



Tahoe Basin Solid Waste Joint Powers Authority



# El Dorado County Solid Waste Management Plan

VOLUME III

## Response to Public Comments

January 31, 2012



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## Section 1

# Comments Received



# 1. Comments Received

Volume III of the El Dorado Solid Waste Management Plan (Plan) contains responses to public comments received on the Draft Plan. This volume III is in addition to the Action Plan, Volume I (Executive Summary), and Volume II (Detailed Strategies and Support).

Volume III is organized into three (3) sections:

1. *Comments Received*
2. *Response to Comments*
3. *Modifications to Language in Draft Plan.*

The Draft Plan was completed on August 15, 2011. On September 27, 2011, the Board of Supervisors gave approval for the Environmental Management Department, and the Solid Waste Management Plan Committee, to release the draft version of the Solid Waste Management Plan for a 45-day public comment period. The 45-day public comment period closed on November 11, 2011.

The Environmental Management Department posted the three volumes of the Draft Plan (the Action Plan, Volume I, and Volume II) on its website and also made printed copies available at the Environmental Management Department office and the County library. The Environmental Management Department also placed a notification in the local newspaper (Mountain Democrat) that the Draft Plan was posted on its website for comment. The Environmental Management Department accepted written comments submitted by email (via a link directly from the website) and written comments mailed to County offices.

The County received comments from eleven (11) individuals as follows, listed in the order received (with titles noted for individuals associated with a company or agency):

- **Comment #1** – Richard Boylan, Ph.D.
- **Comment #2** – Toni Beers
- **Comment #3** – Laurel Stroud
- **Comment #4** – Charlene Carveth, Acting Agricultural Commissioner
- **Comment #5** – Sue Mosbacher
- **Comment #6** – Mueller Family
- **Comment #7** – Shawna Purvines, Senior Planner, El Dorado County
- **Comment #8** – Janet Postlewait, Principal Planner, Department of Transportation, El Dorado County
- **Comment #9** – Tim and Mary Dohnke
- **Comment #10** – Chuck Wolfe
- **Comment #11** – Jeffery Tillman, President, South Tahoe Refuse Co. Inc.

**Exhibit III-1**, beginning on the following page, provides each of the 11 public comments.

**Exhibit III-1**

**Comments Received on Draft Solid Waste Management Plan**

**Comment #1**

The Solid Waste Management Plan (SWMP), as amended by the diligent SWMP Committee members, is a thoughtful outline of good ways in which El Dorado County can proceed in order to achieve efficient handling of our recyclables and solid waste.

A special tip-of-the-hat to Laurel Stroud, who resolutely represented the best interests of Diamond Springs and El Dorado in these deliberations.

We do not want a MRF along Enterprise Drive, Diamond Springs.

The MRF belongs in an isolated area of the county away from people, homes, businesses, schools, and potential park sites, and with its own access road built for large trucks.

We all must stay alert. The Plan will only happen the way we want if we do not take our eye off the ball.

Richard Boylan, Ph.D.  
Diamond Springs

**Comment #2**

The Plan is comprehensive, complete and an excellent way to proceed. My only two concerns are:

- Will the County adhere to the Plan or become "creative" in its implementation and execution?
- Will there be diligent accountability (something I've observed to be in short supply in El Dorado County)?

Toni Beers

**Comment #3**

The SWMP group was not disbanded, so I'm thinking we will still be meeting. Hopefully, we can keep the County on track. I feel that the Env. Mgmt. people are with us, but who knows if they would get pressured or outvoted in the future. I'm going to stay in contact with Gerri Silva so that we can know the progress of things.

Laurel Stroud

**Comment #4**

My one comment on the Draft Solid Waste Management Plan would fall under the implementation of the Commercial Recycling Program. Currently the nearest facility for farmers to recycle pesticide containers is a transfer facility in North Highlands. Many of the farmers in the area would gladly recycle these containers if we had a local program. Hopefully this is a program that could be implemented with little resistance.

Charlene Carveth  
Acting Agricultural Commissioner/ Sealer of Weights & Measures  
El Dorado County Dept. of Agriculture/Weights & Measures

**Comment #5**

Here are our initial comments regarding Strategies 2.13 and 2.17 on home composting:

1. The document references the UC Davis Master Composter Program. We don't have a separate Master Composter program in El Dorado County, but we do have Master Gardener Composting Specialists who do the functions listed for the Master Composters. I'd switch "Master Gardener Compost Specialists" for Master Composters.
2. The Master Gardeners are building a demonstration garden behind the community college, next to the community observatory. This site will be available for hands-on composting classes for the community, at no charge to the county.
3. Funding for additional staffing for the county could be minimal, depending on how involved you want the Master Gardeners to be. We have 114 members and are getting ready to train another 40. These volunteers can coordinate scheduling classes and parts of the program. We have extremely talented and well educated retired professionals who are more than willing to help. We could have different teams work with the various county participants, and a team to help plan the implementation of the home composting phase of the plan.
4. We have several existing composting classes that we teach regularly, so there's no start up time required to create the public education content.
5. I work very closely with the Placer/Nevada County Master Gardener program, which has a long-running project with their solid waste facilities to provide composting training. Cooperative Extension programs share project materials, so we could use any of the execution tools they do.

Thank you for giving the Master Gardeners the opportunity to help with the project. We're very excited about the possibilities!

Sue Mosbacher  
MG and MFP Program Representative  
Amador and El Dorado Counties

**Comment #6**

To the Board of Supervisors and the Environmental Management Department staff,

I would like to sincerely thank the Environmental Management Department (EMD) and the Solid Waste Management Plan (SWMP) volunteer committee for their dedication and hard work on this Solid Waste Management Plan. I know it was not easy. But things worth having never are. This plan when implemented by honest, dedicated, patriotic citizens, un-elected and elected officials will be one of the greatest vehicles for positive change to happen in this country in a very long time!

Although, unfortunately, I would like to point out a few major problems I see with the SWMP.

I expect these to be addressed and corrected by the Board of Supervisors and EMD prior to the final release of the SWMP document and not recreated during the Solid Waste Management Plan's implementation.

1. Table 3-1 clearly indicates that the largest populations and projected growth over 52% in the next 20 years will be in El Dorado Hills. Yet the Population Centers Map (Figure E-1) shows the center of population in the county in "Greater Placerville" or namely the Missouri Flat Rd. area which is only expected to grow by a mere 5.7%.

This is noted as fact by the preparer within the SWMP document as well. It would appear that El Dorado Hills wants to continue to give Diamond Springs their garbage via fully loaded garbage trucks driving up hill. (see Table 3-1 below) This inefficiency alone flies-in-the-face of the SWMP being a "plan" for progress, for the community and environmental good. This is clearly an error that needs to be corrected.

