GLENN COUNTY
Planning & Community Development Services Agency

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Mardy Thomas, Director

STAFF REPORT SUPPLEMENTAL
(FOR CONTINUATION OF APRIL 16, 2025, PLANNING COMMISSION MEETING)

MEETING DATE: July 16, 2025

TO: Glenn County Planning Commission

FROM: Andy Popper, Principal Planner

SUBJECT: **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion**

Attachments:

i. Conditions of Approval and Mitigation Measures, with Supplemental Conditions of Approval

Supplemental Letters received from April 8 2025 to June 5, 2025:

A. Notice of Settlement – Adams Broadwell Joseph & Cardozo, Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project, June 6, 2025
B. Syntech Response to Adams Broadwell Joseph & Cardozo, May 23, 2025
C. Adams Broadwell Joseph & Cardozo, CUP2024-004, MND Comment Letter April 15, 2025, Syntech Advanced Thermal Conversion Project and Exhibit A
D. PGE No Impact CUP-2024-004; April 21, 2025
E. CA DOC Geology Energy Management Division (CalGEM), No Impact, April 8, 2025

Planning Commission Documents from April 16, 2025:

0. Planning Commission Staff Report
1. Conditions of Approval and Mitigation Measures (previous/prior to supplemental)
2. Mitigated Negative Declaration and Initial Study
3. Request for Review, Application, and Comments
4. Syntech Responses to Agency Pre-Consultation Comments
5. Syntech Traffic Analysis and Internal Circulation Plan

1. SUPPLEMENTAL INFORMATION

Prior to the Planning Commission Public Hearing held on April 16, 2025, the Planning Division received a comment letter dated April 15, 2025, from Adams Broadwell Joseph & Cardozo regarding the Carriere/Syntech Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (Conditional Use Permit 2024-004). As a result of the letter, during the April 16, 2025, Planning Commission meeting it was elected to continue the Conditional Use Permit 2024-004, Public Hearing to a date uncertain.

On May 23, 2025 the applicant, Syntech Energy Services, submitted documentation to the Planning Division in response to the April 15, 2025, from Adams Broadwell Joseph & Cardozo comments. Then on June 6, 2025, the Planning Division received a Notice of Settlement from Adams Broadwell Joseph & Cardozo, stating that they entered into a settlement agreement with the Applicant. Further, the letter concludes that with the Applicant's agreement to implement additional measures, the issues raised regarding the Project have been addressed and resolved and support the project and request that it be approved.

In response to the June 6, 2025, letter the following Supplemental Conditions of Approval are part of the project, in addition to the proposed Conditions and Mitigations Measures.

SUPPLEMENTAL CONDITIONS OF APPROVAL:

The following supplemental Conditions of Approval are in response to comments received in the June 6, 2025, Notice of Settlement from Adams Broadwell Joseph & Cardozo requesting that the County include the measures as mitigation measures or conditions of approval for the Project.

A. AIR QUALITY AND PUBLIC HEALTH

i. **Best Available Control Technology (BACT)**: Developer shall apply BACT to the Project's new emissions units and any modifications of an existing emissions unit which result in an emissions increase where the emissions unit's potential to emit is equal to or exceeds the following amounts:

Pollutant	Pounds per Day
Asbestos	0.030
Beryllium	0.002
Carbon monoxide	500.000
Fluorides	15.000
Hydrogen sulfide	50.000
Lead	3.200
Mercury	0.500
Nitrogen oxides	25.000
Particulate matter (PM-10)	80.000
Reactive organic compounds	25.000
Reduced sulfur compounds	50.000
Sulfur oxides	80.000
Sulfuric acid mist	35.000
Total reduced sulfur compounds	50.000
Vinyl chloride	5.000

ii. **Offsets:** Developer shall implement emission reductions from existing emission sources at the Project site with a potential to emit non-attainment pollutants or their precursors equal to or exceeding 25 tons per year. Offsets shall be calculated pursuant to Glenn County Air Pollution Control District ("GCAPCD") Regulations, Article III, Sec. 51, and shall be sufficient to offset calendar quarter emission increases of non-attainment pollutants or their precursors associated with the new or modified stationary source.

iii. **Leak Detection and Repair (LDAR):** Developer shall implement an LDAR program during Project operation which includes regular inspection and monitoring for fugitive emissions, as well as emissions from the Project's point- source release of exhaust from the post-methanator gas separation unit, including but not limited to CO2 emissions.

