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*A JOINT COMMISSION APPOINTED BY:
County of Sacramento
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City of Elk Grove
City of Galt
City of Isleton*

June 27, 2016

Dana Mahaffey
City of Sacramento
Development Services Department, Planning Division
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: SEC Recommendation for the Proposed Florin Perkins Public Disposal Site
MRF/LVTS

Dear Ms. Mahaffey:

The Sacramento Environmental Commission ("SEC") is a joint County/City appointed commission chartered to advise the Sacramento County Board of Supervisors and the City Councils of Folsom, Galt, Isleton, Elk Grove and Sacramento on environmental issues facing our communities. The SEC was requested by the project applicant, Zanker Road Resource Management, Ltd. (Zanker), to review the proposed project proposal and offer recommendations for its approval.

The SEC received a presentation from Zanker at our June 20, 2016 meeting addressing the proposal and findings of the May 2016 City of Sacramento Initial Study/Mitigated Negative Declaration (IS/MND). In addition to this presentation, members of the SEC reviewed the IS/MND and considered comments submitted to your office by the Sacramento County Environmental Management Department (EMD) dated June 9, 2016.

The SEC Commissioners recognize the benefit that the expanded recycling operation brings to the region because processing capacity for construction and demolition material is limited. This project would contribute to meeting the State of California's future 75% solid waste recycling requirement; with the additional processing capacity proposed at this facility being important to meeting the state mandate. We agree with the IS/MND conclusion that

implementation of the proposed project would provide an overall environmental benefit (IS/MND Page 26).

We have noted an item that we request you consider during your review of this proposal. The IS/MND concluded that the noise emission from the operation of the proposed facility would exceed the City's nighttime noise standard as measured at adjacent properties (IS/MND Page 81-82). Restricted operations, avoiding nighttime operations, would avoid this exceedance. We recommend that the permit for this project include a condition that restricts nighttime operations until the time that additional mitigation measures are implemented and proved to reduce noise exposure to acceptable levels.

We also recommend that because the existing Solid Waste Facility Permit (SWFP) allows the Local Enforcement Agency (LEA) to consider incremental tonnage increases in the revised SWFP, the City permitted capacity should correspond to the incremental permitted maximums defined by EMD. This coordination would avoid future potential confusion or conflicting permit conditions over this facility.

Because the proposed project can be implemented without significant impacts to the environment, the SEC recommends including these two conditions in a permit issued by the City. We appreciate the opportunity to submit this recommendation for your consideration.

If you have any questions, please contact Jill Koehn, SEC Secretary at (916) 875-8584 or koehnjill@saccounty.net.

Sincerely,



Richard Hunn, Chair
Sacramento Environmental Commission