicable to the proposed project.

STATE

There are no specific state regulations pertaining to utilities and service systems applicable to the proposed project.

LOCAL

There are no specific local regulations pertaining to utilities and service systems applicable to the proposed project.

3.16.2 THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on the environment if it will:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- 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 providers existing commitments;
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- Comply with federal, state, and local statutes and regulations related to solid waste.

3.16.3 IMPACTS AND MITIGATION MEASURES

Impact #3.16-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-2: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-3: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-4: Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any

modification to the land surrounding the plant. The proposed project will not require any additional water be supplied to the facility, therefore the existing facility has sufficient water supplies available to serve the project from existing entitlements and resources. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-5: 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 providers existing commitments.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. The proposed project will not result in any additional wastewater, therefore the project will not result in a determination by the wastewater treatment provider which serves project that it has adequate capacity to serve the project's projected demand in addition to the providers existing commitments. There is ***no impact.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. DST Output was has contracted with Smurfit-Stone, an outside hauler, to handle the facilities recycling and garbage services. Recycling service is provided by Smurfit-Stone and garbage disposal is hauled by Smurfit-Stone to the existing Sacramento County Landfill (Kiefer). The majority of waste from the additional printers will be recycling while the actual amount of solid waste produced will be minimal and will be handled with existing waste from the facility. It is not expected that the landfill will not have sufficient permitted capacity to accommodate the proposed project solid waste disposal needs since the primary byproduct of the printers will be recyclable. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

Impact #3.16-7: Comply with federal, state, and local statutes and regulations related to solid waste.

Discussion/Conclusion: The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. Solid waste from the proposed project and existing facility is collected by a private company, Smurfit-Stone, with the majority of materials being recycling handled by Smurfit-Stone and the solid waste being disposed of at Kiefer Landfill. All collection, transporting, recycling and disposal of solid waste will be in compliance with applicable federal, state and local statutes and regulations. This impact is ***less than significant.***

Mitigation Measures

No mitigation measures are required.

3.17 Global Climate Change

INTRODUCTION

This section considers the impacts of proposed project on greenhouse gas emissions and global climate change, as well as climate change impacts to water supply. It is not expected the addition of several new printing machines within the existing DST Output West plant will result in a substantial increase in generation of CO_2 (a principal greenhouse gas contributing to global climate change) over existing conditions. Additionally, the proposed increase in printing capacity will not significantly modify the operation of the plant, affect the land surrounding the plant or result in additional vehicle trips.

GLOBAL WARMING IMPACTS AND CAUSES

Climate change is recognized throughout the world to be one of the most daunting and controversial subjects of our time. Human activities are altering the chemical composition of the atmosphere through the rapid buildup of climate change emissions, primarily carbon dioxide, methane, nitrous oxide, and hydrofluorocarbons. According to scientific studies, concentrations of these gasses in the atmosphere are increasing at a rate not experienced for millions of years, although there is some uncertainty about exactly how and when the earth's climate will respond. Scientific observations - in conjunction with climate models - indicate detectable changes are underway.

These observed changes include global rise in the mean air and water temperatures and regional temperature, precipitation, soil moisture, and sea level extremes. All of these changes could have significant adverse effects on water resources and ecological systems, as well as on human health and the economy.

Research suggests that human activities, such as the burning of fossil fuels and clearing of forests, contribute additional carbon dioxide (CO_2) and other heat trapping gas emissions into the atmosphere. Future global climate change could have widespread consequences that would affect many of California's important resources, including its water supply. Projected effects of climate change on California include:

- Increased air pollution.
- Intensified heat waves.
- An expanded range of infectious diseases.
- A decline in the Sierra Nevada snow pack, with resulting impacts on water supply, ecosystems and hydropower.
- A range of agriculture impacts, including expanded ranges for weeds and pests, and a decrease in chill hours required by some of the state's crops.
- A rise in sea level and more severe storm events increasing coastal flooding.

- Increased flooding in river delta and floodplain areas.

- An increase in the risk of large wildfires.

ACTIONS TO REDUCE GLOBAL WARMING

California has taken actions to reduce climate change emissions. The California Energy Commission has adopted energy efficiency standards for buildings and appliances that are the most stringent in the world. The California Air Resources Board (CARB) has adopted vehicle climate change standards that are the first of their kind in the United States. The State's Renewable Portfolio Standard was accelerated by the Governor. It requires that at least 20 percent of all power used in California be generated by renewable resources by 2010. The California Public Utilities Commission recently adopted a Solar Building Initiative.

Executive Order S-3-05 signed by the Governor on June 1, 2005, established statewide climate change emission reduction targets as follows:

- By 2010, reduce emissions to 2000 levels;

- By 2020, reduce emissions to 1990 levels;

- By 2050, reduce emissions to 80 percent below 1990 levels.

Most recently, the Governor signed Executive Order S-01-07 on January 18, 2007, establishing carbon reduction targets as follows:

- By 2020, reduce carbon intensity in California transportation fuels by at least 10 percent

In 2006 the Legislature adopted AB 32 as California's "Global Warming Solutions Act" to begin the process of reversing the causes of global warming. (See Chapter 488 Statutes of 2006). This measure directs CARB to develop a statewide greenhouse gas (GHG) emissions cap for 2020 and to develop and implement regulations and market mechanisms to reduce GHG emissions.

Beyond the established statewide goals on emission reductions and caps, other state and regional agencies are developing strategies for incorporating energy efficiency and climate change emissions reduction measures into the policy framework governing land use and transportation. Some local air districts have begun to incorporate climate protection objectives into their ongoing local programs.

3.17.1 SETTING

Environmental Setting

EXISTING GREENHOUSE GASES AND LINKS TO GLOBAL CLIMATE CHANGE

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's

atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for enhancing the greenhouse effect (Ahrens 2003). Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors (California Energy Commission 2006a). In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (California Energy Commission 2006a). A byproduct of fossil fuel combustion is CO_2. Methane, a highly potent GHG, results from offgassing associated with agricultural practices and landfills. Processes that absorb and accumulate CO_2, often called CO_2 "sinks," include confined animal facilities uptake by vegetation and dissolution into the ocean.

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. According to the California Energy Commission 2006a, Page 17, California is the 16th largest emitter of CO_2 in the world and produced 492 million gross metric tons of carbon dioxide equivalents in 2004. Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potentials to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. For example, methane is a much more potent GHG than CO_2. As described in the General Reporting Protocol of the California Climate Action Registry (2006), one ton of CH_4 has the same contribution to the greenhouse effect as approximately 21 tons of CO_2. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2004, accounting for 40.7% of total GHG emissions in the state (California Energy Commission 2006a). This category was followed by the electric power sector (including both in-state and out-of-state sources) at 22.2% and the industrial sector at 20.5% (California Energy Commission 2006a).

FEEDBACK MECHANISMS AND UNCERTAINTY

Many complex mechanisms interact within Earth's energy budget to establish the global average temperature. For example, a change in ocean temperature would be expected to lead to changes in the circulation of ocean currents, which, in turn would further alter ocean temperatures. There is uncertainty about how some factors could affect global climate change because they have the

potential to both enhance and neutralize future climate warming. Examples of these conditions are also described below.

Direct and Indirect Effects of Aerosols

Aerosols, including particulate matter, reflect sunlight back to space. As particulate matter attainment designations are met, and fewer emissions of particulate matter occur, the cooling effect of anthropogenic aerosols would be reduced, and the greenhouse effect would be further enhanced. Similarly, aerosols act as cloud condensation nuclei, aiding in cloud formation and increasing cloud lifetime. Clouds can efficiently reflect solar radiation back to space (see discussion of the cloud effect below). As particulate matter emissions are reduced, the indirect positive effect of aerosols on clouds would be reduced, potentially further amplifying the greenhouse effect.

The Cloud Effect

As global temperature rises, the ability of the air to hold moisture increases, facilitating cloud formation. If an increase in cloud cover occurs at low or middle altitudes, resulting in clouds with greater liquid water content such as stratus or cumulus clouds, more radiation would be reflected back to space, resulting in a negative feedback mechanism, wherein the side effect of more cloud cover resulting from global warming acts to balance further warming. If clouds form at higher altitudes in the form of cirrus clouds, however, these clouds actually allow more solar radiation to pass through than they reflect, and ultimately they act as a GHG themselves. This results in a positive feedback mechanism in which the side effect of global warming acts to enhance the warming process. This feedback mechanism, known as the "cloud effect" contributes to uncertainties associated with projecting future global climate conditions.

Other Feedback Mechanisms

As global temperature continues to rise, CH_4 gas currently trapped in permafrost, would be released into the atmosphere when areas of permafrost thaw. Thawing of permafrost attributable to global warming would be expected to accelerate and enhance global warming trends. Additionally, as the surface area of polar and sea ice continues to diminish, the Earth's albedo, or reflectivity, is also anticipated to decrease. More incoming solar radiation will likely be absorbed by the Earth rather than being reflected back to space, further enhancing the greenhouse effect. The scientific community is still studying these and other positive and negative feedback mechanisms to better understand their potential effects on global climate change.

Regulatory Setting

FEDERAL

At this time, the Environmental Protection Agency (EPA) does not regulate GHG emissions. In a 5-4 opinion issued on April 2, 2007, the United States Supreme Court concluded, in *Massachusetts, et al. v. Environmental Protection Agency*, that "greenhouse gases fit well within the Clean Air Act's definition of 'air pollutant,'" and held that "EPA has the statutory authority to regulate the emission of such gases from new motor vehicles."

In that case, petitioners (states including California and New York, several cities, and American Samoa) with the support of several environmental organizations, requested that EPA regulate greenhouse gas emissions (primarily carbon dioxide) from new vehicles under section 202(a)(1) of the Federal Clean Air Act. Based on policy considerations and a conclusion by the National Research Council (an arm of the National Academy of Sciences) that it "cannot be unequivocally established" whether a "causal linkage" existed between global warming and greenhouse gas emissions, the EPA Administrator denied the rulemaking petition.

The District of Columbia Circuit upheld the denial, holding that "the EPA Administrator properly exercised his discretion under section 202 (a)(1)" and that the Administrator's decision not to regulate was consistent with other case law which allowed such decisions to be based on policy judgments where the issues to be resolved are "on frontiers of scientific knowledge."

The Supreme Court disagreed, saying that "EPA has offered no reasoned explanation for its refusal to decide whether greenhouse gases cause or contribute to climate change." "Once EPA has responded to a petition for rulemaking," the Court said, "its reasons for action or inaction must conform to the authorizing statute" and "EPA can avoid taking further action only if it determines that greenhouse gases do not contribute to climate change or if it provides some reasonable explanation as to why it cannot or will not exercise its discretion to determine whether they do."

The matter has been remanded, and it remains to be seen whether EPA will simply articulate a more detailed explanation for declining to regulate or begin a rulemaking process to regulate greenhouse gas emissions from motor vehicles. In the meantime, a variety of climate change-related bills have been introduced in the United States House of Representatives and Senate, that, if enacted, would likely result in additional statutory direction to EPA and other federal agencies regarding the regulation of greenhouse gases from motor vehicles and stationary sources.

In spite of the Supreme Court's recent ruling in *Massachusetts v. EPA* holding that EPA has authority to regulate greenhouse gas emissions from new motor vehicles, greenhouse gases are not currently regulated under the Federal Clean Air Act. Potential greenhouse gas legislation and/or EPA rulemaking processes could take several years to become effective. Nonetheless, at least one federal district court has held that where carbon dioxide emissions from a project could result in environmental impacts, NEPA requires analysis of those impacts. *Border Power Plant Working Group v. Department of Energy* (S.D. Cal. 2003) 260 F.Supp.2d 997.

STATE

At the time of this writing, there are no regulations setting ambient air quality emissions standards for greenhouse gases; however, it is anticipated that such will be developed in the near future in accordance with the following recently enacted California legislation and Executive Order S-3-05 as described below.

Assembly Bill 1493

In 2002, then-Governor Gray Davis signed Assembly Bill (AB) 1493, which required that the California Air Resources Board (CARB) develop and adopt, by January 1, 2005, regulations that

achieve “the maximum feasible reduction of greenhouse gases by passenger vehicles and light-duty truck and other vehicles determined by the CARB vehicles whose primary use is noncommercial personal transportation in the state.”

Executive Order S-3-05

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra’s snowpack, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total greenhouse gas emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050.

The Executive Order directed the Secretary of the California Environmental Protection Agency (Cal EPA) to coordinate a multi-agency effort to reduce greenhouse gas emissions to the target levels. The Secretary will also submit biannual reports to the governor and state legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California’s resources; and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of the Cal EPA created a “Climate Act Team” (CAT). In March 2006, Cal EPA released a report on behalf of the CAT (comprised of cabinet secretaries and policy makers from Cal EPA, CEC, CARB, CPUC, CIWMB, Caltrans, the Department of Food and Agriculture, and the Governor’s office). Among other things, the CAT Report” outlined the principles of climate change science that formed the basis for the evaluation of potential climate-change related impacts that could occur in California. The report cited the International Panel on Climate Change (IPCC) and other sources to conclude that global temperatures are increasing and that human activities are contributing to the build-up of climate change pollutants. The report also summarized potential effects of climate change based on three IPCC scenarios and described potential emission reduction strategies.

Assembly Bill 32, California Global Warming Solutions Act of 2006

California enacted Assembly Bill 32 (AB 32), effective January 1, 2007, to cap carbon dioxide emissions in an effort to address one of the sources of global warming concern. AB 32 directs the California Air Resources Board ("CARB") to require reporting and verification of current greenhouse gas emissions (defined as carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) and to estimate 1990 greenhouse gas emissions levels prior to January 1, 2008 (Health and Safety Code §§ 38530, 38550). CARB must adopt a statewide greenhouse gas emissions limit equal to the approved 1990 emissions levels and set a reduction schedule and adopt regulatory programs to achieve the target levels by 2020. The law focuses on reducing emissions to “maximum technologically feasible and cost-effective levels” (Health and Safety Code § 38560). CARB is charged with publishing a list of early action greenhouse gas emission reduction measures by June 30, 2007, and adopting regulations to implement those early action measures by January 1, 2010, while final regulations for greenhouse gas emission limits and emission reduction measures must be adopted by January 1, 2011 and become operative by January 1, 2012 (Health and Safety Code §§ 38560.5, 38562).

CARB may establish market-based compliance mechanisms (e.g. a "cap and trade" system) allowing emitters to purchase, bank or trade greenhouse gas "allowances" from third parties and/or may adopt a declining annual aggregate emissions limitation (Health and Safety Code §§ 38505(k), 38562(c), 38570 et seq). Under extraordinary circumstances, or in cases of catastrophic events or threat of economic harm, AB 32 allows the Governor to extend deadlines for adoption of regulations mandated by AB 32 for up to one year at a time (Health and Safety Code § 38599(a)).

In a CARB presentation at a February 27, 2007 public workshop discussing initial regulatory concepts for mandatory greenhouse gas emissions reporting under AB 32, cement manufacturers, electric power generation, oil refineries, industrial/commercial combustion, oil and gas production, and landfills were listed as potential covered sources. Of note, the presentation stated that other sources may be considered for mandatory reporting on emissions.

Senate Bill 1368

SB 1368 is the companion bill of AB 32 and was signed by Governor Schwarzenegger in September 2006. SB 1368 requires the California Public Utilities Commission (PUC) to establish a greenhouse gas emission performance standard for base load generation from investor owned utilities by February 1, 2007. The California Energy Commission (CEC) must establish a similar standard for local publicly owned utilities by June 30, 2007. These standards cannot exceed the greenhouse gas emission rate from a base load combined-cycle natural gas fired plant. The legislation further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the PUC and CEC.