Table 3-1  
 El Dorado County  
 Population Estimates by Region  
 (2005 to 2030)  
 (recreated for clarity)

| Region              | 2010-2020 | 2020-2030     |
|---------------------|-----------|---------------|
| El Dorado Hills     | 30.7%     | 21.9% = 52.6% |
| Greater Placerville | 2.7%      | 3.0% = 5.7%   |

2. The Diamond Springs Industrial Drive site is still on the list of preferred sites to build a MRF or Eco-Park. This is an outrage to the over 4,500 petition signers and the residents of Diamond Springs! I will remind you that this site has been proven over and over again to be the wrong location via nearly 5000 hours of in-depth research and 6 full binders. Each filled with hundreds of pages of fact and documentation that was prepared by a independent consultant and Residents Involved In Positive Planning, Inc. (RIPP, Inc.). issued to this SWMP plan consultant and prior, to the Board of Supervisors and the EMD management and staff. If a MRF or Eco-Park or what ever new name is invented for it is ever built there it will result in a avalanche of law suits and public outrage that this county and its residents cannot afford in either time or money.

Note: this "bullet" paragraph from the LVTO section that seems to indicate that my above observations are correct.

- West Central County Region – a primarily rural area consisting of the southern half of the Cameron-Park-Shingle Springs RAD, plus two additional RADs: Diamond Springs and Pollock Pines. This region covers much of the area south of Placerville and east of El Dorado Hills. There would be relatively minor use of the south LVTO by this area, because a majority of the self-haulers from this region likely would use the existing WERS facility, or if constructed, the EcoPark. Please correct this insult to the community.

3. I would also like to raise your attention to the Pay As-You-Throw (PAYT) idea. Table 4.5 clearly shows by example what a poor idea this is for rate payers. Please reconsider it.

Thank you very much for your attention to these matters.

Respectfully,

The Mueller family,  
 Michael, Maryann, Joshua, Kimberli, Siegfried and Sandra



## Comment #7

I have reviewed the Draft Solid Waste Management Plan and I think it looks great.

My only comment/suggestion is to possibly consider increasing the public education component. I see it is somewhat addressed in various strategies. However, prior to implementation of the strategies it would be nice if first an educational component could be released to show how a household might reduce waste or reduce what is thrown away. Government and Commercial strategies I am not so concerned with but single family households may have to significantly change the way they are dealing with trash or pay the price. It would be good to give them some tips on how to reduce so they can have them in place prior to implementation of the strategy especially the Pay-As-You-Throw (PAYT) pricing program.

Other than that I think it looks great. Thanks for the opportunity to look it over.

Shawna L. Purvines  
Sr. Planner  
Development Services

## Comment #8

Thank you for the opportunity to review and comment on the Draft Solid Waste Management Plan. DOT staff has reviewed the document and has the following comments:

Overall: The Plan adequately addresses the fact that for any of the proposed infrastructure strategy options that may be chosen in the future, detailed traffic studies must be conducted to determine the appropriate improvements necessary to mitigate impacts to the traffic and circulation system.

Regarding the discussion on page 24 of Appendix F, Union Mine Landfill Site Utilization Assessment, the assumptions used to determine total estimated construction costs for the new UMDS access road are very low. DOT recommends using a more conservative approach such as the following:

- For the new road to handle truck access, use 6 inch AC on 12 to 18 inch AB.
- Use a preliminary ball park cost of \$2.5 M/mile. The total cost would then be approximately \$14M rather than the \$6.5 to \$8.5M suggested.
- It should be made clear that suggested cost estimates do not include right of way acquisition.

Let me know if there is anything else you need or if you have any further questions.

Cordially,  
Janet Postlewait  
Principal Planner  
El Dorado County

Exhibit III-1

Comments Received on Draft Solid Waste Management Plan (continued)

Comment #9

To: EDC Board of Supervisors and the Environmental Management Department staff,

Why is the Diamond Springs Industrial Drive site still on the list of preferred sites to build a MRF or Eco-Park? Do the over 4,500 citizens who signed a petition in opposition to the Diamond Springs Industrial Drive site have no voice in this decision?

The exhaustive research done on this location supports the fact that this is the wrong location.

The SWMP report supports the folly in considering the Industrial Drive location. According to the projected growth in El Dorado County through 2030 (table 3-1), the Greater Placerville area will grow by 5.7% contrasted to El Dorado Hills which will grow by 52.6%. It makes no sense for fully-loaded trucks to travel uphill unless El Dorado Hills is simply saying to the residents of Diamond Springs, "Not in my back yard."

Finally, at a time when our county is being mandated to comply with AB32 and reduce our carbon emissions, how will this uphill, extra miles traveled impact future efforts to comply? What will the county pay in fines or penalties?

I thought we had crossed this bridge. Therefore, I can only assume that inclusion of the Diamond Springs Industrial Drive site as "preferred" must have been a mistake.

Please remove the Industrial Drive site from the preferred list of ECO Park/ MRF sites.

Respectfully,  
Tom and Mary Dohnke  
Diamond Springs

| Comment #10  |
|--|
| <p>Chuck Wolfe PO Box 664 El Dorado CA 95623<br/>ctwolfe@hughes.net</p>  |
| <p>El Dorado County Environmental Management<br/>2850 Fairlane Court, Building C<br/>Placerville, CA 95667</p> <p>Re: El Dorado County Solid Waste Management Plan</p> <p>I am encouraged that El Dorado County is moving towards completion of a solid waste management plan and commend those who have given their time in this endeavor. In reviewing this plan I am concerned with some elements and details. In particular I am concerned that there is no emphasis on securing a permanent waste site. This plan uses the Union Mine Landfill as a fall back for this inadequacy. I have many concerns about this option including public safety, environmental risk and higher costs.</p> <p><b>Public Safety</b></p> <p>Union Mine Road, being the only access road to this site, needs major improvements to safely accommodate any increase in transfer vehicle traffic. When the EIR was prepared for the landfill expansion, conditions in the area were different. There are more homes in this area now and many planned residential developments in the area sharing access from Union Mine Road. Union Mine High School did not exist at that time. A new EIR needs to be drafted that addresses these changes.</p> <p>When the expansion of the facility was undertaken in 1994, the southern extension of Church Mine Road was eliminated. This road acted as a route to the southern extension of Union Mine Road, allowing access to southern Hwy 49, for commuters and residents from Little Canyon Road, Martinez Creek Road and Church Mine Road. This route was also a safety escape during floods and fire for these same residents. Now there is only one exit available to residents and this increases the fire danger and creates a very dangerous intersection at Union Mine Road and Church Mine Road. Residents wishing to go south on Union Mine from Church Mine or West on Church Mine from Union Mine are forced to make a three point turn between two blind corners on Union Mine Road. I have witnessed many incidents where this condition has created dangerous situations for residents. These incidents include Deadman Creek bridge washout, hillside mudslide onto Church Mine Road near the intersection with Union Mine Road and several fires on the BLM land that closed the road to residents. The closure was not due to fire danger. The closure was due to fire trucks parked in the road. During emergencies residents need acceptable access to the properties beyond the closure to care for family, farm animals and property safety. This unsafe condition is a result of the closure of Church Mine Road. Before any increase in transfer vehicle traffic on Union Mine Road, the former extension of Church Mine Road should be reopened, or replaced, or the intersection at Union Mine should be replaced with a safe alternative and both Union Mine and Church Mine Road should be widened.</p> <p>The increased pedestrian traffic as a result of the Union Mine High School has created a major safety issue in the area along Union Mine Road in both directions from the school. The road is already too narrow, winding and has no place for walkers. The cross-country runners from the high school run right down the road. Walkers have to step into the ditch when cars approach. I have witnessed several close calls for pedestrians in the area where there is only inches between the road and the redwood fence.</p> <p>The California Highway 49 Realignment and Widening Initial Study, mitigated the exclusion of bicycle lanes on the highway 49 widening project, by claiming.</p> <p style="padding-left: 40px;">The El Dorado County Bicycle Transportation Plan adopted in 2005 does not propose bicycle facilities along SR 49 through the project area. The Plan's emphasis for this part of the county is on making Union Mine Road, which runs parallel to SR 49 in this area, a Class III Bike Route. A Class III Bike Route provides a right-of-way designated by signs.</p> <p>This improvement should have been undertaken when the school was built and is needed even more now and certainly a road widening project should be accomplished before any increase in transfer vehicle traffic on Union Mine Road. Road widening to provide for safe pedestrian traffic is way overdue and needs to be top priority in any plan to continue to use Union Mine Landfill.</p> |