B. HAZARDS

i. The Project's Hazardous Materials Business Plan (HMBP) shall include the following:

1. Detailed, site-specific emergency response protocols, including clear shelter- in place procedures;
2. Identify and clearly mark evacuation routes from Project facilities;
3. Implementation of emergency communication systems to notify nearby residents and facilities in the event of an emergency;
4. Project operator shall coordinate with local emergency response teams to ensure a timely and effective response in the event of a catastrophic release, fires, or other hazardous incidents at the Project site;
5. Provide comprehensive worker training consistent with Title 8 CCR Section 5192, including, but not limited to, instruction on the hazardous materials present on-site, methods to reduce exposure risk, and safe handling procedures.

C. AGRICULTURAL RESOURCES

i. Developer shall preserve a total of 6.3 acres of Prime Farmland at the Project site.
Note: This Condition of Approval increases Mitigation Measure AFR -1 (Agriculture and Forest Resources) by 2 acres.

2. RECOMMENDED MOTIONS:

That the Planning Commission adopt the Mitigated Negative Declaration for Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion with the Findings as presented in the April 16, 2025, Staff Report.

That the Planning Commission approve Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion with the Findings as presented in the April 16, 2025, Staff Report and the corresponding Conditions of Approval and Mitigation Measures, including the Supplemental Conditions of Approval.

GLENN COUNTY PLANNING AND

COMMUNITY DEVELOPMENT SERVICES AGENCY

CONDITIONS OF APPROVAL AND MITIGATION MONITORING PROGRAM WITH SUPPLEMENTAL CONDITIONS OF APPROVAL

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Pursuant to the approval of the Glenn County Planning Commission, **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion** is hereby granted subject to the Mitigation Measures and Conditions of Approval set forth herein. Pending final approval by the Glenn County Planning Commission the applicant shall file a signed copy of these Conditions of Approval with the Glenn County Planning & Community Development Services Agency.

Project Description:

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

Location:

The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

APNs: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

CONDITIONS OF APPROVAL AND MITIGATION MEASURES WITH SUPPLEMENTAL CONDITIONS OF APPROVAL

CONDITIONS OF APPROVAL:

Glenn County Planning Division:

Condition of Approval (Planning Division):
The applicant/operator shall provide bi-annual (due by January 1 and July 1 of each year) reporting to the Planning Division evidencing the following:

- That no more than 135,000 tons a year of waste walnut shells (WWS) from the existing onsite walnut shelling facility shall be processed.

- That no more than 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), is transported from the existing onsite walnut shelling facility per year.

- That the waste walnut shells (WWS) are sourced only from the existing onsite walnut shelling facility.

Condition of Approval (Planning Division):
That the areas of operation and uses shall be confined to as listed in these Mitigation Measures and Conditions of Approval, and delineated as on file with the Glenn County Planning & Community Development Services Agency.

Condition of Approval (Planning Division):
The applicant/operator shall provide a bi-annual (due by January 1 and July 1 of each year) Conditions of Approval and Mitigation Measure Compliance monitoring fee of $250.00 to the Planning Division.

Condition of Approval (Planning Division):
Prior to receiving a Building Permit (Zone Clearance) and operations, the Applicant/Landowner shall submit a copy of a recorded (by Glenn County Recorder's office) Agriculture Statement of Acknowledgement to the Planning Division.

Glenn County Building Division:

Condition of Approval (Building Division):
All construction shall require a building permit issued by the Glenn County Building Division.

Condition of Approval (Building Division):
All setbacks to the property lines for existing and proposed structures shall be maintained according to the California Building Code.

Condition of Approval (Building Division):
All existing structures shall comply with the original permitted use, any change of use shall be approved through the permitting process to assure code compliance.

Glenn County Air Pollution Control District (APCD):

Condition of Approval (APCD):
The applicant/operator shall modify their existing District Permit to Operate; complete and submit an Authorization to Construct (ATC) application prior to construction. All new sources of air pollution and the air pollution control equipment including emissions estimates shall be included in the ATC application.

Glenn County Environmental Health Department (EHD):

Condition of Approval (EHD):
The applicant/operator shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.

Condition of Approval (EHD):
The existing onsite wastewater treatment systems (OWTS) shall be expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the Environmental Health Department (EHD).

Condition of Approval (EHD):
Restroom facilities shall be provided to accommodate workers during construction of the project and shall be approved by the EHD.

Condition of Approval (EHD):
Water wells used to supply potable water shall meet current construction requirements, be permitted and regulated by the EHD or the State Water Resource Control Board (SWRCB), Division of Drinking Water.