No air district in California has identified a significance threshold for GHG emissions or a methodology for analyzing air quality impacts related to greenhouse gas emissions. The state has identified 1990 emission levels as a goal through adoption of AB 32. To meet this goal, California would need to generate lower levels of GHG emissions than current levels. However, no standards have yet been adopted quantifying 1990 emission targets. It is recognized that for most projects there is no simple metric available to determine if a single project would help or hinder meeting the AB 32 emission goals. Consumption of fossil fuels in the transportation sector accounted for over 40% of the total GHG emissions in California in 2004. Current standards for reducing vehicle emissions considered under AB 1493 call for "the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles," and do not provide a quantified target for GHG emissions reductions for vehicles.

Senate Bill 97

SB 97 (Chapter 185, Statutes 2007) was signed by Governor Schwarzenegger on August 24, 2007. The legislation provides partial guidance on how greenhouse gases should be addressed in certain CEQA documents. SB 97 requires the Governors Office of Planning and Research (OPR) to prepare CEQA guidelines for the mitigation of GHG emissions, including but not limited to, effects associated with transportation or energy consumption. OPR must prepare these guidelines and transmit them to the Resources Agency by July 1, 2009. The Resources

Agency must then certify and adopt the guidelines by January 1, 2010. OPR and the Resources Agency are required to periodically review the guidelines to incorporate new information or criteria adopted by ARB pursuant to the Global Warming Solutions Act, scheduled for 2012.

In June 2008, OPR released a technical advisory on CEQA and Climate Change: Addressing Climate Change in conducting California Environmental Quality Act (CEQA) analysis as interim recommendations while the official OPR CEQA Guidelines were under development. In January 2009, OPR released its draft CEQA Guideline amendments and additions, which include suggested thresholds of significance and mitigation measures to address global climate change.

Assembly Bill 170

AB 170 was adopted by state lawmakers in 2003 creating Government Code Section 65302.1 which requires cities and counties in the San Joaquin Valley to amend their general plans to include data and analysis, comprehensive goals, policies and feasible implementation strategies designed to improve air quality. These amendments are due no later than one year from the due date specified for the next revisions of a jurisdiction's housing element.

As required in Section 65302.1.b, cities and counties within the San Joaquin Valley must amend the general plan to include a discussion of the status of air quality and strategies to improve air quality. The elements to be amended include, but are not limited to, those elements dealing with land use, circulation, housing, conservation, and open space. Section 65302.1.c identifies four (4) areas of air quality discussion required in these amendments. These areas include: (1) a report describing local air quality conditions, attainment status, and state and federal air quality and transportation plans; (2) a summary of local, district, state, and federal policies, programs, and regulations to improve air quality; (3) a comprehensive set of goals, policies, and objectives to improve air quality; and (4) feasible implementation measures designed to achieve these goals.

Senate Bill 375

SB 375 was signed by Governor Schwarzenegger on September 30, 2008. The bill provides means to further reduce greenhouse gas (GHG) emissions from passenger vehicles and light trucks. The intent of the bill is to connect regional land use planning with transportation policy. The bill requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within their Regional Transportation Plans (RTPs) which sets forth a vision for growth for the region taking into account the transportation, housing, environmental, and economic needs of the region, with the goal of reducing the number of miles traveled by personal vehicles, and thus reducing GHG emissions. Under the law, the California Air Resources Board has two years to give each of California's MPO a GHG emissions reduction target for cars and light trucks. However this target to reduce GHG from cars and light trucks can only be implemented through changes in development pattern of the MPO. Once the guidelines have been established, (in mid-2010), regions will need to prepare an SCS an incorporate them into their RTPs.

LOCAL

El Dorado County Air Quality Management District

The El Dorado County AQMD has not established regulations for greenhouse gas emissions.

El Dorado County General Plan

The Health, Safety and Nose Element of the *2004 El Dorado County General Plan* contains goals, policies and implementation measures to ensure that the residents and visitors to El Dorado County are not exposed to unsafe conditions resulting from greenhouse gas emissions within county. Table 3.17-1 lists local policies and implementation measures that apply to development of the proposed project.

Table 3.17-1
General Plan Policies – Global Climate Change

Policy Number	Policy
6.7.2.1	Develop and implement a public awareness campaign to educate community leaders and the public about the causes and effects of El Dorado County air pollution and about ways to reduce air pollution.
6.7.7.1	The County shall consider air quality when planning the land uses and transportation systems to accommodate expected growth, and shall use the recommendations in the most recent version of the El Dorado County Air Quality Management (AQMD) *Guide to Air Quality Assessment: Determining Significance of Air Quality Impacts Under the California Environmental Quality Act*, to analyze potential air quality impacts (e.g., short-term construction, long-term operations, toxic and odor-related emissions) and to require feasible mitigation requirements for such impacts. The County shall also consider any new information or technology that becomes available prior to periodic updates of the Guide. The County shall encourage actions (e.g., use of light-colored roofs and retention of trees) to help mitigate heat island effects on air quality.

3.17.2 THRESHOLDS OF SIGNIFICANCE

No air district in California, including the El Dorado County AQMD, has identified a significance threshold for GHG emissions from an area source or a methodology for analyzing air quality impacts related to greenhouse gas emissions. The State has identified 1990 emission levels as a goal through adoption of AB 32. However, no standards have yet been adopted quantifying 1990 emission targets. It is recognized that for most projects there is no simple metric available to determine if a single project would help or hinder meeting the AB 32 emission goals. Consumption of fossil fuels in the transportation sector accounted for over 40% of the total GHG emissions in California in 2004. Current standards for reducing vehicle emissions considered under AB 1493 call for "the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles," and do not provide a quantified target for GHG emissions reductions for vehicles. It is important to note that achieving reduction is essentially a regional effort. Apparent "savings" by one jurisdiction may be offset by another.

Emitting CO_2 into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental effects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to generally estimate a project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Given the complex interactions between various global and regional-scale physical, chemical, atmospheric, terrestrial, and aquatic systems that result in the physical expressions of global climate change, it is unfeasible to discern whether the presence or absence of CO_2 emitted by the project would result in any altered conditions.

Given the challenges associated with determining project-specific significance criteria for GHG emissions when the issue must be viewed on a global scale, a quantitative significance criteria is not proposed for the project. For this analysis, a project's incremental contribution to global climate change would be considered significant if due to the size or nature of the project it would generate a substantial increase in GHG emissions relative to existing conditions.

Pending CEQA Guidelines amendments, being prepared by the Governors Office of Planning and Research, have identified the following draft significance criteria pertaining to the impact of Global Warming:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Under the proposed Guidelines criteria greenhouse gas emissions should be addressed if either of the above applies.

3.17.3 IMPACTS AND MITIGATION MEASURES

Impact #3.17-1: The Project could potentially result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change.

Discussion/Conclusion: As described above in the "Environmental Setting" discussion, the cumulative increase in GHG concentrations in the atmosphere has resulted in and will continue to result in increases in global average temperature and associated shifts in climatic and environmental conditions. Multiple adverse environmental effects are attributable to global climate change, such as sea level rise, increased incidence and intensity of severe weather events (e.g., heavy rainfall, droughts), and extirpation or extinction of plant and wildlife species. Given the significant adverse environmental effects linked to global climate change induced by GHGs, the emission of GHGs is considered a significant cumulative impact. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated

with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors (California Energy Commission 2006a); therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and individuals on Earth. The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is to determine whether a project's GHG emissions – which, it can be argued, are at a micro scale relative to global emissions – result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact.

Global climate change is projected to affect water resources in California. For example, an increase in the global average temperature is projected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), and is a major source of supply for the state. Although current forecasts vary (see, e.g., DWR 2006), this phenomenon could lead to significant challenges in securing an adequate water supply for a growing population and California's agricultural industry. An increase in precipitation falling as rain rather than snow could also lead to increased potential for floods because water that would normally be held in the Sierra Nevada until spring could flow into the Central Valley concurrently with winter storm events. This scenario would place more pressure on California's levee/flood control system.

Global climate change is expected to influence many interconnected phenomena, which will in turn affect the rate of climate change itself. Faced with this overwhelmingly complex system, scientists who model climate change must make decisions about how to simplify the phenomenon, such as assuming a fixed rate of temperature change or a certain level of aerosol production or a particular theory of cloud formation. These assumptions make the models applicable to particular aspects of the changing ecosystem, given a good guess about how the future will be. Rather than try to be predictive, the models represent possible scenarios that come with a set of presuppositions. Even when results are quantified, such quantifications are meaningless unless viewed in the light of those presuppositions. For these reasons, a range of models must be examined when trying to assess the potential effects of climate change and the resulting analysis is most appropriately qualitative (See Intergovernmental Panel on Climate Change (IPCC) 2001). This section, therefore, provides a qualitative analysis of the impacts of global climate change as they affect water resources in California and in the project area.

In 2003, global emissions of carbon (i.e., only the carbon atoms within CO_2 molecules) solely from fossil fuel burning totaled an estimated 7,303 million metric tons (Marlands et al. 2006). This translates to approximately 29,400 million tons of CO_2. This is only a portion of global CO_2 emissions because it addresses only fossil fuel burning and does not address other CO_2 sources such as burning of vegetation.

DST Output West has proposed the addition of several new printers inside the existing DST Output West facility that will not directly produce greenhouse gas (GHG) emissions, because the addition will not require additional employees, will not significantly modify the existing operation of the plant, and will not change the exterior appearance of the plant or require any modification to the land surrounding the plant. However, the additional printers will be

permitted to emit an additional 0.7 tons of Volatile Organic Compounds (VOC) a year and these emissions of VOC and oxides of nitrogen in the presence of sunlight react to produce Ozone (O_3), a greenhouse gas. Although the proposed expansion of printing capacity will not directly produce GHG's, the production of VOC, a greenhouse gas precursor, will contribute to GHG's locally, regionally, and globally.

The proposed project has have potential to result in additional truck traffic to handle materials, recycling, solid waste, and outgoing deliverables shipments. It has been estimated by DST Output West that this will only require a minimal amount of additional truck trips to and from the facility. Additionally, SB 375 provides means reduce GHG emissions from passenger vehicles and light trucks.

Although operation of several new printers inside the existing DST Output West facility in combination with growth and development at the local regional and state level, could result in a ***significant, cumulatively considerable and unavoidable*** impact, the VOC generation brought on by the additional printers will be offset by the transfer of 1.4 tons of VOC emission offset credits as permitted under SB 1662 Chapter 725 Statutes of 2008 from a source located within the SMAQMD making the proposed project's contribution to GHG generation ***less than significant.*** The basis for this determination is found in the fact that on an air basin wide level, the 1.4 tons of offset credits originating in the SMAQMD represents only 0.7 tons per year of emissions offset credits within the El Dorado County AQMD due to the distance from the source location in the jurisdiction of the SMAQMD to the DST Output West facility within the El Dorado County AQMD (a 2:1 ratio). Thus a 0.7 ton annual reduction in regional VOC generation will be the net result of the proposed project.

Mitigation Measures

No mitigation measures are required.

CHAPTER FOUR

EVALUATION OF ALTERNATIVES

CHAPTER FOUR
EVALUATION OF ALTERNATIVES

4.1 Introduction

The California Environmental Quality Act and the implementing CEQA Guidelines require that alternatives to the proposed project be discussed in the EIR. The value of such discussion is to inform public decision-makers of the differential environmental impacts which may be associated with each potential alternative, and to enable a reasoned judgment to be made as to which alternative to the proposed project may be environmentally superior. Section 15126.6 of the CEQA Guidelines provides the following description of what should be included in the alternatives discussion in an EIR:

> (a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
>
> (b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
>
> (c) Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be

used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) Evaluation of Alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

(e) "No Project" alternative.

(1) The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).

(2) The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

(3) A discussion of the "no project" alternative will usually proceed along one of two lines:

(A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative

plans would be compared to the impacts that would occur under the existing plan.

(B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

(C) After defining the no project alternative using one of these approaches, the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

(f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can

reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

(2) Alternative locations.

(A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of the potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.

(3) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

The sections of the chapter that follow present a description of the alternatives considered and an analysis of the alternatives in the context of CEQA and the CEQA Guidelines. The range of alternatives addressed includes an evaluation of the no project alternative (which is required to be addressed), a reduced number of printers alternative, and an extended operation hours of existing printers alternative. Finally, this chapter presents an analysis of the comparative environmental superiority of the various alternatives, as required by CEQA.

4.2 Project Goals and Objectives

As stated in Chapter Two of this Draft EIR, the goals of the project proponent for this project are as follows:

1. To ensure that existing jobs are retained as the result of added productivity within the existing plant operation.

2. To enhance production efficiency and output through cost effective use of floor space within the existing plant.

3. To achieve net VOC reduction within the combined SMAQMD and El Dorado County AQMD due to the distance ratio requirement of 2:1 (1.4 tons of reduction within the SMAQMD is required to off-set 0.7 tons of emissions within the El Dorado County AQMD resulting in a net reduction of 0.7 tons of VOC s being generated into the atmosphere annually).

4. To increase profitability and strengthen the El Dorado County economy.

4.3 Alternatives Rejected

According to the CEQA Guidelines, two major provisions are necessary for an adequate alternative site analysis—feasibility and location. The EIR should consider alternate project locations if a significant project impact could be avoided or substantially lessened by moving the project to an alternate site.

During the EIR process it was determined that the analysis of potential off-site locations to accommodate the proposed printing capacity expansion be illogical, since the additional DST Output West printers are to be located in the existing DST Output West plant. Further an alternative location would not result in the elimination or lessening of any environmental impacts.

4.4 Project Alternatives

The following project alternatives have been developed for the proposed project, consistent with CEQA requirements and the project objectives stated above. The following represent a reasonable range of alternatives to the project:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Number of Emission Offset Credits Alternative
- Alternative 3: Extended Operation Hours of Existing Printers Alternative

4.4.1 NO PROJECT ALTERNATIVE

This alternative is required under CEQA and will consist of describing the effects of taking no action or not receiving project approval. This alternative entails a general discussion of what can

reasonably be expected to occur on the project site in the foreseeable future if the proposed project is not approved, based on the existing operation of the DST Output West facility.

The existing conditions within the project area are detailed in the Environmental Setting narratives in each of the subsections in Chapter Three of this Draft EIR. The project site is currently occupied by the DST Output West facility. In accordance with Section 15126.6(e)(3)(B) of the CEQA Guidelines, the No Project alternative assumes a continuation of the existing DST Output West printing plant absent the addition of several new printing machines inside the existing facility resulting in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy) or extension of operating time for existing printers. This alternative would not increase VOC emissions and therefore would not require the transfer of emissions offset credits. If the proposed project were not approved, existing plant operating conditions would remain in effect. The No Project Alternative would not achieve any of the applicant's stated project goals/objectives.

4.4.2 REDUCED NUMBER OF EMISSION OFFSET CREDITS ALTERNATIVE

This alternative would include reduction of the number of emission offset credits received by DST Output West. Because the DST Output West plant has the potential to operate at, or near the VOC emissions limit set forth by the El Dorado County AQMD, this alternative would allow the facility to increase VOC emissions over the emission limits set forth by the El Dorado County AQMD resulting in a ***potentially significant*** impact. The Reduced Number of Emission Offset Credits Alternative would achieve some, but not all, of the applicant's stated project goals/objectives.

4.4.3 EXTENDED OPERATION HOURS OF EXISTING PRINTERS ALTERNATIVE

This alternative would consist of increasing the operating time on existing printers to achieve production output equal to what would be achieved with the addition of several new printers. This alternative would also produce an increase in VOC emissions proportionate to the amount of increased printer operational time and would require the transfer of emissions offset credits. The Extended Operation Hours of Existing Printers Alternative would allow the applicant to achieve the stated project goals/objectives.

4.5 Analysis of Project Alternatives

Each of the alternatives is analyzed below for potential impacts on the environment. The impact discussions are qualitative, and focus on the relative comparative level of impact, as compared to the proposed project. Under each heading, a statement is made indicating whether the impacts created by the alternative are less than, equal to, or greater than those in the proposed project. A summary of these statements is found at the conclusion of this section.