**Comment #10** (continued)

**Environmental**

The Union Mine Landfill is one of the environmentally worst sites to place a disposal facility, of those available to the residents of El Dorado County. The area after the mining operations ceased should have been declared a superfund site, on that basis alone. Positioning a dumpsite over the top of these mine shafts, that reach several thousand feet into the earth with many miles of connecting tunnels and significant stopes, allows this accumulated pollution to infiltrate the water table at many depths. The positioning of this site over the top of a collision contact zone of two dissimilar landmasses, the Melones Fault, further complicates and promotes the spread of this pollution. The steepness and close proximity to watershed that eventually feeds into the Cosumnes River insures that spills and leaks will enter the water supply of areas downstream.

Significant environmental concerns were raised by the EIR prepared for the previous landfill expansion, which included, "biological resources, geology and soils, air quality, hazardous materials and infectious waste, human health and safety, aesthetics and visual resources." These were mitigated by stating that the "benefits identified outweigh the unavoidable adverse environmental effects which may then be considered (acceptable)." That needs to be compared to other available sites. Accepting the worst choice because some remedy is needed and society will suffer without making a choice but not assessing the risks and comparing it to those of other sites is unacceptable. The only comparisons that I have seen are based on cost not environmental risk. A new EIR needs to be prepared that compares the environmental risk of this site with other available sites throughout the county. Placing any processing operations on the site will produce pollution in the form of increased dust, CO2, NOX and noise and will require extensive mitigation monitoring and implementation of effective controls. The results of the monitoring should be made available to the public and nearby residents on an ongoing basis.

**Higher Costs**

The remote placement of the Union Mine Site is a great distance from the sources of solid waste and therefore adds to transportation costs and greenhouse gas emissions. The site is about a thousand-foot drop in elevation from the surrounding areas also adding to fuel cost and greenhouse gas emissions for the transfer vehicles. This is in contradiction to goal 4 of the plan to "reduce greenhouse gas emissions."

There are better sites available in the county and they are closer to the source of the solid waste and closer to other infrastructure, (freeway, railroad, water, sewer, and electric transmission lines). These sites are on less permeable soils and more stable geologic conditions. These sites will not be as available in the future because of planned and anticipated growth. A permanent site should be planned for and procured or set aside now. It will only be more expensive in the future.

In conclusion, I understand that some use of the Union Mine Landfill Site in the future is predictable. For that to happen there needs to be real mitigations, not negative declarations, real measures that provide real safety for the area residents and for the environment. This use of Union Mine Landfill should only be seen as temporary and contingent upon procurement of a permanent and more appropriate site.

I anticipate that this statement will be reviewed by staff and passed on to the Board o Supervisors and be made a part of the discourse in future solid waste management planning.

Sincerely  
Chuck Wolfe

## Comment #11



## SOUTH TAHOE REFUSE CO., INC.

November 11, 2011

Gerri Silva, Director  
El Dorado County Environmental Management  
2850 Fairlane Ct., Building C  
Placerville, CA 95667

Re: El Dorado County Solid Waste Management Plan

Dear Mrs. Silva,

We commend the County staff and consultants on their diligent efforts to develop a long range plan for moving solid waste management forward for El Dorado County. It was encouraging to see that much of what is being recommended has already been implemented in our service area. We submit the following brief comments regarding the draft El Dorado County Solid Waste Management Plan:

- The cart system is not currently compatible with the services provided by South Tahoe Refuse (STR) to our other jurisdictions. It would require a significant investment in vehicles and equipment to modify the service for the east slope unincorporated area of El Dorado County and may not significantly increase recycling since residents can, and already do, participate in the unlimited blue bags program each week.
- While single stream recycling may be effective for residential and some commercial properties, mixed waste recycling works best for resort operations and our commercial Nevada customers. A more effective strategy for the east slope may be modifying the existing MRF line to handle a construction and demolition shift.
- We believe that you would get a bigger bang for your buck from commercial food waste recycling than from residential food waste recycling. The plan's "tons diverted per \$1000" shows otherwise. Having operated a commercial food waste recycling program for the last year in South Lake Tahoe, maximizing the "per stop" tonnage is, in our opinion, the more cost effective operation.
- Please clarify the status of the recycling plans required for each of our service areas that were submitted in 2008, in light of this new, broader approach.
- In the interest of maintaining South Lake Tahoe's cooperative process, we suggest that waste management strategies for the east slope of El Dorado County place a priority on remaining compatible with the City of South Lake Tahoe and Douglas County, by adopting strategies that are developed among our three agencies through that consensus process.

Thank you for your consideration of our input.

Truly yours,

Jeffery Tillman, President

cc: Hilary Roverud, City of South Lake Tahoe  
Cathe Pool, Douglas County

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## Section 2

# Response to Comments



## 2. Response to Comments

Responses to comments are organized into the following topics:

- 2.1 *Materials Recovery Facility (MRF) Location*
- 2.2 *County Implementation Efforts*
- 2.3 *Plan Accountability*
- 2.4 *Commercial Recycling – Pesticide Containers*
- 2.5 *Home Composting*
- 2.6 *Population and Projected Growth*
- 2.7 *Pay As You Throw*
- 2.8 *Public Education*
- 2.9 *Union Mine Landfill Road Costs*
- 2.10 *Union Mine Landfill Suitability*
- 2.11 *East Slope Area Strategies.*

Comments were grouped together by topic. For each response, the applicable comment, or comments, are provided first followed by the response.