Condition of Approval (EHD):
All garbage, rubbish and refuse created, produced or accumulated during construction, at the proposed facility and/or on the property shall be removed by a permitted waste hauler or taken to a permitted facility at least once each week. All garbage shall be kept in a container with a close-fitting cover, without leakage or escape of odors.

California Department of Transportation (Caltrans):

Condition of Approval (Caltrans):
The applicant/operator shall be responsible to complete all Caltrans requirements and improvements; including a (Final) Traffic Impact Study (TIS) that includes information regarding project trip generations, trip distributions, and queuing using the Institute of Transportation Engineering (ITE) Trip Generation Manual for the analysis.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans any requested information regarding driveway access to and from both sites. This information shall be in site plans showing proper dimension of all driveways as outlined in the California Highway Design Manual (HDM) with Auto Turn CAD templates, using the correct design vehicle, showing the design vehicle entering and exiting the site plans.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans mapping for all connections to the State Highway System (SHS) showing the State right of way (ROW) delineated with bearings, distances along with State Route (SR) boundary determination.

Condition of Approval (Caltrans):
The applicant/operator shall ensure with Caltrans that the design vehicle is appropriate, based off the Truck Networks on California State Highways Map for District 3 including information about the design vehicle(s) used at the sites.

Condition of Approval (Caltrans):
The applicant/operator shall be responsible for an encroachment permit issued by Caltrans for any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW).

MITIGATION MEASURES:

Mitigation Measure AFR -1 (Agriculture and Forest Resources):

The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).

Timing/Implementation: In perpetuity of the project

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

Mitigation Measure H & WQ-1 (Hydrology & Water Quality):

Prior to permit issuance, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Timing/Implementation:
Prior to site disturbance (including moving dirt, leveling and grading)

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency &
Central Valley Regional Water Quality Control Board

Mitigation Measure CR-1 (Cultural Resources):

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner.

  The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either:
  1) is not eligible for the NRHP or CRHR; or
  2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify Glenn Butte County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

  Timing/Implementation: During Construction/Excavation Activities

  Enforcement/Monitoring:
  Glenn County Planning & Community Development Services Agency

Mitigation Measure TCR -1 (Tribal Cultural Recourses):

In the event that any prehistoric or historic subsurface cultural (including Tribal) resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and the applicant/operator shall consult with the County and a qualified archaeologist (as approved by the County) and corresponding tribal representative to

assess the significance of the find per CEQA Guidelines Section 15064.5. The qualified archaeologist shall determine the nature of the find, evaluate its significance, and, if necessary, suggest preservation or mitigation measures. Appropriate mitigation measures, based on recommendations listed in the archaeological survey report and tribal representative, will be determined by the Glenn County Planning & Community Development Services Agency. Work may proceed on other parts of the project site while mitigation for historical resources, unique archaeological resources, and/or tribal resources is carried out.

All significant cultural materials recovered shall be, at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, tribal representative, and documented according to current professional standards.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

SUPPLEMENTAL CONDITIONS OF APPROVAL:

The following supplemental Conditions of Approval are in response to comments received in the June 6, 2025, Notice of Settlement from Adams Broadwell Joseph & Cardozo requesting that the County include the measures as mitigation measures or conditions of approval for the Project.

A. AIR QUALITY AND PUBLIC HEALTH

i. **Best Available Control Technology (BACT)**: Developer shall apply BACT to the Project's new emissions units and any modifications of an existing emissions unit which result in an emissions increase where the emissions unit's potential to emit is equal to or exceeds the following amounts:

Pollutant	Pounds per Day
Asbestos	0.030
Beryllium	0.002
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Fluorides	15.000
Hydrogen sulfide	50.000
Lead	3.200
Mercury	0.500
Nitrogen oxides	25.000
Particulate matter (PM-10)	80.000
Reactive organic compounds	25.000
Reduced sulfur compounds	50.000
Sulfur oxides	80.000
Sulfuric acid mist	35.000
Total reduced sulfur compounds	50.000
Vinyl chloride	5.000

ii. **Offsets:** Developer shall implement emission reductions from existing emission sources at the Project site with a potential to emit non-attainment pollutants or their precursors equal to or exceeding 25 tons per year. Offsets shall be calculated pursuant to Glenn County Air Pollution Control District ("GCAPCD") Regulations, Article III, Sec. 51, and shall be sufficient to offset calendar quarter emission increases of non-attainment pollutants or their precursors associated with the new or modified stationary source.

iii. **Leak Detection and Repair (LDAR):** Developer shall implement an LDAR program during Project operation which includes regular inspection and monitoring for fugitive emissions, as well as emissions from the Project's point- source release of exhaust from the post-methanator gas separation unit, including but not limited to CO2 emissions.