4.5.1 NO PROJECT ALTERNATIVE

This alternative is required under CEQA and will consist of describing the effects of taking no action or not receiving project approval. This alternative entails a general discussion of what can

reasonably be expected to occur at the project site in the foreseeable future if the proposed project is not approved. This alternative would not increase VOC emissions and therefore would not require the transfer of emissions offset credits.

Aesthetics

Currently the project site is occupied by the DST Output West facility. In its current state the project site is fully developed and is visually similar to surrounding buildings and properties. As is the case with the proposed project, the no project alternative would not result in changes to visual characteristics of the project site. The aesthetic impact under the no project alternative would be ***unchanged*** in comparison to the proposed project.

Agriculture Resources

Currently the project site is occupied by the DST Output West facility. In its current state the project site is a fully developed light industrial site and is not used for agricultural purposes. As with the proposed project, the no project alternative would not place additional pressure on surrounding agriculture lands to develop and would not convert farmland to non-agricultural purposes. The impact to agricultural resources would be ***unchanged*** in comparison to the proposed project.

Air Quality

Currently the project site is occupied by the DST Output West facility that generates emissions that affect air quality. The no project alternative would not result in change to the existing facility or surrounding land or result in generation of additional air pollutants. The impact to air quality would be ***less*** in comparison to the proposed project.

Biological Resources

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not disturb the project site or surrounding lands and there would be no impact to biological resources on or around the project site. The impact to biological resources would be ***unchanged*** in comparison to the proposed project.

Cultural Resources

Currently the project site is occupied by the DST Output West facility. As with the proposed project, the no project alternative would not disturb the existing structure or surrounding lands and there would be no impact to cultural resources on or surrounding the project site. The impact to cultural resources would be ***unchanged*** in comparison to the proposed project.

Geology and Soils

Currently the project site is occupied by the DST Output West facility. As is the case for the proposed project, the no project alternative would not result in alteration of the existing facility

and surrounding properties. The impact to geology and soils would be ***unchanged*** in comparison to the proposed project.

Hazards and Hazardous Materials

Currently the project site is occupied by the DST Output West facility. The facility regularly employs the use, transport, or disposal of hazardous materials or waste. However it is not expected that quantities of such chemicals used on the proposed project site will result in an environmental hazard. Transportation, handling, and use of any hazardous materials must comply with all related federal, state, and local regulations with respect to the hazardous materials. The no project alternative would not result in alteration of the existing plant and impacts related to hazards and hazardous materials are ***unchanged*** compared to the proposed project.

Hydrology and Water Quality

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not disturb surrounding lands and there would be no impact to hydrology or water quality on or surrounding the project site. The impact to hydrology and water quality would be ***unchanged*** in comparison to the proposed project.

Land Use and Planning

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not impact land use and planning. The impact to land use and planning would be ***unchanged*** in comparison to the proposed project.

Mineral Resources

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not impact mineral resources. The impact to mineral resources would be ***unchanged*** in comparison to the proposed project.

Noise

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not produce noise impacts. Under the no project alternative noise impact would be ***unchanged*** in comparison to the proposed project.

Population and Housing

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not result in population and housing impacts. Under the no project alternative population and housing impacts would be ***unchanged*** in comparison to the proposed project.

Public Services

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not result in the development or introduction of new facilities that would require additional public services. Under the no project alternative impacts to public services would be ***unchanged*** in comparison to the proposed project.

Recreation

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not result in additional development or the introduction of people into the proposed project vicinity requiring additional recreation lands or facilities. Under the no project alternative recreation impacts would be ***unchanged*** in comparison to the proposed project.

Transportation/Traffic

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not require additional development or result in the introduction of new people into the proposed project vicinity requiring additional transportation infrastructure. Under the no project alternative transportation/traffic impacts would be ***unchanged*** in comparison to the proposed project.

Utilities and Service Systems

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the no project alternative would not result in the development or introduction of new facilities that would require additional utilities and service systems. Under the no project alternative impacts to utilities and service systems would be ***unchanged*** in comparison to the proposed project.

Global Climate Change

Currently the project site is occupied by the DST Output West facility that generates emissions that affect global climate change in the region. The no project alternative would not result in a net reduction of 0.7 tons of VOC (a greenhouse gas precursor) annually. The basis for this determination is found in the fact that on an air basin wide level, the 1.4 tons of offset credits originating in the SMAQMD represents only 0.7 tons of emissions offset credits within the El Dorado County AQMD due to the distance from the source location in the jurisdiction of the SMAQMD to the DST Output West facility within the El Dorado County AQMD (a 2:1 ratio). Thus a 0.7 ton annual reduction in regional VOC generation will not be achieved as result of the no project alternative. The impact to global climate change would be ***greater*** in comparison to the proposed project.

4.5.2 REDUCED NUMBER OF EMISSION OFFSET CREDITS ALTERNATIVE

This alternative would include reduction of the number of emission offset credits received by DST Output West. This alternative would also see an increase in the number if printer to the facility but not to the extent of the proposed project. Additionally the Reduced Number of Emission Offset Credits Alternative would achieve some, but not all, of the applicant's stated project goals/objectives.

Aesthetics

Currently the project site is occupied by the DST Output West facility. In its current state the project site is fully developed and is visually similar to surrounding buildings and properties. As with the proposed project, the reduced number of emission offset credits alternative would not change the visual characteristics of the site or the surrounding area. The aesthetic impact under the reduced number of emission offset credits alternative would be ***unchanged*** in comparison to the proposed project.

Agriculture Resources

Currently the project site is occupied by the DST Output West facility. In its current state the project site is a fully developed light industrial site and is not used for agricultural purposes. As with the proposed project, the reduced number of emission offset credits alternative would not place additional pressure on surrounding agriculture lands to develop and would not convert farmland to non-agricultural purposes. The impact to agricultural resources would be ***unchanged*** in comparison to the proposed project.

Air Quality

Currently the project site is occupied by the DST Output West facility that generates emissions that affect air quality. As with the proposed project, the reduced number of emission offset credits alternative would increase pollutants to the regional air basins, however since there are fewer emission offset credits available, fewer emissions would be produced in the project area. The impact to air quality would be ***less*** in comparison to the proposed project.

Biological Resources

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits would not result in disturbance to the project site or surrounding lands and there would be no impact to biological resources on or around the project site. The impact to biological resources would be ***unchanged*** in comparison to the proposed project

Cultural Resources

Currently the project site is occupied by the DST Output West facility. As with the proposed project, the reduced number of emission offset credits alternative would not disturb the existing

structure or surrounding lands and there would be no impact to cultural resources on or surrounding the project site. The impact to cultural resources would be ***unchanged*** in comparison to the proposed project.

Geology and Soils

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not result in alteration of the existing facility and surrounding properties. The impact to geology and soils would be ***unchanged*** in comparison to the proposed project.

Hazards and Hazardous Materials

Currently the project site is occupied by the DST Output West facility. The facility regularly employs the use, transport, or disposal of hazardous materials or waste. However it is not expected that quantities of such chemicals used on the proposed project site will result in an environmental hazard. Transportation, handling, and use of any hazardous materials must comply with all related federal, state, and local regulations with respect to the hazardous materials. The reduced number of emission offset credits alternative would not result in alteration of the existing plant. Under the reduced number of emission offset credits alternative, impacts related to hazards and hazardous materials are ***unchanged*** compared to the proposed project.

Hydrology and Water Quality

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not disturb surrounding lands and there would be no impact to hydrology or water quality on or surrounding the project site. The impact to hydrology and water quality would be ***unchanged*** in comparison to the proposed project.

Land Use and Planning

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not impact land use and planning. The impact to land use and planning would be ***unchanged*** in comparison to the proposed project.

Mineral Resources

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not impact mineral resources. The impact to mineral resources would be ***unchanged*** in comparison to the proposed project.

Noise

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not produce noise impacts. Under the reduced number of emission offset credits alternative noise impact would be ***unchanged*** in comparison to the proposed project.

Population and Housing

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not result in population and housing impacts. Under the reduced number of emission offset credits alternative population and housing impacts would be ***unchanged*** in comparison to the proposed project.

Public Services

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not result in the development or introduction of new facilities that would require additional public services. Under the reduced number of emission offset credits alternative impacts to public services would be ***unchanged*** in comparison to the proposed project.

Recreation

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not result in additional development or the introduction of people into the proposed project vicinity requiring additional recreation lands or facilities. Under the reduced number of emission offset credits alternative recreation impacts would be ***unchanged*** in comparison to the proposed project.

Transportation/Traffic

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not require additional development or result in the introduction of new people into the proposed project vicinity requiring additional transportation infrastructure. Under the reduced number of emission offset credits alternative transportation/traffic impacts would be ***unchanged*** in comparison to the proposed project.

Utilities and Service Systems

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the reduced number of emission offset credits alternative would not result in the development or introduction of new facilities that would require additional utilities and service systems. Under the reduced number of emission offset credits alternative impacts to utilities and service systems would be ***unchanged*** in comparison to the proposed project.

Global Climate Change

Currently the project site is occupied by the DST Output West facility that generates emissions that affect global climate change in the region. The reduced number of emission offset credits alternative would result in a net reduction of VOC (a greenhouse gas precursor) annually but not to the extent that would occur under the proposed project. The impact to global climate change would be ***greater*** in comparison to the proposed project.

4.5.3 EXTENDED OPERATION HOURS OF EXISTING PRINTERS ALTERNATIVE

This alternative would consist of increasing the operating time on existing printers to achieve production output equal to what would be achieved with the addition of several new printers. This alternative would also produce an increase in VOC emissions proportionate to the amount of increased printer operational time and would require the transfer of emissions offset credits. This alternative would allow the applicant to achieve the stated project goals/objectives.

Aesthetics

Currently the project site is occupied by the DST Output West facility. In its current state the project site is fully developed and is visually similar to surrounding buildings and properties. As with the proposed project, the extended operation hours of existing printers alternative would not change the existing visual characteristics of the site or the surround area. The aesthetic impact under the extended operation hours of existing printers alternative would be ***unchanged*** in comparison to the proposed project.

Agriculture Resources

Currently the project site is occupied by the DST Output West facility. In its current state the project site is a fully developed light industrial site and is not used for agricultural purposes. As with the proposed project, the extended operation hours of existing printers alternative would not place additional pressure on surround agriculture lands to develop and would not convert farmland to non-agricultural purposes. The impact to agricultural resources would be ***unchanged*** in comparison to the proposed project.

Air Quality

Currently the project site is occupied by the DST Output West facility that generates emissions that affect air quality. The extended operation hours of existing printers alternative would not result in change to the existing facility or surrounding land. The extended operation hours of existing printers alternative would result in generation of additional air pollutants proportionate to the amount of increased printer operational time and would require the transfer of emissions offset credits. The impact to air quality would be ***unchanged*** in comparison to the proposed project.

Biological Resources

Currently the project site is occupied by the DST Output West facility. The proposed project would not disturb surrounding lands and there would be no impact to biological resources on or around the project site. The extended operation hours of existing printers alternative would not result in changes to the proposed project site or surrounding land. The impact to biological resources would be ***unchanged*** in comparison to the proposed project.

Cultural Resources

Currently the project site is occupied by the DST Output West facility. As with the proposed project, the extended operation hours of existing printers alternative would not result in disturbance to the proposed project site or surrounding lands and there would be no impact to cultural resources on or surrounding the project site. The impact to cultural resources would be ***unchanged*** in comparison to the proposed project.

Geology and Soils

Currently the project site is occupied by the DST Output West facility. As is the case for the proposed project, the extended operation hours of existing printers alternative would not result in alteration of the proposed project site or surrounding properties. The impact to geology and soils would be ***unchanged*** in comparison to the proposed project.

Hazards and Hazardous Materials

Currently the project site is occupied by the DST Output West facility. The existing facility regularly employs the use, transport, or disposal of hazardous materials or waste. However it is not expected that quantities of such chemicals used on the proposed project site will result in an environmental hazard. Transportation, handling, and use of any hazardous materials must comply with all related federal, state, and local regulations with respect to the hazardous materials. The extended operation hours of existing printers alternative would not result in alteration of the existing plant. Under the extended operation hours of existing printers alternative, impacts related to hazards and hazardous materials are ***unchanged*** compared to the proposed project.

Hydrology and Water Quality

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not result in disturbance to surrounding lands and there would be no impact to hydrology or water quality on or surrounding the project site. The impact to hydrology and water quality would be ***unchanged*** in comparison to the proposed project.

Land Use and Planning

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not impact

land use and planning. The impact to land use and planning would be ***unchanged*** in comparison to the proposed project.

Mineral Resources

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not impact mineral resources. The impact to mineral resources would be ***unchanged*** in comparison to the proposed project.

Noise

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not produce noise impacts. Under the extended operation hours of existing printers alternative noise impacts would be ***unchanged*** in comparison to the proposed project.

Population and Housing

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not result in population and housing impacts. Under the extended operation hours of existing printers alternative population and housing impacts would be ***unchanged*** in comparison to the proposed project.

Public Services

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not result in the development or introduction of new facilities that would require additional public services. Under the extended operation hours of existing printers alternative impacts to public services would be ***unchanged*** in comparison to the proposed project.

Recreation

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not result in additional development or the introduction of people into the proposed project vicinity requiring additional recreation lands or facilities. Under the extended operation hours of existing printers alternative recreation impacts would be ***unchanged*** in comparison to the proposed project.

Transportation/Traffic

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not require additional development or result in the introduction of new people into the proposed project

vicinity requiring additional transportation infrastructure. Under the extended operation hours of existing printers alternative transportation/traffic impacts would be ***unchanged*** in comparison to the proposed project.

Utilities and Service Systems

Currently the project site is occupied by the DST Output West facility. As is the case with the proposed project, the extended operation hours of existing printers alternative would not result in the development or introduction of new facilities that would require additional utilities and service systems. Under the extended operation hours of existing printers alternative impacts to utilities and service systems would be ***unchanged*** in comparison to the proposed project.

Global Climate Change

Currently the project site is occupied by the DST Output West facility that generates emissions that affect global climate change in the region. The extended operation hours of existing printers alternative would result in the same net reduction of 0.7 tons of VOC (a greenhouse gas precursor) annually as the proposed project. The basis for this determination is found in the fact that on an air basin wide level, the 1.4 tons of offset credits originating in the SMAQMD represents only 0.7 tons of emissions offset credits within the El Dorado County AQMD due to the distance from the source location in the jurisdiction of the SMAQMD to the DST Output West facility within the El Dorado County AQMD (a 2:1 ratio). Thus a 0.7 ton annual reduction in regional VOC generation will be the net result of this alterative. The impact to global climate change would be ***unchanged*** in comparison to the proposed project.

4.6 Environmentally Superior Alternative

In accordance with the CEQA Guidelines Section 15126.6(d), this section compares the impacts of the three alternatives under consideration to those of the proposed project. Table 4-1 shows whether each alternative is environmentally less, greater or unchanged compared to the proposed project for each of the issue areas studied in this EIR. Per CEQA Guidelines Section 15126.6(e)(2), if the no project alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives that were evaluated.