### 2.1 Subject Area: Materials Recovery Facility (MRF) Location

#### Comment #1

We do not want a MRF along Enterprise Drive, Diamond Springs. The MRF belongs in an isolated area of the county away from people, homes, businesses, schools, and potential park sites, and with its own access road built for large trucks.

#### Comment #6 (part 2)

The Diamond Springs Industrial Drive site is still on the list of preferred sites to build a MRF or Eco-Park. This is an outrage to the over 4,500 petition signers and the residents of Diamond Springs! I will remind you that this site has been proven over and over again to be the wrong location via nearly 5000 hours of in-depth research and 6 full binders. Each filled with hundreds of pages of fact and documentation that was prepared by an independent consultant and Residents Involved In Positive Planning, Inc. (RIPP, Inc.). issued to this SWMP plan consultant and prior, to the Board of Supervisors and the EMD management and staff. If a MRF or Eco-Park or whatever new name is invented for it is ever built there it will result in a avalanche of law suits and public outrage that this county and its residents cannot afford in either time or money.

Note: this “bullet” paragraph from the LVTO section that seems to indicate that my above observations are correct.

- West Central County Region – a primarily rural area consisting of the southern half of the Cameron-Park-Shingle Springs RAD, plus two additional RADs: Diamond



## 2. Response to Comments

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Springs and Pollock Pines. This region covers much of the area south of Placerville and east of El Dorado Hills. There would be relatively minor use of the south LVTO by this area, because a majority of the self-haulers from this region likely would use the existing WERS facility, or if constructed, the EcoPark. Please correct this insult to the community.

### Comment #9

Why is the Diamond Springs Industrial Drive site still on the list of preferred sites to build a MRF or Eco-Park? Do the over 4,500 citizens who signed a petition in opposition to the Diamond Springs Industrial Drive site have no voice in this decision?

The exhaustive research done on this location supports the fact that this is the wrong location.

The SWMP report supports the folly in considering the Industrial Drive location. According to the projected growth in El Dorado County through 2030 (table 3-1), the Greater Placerville area will grow by 5.7% contrasted to El Dorado Hills which will grow by 52.6%. It makes no sense for fully-loaded trucks to travel uphill unless El Dorado Hills is simply saying to the residents of Diamond Springs, "Not in my back yard."

Finally, at a time when our county is being mandated to comply with AB32 and reduce our carbon emissions, how will this uphill, extra miles traveled impact future efforts to comply? What will the county pay in fines or penalties?

I thought we had crossed this bridge. Therefore, I can only assume that inclusion of the Diamond Springs Industrial Drive site as "preferred" must have been a mistake.

Please remove the Industrial Drive site from the preferred list of ECO Park/ MRF sites.

### Response

Using objective ranking criteria, the Draft Plan (Appendix E) provided a framework for identifying

which parcels in the County were compatible with County objectives, without selecting any one MRF location. One of the sites, among nine sites that were shortlisted, which was consistent with the objective criteria outlined in Appendix E was the Industrial Way location. This outcome does not mean that the WSJPA, or the County, expects to proceed with developing a new MRF at the Industrial Way location.

In the County's examination of feasible strategies for the Phase I (2011 to 2016), Phase 2 (2017 to 2025), and Phase 3 (2026 to 2040) timeframes, at this time the County does not envision developing a new West Slope MRF. Rather, the County plans to extend the use of, and modify, the existing MRF facility (see page 6 of the Action Plan, Strategy 1.3).

Further, should the WSJPA, or the County, in the future determine the best course of action for County stakeholders is to develop a new MRF in the County, the WSJPA, or County, would have to complete a formal initial study, an Environmental Impact Report (EIR), a public review process, and a permitting process. During the course of these public processes, the County would have to vet all location options and consider sites based on an evaluation method similar to the one in Appendix E of the Plan and potentially using other criteria such as those identified in the comments.

### *Assembly Bill 32*

The County is taking a number of steps to comply with Assembly Bill 32 (AB 32). The County has adopted the Environmental Vision for El Dorado County (Resolution No. 29-2008). The AB 32 Scoping Plan recommends a Statewide 15 percent emissions reduction goal by 2020. The County is in the process of determining a specific emission reduction target.

The County recognizes that when addressing AB 32 emissions reduction targets, the County must take an overall view of the solid waste collection system. The County will consider overall County-wide emissions created by collection truck travel

distances (as pointed out in the comment). Related to potential collection vehicle impacts, the Plan includes strategies to achieve truck emissions reductions, including Strategy 2.18 (Reduce Emissions from Collection Fleets, page 5-7) and Strategy 2.19 (Use Advanced Technologies for Collection Trucks and Vehicles, page 6-8). Depending on the site location selected for Strategy 3.9 (Develop a West Slope C&D Processing Facility, page 4-33), during periods of new development expected to be concentrated on the western-most side of the County, this strategy could help reduce overall debris box and commercial collection truck travel times, leading to overall emissions reductions.

The Plan includes a number of other strategies which will help the County achieve AB 32 emissions reduction targets, including greater use of containerized collection to reduce total vehicle miles traveled (Strategy 1.4, Expand Mandatory Residential Collection Ordinance (page 4-16), Strategy 2.6, Expand Use of Curbside Recycling Programs (page 4-26); implementation of a mandatory commercial recycling program (Strategy 2.4, page 4-24); enhancement of composting programs (Strategy 2.13, page 4-30); and numerous strategies that divert waste from the landfill. The County will consider the combined impact of all of these Plan strategies in assessing its ability to meet AB 32 requirements.

## 2.2 Subject Area: County Implementation Efforts

### Comment #2 (part 1)

Will the County adhere to the Plan or become “creative” in its implementation and execution?

### Comment #3

Hopefully we can keep the County on track. I feel the Env. Mgmt. people are with us, but who knows if they would get pressured or outvoted in the future.

### Response

The County has identified, and prioritized, a range of solid waste management strategies, in the Action Plan portion of the Plan that the County expects could be reasonably implemented through actions of the County jurisdictions, residents, and solid waste franchisees. The Action Plan identifies the details and implementation timing for each of these strategies. Subject to such factors as funding availability and jurisdictional approvals, the County expects to proceed with implementing the strategies as they are presented in the Action Plan.

## 2.3 Subject Area: Plan Accountability

### Comment #2 (part 2)

Will there be diligent accountability?

### Response

The jurisdictions contributing to the Plan have prioritized performance tracking as a way to measure Plan outcomes. Measurement efforts are described in goal 10 of the Executive Summary (page 12) and objective 5 of the Executive Summary (page 13). Performance measurement is further detailed in Strategy 5.1, Identify Appropriate Performance Metrics for Each Selected Strategy (see page 4-38 of Volume II) and Strategy 5.2, Determine and Implement Appropriate Performance Tracking (see page 5-11 of Volume II).

## 2.4 Subject Area: Commercial Recycling – Pesticide Containers

### Comment #4

My one comment on the Draft Solid Waste Management Plan would fall under the implementation of the Commercial Recycling Program. Currently the nearest facility for farmers to recycle pesticide containers is a transfer facility in North Highlands. Many of

the farmers in the area would gladly recycle these containers if we had a local program. Hopefully this is a program that could be implemented with little resistance.