B. HAZARDS

i. The Project's Hazardous Materials Business Plan (HMBP) shall include the following:

1. Detailed, site-specific emergency response protocols, including clear shelter- in place procedures;
2. Identify and clearly mark evacuation routes from Project facilities;
3. Implementation of emergency communication systems to notify nearby residents and facilities in the event of an emergency;
4. Project operator shall coordinate with local emergency response teams to ensure a timely and effective response in the event of a catastrophic release, fires, or other hazardous incidents at the Project site;
5. Provide comprehensive worker training consistent with Title 8 CCR Section 5192, including, but not limited to, instruction on the hazardous materials present on-site, methods to reduce exposure risk, and safe handling procedures.

C. AGRICULTURAL RESOURCES

i. Developer shall preserve a total of 6.3 acres of Prime Farmland at the Project site.

Note: This condition of approval increases *Mitigation Measure AFR -1 (Agriculture and Forest Resources)* by 2 acres.

Acknowledgment:

I hereby declare under penalty of perjury that I have read the foregoing conditions, which are in fact the conditions that were imposed upon the granting of the Conditional Use Permit, and that I agree to abide fully by said conditions. Additionally, I have read the Staff Report and I am aware of codified county, state, and/or federal standards and regulations that shall be met with the granting of this permit. I have the proper legal authority to, and am signing on the behalf of, those with interest in:

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC
Advanced Thermal Conversion

Signed: _____ Date: _____

Wayne McFarland, Owner, SynTech CF1, LLC

Signed: _____ Date: _____

William Carriere, Carriere Family Farms, Landowner

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June 6, 2025

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Via Email
Andy Popper, Principal Planner
Email: apopper@countyoglenn.net

Re: Notice of Settlement – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas and Mr. Popper,

This firm represents Citizens for Responsible Industry ("Citizens") regarding the above-referenced Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project"). On April 15, 2025, Citizens submitted written comments to Glenn County ("County") on the Project's March 2025 Mitigated Negative Declaration/Initial Study ("MND"), alleging factual and legal errors in the County's environmental review of the Project under the California Environmental Quality Act ("CEQA"), Public Resources Code Section 21000 *et seq*.

Citizens is pleased to report that, as a result of direct discussions with SynTech CF1, LLC ("Applicant"), Citizens has entered into a legally enforceable settlement agreement with the Applicant. The Applicant has committed to implementing additional measures beyond those specifically called out in the MND to address several of the environmental concerns raised by Citizens, including, but not limited to: air quality, public health, hazards, and agricultural resources, and asks that the County include the measures as mitigation measures or conditions of approval for the Project. The measures are set forth below.

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A. AIR QUALITY AND PUBLIC HEALTH

i. **Best Available Control Technology (BACT)**: Developer shall apply BACT to the Project's new emissions units and any modifications of an existing emissions unit which result in an emissions increase where the emissions unit's potential to emit is equal to or exceeds the following amounts:

Pollutant	Pounds per Day
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ii. **Offsets:** Developer shall implement emission reductions from existing emission sources at the Project site with a potential to emit non-attainment pollutants or their precursors equal to or exceeding 25 tons per year. Offsets shall be calculated pursuant to Glenn County Air Pollution Control District ("GCAPCD") Regulations, Article III, Sec. 51, and shall be sufficient to offset calendar quarter emission increases of non-attainment pollutants or their precursors associated with the new or modified stationary source.

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B. HAZARDS

i. The Project's Hazardous Materials Business Plan (HMBP) shall include the following:
   1. Detailed, site-specific emergency response protocols, including clear shelter-in place procedures;
   2. Identify and clearly mark evacuation routes from Project facilities;

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3. Implementation of emergency communication systems to notify nearby residents and facilities in the event of an emergency;
4. Project operator shall coordinate with local emergency response teams to ensure a timely and effective response in the event of a catastrophic release, fires, or other hazardous incidents at the Project site;
5. Provide comprehensive worker training consistent with Title 8 CCR Section 5192, including, but not limited to, instruction on the hazardous materials present on-site, methods to reduce exposure risk, and safe handling procedures.