Table 4-1
Impact Comparison Summary Between Proposed Project and Alternatives

Impact Category	No Project Alternative	Reduced Number of Emission Offset Credits Alternative	Extended Operation Hours of Existing Printers Alternative
Aesthetics	Unchanged	Unchanged	Unchanged
Agricultural Resources	Unchanged	Unchanged	Unchanged
Air Quality	Reduced	Reduced	Unchanged
Biological Resources	Unchanged	Unchanged	Unchanged
Cultural Resources	Unchanged	Unchanged	Unchanged
Geology and Soils	Unchanged	Unchanged	Unchanged
Hazards and Hazardous Materials	Unchanged	Unchanged	Unchanged

Impact Category	No Project Alternative	Reduced Number of Emission Offset Credits Alternative	Extended Operation Hours of Existing Printers Alternative
Hydrology and Water Quality	Unchanged	Unchanged	Unchanged
Land Use and Planning,	Unchanged	Unchanged	Unchanged
Mineral Resources	Unchanged	Unchanged	Unchanged
Noise	Unchanged	Unchanged	Unchanged
Population and Housing	Unchanged	Unchanged	Unchanged
Public Services	Unchanged	Unchanged	Unchanged
Recreation	Unchanged	Unchanged	Unchanged
Transportation and Traffic	Unchanged	Unchanged	Unchanged
Utilities and Service Systems	Unchanged	Unchanged	Unchanged
Global Climate Change	Greater	Greater	Unchanged
Number of Impacts Reduced	1	1	0
Number of Impacts Increased	1	1	0
Number of Impacts Unchanged	15	15	17

The Extended Operation Hours of Existing Printers alternative and the Proposed Project are the environmentally superior alternatives because they would both result in a 0.7 tpy net reduction in VOC generation (a greenhouse gas precursor) in comparison with the No Project alternative and Reduced Number of Emission Offset Credits alternatives.

CHAPTER FIVE

MANDATORY CEQA SECTIONS

CHAPTER FIVE
MANDATORY CEQA SECTIONS

This chapter of the EIR provides for the required statements regarding the consequences of project implementation on the environment. The subsections below provide a listing of the environmental effects that cannot be mitigated, irreversible impacts, and finally cumulative impacts. Each of the statements below is supported in the analysis contained Chapter Three of this EIR.

5.1 Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Based on the analysis conducted in Chapter Three of this Draft EIR, the following impacts were found not to be significant:

AESTHETICS

Impact #3.1-1: Have a substantial adverse effect on a scenic vista.

Impact #3.1-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Impact #3.1-3: Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact #3.1-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

AGRICULTURE RESOURCES

Impact #3.2-1: 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 Department of Conservation, to non-agricultural use.

Impact #3.2-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Impact #3.2-3: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

AIR QUALITY

Impact #3.3-1: Conflict with or obstruct implementation of any applicable air quality plan.

Impact #3.3-2: Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation due to area source or operational emissions.

Impact #3.3-3: Violate any air quality standard or contribute substantially to an existing or projected air quality violation across air basins.

Impact #3.3-4: 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact #3.3-5: Expose sensitive receptors to substantial pollutant concentrations.

Impact #3.3-6: Create objectionable odors affecting a substantial number of people.

BIOLOGICAL RESOURCES

Impact #3.4-1: 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 CDFG or USFWS.

Impact #3.4-2: 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 CDFG or USFWS.

Impact #3.4-3: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact #3.4-4: 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.

Impact #3.4-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact #3.4-6: Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan.

CULTURAL RESOURCES

Impact #3.5-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Impact #3.5-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

Impact #3.5-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact #3.5-4: Disturb any human remains, including those interred outside of formal cemeteries.

GEOLOGY AND SOILS

Impact #3.6-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides.

Impact #3.6-2: Result in substantial soil erosion or the loss of topsoil.

Impact #3.6-3: 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.

Impact #3.6-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact #3.6-5: 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.

HAZARDS AND HAZARDOUS MATERIALS

Impact #3.7-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact #3.7-2: 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.

Impact #3.7-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact #3.7-4: 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.

Impact #3.7-5: Be located within an airport land use plan within two miles of a public airport or the vicinity of a private airstrip, creating a safety hazard for people residing or working in the project area.

Impact #3.7-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Impact #3.7-7: Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

HYDROLOGY AND WATER QUALITY

Impact #3.8-1: Violate any water quality standards or waste discharge requirements.

Impact #3.8-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Impact #3.8-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

Impact #3.8-4: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Impact #3.8-5: Create or contribute runoff which would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff.

Impact #3.8-6: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Impact #3.8-7: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Impact #3.8-8: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact #3.8-9: Result in a significant risk of inundation by seiche, tsunami, or mudflow.

LAND USE AND PLANNING

Impact #3.9-1: Physically divide an established community.

Impact #3.9-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact #3.9-3: Conflict with any applicable habitat conservation plan or natural community conservation plan.

MINERAL RESOURCES

Impact #3.10-1: 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.

Impact #3.10-2: 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.

NOISE

Impact #3.11-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact #3.11-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

Impact #3.11-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact #3.11-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact #3.11-5: 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 expose people residing or working in the project area to excessive noise levels.

Impact #3.11-6: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

POPULATION AND HOUSING

Impact #3.12-1: Induce substantial 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).

Impact #3.12-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Impact #3.12-3: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

PUBLIC SERVICES

Impact #3.13-1: Result in 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.

RECREATION

Impact #3.14-1: 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.

Impact #3.14-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

TRANSPORTATION/TRAFFIC

Impact #3.15-1: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicles trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact #3.15-2: Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

Impact #3.15-3: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Impact #3.15-4: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact #3.15-5: Result in inadequate emergency access.

Impact #3.15-6: Result in inadequate parking capacity.

Impact #3.15-7: Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

UTILITIES AND SERVICE SYSTEMS

Impact #3.16-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact #3.16-2: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact #3.16-3: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact #3.16-4: Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact #3.16-5: 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 providers existing commitments.

Impact #3.16-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Impact #3.16-7: Comply with federal, state, and local statutes and regulations related to solid waste.

GLOBAL CLIMATE CHANGE

Impact #3.17-1: The Project could potentially result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change.

5.2 Significant Environmental Effects Requiring Mitigation

Multiple environmental impacts have been identified which can be reduced to a level of less than significant upon incorporation of mitigation measures. These impacts are listed below. Refer to Chapter Three of the DEIR for a full analysis of impacts and mitigation measures.

AESTHETICS

None

AGRICULTURE RESOURCES

None

AIR QUALITY

None

BIOLOGICAL RESOURCES

None

CULTURAL RESOURCES

None

GEOLOGY AND SOILS

None

HAZARDS AND HAZARDOUS MATERIALS

None

HYDROLOGY AND WATER QUALITY

None

LAND USE AND PLANNING

None

MINERAL RESOURCES

None

NOISE

None

POPULATION AND HOUSING

None

PUBLIC SERVICES

None

RECREATION

None

TRANSPORTATION/TRAFFIC

None

UTILITIES AND SERVICE SYSTEMS

None

GLOBAL CLIMATE CHANGE

None

5.3 Significant Environmental Effects That Cannot Be Avoided

CEQA Guidelines Section 15126.2(b) requires that the EIR describe any significant impacts, including those that cannot be reduced to a level of insignificance. Where there are impacts that cannot be alleviated with the implementation of feasible mitigation measure(s), their implications and the reasons why the project is being proposed notwithstanding their effect, should be described.

The environmental impacts that would result from the proposed project are discussed in detail in Chapter Three of this EIR. The following is a brief review of the impacts that have been found to be significant and unavoidable.

AESTHETICS

None

AGRICULTURE RESOURCES

None

AIR QUALITY

None

BIOLOGICAL RESOURCES

None

CULTURAL RESOURCES

None

GEOLOGY AND SOILS

None

HAZARDS AND HAZARDOUS MATERIALS

None

HYDROLOGY AND WATER QUALITY

None

LAND USE AND PLANNING

None

MINERAL RESOURCES

None

NOISE

None

POPULATION AND HOUSING

None

PUBLIC SERVICES

None

RECREATION

None

TRANSPORTATION/TRAFFIC

None

UTILITIES AND SERVICE SYSTEMS

None

GLOBAL CLIMATE CHANGE

None

5.4 Irreversible Impacts

CEQA Guidelines Section 15126.2(c) requires a discussion of significant and irreversible changes that would be caused by the proposed project if implemented. The use of non-renewable resources during a project is irreversible when a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts must also be considered, as well as the possibility of environmental accidents and commitments incurred by future generations.

AESTHETICS

None

AGRICULTURE RESOURCES

None

AIR QUALITY

None

BIOLOGICAL RESOURCES

None

CULTURAL RESOURCES

None

GEOLOGY AND SOILS

None

HAZARDS AND HAZARDOUS MATERIALS

None

HYDROLOGY AND WATER QUALITY

None

LAND USE AND PLANNING

None

MINERAL RESOURCES

None

NOISE

None

POPULATION AND HOUSING

None

PUBLIC SERVICES

None

RECREATION

None

TRANSPORTATION/TRAFFIC

None

UTILITIES AND SERVICE SYSTEMS

None

GLOBAL CLIMATE CHANGE

None

5.5 Cumulative Impacts

CEQA requires that an EIR examine the cumulative impacts associated with a project. The range of projects to be included in the cumulative impacts analysis encompasses "past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those outside of the control of the agency." Section 15130 requires cumulative impacts to be discussed "where they are significant." A cumulative effect is deemed significant if the project's incremental contribution to a cumulative impact is "considerable." A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (CEQA, Section 15130).

The Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List Method – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (Section 15130(A)).

- General Plan Projection Method – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact (Section 15130 (B)).

The General Plan Projection Method was selected to conduct the cumulative impact analysis for this EIR. The County has adopted a General Plan that will be used as the basis for this analysis as it contains the most current predicted improvements and development guidelines of the County.

For the purposes of this EIR, the cumulative setting is based on a two-fold approach. For some impact issue areas (i.e., air quality, traffic), the cumulative setting is defined by specific regional boundaries (air basin, regional roadway network, etc.) or projected regional or area-wide conditions, contributing to cumulative impacts. For the remaining impact issue areas, the cumulative setting is based on development anticipated within the vicinity of the project.

Development of the General Plan as identified above in combination with the proposed project has the potential to result in cumulatively considerable impacts and is analyzed below.

AESTHETICS

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional Volatile Organic Compound (VOC) emissions of up to 0.7 tons per year (tpy). The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. With the absence of physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

AGRICULTURAL RESOURCES

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Implementation of the proposed project will not result in the conversion of any amount of land classified as Prime Farmland or land zoned for agricultural uses to a non-agricultural use. With the absence of physical changes to the project site and no impact on Prime Farmland or land zoned for agricultural purposes, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan

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AIR QUALITY

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and will not require additional employees. Additionally the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. The proposed project will however produce an increase in VOC emissions that will be offset with emission offset credits. Therefore, the project will result in a ***cumulatively considerable*** net increase in ozone precursors, a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

BIOLOGICAL RESOURCES

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. The proposed project will not directly alter existing biological resources. Absent impacts to biological resources on or surrounding the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

CULTURAL RESOURCES

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Absent physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

GEOLOGY AND SOILS

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Absent physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

MINERAL RESOURCES

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Absent physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

HAZARDS AND HAZARDOUS MATERIALS

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The facility regularly employs the use, transport, or disposal of hazardous materials or waste. However it is not expected that quantities of such chemicals used on the proposed project site will result in an environmental hazard. Transportation, handling, and use of any hazardous materials must comply with all related federal, state, and local regulations with respect to the hazardous materials. Therefore, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

HYDROLOGY AND WATER QUALITY

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The

proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Absent physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

LAND USE, PLANNING, POPULATION AND HOUSING

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Absent physical changes to the project site, the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

NOISE

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because all impacts relating to noise were less than significant, implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

PUBLIC SERVICES

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because all impacts relating to public services were less than significant, implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

RECREATION

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because all impacts relating to recreation were less than significant, implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

TRANSPORTATION/TRAFFIC

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because all impacts relating to transportation/traffic were less than significant, implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

UTILITIES AND SERVICE SYSTEMS

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy. The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because all impacts relating to utilities and service systems were less than significant, implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

GLOBAL CLIMATE CHANGE

The proposed project consists of the addition of several new printing machines inside the existing DST Output West facility resulting in additional VOC emissions of up to 0.7 tpy The proposed project will not significantly modify the existing plant operation and the proposed project will not change the exterior appearance of the plant or require modification to the land surrounding the plant. Because this impact is considered less than significant (potential greenhouse gas emissions will actually be reduced), implementation of the proposed project ***will not contribute to cumulatively considerable*** impacts that may result from implementation of the El Dorado County General Plan.

5.6 Growth Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires a discussion of growth-inducing impacts of a proposed project. Growth inducement occurs when a project would, either directly or indirectly, foster economic or population growth, construct additional housing, remove obstacles to population growth, increase burdens on existing community service facilities to the extent that new facilities would be needed, or encourage other activities that cause significant environmental effects. Note that it must not be assumed that growth is necessarily beneficial, detrimental, or of little significance to the environment.

DIRECT GROWTH INDUCEMENT

Direct population growth occurs when a project would result in the construction of a substantial amount of new housing or otherwise directly cause a substantial increase in the County's population.

The proposed project will not directly induce population growth, because it is a light industrial production enhancement project that will not result in construction of housing units or directly induce housing development.

INDIRECT GROWTH INDUCEMENT

Indirect growth inducement occurs when a project would extend infrastructure to undeveloped areas or otherwise remove obstacles to population growth.

The proposed project will not indirectly induce population growth because it will not extend infrastructure closer to undeveloped areas, thereby potentially facilitating their future development.

APPENDICES

APPENDIX A

Senate Bill No. 1662

CHAPTER 725

An act relating to air pollution.

[Approved by Governor September 30, 2008. Filed with Secretary of State September 30, 2008.]

LEGISLATIVE COUNSEL'S DIGEST

SB 1662, Cox. Air districts: emission reduction offsets: Sacramento metro federal nonattainment area.

Under existing law, increases in emissions of air pollutants at a stationary source located in an air pollution control district or air quality management district may be offset by emission reductions credited to a stationary source located in another district if both stationary sources are located in the same air basin.

This bill would allow one stationary source located in the El Dorado County Air Quality Management District, to be determined by the El Dorado County Air Quality Management District, to offset increases in emissions by emission reductions credited to any stationary source located in the Sacramento Metropolitan Air Quality Management District if both stationary sources are in the Sacramento metro federal nonattainment area.

This bill would state the findings and declarations of the Legislature concerning the need for special legislation.

The bill would impose a state-mandated local program by imposing new duties on the districts relative to determining the applicability of the offsets.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.

The people of the State of California do enact as follows:

SECTION 1. (a) Increases in emissions of air pollutants at one stationary source located in the El Dorado County Air Quality Management District, to be determined by the El Dorado County Air Quality Management District pursuant to subdivision (d), may be offset by emission reductions credited to any stationary source located in the Sacramento Metropolitan Air Quality Management District, if both the stationary source in the El Dorado County Air Quality Management District and the stationary source or sources in the Sacramento Metropolitan Air Quality Management District are in the Sacramento metro federal nonattainment area.

(b) The requirements of Section 40709.6 of the Health and Safety Code, except subdivision (a) of that section, shall apply to any offsetting of emissions pursuant to this section.

(c) Before authorizing any offsetting of emissions pursuant to this section, the El Dorado County Air Quality Management District shall prepare and certify an environmental impact report pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code, including an analysis of, and mitigation for, the environmental impacts.

(d) The El Dorado County Air Quality Management District shall select one and only one stationary source located in the district that shall be able to offset emissions pursuant to this section. That stationary source shall only be allowed to offset emissions pursuant to this section until January 1, 2010. However, any credits acquired pursuant to this section before that date may be applied to offset emissions from that stationary source in future years, at the discretion of the El Dorado County Air Quality Management District.

SEC. 2. Due to unique circumstances concerning the Sacramento metro federal nonatttainment area, the Legislature finds and declares that a general statute cannot be made applicable within the meaning of Section 16 of Article IV of the California Constitution.

SEC. 3. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because a local agency or school district has the authority to levy service charges, fees, or assessments sufficient to pay for the program or level of service mandated by this act, within the meaning of Section 17556 of the Government Code.