### Response

Empty pesticide containers currently are accepted at no charge at two household hazardous waste (HHW) facilities on the West Slope: the WERS facility (in Placerville) and the El Dorado Hills Fire Station (on Bass Lake Road). Empty pesticide containers also are accepted at the STR HHW facility on the East Slope. Unfortunately, due to the potentially hazardous nature of pesticide containers, and the special handling requirements, the commercial curbside recycling program (identified in Strategy 2.4, page 4-24) cannot include empty pesticide containers as an acceptable material.

## 2.5 Subject Area: Home Composting

### Comment #5 (part 1)

The document references the UC Davis Master Composter Program. We don't have a separate Master Composter program in El Dorado County, but we do have Master Gardener Composting Specialists who do the functions listed for the Master Composters. I'd switch "Master Gardener Compost Specialists" for Master Composters.

### Response:

The Plan will be updated to identify these efforts.

### Comment #5 (part 2)

The Master Gardeners are building a demonstration garden behind the community college, next to the community observatory. This site will be available for hands-on composting classes for the community, at no charge to the county.

### Response

The Plan will be updated to identify these efforts.

### Comment #5 (part 3)

Funding for additional staffing for the county could be minimal, depending on how involved you want the Master Gardeners to be. We have 114 members and are getting ready to train another 40. These volunteers can coordinate scheduling classes and parts of the program. We have extremely talented and well educated retired professionals who are more than willing to help. We could have different teams work with the various county participants, and a team to help plan the implementation of the home composting phase of the plan.

### Response

The Plan will be updated to identify these efforts.

### Comment #5 (part 4)

We have several existing composting classes that we teach regularly, so there's no start up time required to create the public education content.

### Response

The Plan will be updated to identify these efforts.

### Comment #5 (part 5)

I work very closely with the Placer/Nevada County Master Gardener program, which has a long-running project with their solid waste facilities to provide composting training. Cooperative Extension programs share project materials, so we could use any of the execution tools they do.

### Response

The Plan will be updated to identify these efforts.

## 2.6 Subject Area: Population and Projected Growth

### Comment #6 (part 1)

**Table 3-1**, right, clearly indicates that the largest populations and projected growth over 52% in the next 20 years will be in El Dorado Hills. Yet the Population Centers Map (Figure E-1, page E-5) shows the center of population in the county in "Greater Placerville" or namely the Missouri Flat Rd. area which is only expected to grow by a mere 5.7%.

This is noted as fact by the preparer within the SWMP document as well. It would appear that El Dorado Hills wants to continue to give Diamond Springs their garbage via fully loaded garbage trucks driving up hill (see Table 3-1 excerpt right). This inefficiency alone flies-in-the-face of the SWMP being a "plan" for progress, for the community and environmental good. This is clearly an error that needs to be corrected.

### Response

The County recognizes that the El Dorado Hills area is projected to grow significantly over the 20-year planning horizon presented in the Plan. However, in assessing the population concentration for the West Slope (Figure E-1, page E-5), relative to the overall population for the West County area, El Dorado Hills will remain a minority of the population, even by 2030. Based on the data in Table 3-1 of Volume II, page 3-3, in 2010 El Dorado Hills is approximately 24 percent of the West Slope population [From Table 3-1 on page 3-3: 36,000 (El Dorado Hills population)/(182,019 – 24,087 – 7,000) (i.e., Total County minus Tahoe Basin Area minus South Lake Tahoe populations)]. Even with the dramatic expected growth over 20 years, El Dorado Hills is projected to be only approximately 32 percent of the West Slope population in 2030 [From Table 3-1 on page 3-3: 57,344/(209,923 – 7,098 – 25,069)].

**Table 3-1 (Portion of Table 3-1 only)\*  
El Dorado County  
Population Estimates by Region  
(2005 to 2030)  
(recreated for clarity)**

| Region              | 2010-2020 | 2020-2030 | Total |
|---------------------|-----------|-----------|-------|
| El Dorado Hills     | 30.7%     | 21.9%     | 52.6% |
| Greater Placerville | 2.7%      | 3.0%      | 5.7%  |

\* Excerpt as provided in the comment. Does not represent the entire Table 3-1 in Volume II, page 3-3).

Regarding the potential use of a southern Limited Volume Transfer Operation (LVTO, see Appendix I of Volume II for background discussion) by West Central County Region residents, the County assumed that based on the proximity of the West Central County Region to the existing WERS, and the topographic features (hills/mountains) separating a potential south LVTO from potential users, this region would continue to use the WERS, or if constructed the EcoPark, for self-haul activities.

## 2.7 Subject Area: Pay As You Throw

### Comment #6 (part 3)

I would also like to raise your attention to the Pay As-You-Throw (PAYT) idea. Table 4.5 clearly shows by example what a poor idea this is for rate payers. Please reconsider it.

### Response

Pay-As-You-Throw (PAYT) programs are used by many jurisdictions in California as a way to provide a financial incentive to customers to reduce the amount of refuse they generate, and increase the amount of material they divert from the landfill. PAYT is most effectively used in conjunction with providing customers sufficient overall container capacity to divert materials from the refuse container into a recycling container

and/or yard container. During the transition period when a PAYT program is implemented, depending on generation levels, customers may be able to reduce their refuse container size (by shifting materials typically placed in the refuse container into recycling and yardwaste containers) and in some cases continue to pay a relatively similar rate, or possibly a reduced rate, for equivalent service. It is important to note that the example comparative PAYT rate structures shown in Table 4-5 (page 4-23) are meant to demonstrate rate differences, within a PAYT rate structure, that may be used to create sufficient financial incentives for a customer to make a decision to reduce their refuse generation. Rate structures with smaller differences between rates may not provide a sufficient financial incentive to encourage a customer to reduce refuse generation.

### 2.8 Subject Area: Public Education

#### Comment #7

My only comment/suggestion is to possible to consider increasing the public education component. I see it is somewhat addressed in various strategies. However, prior to implementation of the strategies it would be nice if first an educational component could be released to show how a household might reduce waste or reduce what is thrown away. Government and Commercial strategies I am not so concerned with but single family households may have to significantly change the way they are dealing with trash or pay the price. It would be good to give them some tips on how to reduce so they can have them in place prior to implementation of the strategy especially the Pay-As-You-Throw (PAYT) pricing program.

#### Response

The Plan will be updated to include targeted residential education efforts. References to targeted residential education are now included

within the Strategy 2.2 (Use Greater Pay-As-You-Throw (PAYT) Pricing Programs, page 4-21) and within Strategy 2.17 (Advance Outreach and Education, page 4-30) will be expanded.

### 2.9 Subject Area: Union Mine Landfill Road Costs

#### Comment #8

Overall: The Plan adequately addresses the fact that for any of the proposed infrastructure strategy options that may be chosen in the future, detailed traffic studies must be conducted to determine the appropriate improvements necessary to mitigate impacts to the traffic and circulation system.