C. AGRICULTURAL RESOURCES

i. Developer shall preserve a total of 6.3 acres of Prime Farmland at the Project site.

With the Applicant's agreement to implement the additional measures above, the issues raised by Citizens regarding the Project have been addressed and resolved. Citizens hereby supports the Project and requests that the County approve the Project.

Thank you for your attention to this matter.

Sincerely,

Alaura McGuire

ARM:acp

7836-021acp

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MITIGATED NEGATIVE DECLARATION: APPLICANT'S RESPONSE

MEETING DATE: _____

PROJECT TITLE: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

LEAD AGENCY: Glenn County Planning & Community Development Services Agency
225 N. Tehama St.
Willows, California 95988

CONTACT: Andy Popper, Principal Planner
(530) 934-6540
apopper@countyofglenn.net

LOCATION: The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

APN: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

APPLICANT: SynTech CF1, LLC, wholly owned subsidiary of SynTech Holdings, LLC
Wayne McFarland, Owner
1625 Broadway Street, Suite 119
Fresno, CA 93721
(815) 513-3363
wmcf@syntechbioenergy.com

LANDOWNER: Carriere Family Farms
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Glenn, CA 95943
(530) 934-8200
wcarriere@carrierefarms.com

ENGINEER: Jason Vine
1767 Market Street, Suite C1
Redding, CA 96001
(530) 526-7493
jason@realm-engineering.com

ZONING: "FS-80" Farmland Security Zone
GENERAL PLAN: "Intensive Agriculture"

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Executive Summary

This document provides the Carriere/SynTech CF1, LLC (SynTech) formal response to the comments submitted by Citizens for Responsible Industry and their consultant, Dr. Komal Shukla, (together "Citizens") regarding the Mitigated Negative Declaration (MND) prepared for the Advanced Thermal Conversion Project (the Project) proposed by SynTech CF1, LLC (Applicant). The comments raise twelve principal objections to the adequacy of the MND under the California Environmental Quality Act (CEQA). Each objection has been reviewed in detail and is addressed in the pages that follow.

After a comprehensive analysis, the Applicant respectfully submits that:

- The MND complies with all procedural and substantive requirements of CEQA.
  The environmental baseline was accurately described, public review requirements were met, and the Initial Study properly applied CEQA's "fair argument" standard. No violations of disclosure or due process have occurred.

- Air quality, health risk, and emissions impacts are fully addressed and mitigated.
  The Project is subject to mandatory permitting through the Glenn County Air Pollution Control District (GCAPCD), which ensures compliance with air quality thresholds and Best Available Control Technology (BACT). Citizens' emissions modeling and health risk concerns rely on speculative assumptions and are not supported by site-specific data.

- Greenhouse gas and energy impacts are less than significant.
  The Project uses on-site agricultural byproducts to produce renewable natural gas (RNG) and biochar, displacing fossil fuel use and delivering a net carbon benefit based on a life cycle analysis, because the CO2 emissions from the facility will be more than compensated for by avoided emissions of CO2 from the fossil fuels displaced by our RNG and CO2/CH4 from disposal of waste walnut shells by combustion, landfilling, or land application. CEQA allows a qualitative analysis in this context and no evidence has been presented that emissions would exceed any applicable threshold.

- Biological resources, farmland conversion, and hazards are properly mitigated.
  The site is previously disturbed and lacks sensitive habitat. Pre-construction surveys and setbacks are required. Agricultural mitigation offsets are in place, and safety concerns are addressed through design controls and regulatory compliance.

- Cumulative impacts are analyzed and do not require preparation of an Environmental Impact Report (EIR).
  The MND evaluates cumulative conditions using existing environmental data and concludes reasonably that the Project will not result in significant effects.

In total, no substantial evidence has been submitted that the Project will result in a significant, unmitigated environmental impact. The MND reflects a thorough, conservative, and well-documented analysis. As such, adoption of the Mitigated Negative Declaration remains appropriate and legally defensible under CEQA.

SynTech respectfully requests that the Glenn County Planning Commission adopt the MND and approve the Project as proposed.