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APPENDIX B

Notice of Preparation

To: _____
(Agency)

_____
(Address)

_____

Subject: Notice of Preparation of a Draft Environmental Impact Report

Lead Agency:	**Consulting Firm** (if applicable)**:**
El Dorado County Air Quality Management District (Agency Name)	Quad Knopf, Inc. (Firm Name)
2850 Fairlane Court, Building C (Street Address)	One Sierragate Plaza, Suite 270C (Street Address)
Placerville, CA 95667 (City/State/Zip)	Roseville, CA 95678 (City/State/Zip)
Marcella McTaggart, Air Pollution Control Officer (Contact)	Ronald J. Mauck, AICP (Contact)

The El Dorado County Air Quality Management District will be the Lead Agency and will prepare an Environmental Impact Report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project.

The project description and location are described below. An Initial Study was not prepared for this project; instead an EIR will be prepared.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Marcella McTaggart at the address shown above. We will need the name for a contact person in your agency.

Project Title: DST Output West Printing Capacity Expansion Project

Project Location: El Dorado Hills (City-nearest) El Dorado County (County)

Project Description:

INTRODUCTION

This Notice of Preparation (NOP) of an Environmental Impact Report (EIR) pertains to the DST Output West Printing Capacity Expansion Project. The El Dorado County Air Quality Management District is the Lead Agency for the preparation of this EIR. The EIR is being prepared pursuant to SB 1662 Section 1 (c) Chaptered in 2009 requiring the El Dorado County Air Quality Management District to prepare and certify an EIR prior to authorizing a one time only transfer of emission reduction credits for the proposed project. The proposed project is located in the El Dorado Hills Community in El Dorado County.

PROJECT LOCATION

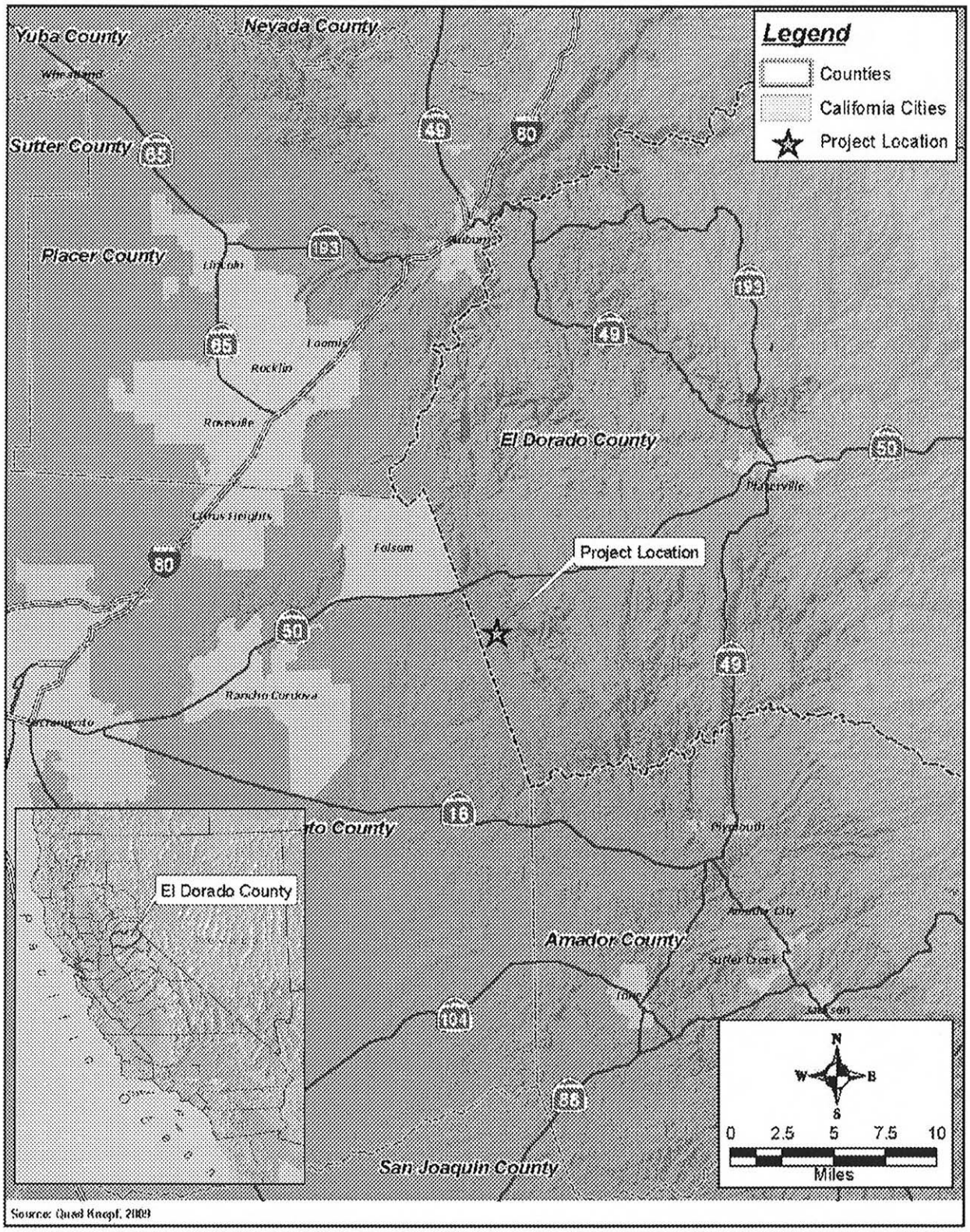
The proposed project site is located at 5220 Robert J. Mathews Pkwy (Assessors Parcel Number 117-010-14), approximately 2.5 miles to the south of State Route 50, ¼ mile west of Latrobe Road on the south side of Investment Blvd, in the unincorporated community of El Dorado Hills. Figure 1 provides a regional vicinity map and Figure 2 provides an aerial photo of the proposed project location within the El Dorado Hills Business Park.

PROJECT NARRATIVE

The proposed project consists of the addition of up to three new printers which will result in an additional 0.7 tons of Volatile Organic Compound (VOC) emissions. The additional 0.7 tons of VOC emissions will exceed the El Dorado Air Quality Management District 10 ton per year VOC emission threshold of significance (the printing plant is currently operating at, or near, the 10 ton threshold). In order to provide for further expansion, acquisition of emissions offset credits is necessary. It is proposed that the VOC threshold exceedance brought on by the additional printers will be offset by the transfer of 1.4 tons of VOC emission offset credits, due to the applicable distance ratio of 2:0 represents only 0.7 tons of emissions offsets, from a source located in the jurisdiction of the Sacramento Air Quality Management District as permitted under SB 1662.

ANTICIPATED ENVIRONMENTAL IMPACTS:

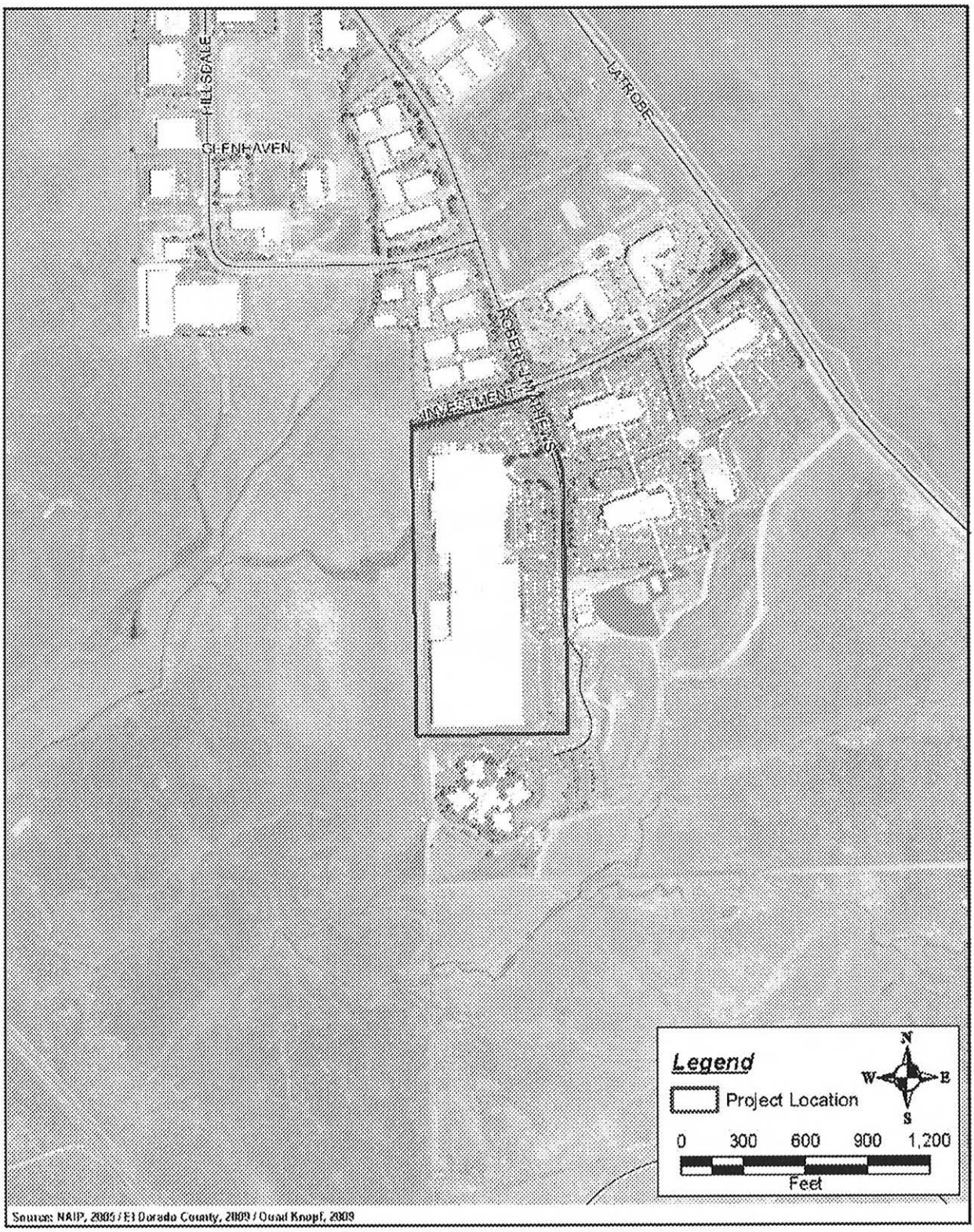
Because the addition of up to three additional printing machines within the existing plant will not modify the operation of the plant, change the exterior appearance of the plant or affect the land surrounding the plant, it is not anticipated that analysis and mitigation will be required in the following environmental impact areas: Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, Public Services, Population and Housing, Recreation, Transportation/Traffic, Utilities and Service Systems. It is anticipated that analysis pertaining to Air Quality and Hazards and Hazardous Materials, including mitigation if required, will be provided in the EIR. Mandatory Findings of Significance for project impacts will be included in the analysis when appropriate. The EIR will also analyze feasible alternatives to the proposed project in sufficient depth to afford readers an understanding of the different alternatives and environmental consequences.



Quad Knopf

DST OUTPUT WEST PRINTING CAPACITY EXPANSION
REGIONAL LOCATION MAP

Figure 1



Quad Knopf

DST OUTPUT WEST PRINTING CAPACITY EXPANSION
VICINITY MAP

Figure 2

USES OF THE EIR AND REQUIRED AGENCY ACTIONS AND PERMITS

The EIR will be used to satisfy the requirements of CEQA, with regards to the proposed project. The El Dorado County Air Quality Management District, acting as Lead Agency, will oversee the preparation and adoption of the EIR, and will be responsible for its availability and use by the public and other interested agencies and parties.

El Dorado County Air Quality Management District decision makers will use the EIR in consideration of project approval to be in compliance with SB 1662 (transfer of 1.4 tons of VOC emission offset credits from a source located in the jurisdiction of the Sacramento Air Quality Management District).

DESCRIPTION OF PROJECT ALTERNATIVES

The following three alternatives will be identified and evaluated in the EIR and include the "No Project" alternative, "Increased Operations" alternative, and the "Reduced Units" alternative.

No Project Alternative

This alternative is required under CEQA, and will consist of describing the effects of taking no action or not receiving project approval. This alternative entails a general discussion of what can reasonably be expected to occur at the project site in the foreseeable future if the proposed project is not approved. This alternative would not increase VOC emissions and therefore would not require the transfer of emissions offset credits.

Increased Operations

This alternative would consist of increasing the operating time on existing printers to achieve production output equal to what would be achieved with the addition of up to three additional printers. This alternative would also produce an increase in VOC emissions proportionate to the amount of increased printer operational time and would require the transfer of emissions offset credits.

Reduced Density Alternative

This alternative would include reduction of the number of proposed additional printers. This alternative would also produce an increase in VOC emissions and would require the transfer of emissions offset credits.

08-19-2009
Date

Monalee McTaggart
Signature

Air Pollution Control Officer
Title

(530) 621-5306
Telephone

EL DORADO LAFCO

LOCAL AGENCY FORMATION COMMISSION

550 Main Street Suite E • Placerville, CA 95667

Phone: (530) 295-2707 • Fax: (530) 295-1208

lafco@edcgov.us • www.edlafco.us

September 9, 2009

Marcella McTaggart, Air Pollution Control Officer
El Dorado County Air Quality Management District
2850 Fairlane Court, Building C
Placerville, CA 95667

Subject: Notice of Preparation of a Draft Environmental Report – DST Output West Printing Capacity Expansion Project

Dear Ms. McTaggart,

Thank you for the opportunity to provide comments on the above project. LAFCO's State mandated role is to promote orderly growth and development and to encourage efficient service areas for local service providers. LAFCO has reviewed the submitted materials relating to this project. Given that the draft environmental impact report will only review a limited number of environmental impact areas and the Air Quality Management District does not anticipate an analysis and mitigation of the areas of most concern to LAFCO, this agency has no comment on the project.

Regards,

José C. Henríquez
LAFCO Executive Officer

S:\Projects\MISC\Inquiries\DST Output West Printing Capacity Expansion Project.doc

RECEIVED
SEP 2009
AQMD

APPENDIX C

SECOR
SECOR INTERNATIONAL INCORPORATED
www.secor.com
7730 Southwest Mohawk Street
Tualatin, OR 97062
503-691-2030 TEL
503-692-7074 FAX

DRAFT

EMISSIONS INVENTORY REPORT FOR

DST OUTPUT WEST, LLC

El Dorado Hills, California

September 18, 2006
15OT.DSTEH.02.0002

Prepared by:

J. Patrick Stevens
Principal Engineer

Reviewed by:

Brian Patterson, Ph.D.
Senior Scientist

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LIST OF APPENDICES

1.0 INTRODUCTION

DST Output is a firm specializing in integrated print-and-electronic billing, customer care, and customer communications solutions to financial services, communications, insurance, healthcare, and utility companies. As part of DST's ongoing efforts to reduce printing turnaround time, increase service features and reduce costs to customers, DST began permitting and installing high-speed inkjet printers at the DST Output West, LLC (DST) facility in El Dorado Hills, California, several years ago.

The emissions estimates used for previous inkjet air quality permit applications were based on theoretical calculations, assuming a certain number of droplets, of a certain size, applied to each page. SECOR International Incorporated (SECOR) was retained to assist in developing a more accurate method of estimating emissions from the inkjet printing operation.

SECOR performed a site visit to inspect the process and to interview operational, maintenance, purchasing, and management personnel at the facility. It was determined that the most accurate basis for estimating emissions was to utilize the existing tracking of volatile organic compound (VOC)-containing products delivered to the "manufacturing floor". It was assumed that 100% of the VOC content of this product usage was emitted. This product usage tracking system is verified by regular physical inventories. One disadvantage of this method is that there is no tracking in place to allocate the usage to the different printers. In SECOR's review of the situation, it is clear that accurate and reliable tracking of product usage to each printer would be difficult. However, in consultation with the El Dorado County Air Quality Management District (AQMD), it appears that re-permitting all of the printers together under a facility-wide cap for all inkjet printers may be acceptable.