Regarding the discussion on page 24 of Appendix F, Union Mine Landfill Site Utilization Assessment, the assumptions used to determine total estimated constructions costs for the new UMDS access road are very low. DOT recommends using a more conservative approach such as the following:

- For the new road to handle truck access, use 6 inch AC on 12 to 18 inch AB.
- Use a preliminary ball park cost of \$2.5 M/mile. The total cost would then be approximately \$14M rather than the \$6.5 to \$8.5M suggested.
- It should be made clear that suggested cost estimates do not include right of way acquisition.

#### Response

Appendix F, and the Executive Summary (discussion in Section H), have been updated to reflect the DOT-provided cost per mile figures and assumptions regarding right-of-way.

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## 2.10 Subject Area: Union Mine Landfill Suitability

### Comment #10

I am encouraged that El Dorado County is moving towards completion of a solid waste management plan and commend those who have given their time in this endeavor. In reviewing this plan I am concerned with some elements and details. In particular I am concerned that there is no emphasis on securing a permanent waste site. This plan uses the Union Mine Landfill as a fall back for this inadequacy. I have many concerns about this option including public safety, environmental risk and higher costs.

#### *Public Safety*

Union Mine Road, being the only access road to this site, needs major improvements to safely accommodate any increase in transfer vehicle traffic. When the EIR was prepared for the landfill expansion, conditions in the area were different. There are more homes in this area now and many planned residential developments in the area sharing access from Union Mine Road. Union Mine High School did not exist at that time. A new EIR needs to be drafted that addresses these changes.

When the expansion of the facility was undertaken in 1994, the southern extension of Church Mine Road was eliminated. This road acted as a route to the southern extension of Union Mine Road, allowing access to southern Hwy 49, for commuters and residents from Little Canyon Road, Martinez Creek Road and Church Mine Road. This route was also a safety escape during floods and fire for these same residents. Now there is only one exit available to residents and this increases the fire danger and creates a very dangerous intersection at Union Mine Road and Church Mine Road. Residents wishing to go south on Union Mine from Church Mine or West on

Church Mine from Union Mine are forced to make a three point turn between two blind corners on Union Mine Road. I have witnessed many incidents where this condition has created dangerous situations for residents. These incidents include Deadman Creek bridge washout, hillside mudslide onto Church Mine Road near the intersection with Union Mine Road and several fires on the BLM land that closed the road to residents. The closure was not due to fire danger. The closure was due to fire trucks parked in the road. During emergencies residents need acceptable access to the properties beyond the closure to care for family, farm animals and property safety. This unsafe condition is a result of the closure of Church Mine Road. Before any increase in transfer vehicle traffic on Union Mine Road, the former extension of Church Mine Road should be reopened, or replaced, or the intersection at Union Mine should be replaced with a safe alternative and both Union Mine and Church Mine Road should be widened.

The increased pedestrian traffic as a result of the Union Mine High School has created a major safety issue in the area along Union Mine Road in both directions from the school. The road is already too narrow, winding and has no place for walkers. The cross-country runners from the high school run right down the road. Walkers have to step into the ditch when cars approach. I have witnessed several close calls for pedestrians in the area where there is only inches between the road and the redwood fence.

The California Highway 49 Realignment and Widening Initial Study, mitigated the exclusion of bicycle lanes on the highway 49 widening project, by claiming.

*The El Dorado County Bicycle Transportation Plan adopted in 2005 does not propose bicycle facilities along SR 49 through the project area. The Plan's emphasis for this part of the county is on making Union Mine Road, which runs parallel to SR 49 in this area, a*

*Class III Bike Route. A Class III Bike Route provides a right-of-way designated by signs.*

This improvement should have been undertaken when the school was built and is needed even more now and certainly a road widening project should be accomplished before any increase in transfer vehicle traffic on Union Mine Road. Road widening to provide for safe pedestrian traffic is way overdue and needs to be top priority in any plan to continue to use Union Mine Landfill.

### ***Environmental***

The Union Mine Landfill is one of the environmentally worst sites to place a disposal facility, of those available to the residents of El Dorado County. The area after the mining operations ceased should have been declared a superfund site, on that basis alone. Positioning a dumpsite over the top of these mine shafts, that reach several thousand feet into the earth with many miles of connecting tunnels and significant stopes, allows this accumulated pollution to infiltrate the water table at many depths. The positioning of this site over the top of a collision contact zone of two dissimilar landmasses, the Melones Fault, further complicates and promotes the spread of this pollution. The steepness and close proximity to watershed that eventually feeds into the Cosumnes River insures that spills and leaks will enter the water supply of areas downstream.

Significant environmental concerns were raised by the EIR prepared for the previous landfill expansion, which included, "biological resources, geology and soils, air quality, hazardous materials and infectious waste, human health and safety, aesthetics and visual resources." These were mitigated by stating that the "benefits identified outweigh the unavoidable adverse environmental effects which may then be considered (acceptable)." That needs to be compared to other available sites. Accepting the worst choice because some remedy is needed and society will suffer without making a choice but not

assessing the risks and comparing it to those of other sites is unacceptable. The only comparisons that I have seen are based on cost not environmental risk. A new EIR needs to be prepared that compares the environmental risk of this site with other available sites throughout the county. Placing any processing operations on the site will produce pollution in the form of increased dust, CO<sub>2</sub>, NO<sub>x</sub> and noise and will require extensive mitigation monitoring and implementation of effective controls. The results of the monitoring should be made available to the public and nearby residents on an ongoing basis.

### ***Higher Costs***

The remote placement of the Union Mine Site is a great distance from the sources of solid waste and therefore adds to transportation costs and greenhouse gas emissions. The site is about a thousand-foot drop in elevation from the surrounding areas also adding to fuel cost and greenhouse gas emissions for the transfer vehicles. This is in contradiction to goal 4 of the plan to "reduce greenhouse gas emissions."

There are better sites available in the county and they are closer to the source of the solid waste and closer to other infrastructure, (freeway, railroad, water, sewer, and electric transmission lines). These sites are on less permeable soils and more stable geologic conditions. These sites will not be as available in the future because of planned and anticipated growth. A permanent site should be planned for and procured or set aside now. It will only be more expensive in the future.

In conclusion, I understand that some use of the Union Mine Landfill Site in the future is predictable. For that to happen there needs to be real mitigations, not negative declarations, real measures that provide real safety for the area residents and for the environment. This use of Union Mine Landfill should only be seen as temporary and contingent upon procurement of a permanent and more appropriate site.

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I anticipate that this statement will be reviewed by staff and passed on to the Board of Supervisors and be made a part of the discourse in future solid waste management planning.