Citizens' Objection	Applicant's Response
Procedural CEQA violations	Disputed with documentation access timelines, regulatory standards, and fair argument analysis
Environmental setting	Supported with baseline conditions, existing site use, and distance from sensitive receptors
Air quality and emissions	Addressed via permitting from GCAPCD authority, CEQA authority, and dismissal of hypothetical modeling
Health risks	Explained distance from sensitive receptors, emissions controls, and deferral to "Hot Spots" assessment
GHG and energy	Supported through qualitative CEQA-compliant analysis and lifecycle carbon benefits
Hazards and upset risk	Responded with fire code compliance, emergency planning, and system design features
Prime farmland and land use	Addressed through zoning consistency, agriculture support functions, and mitigation plan
Emissions estimates and BACT	Explained through GCAPCD permitting, system design, and CEQA approval process
Biological resources	Addressed with disturbance-level analysis and mitigation by pre-construction survey
Wastewater and noise	Shown to be minor, fully regulated, and within CEQA thresholds
Cumulative impacts	Demonstrated no additive significance and proper CEQA cumulative analysis

Overall CEQA conclusions	Affirmed with substantial evidence and absence of any significant unmitigated impact

I.____Introduction

Carriere/SynTech CF1, LLC (SynTech) appreciates the opportunity to respond to the comments submitted by Citizens for Responsible Industry and their consultant, Dr. Komal Shukla[1], (together "Citizens") regarding the Mitigated Negative Declaration (MND) prepared for the Advanced Thermal Conversion Project (the Project) proposed by SynTech CF1, LLC (Applicant). We have reviewed their submission thoroughly and, although we appreciate their concern, we respectfully disagree with its conclusions.

The Project will not have a significant environmental impact. As documented in the Initial Study and supported by the record, the Project has been carefully designed with robust mitigation measures and operational controls to ensure that all potential environmental effects are reduced to less-than-significant levels.

We address each point raised in the comments in the sections that follow, demonstrating that the MND satisfies all requirements under the California Environmental Quality Act (CEQA), is supported by substantial evidence, and remains the appropriate environmental document for the Project. Based on the full record, approval of the Project through adoption of the MND is both legally sound and environmentally responsible.

II.___CEQA Compliance and Procedural Adequacy

The County complied with CEQA's public disclosure obligations under Public Resources Code § 21092(b)(1) and CEQA Guidelines § 15072(g)(4). At every stage of environmental review, Glenn County and the Applicant took reasonable, good-faith steps to ensure public access to referenced documents, consistent with CEQA's requirements for transparency and public participation.

A. Public Access and Document Availability

The Initial Study and MND, including all referenced appendices, were made available for public review on the County's website and were available in physical form upon request at the Planning Department during normal business hours throughout the full 30-day public comment period. The documents were posted on the CEQAnet portal (State Clearinghouse No. 2024120076), consistent with the requirement to make all referenced materials "readily accessible to the public" under CEQA Guidelines § 15072(g)(4).

Citizens claim that certain records, specifically, air quality data and supporting calculations, were not made available in response to its March 26, 2025 request; however, these materials

[1] The header of Dr. Shukla's response references the wrong project, is dated March 11, 2024 and refers to Imperial County, California. It doesn't appear, at least in part, to relate to the Project; however, the Applicant will nonetheless respond to it insofar as it does.

were not cited in the MND as standalone documents, but were instead summarized within the body of the MND and incorporated into the Conditions of Approval, including the requirement that all emissions data and air pollution control equipment specifications be submitted as part of the Authority to Construct (ATC) application. The MND states, "All new sources of air pollution and the air pollution control equipment including emissions estimates shall be included in the ATC (Authority to Construct) application." This means the emissions calculations were not omitted, but instead are deferred to the ATC process, a standard practice for CEQA where agency-level permit conditions address site-specific technical detail beyond the scope of the initial environmental review. Here the Condition of Approval requires compliance with Glenn County Air Pollution Control District (GCAPCD) permitting, which includes emissions analysis.

The April 4, 2025, request to extend the comment period was also considered in light of CEQA's mandatory timelines and the availability of the core project documents. No information relevant to the fair evaluation of environmental impacts was withheld.

B. Application of CEQA's "Fair Argument" Standard

Citizens rely on the "fair argument" standard to argue that an Environmental Impact Report (EIR) is required. However, this standard does not mandate an EIR when there is the possibility of significant impact. As CEQA Guidelines § 15064(f)(1) makes clear, an EIR is required only where substantial evidence in the record supports a fair argument of a significant effect. According to CEQA Guidelines § 15064(f)(2), even if there were substantial evidence in the record, an EIR is still not mandated if the applicant mitigates the effects to a point where clearly no significant effect on the environment would occur and there is no substantial evidence in light of the whole record that the project, as revised, may have a significant effect on the environment.