Based on 4 months of actual usage data (May through August 2006), it appears that the potential to emit (PTE) of the printers is significantly less than the sum of the permitted VOC limits for inkjet printers. These emissions estimates are based on the assumption that 100% of the VOC and hazardous air pollutants (HAP) content of the materials used are emitted and do not incorporate any subtraction for ink waste disposed of off site. The emissions estimates are presented in Appendix A and are summarized below.

VOC Emissions from Inkjet Printing

Permit Limit Sum 9 Printers	SECOR PTE Estimate 9 Printers	Permit Limit Sum 12 Printers	SECOR PTE Estimate 12 Printers
2.97 tons/yr	1.90 tons/yr	3.90 tons/yr	2.27 tons/yr

Therefore, it appears that the three new Series 5000 printers recently permitted (which brought the total number of printers to 12), could fit under the previous 2.97 tons/yr permitted emissions (if a facility-wide emissions cap can be implemented for the inkjet operation).

2.0 FACILITY BACKGROUND

The DST facility has been utilizing inkjet technology for several years. Prior to the installation of the high-speed inkjet machines, the primary method of printing was toner based. Toner-based printing does not produce significant air quality emissions[1], but is less versatile than the new high-speed inkjet technology. Inkjet technology allows for the use of color, is faster, and is at a lower cost than the toner-based printing technology.

In late August 2006, Authority to Construct permits were issued by the AQMD for three new Series 5000 inkjet printers. Prior to that time, the total number of permitted inkjet printers was nine, consisting of five Series 5000 printers and four Series 3700 printers. This complement of nine printers operated at full production during the study period (May through August 2006) that forms the basis for the actual ink and solvent usage in the attached emissions inventory.

[1] The US EPA's Compilation of Emission Factors (AP-42) does not mention toner based printing in Section 4.9.1 General Graphic Printing (4/81, reformatted 1/95).

3.0 INKJET PRINTER PROCESS

The inkjet printers used by DST are very large and fast inkjet printers developed initially by Scitex. The technology was acquired by Kodak, which now manufactures the Versa Mark Print Station Model 3700 Series and Model 5000 Series currently used by DST. The maximum printing speeds of these printers varies from 500 to 1,000 feet per minute, depending on the model, and how they are set up. The two finished paper sizes that are produced are 6-5/8" x 9-1/3" and 8-1/2" x 11". Each one-sided page is considered to be a printed "image" if any ink is put on the page. Currently, about 60% of the number of images printed is the smaller size (6-5/8" x 9-1/3") image.

The ink and solvents used are delivered from sealed containers (55-gallon drums and 5-gallon "cubes", which are boxes fitted with collapsible plastic containers), through sealed hose connections. The inks are water-based formulations that include very small quantities of VOCs and HAPs. The print station supplies ink to its print heads and recovers unused liquid ink for subsequent printing. There are no fugitive evaporative losses from containers, and there are no mixing operations required. The only air quality emissions from the ink are generated in the process of applying and drying the ink. Any residual material in the 55-gallon drums is manually drained into a sealed container and manifested for removal as non-hazardous waste.

4.0 EMISSIONS CALCULATIONS

This section summarizes the assumptions, emission factors, and calculations used to estimate the previous PTE (nine printers) of regulated pollutants, as well as the facility's new PTE (existing nine printers plus three new printers) of regulated pollutants. PTE is defined in AQMD Rule 522.2.W as ". . . the maximum capacity of the unit to emit a regulated air pollutant or HAP considering the unit's physical and operational design." The data used in estimating the facility's PTE were developed utilizing process, raw material, and production information from the DST facility.

4.1 Production and Process Rates

Table 1 in Appendix A contains the production and process rates that serve as the throughput basis for the emissions estimates. The second column in Table 1 contains total ink usage, as well as total images printed in the 4-month period of May through August 2006. Earlier data were not used because the inkjet printers were not operating at full production. The total area printed was estimated assuming 60% of the total number of images printed were on 6 5/8" x 9 1/3" paper and 40% were on 8 ½" x 11" paper. The next column contains the estimated PTE annual rates for the current nine printers. These estimates were based on the previous PTE production scenario of 12 billion images printed per year. The last column contains the estimated new PTE annual rates for the existing nine printers plus three new printers. These estimates were based on the PTE production scenario of 14.34 billion images printed per year, provided by DST.

4.2 Estimated Previous PTE Annual Emissions

Table 2 contains the estimated VOC and HAP PTE emissions for the current nine printers. These calculations were based on the VOC and HAP content of each ink used. These data were either obtained from the Material Safety Data Sheet (MSDS) or from conversations with the vendors.

4.3 Estimated New PTE Annual Emissions

Table 3 contains the estimated VOC and HAP PTE emissions for the existing nine printers plus the three new printers. These calculations were based on the VOC and HAP content of each ink used. These data were either obtained from the MSDS or from conversations with the vendors.

4.4 Disposal of Ink and Solvent Waste

SECOR has not reduced the estimated emissions due to the disposal of the ink and solvent wastes in sealed containers. The current practice is to place ink and solvent wastes into a sealed container and have it removed from the facility as non-hazardous waste by a waste hauling vendor. SECOR believes that it is legitimate to subtract the average VOC content of the ink and solvent waste from future emissions tracking recordkeeping.

5.0 SUMMARY AND CONCLUSIONS

Table 4 summarizes the estimated PTE emissions for the existing nine printers, as well as the existing nine printers plus the three new printers. Also shown is the permit limit for annual VOC emissions for each printer. It is evident that, even when adding the PTE emissions from the three new printers, the new PTE is still lower than the sum of the VOC permit limits for the nine current printers. Actual emissions for 12 months worth of production will be lower than the estimated PTE, as long as the ink and solvent mix remains similar to that recorded during the 4-month study period.

Therefore, based on the attached emissions inventory, there should not be a shortage of VOC emission reduction credits in the current permitting process for the three new printers. If you have any questions regarding these calculations, please call Patrick Stevens of SECOR at (503) 691-2030.

APPENDIX A
EMISSIONS INVENTORY

Emissions Inventory Report
DST Output West, LLC
El Dorado Hills, California
15OT.DSTEH.02.0002
September 18, 2006

Table 1
Production and Process Rates
DST Output West, LLC, El Dorado Hills, California

Process	Actual 2006 May - August Rates		Previous Estimated PTE Annual Rates (nine printers) (1)		New Estimated PTE Annual Rates (previous nine printers plus three new printers) (5)	
Total Images Printed	1,628,143,898	images (2)	12,000,000,000	images (3)	14,340,000,000	images (3)
Estimated Total Area Printed	71,882,553,097	SF (4)	529,800,000,000	SF	633,111,000,000	SF
Ink Usage						
Kodak FD1034 Black	5.3	gallons (2)	39	gallons	47	gallons
Kodak FV1501 Black	7,807.9	gallons (2)	57,547	gallons	68,768	gallons
Kodak FV2001 Process Cyan (blue)	375.1	gallons (2)	2,765	gallons	3,304	gallons
Kodak FV2002 Process Magenta	348.7	gallons (2)	2,570	gallons	3,071	gallons
Kodak FV2003 Process Black	1,978.1	gallons (2)	14,579	gallons	17,422	gallons
Kodak FV2014 Process Yellow	253.6	gallons (2)	1,869	gallons	2,234	gallons
Collins Orange SWO-4576	55.5	gallons (2)	409	gallons	489	gallons
Collins Red SWR-4911	29.1	gallons (2)	214	gallons	256	gallons
Collins Orange SWO-5173	29.1	gallons (2)	214	gallons	256	gallons
Collins Black SWK-5190	3,571.6	gallons (2)	26,324	gallons	31,457	gallons
Collins Ink Red SWR-5197	6.7	gallons (2)	50	gallons	59	gallons
Kodak FR1014 Replenisher	7.5	gallons (2)	55	gallons	66	gallons
Kodak FF1042 Replenisher	909.8	gallons (2)	6,706	gallons	8,013	gallons
Kodak FF1044 Flush	174.4	gallons (2)	1,285	gallons	1,536	gallons
Kodak FF2006 Shutdown	243.0	gallons (2)	1,791	gallons	2,141	gallons

References:

(1) Printers include #29 Model 5,000 Permit #10-1432, #31 Model 5,000 Permit #10-1431, #83 Model 5,000 #10-1430, #84 Model 5,000 Permit #10-1387, #85 Model 5,000 Permit #10-1408, #87 Model 3,700 Permit #10-1426, #88 Model 3,700 Permit #10-1426, #89 Model 3,700 Permit #10-1425, and #90 Model 3,700 Permit #10-1424.

(2) Provided by DST Output West, LLC, El Dorado Hills, California facility. Rates are the sum of the production values from May, June, July, and August 2006.

(3) Provided by DST Output West, LLC, El Dorado Hills, California facility, August 2006.

(4) Area Printed based on an estimate of 60% printed on 6 5/8" X 9 1/3" and 40% printed on 8 1/2" X 11" paper. Area quantities are in square feet (SF).

(5) PTE production scenario of the nine previously permitted printers, plus three new model 5,000 printers (#80 Model 5,000 Permit #10-1450, #81 Model 5,000 Permit #10-1451, #82 Model 5,000 Permit #10-1452).

Table 2
Estimated Previous PTE Annual VOC/HAP Emissions for the Previous Nine Printers
DST Output West, LLC, El Dorado Hills, California

Product	Raw Material Components [1]				Estimated PTE Annual Rates [2] (gallons/yr)	Current PTE Annual Emissions (tons/yr)	
	Density (lbs/gal)	VOC/HAP	Amount in Product				
FD1034 Black Ink Kodak Versamark, Inc.	8.5	Total VOC	0.260	lbs/gal	39	0.0051	(a)
FV1501 Black Ink Kodak Versamark, Inc.	8.55	Total VOC	0.020	lbs/gal	57,547	0.58	(a)
FV2001 Process Cyan (Blue) Ink Kodak Versamark, Inc.	8.41	Total VOC	0.060	lbs/gal	2,765	0.08	(a)
FV2002 Process Magenta Ink Kodak Versamark, Inc.	8.40	Total VOC	0.060	lbs/gal	2,570	0.08	(a)
FV2003 Process Black Ink Kodak Versamark, Inc.	8.51	Total VOC	0.060	lbs/gal	14,579	0.44	(a)
FV2014 Process Yellow Ink Kodak Versamark, Inc.	8.40	Total VOC	0.250	lbs/gal	1,869	0.23	(a)
Orange SWO-4576 Collins Ink Corporation	8.76	Total VOC	0.043	lbs/gal	409	0.01	(a)
Red SWR-4911 Collins Ink Corporation	8.76	Total VOC	0.050	lbs/gal	214	0.01	(a)
Orange SWO-5173 Collins Ink Corporation	8.76	Total VOC	0.022	lbs/gal	214	0.00	(a)
Black SWK-5190 Collins Ink Corporation	8.76	Total VOC	0.010	lbs/gal	26,324	0.13	(a)
Red SWR-5197 Collins Ink Corporation	8.76	Total VOC	0.049	lbs/gal	50	0.0012	(a)
FR1014 Replenisher Kodak Versamark, Inc.	8.32	Total VOC	0.010	lbs/gal	55	0.0003	(a)
FR1042 Replenisher Fluid Kodak Versamark, Inc.	8.32	Total VOC	0.010	lbs/gal	6,706	0.03	(a)
FF1044 Flush Fluid Kodak Versamark, Inc	8.40	Total VOC Glycol Ether [3]	0.010 1.000	lbs/gal wt %	1,285	0.006 0.05	(a) (b)
FF2006 Shutdown Fluid Kodak Versamark, Inc.	8.39	Total VOC Ethylene Glycol	0.330 2.500	lbs/gal wt %	1,791	0.30 0.188	(a) (b)
					TOTAL VOC	1.894	
					TOTAL HAP	0.242	

Notes:

(a) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallon/yr]) x (VOC/HAP content [lbs/gal])) / 2,000 [lbs/ton]

(b) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallons/yr]) x (density [lbs/gal]) x (VOC/HAP content [wt %] / 100)) / (2000 lbs/ton)

References:

(1) From manufacturer's MSDS, product information sheet, or telephone conversation with manufacturer.

(2) See Table 1, Production and Process Rates.

(3) SECOR assumed this glycol ether is a HAP; the MSDS did not name the specific glycol ether, and some glycol ethers are HAPs.

Table 3
Estimated New PTE Annual VOC/HAP Emissions for the Previous Nine Printers and Three New Printers
DST Output West, LLC, El Dorado Hills, California

Product	Raw Material Components [1]				Estimated PTE Annual Rates [2] (gallons/yr)	Proposed PTE Annual Emissions (tons/yr)	
	Density (lbs/gal)	VOC/HAP	Amount in Product				
FD1034 Black Ink Kodak Versamark, Inc.	8.5	Total VOC	0.260	lbs/gal	47	0.0060	(a)
FV1501 Black Ink Kodak Versamark, Inc.	8.55	Total VOC	0.020	lbs/gal	68,768	0.69	(a)
FV2001 Process Cyan (Blue) Ink Kodak Versamark, Inc.	8.41	Total VOC	0.060	lbs/gal	3,304	0.10	(a)
FV2002 Process Magenta Ink Kodak Versamark, Inc.	8.40	Total VOC	0.060	lbs/gal	3,071	0.09	(a)
FV2003 Process Black Ink Kodak Versamark, Inc.	8.51	Total VOC	0.060	lbs/gal	17,422	0.52	(a)
FV2014 Process Yellow Ink Kodak Versamark, Inc.	8.40	Total VOC	0.250	lbs/gal	2,234	0.28	(a)
Orange SWO-4576 Collins Ink Corporation	8.76	Total VOC	0.043	lbs/gal	489	0.01	(a)
Red SWR-4911 Collins Ink Corporation	8.76	Total VOC	0.050	lbs/gal	256	0.01	(a)
Orange SWO-5173 Collins Ink Corporation	8.76	Total VOC	0.022	lbs/gal	256	0.00	(a)
Black SWK-5190 Collins Ink Corporation	8.76	Total VOC	0.010	lbs/gal	31,457	0.15	(a)
Red SWR-5197 Collins Ink Corporation	8.76	Total VOC	0.049	lbs/gal	59	0.0015	(a)
FR1014 Replenisher Kodak Versamark, Inc.	8.32	Total VOC	0.010	lbs/gal	66	0.0003	(a)
FR1042 Replenisher Fluid Kodak Versamark, Inc.	8.32	Total VOC	0.010	lbs/gal	8,013	0.04	(a)
FF1044 Flush Fluid Kodak Versamark, Inc	8.40	Total VOC Glycol Ether [3]	0.010 1.000	lbs/gal wt %	1,536	0.008 0.06	(a) (b)
FF2006 Shutdown Fluid Kodak Versamark, Inc.	8.39	Total VOC Ethylene Glycol	0.330 2.500	lbs/gal wt %	2,141	0.35 0.224	(a) (b)
					TOTAL VOC	2.263	
					TOTAL HAP	0.289	

Notes:

(a) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallon/yr]) x (VOC/HAP content [lbs/gal])) / 2,000 [lbs/ton]

(b) PTE Annual Emissions (tons/yr) = ((estimated PTE annual rate [gallons/yr]) x (density [lbs/gal]) x (VOC/HAP content [wt %] / 100)) / (2000 lbs/ton)

References:

(1) From manufacturer's MSDS, product information sheet, or telephone conversation with manufacturer.

(2) See Table 1, Production and Process Rates.

(3) SECOR assumed this glycol ether is a HAP; the MSDS did not name the specific glycol ether, and some glycol ethers are HAPs.