### Response

The County recognizes the extent of the current limitations regarding use of Union Mine Landfill. The County has indicated in the Plan that it would have to undertake an EIR process to re-open the landfill to accept County waste. Before proceeding with the Union Mine Landfill re-opening project, the County would complete an EIR process which would address the range of potential environmental impacts noted in the comment, including among others, the impacts related to area hydrology and water quality, geology and soils, public services (e.g., schools, bike lanes), and transportation and traffic (e.g., road modifications and improvements, and alternate access). The EIR would need to consider mitigation measures for potentially significant impacts associated with re-opening the Union Mine Landfill.

The EIR also would need to offer alternatives, should they be available, to the contemplated project. These alternatives would include impacts associated with out-of-County waste transport and alternative technologies. Out-of-County transport would create significant impacts affecting transportation and greenhouse gas emissions. The development of an alternative technology facility would pose impacts as well, and at this time there are no such permitted facilities in the state.

The Plan addresses the significant costs associated with re-opening Union Mine Landfill (Table F-4) and in Section H of the Executive Summary. Due to these cost limitations, at this time, the County has not included this strategy (Strategy 3.3, Re-Open Union Mine Landfill) in its proposed Action Plan. However, opening Union Mine Landfill could become more economical, and less impactful on the

environment, should, for example, the cost of out-of-County transport increase and/or the out-of-County disposal destination(s) object to taking in another county's trash.

The comment identifies the possibility of developing a new landfill at an alternative location in the County. Unfortunately, the possibility of the County permitting and developing a new landfill in California is highly unlikely at this time. No new landfills have been permitted in California in the last decade. This limitation formed the basis for why the Plan contemplated the option of re-opening the Union Mine Landfill as opposed to developing a new landfill.

## 2.11 Subject Area: East Slope Area Strategies

### Comment #11 (part 1)

The cart system is not currently compatible with the services provided by South Tahoe Refuse (STR) to our jurisdictions. It would require a significant investment in vehicles and equipment to modify the service for the east slope unincorporated area of El Dorado County and may not significantly increase recycling since residents can, and already do, participate in the unlimited blue bags program each week.

### Response

The County recognizes the limitations related to conversion of existing vehicles and equipment required for transitioning to cart-based services. Strategy 3.8 (Renovate South Lake Tahoe MRF and Transfer Station to Accept Single Stream Recyclables, page 6-19), a long-term strategy scheduled for the 2026 to 2040 period, indicates that STR should evaluate use of a cart-based single stream system, at that time, to determine if it would be more effective, and/or more economical (page 6-20).



### Comment #11 (part 2)

While single stream recycling may be effective for residential and some commercial properties, mixed waste recycling works best for resort operations and our commercial Nevada customers. A more effective strategy for the east slope may be modifying the existing MRF line to handle a construction and demolition shift.

#### Response

The County will modify Strategy 3.8 (Renovate South Lake Tahoe (STR) Material Recovery Facility and Transfer Station to Accept Single Stream Recyclables, page 6-19) to specify that the target for single stream recycling is residential and some commercial customers, but not all commercial customers.

### Comment #11 (part 3)

We believe that you would get a bigger bang for your buck from commercial food waste recycling than from residential food waste recycling. The plan's "tons diverted per \$1000" shows otherwise. Having operated a commercial food waste recycling program for the last year in South Lake Tahoe, maximizing the "per stop" tonnage is, in our opinion, the more cost effective operation.

#### Response

The County recognizes the cost per ton perspective identified in the comment. The data in Table 3 of the Executive Summary (page 28), however, contemplates the County incorporating residential food waste into an existing ongoing residential yardwaste program, with relatively limited new incremental County-wide costs for trucks and labor. Costs of the commercial food waste program contemplate entirely new trucks and laborers, lowering the diverted tons per \$1,000 ratio for commercial food waste collection shown in Table 3.

### Comment #11 (part 4)

Please clarify the status of the recycling plans required for each of our service areas that were submitted in 2008, in light of this new, broader approach.

#### Response:

The County will work with its franchisees to address updates to recycling plan requirements, where necessary, so that these recycling plans align with the goals, objectives, and strategies stated in the Plan. Areas where existing recycling plans conflict with the Plan strategies will require updates or revisions.

### Comment #11 (part 5)

In the interest of maintaining South Lake Tahoe's cooperative process, we suggest that waste management strategies for the east slope of El Dorado County place a priority on remaining comparable with the City of South Lake Tahoe and Douglas County, by adopting strategies that are developed among our three agencies through that consensus process.

#### Response

The County recognizes the importance of the South Lake Tahoe Basin Waste Management Authority (Authority) in shaping solid waste management policies for the South Lake Tahoe Basin. The County will make efforts to work closely with the City of South Lake Tahoe, and Douglas County, through consensus, to adopt solid waste management strategies that work for each of the Authority members, to the degree that they do not diverge significantly from those presented in the Plan.



## Section 3

# Modifications to Language in Draft Plan



### 3. Modifications to Language in Draft Plan

**Exhibit III-2**, beginning on the next page, identifies the text in the Draft Plan that the County modified in response to public comments. Exhibit III-2 provides the subject of the text change, the original Draft Plan page reference, and the text before and after the modification. For cases where the County added new text to the Draft Plan, but did not change the original Draft Plan text, the column labeled “Text in Draft Plan” is shown as “N/A.” Finally, **Exhibit III-3**, on page 3-5, provides other minor errata made to the Draft Plan.



### 3. Modifications to Language in Draft Plan

#### Exhibit III-2 Text Additions and Changes Made to Draft Plan In Response to Public Comments

Page 1 of 3

| Subject                                       | Page Reference in Draft Plan                                   | Text in Draft Plan  | Text in Final Plan  |
|---|--|---|---|
| 1. Home Composting                            | 4-30, column 1, paragraph 2, 4 <sup>th</sup> sentence          | One model that has been successful in many jurisdictions is to provide “Master Composter” training classes to educate individuals in compost science, soil health, and natural gardening techniques. These individuals then go back to their communities to provide education and outreach. | <p>Through the University of California Cooperative Extension (UCCE), over 100 County residents have become trained as a Master Gardener. Training includes compost science, soil health, and natural gardening techniques. These County residents then volunteer to provide training to the community.</p> <p>Through this UCCE Master Gardener program, the UCCE also has provided training to the Master Gardeners on composting. The UCCE has designated approximately 114 Master Gardener Composting Specialists in the County. The County should leverage opportunities for this volunteer group of Master Gardener Composting Specialists to provide classes, and other composting training, to the community.</p> |
|   | 4-30, column 2, paragraph 1, new 2 <sup>nd</sup> sentence      | N/A   | However, the costs may be minimized if the County uses the Master Gardener Composting Specialists to plan and conduct training efforts. The County also may be able to leverage existing composting training materials, used by the UCCE, for programs in other areas. Additionally, the County’s Master Gardeners are building a demonstration garden behind the community college, which may be available, at no charge to the County, for hands-on composting classes.   |
| 2. Pay-As-You-Throw Outreach and Education    | Page 4-22, column 1, paragraph 4, new 3 <sup>rd</sup> sentence | N/A   | The County will provide mailers included with customer bills, newsletters, as well as information on the County and/or franchised hauler’s website(s), well in advance of implementing a PAYT program. These materials will describe the new program, identify changes, present available options, and provide pricing scenarios. The County will conduct in a public hearing prior to implementing PAYT programs.  |
| 3. General Residential Outreach and Education | Page 4-31, column 1, paragraph 1, new 2 <sup>nd</sup> sentence | N/A   | The County will focus outreach and education efforts on the residential sector in advance of implementing new programs and services, particularly when households are asked to change the way they handle their materials or when pricing will change.  |