Here, the MND evaluates potential environmental impacts using accepted methodologies and conservative assumptions. Where impacts could approach significance, mitigation measures and Conditions of Approval have been imposed to ensure they remain below threshold levels. For example, emissions are subject to regulatory oversight by GCAPCD and air quality compliance will be confirmed through the ATC process prior to operation. The MND appropriately disclosed these conditions and relies on the oversight of the responsible permitting agencies, which is consistent with CEQA's framework for tiered environmental review.

In sum, the County has satisfied all procedural obligations under CEQA. The MND is complete, publicly accessible, and properly scoped. No supplemental documentation has been withheld that would materially alter the County's decision. The Project's potential impacts have been thoroughly evaluated, and the findings of less-than-significant effect are well supported.

III. Land Use Inconsistencies

The Project is consistent with Glen County's General Plan and Farmland Security Zone (FS-80) and in the Intensive Agriculture (IA) land use designation. Any concern that it would displace viable agricultural operations and require a general plan amendment is due to a misunderstanding of the Project's function and the intent of Glen County's General Plans IA designation.

A. Alignment with Agricultural Objections

The Project supports, not displaces, the agricultural use of the property and is a critical part of ongoing agricultural operations. It is co-located with, and directly tied, to an active walnut processing operation. It supports a sustainable method of waste mitigation by processing 135,000 tons of walnut shells annually that would otherwise decompose in a landfill producing methane and CO2 as they decompose. These shells are produced entirely onsite and will be used as feedstock. This closed-loop model supports the agriculture economy by creating an additional value-added product from material produced by an existing agricultural operation. This increases the economic and environmental viability of Carriere's agricultural operations by creating renewable energy and providing a new revenue stream for farmers, while maintaining active farmland.

The Glenn County General Plan expressly encourages agricultural diversification and value-added uses that support long-term viability of farming. Specifically:

- Policy AG 2-5: Promote best management practices in agricultural operations to reduce emissions, conserve energy and water, promote soil health, and utilize alternative energy sources.
- Policy AG 3-2: Agricultural-related industrial and commercial support operations shall be permitted on agricultural designated lands. Such uses may include, but are not limited to, processing, assembly, distribution and warehousing of agricultural materials and commodities and alternative energy systems that provide energy for on-site uses.
- Policy ED 3-5: Promote the use of solar technology, cogeneration, biomass systems, and water reuse to reduce the long-term operational costs for businesses and provide a sustainable approach to water and energy use.

B. Farmland Conversion is Not Mischaracterized

The Project will not convert 4.3 acres of prime farmland and, therefore, will not trigger a significant impact under CEQA. Glenn County's General Plan at ED 3-5 states, in part, that "Renewable energy projects should not be approved or developed in such a way as to displace viable agricultural operations or render prime farmlands unusable for agricultural activities." The Project does not contradict this objective. The Project is located on a small portion of marginal land adjacent to existing buildings. The project does not significantly remove prime agricultural land from production. This area is already disturbed and does not currently support walnut production. It has historically been used as part of the shelling facility's operational footprint. The Project does not displace agriculture. Instead, it upholds the intent of the Glenn County's General Plan by enabling the sustainable continuation of agriculture for its designated land use.

Citizen's raise a concern that Mitigation Measure AR-1 is inadequate, but this overlooks the critical fact that the Condition of Approval requires that the Project set aside, in perpetuity/project life, another piece of prime farmland the same size as the Project. This is typically referred to as "land banking." Mitigation Measure AR-1 ensures a 1:1 conversion ratio, preserving an equal amount of prime farmland elsewhere on the site or under a conservation agreement in perpetuity, consistent with Glenn County Code § 15.830.030(E)(2)(a).

The claim that the Project "does not qualify" as an allowable use under IA zoning ignores that:

- The Glenn County Zoning Code permits alternative energy facilities in IA zones with a conditional use permit.
- The Project is directly tied to, and enhances, the viability of ongoing agricultural operations by processing on-site byproducts.

C. No General Plan Amendment is Required

An amendment to the General Plan is not required, because the Project:

- Does not introduce non-agricultural industrial use but instead adds an ancillary facility that converts agricultural waste.
- Does not convert land use for cultivation or irrigation.
- Does not introduce incompatible urban encroachment.
- Complies with the IA zone's intent to preserve land for long-term agricultural use.

The Project aligns with the General Plan and zoning code. It preserves agricultural land in production, enhances farm sustainability, while integrating with existing operations. The MND

correctly finds that land use impacts are less than significant, and an amendment is not warranted.