Table 4
Current and Proposed Estimated PTE Facility Wide Emissions Summary
DST Output West, LLC, El Dorado Hills, California

Source	Previous Permit Limit VOC (tons/yr)	Previous PTE (nine printers)		New Permit Limit VOC (tons/yr)	Proposed PTE (nine plus three new printers)	
		VOC	HAPs (1)		VOC	HAPs (1)
#27 Model 5,000 Printer (Permit #10-1432)	0.31	included in total below	included in total below	0.31	included in total below	included in total below
#31 Model 5,000 Printer (Permit #10-1431)	0.31			0.31		
#83 Model 5,000 Printer (Permit #10-1430)	0.31			0.31		
#84 Model 5,000 Printer (Permit #10-1387)	0.20			0.2		
#85 Model 5,000 Printer (Permit #10-1408)	0.20			0.2		
#87 Model 3,700 Printer (Permit #10-1421)	0.41			0.41		
#88 Model 3,700 Printer (Permit #10-1426)	0.41			0.41		
#89 Model 3,700 Printer (Permit #10-1425)	0.41			0.41		
#90 Model 3,700 Printer (Permit #10-1424)	0.41			0.41		
#80 Model 5,000 Printer (Permit #10-1450)	N/A	N/A	N/A	0.31		
#81 Model 5,000 Printer (Permit #10-1451)	N/A	N/A	N/A	0.31		
#82 Model 5,000 Printer (Permit #10-1452)	N/A	N/A	N/A	0.31		
TOTAL	2.97	1.89	0.24	3.90	2.26	0.29

References:

(1) The major source threshold for an individual HAP is 10 tons per year and 25 tons for all HAPs combined.

APPENDIX D

Air Permitting Specialists
12247 Welch Road
Wilton, CA 95693
Phone 916.687.8352
Fax 916.687.7863
E-Mail: ray.kapahi@gmail.com

Air Permitting Specialists

Technical Note

Air Quality Impacts Associated with Interbasin Transfer of Reactive Organic Compounds

El Dorado Hills, California

August 9, 2006

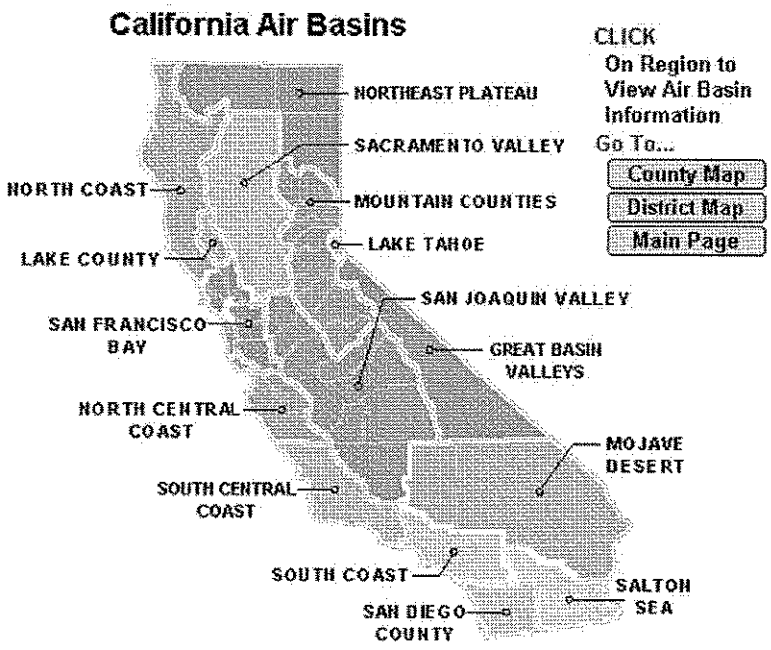
Prepared for:
DST Output West, LLC
5220 Robert J Matthews Pkwy.
El Dorado Hills, California 95762

TABLE OF CONTENTS

1.0 BACKGROUND

Air Permitting Specialists (APS) has been retained by DST Output West, LLC (DST) to evaluate the air quality implications associated with interbasin transfer of emission reduction credits (ERCs). This evaluation is being prepared in support of a permit application submitted by DST to El Dorado County Air Pollution Control District (District) to construct and operate printing equipment at their facility in El Dorado Hills, California. In reviewing the permit application, District has determined that as a condition of approval, DST must provide offsets totaling 1.4 tons of reactive organic compounds (ROCs).

District rules require that offsets be secured either within the District boundary (County of El Dorado) or within the air basin (Mountain County Air Basin). The boundaries of the Mountain Counties and other air basins are shown below.



(Source: CARB 2006)

Analysis by the District staff and DST indicate that ROC offsets (emission reduction credits) are not available within El Dorado County or within the Mountain Counties Air Basin. As a result, DST has identified ROC offsets in the City of Sacramento that is part of the Sacramento Valley Air Basin. This air basin is adjacent to and west of El Dorado County and the Mountain Counties Air Basin.

Since the goal of providing emission reductions is to reduce overall air quality impacts from the new emission source, would offsetting emissions at another air basin still achieve this goal? This Technical Note answers this question by examining the relationship between ROC reduction in the Sacramento Air Basin and air quality in El Dorado Hills.

The technical note is divided into four main sections. Immediately following this Background, Section 2 examines the relevance of ROC emissions and formation of ozone (smog). Next, Section 3 discusses the relationship between emissions originating in Sacramento Air Basin and ozone concentrations in El Dorado County. The technical note concludes with an analysis of the most appropriate offset ratio applicable to the current DST permit application.

2.0 IMPACT OF ROC EMISSIONS ON AIR QUALITY

Unlike other criteria air pollutants such as carbon monoxide (CO), oxides of nitrogen (NOx) or fine particulate matter (PM-10) that have ambient air quality standards (See Appendix), there are no ambient air quality stands for ROCs. However, ROCs are precursor compounds that lead to the formation of ozone (smog). Ozone does have ambient air quality standards. Since El Dorado county has been designated as a non-attainment area for the state's one hour ozone standard (0.08 parts per million), reducing ROC emissions is an important part of the County's efforts to attain the state's 1-hour and 8-hour ozone standards.

In addition to ROCs, the other main precursor compound that leads to ozone formation is NOx. In the presence of sunlight, NOx and ROCs chemically react to form ozone and other compounds. Several characteristics distinguish ozone from other criteria air pollutants such as CO, SO_2 and PM-10:

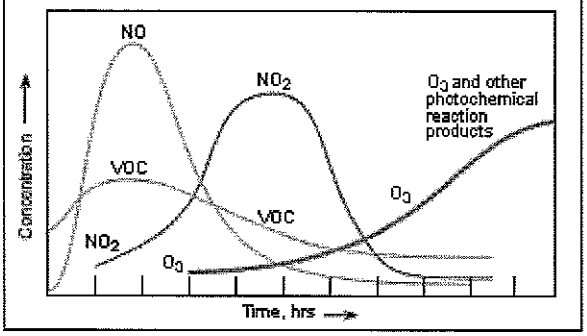
1. Ozone is a secondary air pollutant;
2. The time scale for ozone formation is 4 to 6 hours;
3. Ozone is a regional air pollutant.

1) Ozone is a Secondary Air Pollutant
Unlike other air pollutants, including ROCs, ozone is not directly released into the atmosphere. It is a result of chemical reactions in the atmosphere involving NOx and ROCs in the presence of sunlight. In order to reduce ozone, one must reduce the amount of NOx and/or ROCs released into the atmosphere.

2) The Time Scale for Ozone Formation is 4 to 6 Hours
The time scale relevant to ozone formation is several hours. Numerous studies have concluded that it takes several hours to form ozone. As shown in Figure 1 (next page), there is a time lag of several hours between the time NOx and ROCs are emitted into the

atmosphere and peak concentrations of ozone. In this figure, ROCs are labeled as VOC (volatile organic compounds).

Figure 1. Pollutant Concentration Profiles Due to Photochemical Reactions



The time lag between precursor emissions and ozone formation is important because the location of high ozone concentration may not coincide with location(s) where NOx or ROCs are emitted. For example, winds could transport NOx and ROCs into other geographic areas while these compounds are chemically reacting to form ozone. This is discussed below.

3) The Spatial Scale for Ozone Impacts is Regional (20 to 50 or more miles)
CO, SO_2 and other primary air pollutants show the highest pollutant concentrations occur near the emission source. This concentration decreases with distance from the emission source. As a result, air quality impacts from primary air pollutants are localized near emission sources.

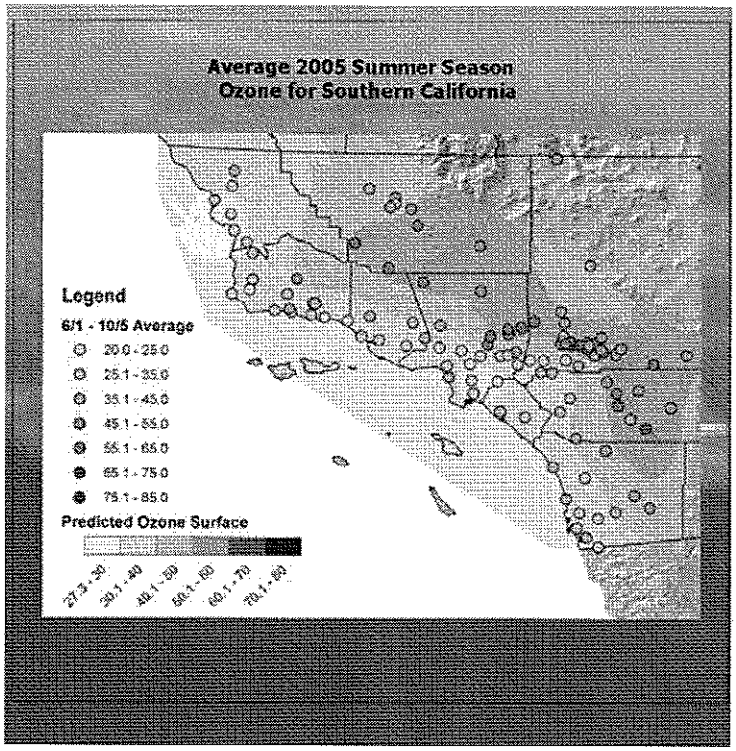
Ambient measurements of ozone concentrations at many locations indicate that ozone is a regional air pollutant. Extensive measurements in the past 30 years in Los Angeles, San Francisco Bay Area and the California's Central Valley confirm that high ozone concentrations occur within counties and geographic regions sharing similar air flow patterns.

The ozone concentration data further indicate that highest concentrations of ozone often occur at locations where relative lower amounts of precursor compounds are released. For example, highest concentrations of ozone in Southern California occur in San Bernardino and Riverside counties even though the highest emissions occur in Los Angeles and Orange Counties. (See Figure 2, next page). In Northern California, the highest ozone concentrations are reported in the Livermore Valley while the main sources of emissions are located in Richmond and Martinez. Similarly, the highest ozone concentrations are reported in the eastern portions of Sacramento Valley and western portions of El Dorado County while most of the emissions occur in the city of Sacramento.

The most recent (2006) ROG emission estimates by CARB indicate that 67 tons of ROCs are released daily in Sacramento County. This is roughly three times higher than the 18

tons/day released in El Dorado County. In spite of large differences in emissions, peak ozone concentrations in the two counties are virtually identical. For 2006, the peak 1-hour ozone concentrations forecast by CARB for Sacramento and El Dorado counties are 0.138 and 0.134 ppm respectively.

Figure 2
(Source: EPA 2006)



In summary, ozone is a secondary air pollutant that differs from other (primary) air pollutants in three important ways: it is regional, it takes several hours to produce ozone from NOx and ROCs and the location of highest ozone concentrations do not always coincide with location of highest emissions.

3.0 IMPACT OF ROC REDUCTIONS IN SACRAMENTO COUNTY ON AIR QUALITY IN EL DORADO COUNTY

In the previous section it was noted that El Dorado County has similar ozone concentrations as Sacramento County and Sacramento Valley air basin even though emissions in El Dorado county are a fraction of those in Sacramento. The principal reason for this anomaly is the transport of precursor emissions and ozone from the Sacramento region into El Dorado County. As shown in Figure 3, the predominant wind flow is from the West (from Sacramento region) towards El Dorado County.

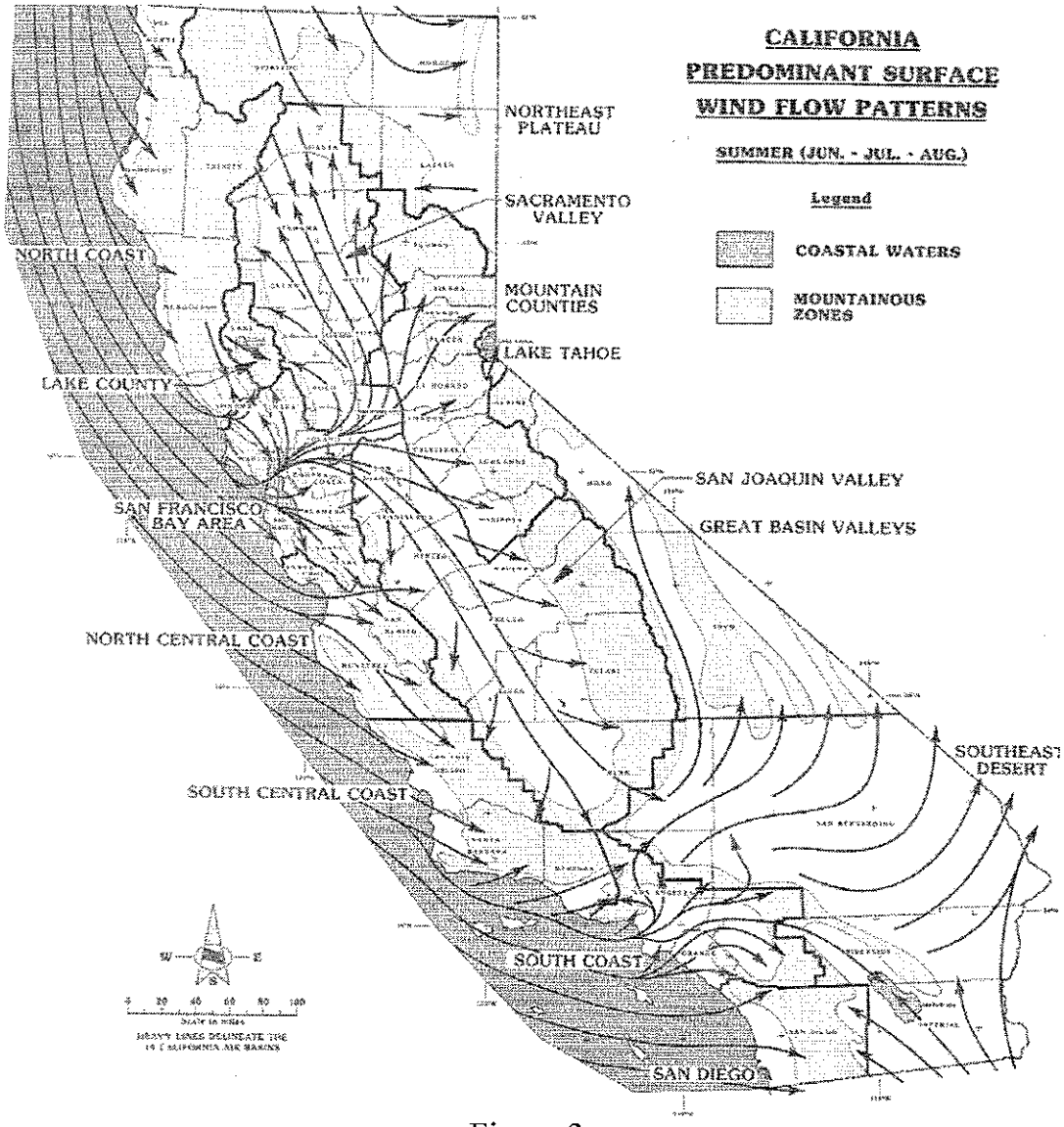


Figure 3
(Source CARB 1984)

The interbasin transport of emissions and ozone from one region to another has been verified by CARB and is the basis of several state regulations specifically aimed at reducing emissions in upwind regions. For example, Title 17, Article 6, Section 70600 of the California Code of Regulations stipulates emission control requirements in upwind districts in order to reduce ozone impacts in downwind areas.