**Exhibit III-2**  
**Text Additions and Changes Made to Draft Plan**  
**In Response to Public Comments** *(continued)*

| Subject  | Page Reference in Draft Plan   | Text in Draft Plan   | Text in Final Plan   |
|--|--|--|--|
| 4. Union Mine Landfill Road Construction Costs             | Page 32, Executive Summary, Table 6, Costs, Option B   | Landfill Development Costs: \$25-\$45<br>Total Landfill Disposal Costs: \$45-\$75<br>Total Costs: \$55-\$95 (mid \$70)   | Landfill Development Costs: \$32-\$50<br>Total Landfill Disposal Costs: \$52-\$80<br>Total Costs: \$62-\$100 (mid \$81)  |
|  | Page 32, Executive Summary, Table 6, Costs, Option D   | Landfill Development Costs: \$13-\$21<br>Total Landfill Disposal Costs: \$33-\$51<br>Total Costs: \$43-\$71 (mid \$57)   | Landfill Development Costs: \$16-\$23<br>Total Landfill Disposal Costs: \$36-\$53<br>Total Costs: \$46-\$73 (mid \$59.50)  |
|  | Page 6-15, Table 6-5, column 2, 1 <sup>st</sup> row  | Requires access road improvements which could cost between \$5 and \$10 million  | Requires access road improvements which could cost \$14 million, or more   |
|  | Page 6-15, Table 6-5, column 2, 2 <sup>nd</sup> row  | Necessitates costs to improve and expand the Union Mine Landfill of between approximately \$13 and \$76 per ton of landfill capacity depending on the scenario (see Table F-4 in Appendix F)         | Necessitates costs to improve and expand the Union Mine Landfill of between approximately \$16 and \$76 per ton of landfill capacity depending on the scenario (see Table F-4 in Appendix F) |
|  | Page F-25, column 1, paragraph 2, 1 <sup>st</sup> sentence   | Total estimated construction costs for the new UMDS access road are between \$6.5 and \$8.5 million dollars.   | Total estimated construction costs for the new UMDS access road are approximately \$14 million dollars.  |
|  | Page F-25, column 1, paragraph 2, 4 <sup>th</sup> sentence   | The proposed pavement section was 4 inches AC over 6 to 8 inches of CAB, for the entire length (2.87 miles) and width (40 foot), at an estimated cost of \$5.50 per square foot.                     | The proposed pavement section was 6 inches AC over 12 to 18 inches of CAB, for the entire length (2.87 miles) and width (40 feet).   |
|  | Page F-25, column 1, paragraph 3, new 1 <sup>st</sup> sentence   | N/A  | The above \$14 million estimate does not include right-of-way acquisition costs.   |
|  | Page F-25, footnote 10, new 1 <sup>st</sup> sentence   | N/A  | Equivalent to \$2.5 million per mile.  |
| Page F-27, column 2, paragraph 2, 5 <sup>th</sup> sentence | For scenario 1, the costs range from \$24.93 to \$76.29 per ton of additional landfill capacity and for scenario 2, the costs range from \$13.37 to \$32.30 per ton of additional landfill capacity. | For scenario 1, the costs range from \$31.75 to \$76.29 per ton of additional landfill capacity and for scenario 2, the costs range from \$15.87 to \$32.30 per ton of additional landfill capacity. |  |

### 3. Modifications to Language in Draft Plan

#### Exhibit III-2

#### Text Additions and Changes Made to Draft Plan In Response to Public Comments *(continued)*

Page 3 of 3

| Subject   | Page Reference in Draft Plan   | Text in Draft Plan              | Text in Final Plan  |
|---|--|---------------------------------|---|
| 4. Union Mine Landfill Road Construction Costs <i>(continued)</i> | Page F-28, Table F-4, Scenario 1, Alternative Road, Road Improvement Costs | Low – \$16.82<br>High – \$36.82 | Low – \$23.64<br>High – \$41.82   |
|   | Page F-28, Table F-4, Scenario 1, Alternative Road, Total Cost             | Low – \$24.93<br>High – \$44.93 | Low – \$31.75<br>High – \$49.93   |
|   | Page F-28, Table F-4, Scenario 2, Alternative Road, Road Improvement Costs | Low – \$6.20<br>High – \$13.57  | Low – \$8.70<br>High – \$15.40  |
|   | Page F-28, Table F-4, Scenario 2, Alternative Road, Total Cost             | Low – \$13.37<br>High – \$20.74 | Low – \$15.87<br>High – \$22.57   |
| 5. East Slope Cart-Based Services                                 | 6-20, column 1, new 3rd paragraph  | N/A                             | After evaluating program economics, and based on the extent of additional diversion potential, the County and STR may determine that single stream recycling (with a cart) is feasible for some residential or commercial customers, but not others. The County and STR also may determine cart-based services are only economically practical using a long-term phased approach. |

**Exhibit III-3**

**Other Errata Made to Draft Plan**

| Subject   | Page Reference in Draft Plan | Text in Draft Plan   | Text in Final Plan  |
|---|------------------------------|--|---|
| 1. Draft reference on each page                   | All                          | DRAFT  | Remove DRAFT on each page for Final Plan  |
| 2. Table 6 row title, Executive Summary           | 32, Table 6, column 5        | Landfill Development Costs   | Landfill Development and Road Improvement Costs   |
| 3. Reference to West Slope Joint Powers Authority | 4-6 (footnote 1)             | Depending on the extent of responsibilities of the WESJPA, the member agencies could offer to provide city, service district, or county staffing for the WESJPA rather than having the WESJPA hire its own staffing. For example, should the WESJPA not direct material flow to a facility, and assume a more limited programmatic role, as opposed to one involving facility development and management, WESJPA staffing support requirements would be minimal. | Depending on the extent of responsibilities of the WSJPA, the member agencies could offer to provide city, service district, or county staffing for the WSJPA rather than having the WSJPA hire its own staffing. For example, should the WSJPA not direct material flow to a facility, and assume a more limited programmatic role, as opposed to one involving facility development and management, WSJPA staffing support requirements would be minimal. |
| 4. Title for Strategy 2.19                        | 6-8, column 2                | Used Advanced Technologies for Collection Trucks and Vehicles  | Use Advanced Technologies for Collection Trucks and Vehicles  |
| 5. Title for Table F-4                            | F-28                         | Union Mine Landfill Development Costs  | Total Union Mine Landfill Development and Road Improvement Costs  |

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