The ozone transport phenomena indicate that the best way to reduce ozone impacts in downwind areas is to reduce precursor emissions in upwind areas. This means that reduction in ozone precursors in Sacramento region would lead to reduced ozone concentrations in El Dorado County.

In terms of the location of ROC emission offsets for DST, the ideal location for such offsets would not be locally in El Dorado Hills, but in the Sacramento region. Such offsets would yield the most benefit to El Dorado County in terms of reduced ozone impacts.

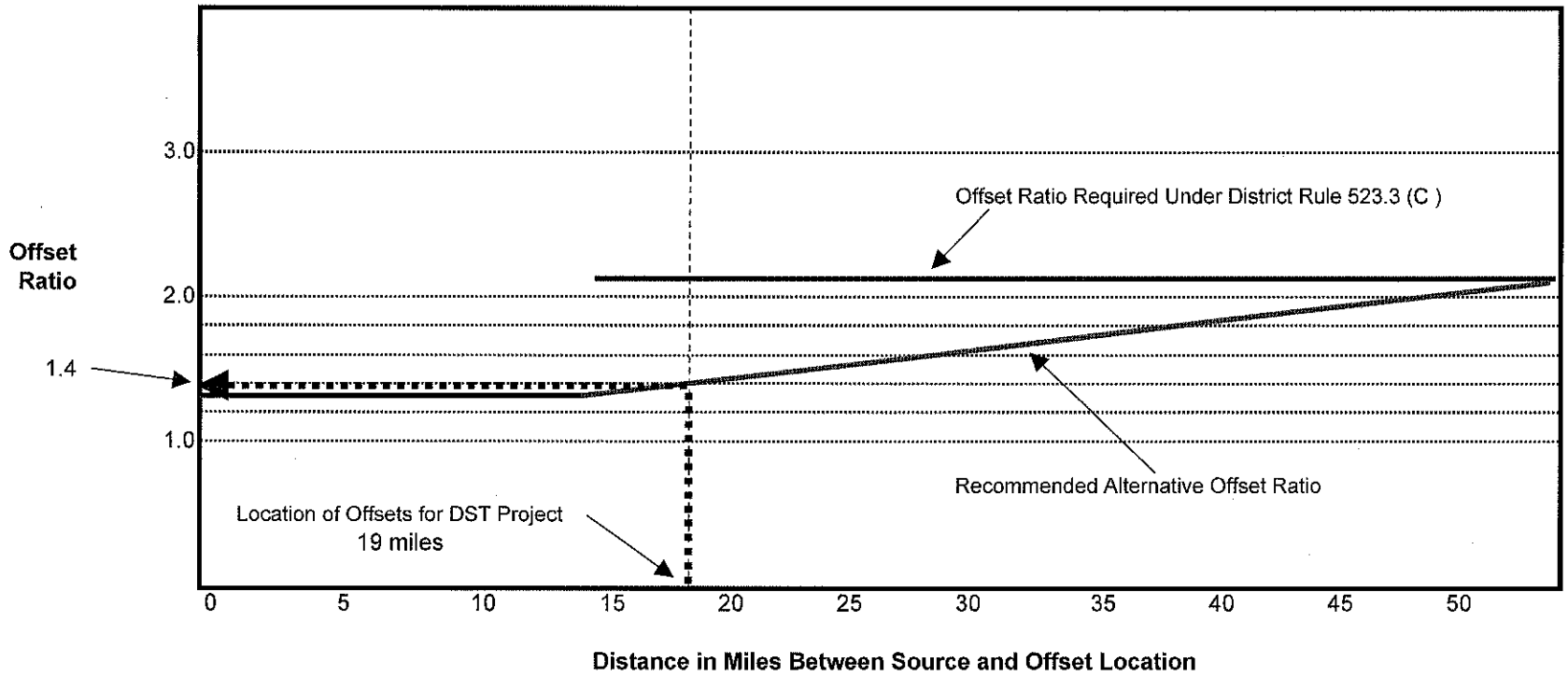
4.0 DEVELOPMENT OF OFFSET RATIO

District regulations require that any offsets located beyond 15 miles be offset 2.1 to 1. This offset ratio is used for distances up to 50 miles. The principal behind seeking an offset ratio greater than 1 : 1 is to ensure there would be sufficient local air quality benefit when offsets are located some distance away from the emitting source. This principal is valid for primary air pollutants, such as CO, PM-10, etc. This principal does not apply to secondary regional air pollutants that may be subject to regional transport.

In the case of the DST permit application, there is no technical basis for requiring an offset ratio above 1:1. As shown in the previous section, El Dorado County is impacted primarily by ozone and precursor emissions originating in the Sacramento Region. Therefore, any reduction in ROC and NOx emissions in this region would directly benefit El Dorado county. Nevertheless, the offset requirement is included in District regulations and therefore DST must comply with the offset ratio versus distance requirement of Rule 523.3 (C). The offset ratios, however, can be refined as shown in Figure 4 by replacing the step-function (blue lines) with a linear function (green line).

For a distance up to 15 miles, Rule 523.3 (C) (1) requires an offset ratio of 1.3:1. Beyond 15 miles and up to 50 miles, an offset ratio of 2.1 : 1 is required. These ratios are shown in Figure 4. Since the same offset ratio is required for all distances between 15 to 50 miles, it would be more appropriate to scale the offset ratio according to distance according to Rule 523.3 (C) (2) which provides for an offset ratio of no less than 1.2 to 1.0 conditioned upon performance of an air quality analysis. This report meets this requirement and concludes that since offsets for the DST project are located 19 miles from the source, an offset ratio of 1.4 to 1.0 would be more appropriate as demonstrated in Figure 4.

Figure 4
Development of an Alternative Offset Ratio



09-1424.A.200

5.0 SUMMARY

A review of ozone chemistry, the spatial distribution of NOx and ROC emissions in the Sacramento region and El Dorado County as well as the local wind and topographical data indicates that the principal source of high ozone concentrations in El Dorado County is through interbasin transport. Given these characteristics, a reduction in ROC and NOx emissions in the Sacramento region would lead to reduced ozone concentrations in El Dorado County. Since ozone is regional in character, the traditional offset ratios used for primary air pollutants are not applicable for secondary air pollutants such ozone.

6.0 REFERENCES

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CARB (1984) "California Surface Wind Climatology", California Air Resources Board, Aerometric Data Division Sacramento, CA.

Cohen, Ronald C. (2005) "Quantifying Atmospheric Nitrogen Oxides Upwind and in the Lake Tahoe Basin", Report to CARB prepared by Univ. of California, Berkeley, Dept. of Chemistry. January 2005. Available at: http://www.arb.ca.gov/research/apr/past/01-327.pdf

Seinfeld, John H. (1975) "Air Pollution – Physical and Chemical Principles", McGraw Hill, 1975.

APPENDIX

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.08 ppm (157 µg/m^3)[8]		
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		50 µg/m^3		
Fine Particulate Matter (PM2.5)	24 Hour	No Separate State Standard		65 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	15 µg/m^3		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	—
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	—	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 µg/m^3)		—		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m^3)	—	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	1 Hour	0.25 ppm (655 µg/m^3)		—	—	—
Lead[9]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	—
	Calendar Quarter	—		1.5 µg/m^3	Same as Primary Standard	High Volume Sampler and Atomic Absorption
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[9]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page ...

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calender year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. New federal 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18,1997. Contact U.S. EPA for further clarification and current federal policies.

9. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

California Air Resources Board (5/17/06)

Ambient Air Quality Standards

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	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	1 Hour	0.25 ppm (655 µg/m^3)		—	—	—
Lead[9]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	—
	Calendar Quarter	—		1.5 µg/m^3	Same as Primary Standard	High Volume Sampler and Atomic Absorption
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Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
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See footnotes on next page ...

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

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7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. New federal 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18,1997. Contact U.S. EPA for further clarification and current federal policies.

9. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

California Air Resources Board (5/17/06)

APPENDIX E

Print Form

Reset Form

EL DORADO COUNTY
ENVIRONMENTAL MANAGEMENT
SOLID WASTE & HAZARDOUS MATERIALS DIVISION

2850 Fairlane Ct., Bldg. C, Placerville, CA 95667 - (530) 621-5300
3368 Lake Tahoe Blvd., #303, So. Lake Tahoe, CA 96150 - (530)573-3450

BUSINESS PLAN

A. MATERIAL HANDLING Describe how hazardous materials are handled at your facility. For example: are they stored until sold, burned as fuel, used in a manufacturing process, etc...

Hazardous materials (Diesel fuel) are burned as fuel in the back up ICE generators.
Welding tanks are stored in the maintenance area. When empty vendor will pick up.
Inks and cleaners used in printing process are stored until needed.

B. SAFETY ORGANIZATION If your business has a department or an individual responsible for safety, then please indicate the organizational structure of that department here or that person's name here.

Safety and Environmental Health Manager--- Mike McClain 916-939-5595

Safety and Environmental Health Sr. Admin. --- Frances Lester 916-939-5594

C. RELEASE CONTAINMENT PROCEDURES Describe how you deal with a large hazmat spill or release at your facility.

Large spills are contained and cleaned up by trained DST employees. If a spill should occur in or near a waterway or is beyond the capacity of employees, PARC Environmental will be called to address the spill and clean up. Also PARC will team with DST associates if necessary to prevent any spills from reaching any waterways.

D. EQUIPMENT I List any personal safety equipment that you may have on hand (respirators, gloves, coveralls, etc...)

Equipment	Storage Location
Gloves, goggles and syphon pump for spill containm	Hazardous Materials Storage Container
Gloves, goggles and spill containment.	Shipping/ Receiving Dock

E. EQUIPMENT II Control and Cleanup equipment (absorbent materials, kitty litter, shovels, empty containers, etc...)

Equipment	Storage Location
Spill Kit w/ gloves, goggles and spill containment	Hazardous Materials Storage Container
Spill Kit w/ gloves, goggles and spill containment	Shipping/ Receiving Dock

F. EQUIPMENT III Monitoring equipment (gauges, meters, pH paper, etc...)

Equipment	Storage Location
CO, CO2, % of O2 Monitor	Safety & Environmental Health Manager office.

G. EVACUATION Number of employees per shift: See attachment Shift hours: See attachment
Method of employee notification (verbal, loudspeaker, radio, telephone, etc...)
Alarm with verbal instructions.

Evacuation routes (if indicated on facility map so state, otherwise describe)
Evacuation maps are posted throughout the facility (floors 1 & 2) with routes and meeting area information.

Where should employees assemble in order to be counted?
Designated evacuation assemble area in the east parking lot.

H. ADJACENT AREAS Identify surrounding structures within 2000 feet of your facility (schools, hospitals, residential, commercial, or open space)

North: Commercial

South: Open Space

East: Commercial

West: Open Space

TRAINING PLAN

State law requires that businesses must provide initial training and annual refresher training to all employees who handle hazardous materials and wastes. Records of the training sessions must be kept onsite. The training program shall at a minimum include the following:

1) Methods for the safe handling of hazardous materials.
2) Material safety data sheet use and location.
3) Procedures for contacting local emergency response agencies.
4) Proper use of all emergency response/spill cleanup equipment stored onsite.
5) All other aspects of this hazardous materials business plan.

Person responsible for training: Mike McClain -- SEH Manager

SIGN UP SHEET The following employees have received the appropriate training as outlined above.

SIGNATURE OF EMPLOYEE DATE

ATTACHED IS A LIST OF THE TRAINED SPILL REPONSE TEAM.

ALSO ATTACHED IS A LIST OF ASSOCIATES TRAINED IN NON-HAZARDOUS SPILL RESPONSE.

G. Evacuation Information

Shift Name	Shift Time	Shift Days	# of Associates on shift
Shift 1	8am -- 5pm	Mon- Fri	403
LWD	6am – 6pm	Thurs, Fri, Sat (Alt Weds)	198
LWN	6pm – 6am	Weds, Thurs, Fri (Alt Sat)	170
EWD	6am – 6pm	Sun, Mon, Tues (Alt Weds)	190
EWN	6pm – 6am	Sun, Mon, Tues (Alt Sat)	157

Spill Responder Contact List

April ----- December 2009

Incidental Non Hazardous Spill Responders

Associates Name	Shift	Employee #	Supervisor	Contact Number	Department#
Dennis Caspary	M-F	67746	Steven Edwards	939-5410	Materials Management
Tom Coulam	EWN	51569	Shawn Caesar	939-4606	Materials Management
Nathan Bailey	EWD	41471	Vince Reynolds	939-4606	Materials Management
Nick Battaini	EWD	42134	Ian Loza	939-5659	JST
Lucas Buzzard	EWD	42675	Vince Reynolds	939-4606	Materials Management
Ray Donley	LWD	61257	Ryan Edwards	939-4606	Materials Management
Jennifer Giannandrea	LWD	39307	Ian Loza	939-5659	JST
Linda Luce	EWD	51673	Ian Loza	939-5659	JST
Vincent Tewksbury	EWD	67583	Ian Loza	939-5659	JST
Paul Richards	LWD	59711	Ian Loza	939-5659	JST
Walter Zimmerman	LWN	59103	Mark Stowell	939-4606	Materials Management
24 Hour Hazardous Spill Responders					
Amos Lee	LWN	50572	Ian Loza	939-5659	JST
Gary Cox	EWN	50588	Ian Loza	939-5659	JST
Zach Booth	EWD	62747	Dan Haddad	939-5526	Commingling
Josh Hall	LWN	50932	Ian Loza	939-5659	JST
Chan Saeyang	LWD	61454	Vince Reynolds	939-4606	Materials Management
Mike Sillers	M-F	42703	Paul Schlosser	939-4146	Maintenance Facility
Pete McInotosh	M-F	50348	Mike Petersen	939-5587	Materials Management
Bill Lobacz	M-F	40893	Pete McInotosh	939-5550	Materials Management

Response to Violations Observed During Inspection of 6/29/09

Date violation was addressed: 7/29/09

3. 22CCR 66265.173 Keep all containers of hazardous waste closed except when transferring contents.

Response:

Emailed maintenance manager our findings and instructed him that after his department uses the drum to close the bung. I met the manager and showed him the drums in question so there was no confusion.

Date violation was addressed: 8/3/09

4. 22CCR 66261.7 Empty containers over 5 gallons must be labeled with the date emptied and managed within 1 year.

Response:

Removed all empty containers; 30gal and 55gal from waste storage area. A couple of 5 gal containers remain on site. When drums become empty they will be labeled with the date the container became empty and managed accordingly.

APPENDIX F

LIST OF PERSONS AND SOURCES CONSULTED

CalEPA. *Climate Action Team Report.* March 2006. http://www.climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF

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El Dorado County Development Services Department – Planning Services. *Zoning Ordinance, Title 17, El Dorado County Code.* March, 2009.

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McTaggart, Marcella, Air Pollution Control Officer. *County of El Dorado, Air Quality Management District*. September, 2009.

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State Water Resource Control Board. GeoTracker. Accessed September 2009. http://geotracker.swrcb.ca.gov/

United States Environmental Protection Agency. *The Green Book Nonattainment Areas for Criteria Pollutants.* Accessed, September 2009. http://www.epa.gov/air/oaqps/greenbk/index.html

APPENDIX G

LIST OF PERSONS PREPARING THIS EIR

Josh McDonnell, AICP, Principal Planner

Ronald Mauck, AICP, Senior Planner

Travis Crawford, Senior Planner

David Duda, Air Quality Specialist

Chris Annicella, Assistant Planner/GIS Technician

Courtney Lee, Project Administrator