IV. Inadequate Description of Environmental Setting

The MND accurately represents baseline conditions, specifically the air quality conditions at the Project site, as supported by both CEQA requirements and the actual content of the MND.

A. Baseline Conditions are Properly Established

CEQA requires that the environmental setting be based on existing physical conditions at the time of the environmental review. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts (CEQA Guidelines § 15125(a)). The MND satisfies this standard by describing the Project site as being located on an existing active walnut processing facility, surrounded by agricultural land, and in an area with low population density. The MND incorporates regional air quality designations, land use context, and operational conditions into its environmental setting. The MND addresses the geographic area of the project and the current baseline that it controls by identifying the current Vehicle Miles Traveled (VMT) and stating that the Project will not significantly increase the current VMT.

B. Baseline Facility Emissions Are Part of the Project Baseline

Citizens cite the 2018 AB 2588 Hot Spot Report which identifies the existing Carriere Family Farms shelling facility as an intermediate risk facility; however, although we appreciate their concern, this existing permitted operation is separate from the Project. Any emissions associated with current operations are already part of the environmental baseline. The Project will not significantly affect this baseline. CEQA analysis focuses on the practical possibility of the Project's likely near-term and long-term impacts on baseline conditions. The MND clearly separates existing conditions from new Project components and imposes mitigation where new emissions or land use changes are proposed. Dr. Shukla's health risk assessment does not account for the effect the Project will have on the baseline or any proposed mitigation. Her analysis is hypothetical. CEQA Guidelines at § 15125(a)(3) states that a lead agency may not rely on hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline.

C. Sensitive Receptors Are Identified and Addressed

The MND evaluates sensitive receptors by confirming that the Project is adjacent to the existing agricultural processing facility and in an area zoned for agriculture uses. There are no schools, churches, hospitals, recreation areas, or other public facilities within the immediate vicinity of the project site. Although, as Citizens points out, one residence is located approximately 450 feet from the site, the MND correctly mitigates any risk by complying with applicable local, state and federal laws and regulations regarding contaminants and pollutants (Glenn County Code § 15.560.040). Compliance with existing regulations reduces risk exposure to less than significant levels.

The MND accurately defines the baseline and provides sufficient methods for determining the Project's impact and mitigating any possible negative effects. Citizens' response relies on hypothetical measurements and a misleading comparison to baseline levels.

V.____Air Quality and Health Risk Impacts

The MND appropriately evaluates air quality impacts using regional standards and incorporates mitigation strategies consistent with CEQA and GCAPCD requirements in keeping with the purpose and scope of a CEQA review and the regulatory framework under which emissions are managed.

A._____Emissions Are Accounted for Through Regulatory Oversight

As stated in the MND, the Project is subject to an ATC and Permit to Operate (PTO) through GCAPCD. As a condition of Project approval (Condition of Approval), the Applicant must submit detailed emission data, air pollution control equipment specifications, and modeling to GCAPCD prior to construction. This standard is acceptable under CEQA, particularly for facilities requiring a post-approval air quality permit. The MND's role is not to duplicate the permit process, but to identify whether Project level emissions may exceed CEQA significance thresholds. It does this by committing the Project to regulatory compliance, which CEQA recognizes as a valid form of mitigation. CEQA Guidelines § 15126.4(a)(1)(B) states:

> The specific details of a mitigation measure, however, may be deferred when it is impractical or infeasible to include those details during the project's environmental review and the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) lists the potential actions to be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit process may be identified as a future action in the proper deferral of mitigation details if compliance is mandatory and would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

Although we appreciate Citizens' concern, the Project will not exceed the CEQA standard with these controls in place.

B. Expert Opinion Does Not Constitute Specific Evidence Without Site-Specific Data

Citizens rely heavily on a report by Dr. Komal Shukla. This report draws conclusions from unrelated facilities that do not reflect Project specific operations. For example, when referring to her concern around dust generation, she cites wind speed data for Willow, CA. She then extrapolates the impact of wind-borne dust at the Project site; however, the Project site is located twelve miles from Willows, CA, and, due to local terrain and weather patterns, wind speeds in Willows are typically 5-10 mph higher than at the Project site.

The GCAPCD has standard construction requirements that cover dust and noise, worker safety, and sanitation, which will be followed by the Project. There are no exceptional construction-related air quality risks associated with this development that would differ significantly from that of any other construction project already undertaken to build roads, utilities, buildings, and services already present in the area. The Project will coordinate with local districts and bodies to demonstrate compliance with all applicable construction requirements, including watering down dust during construction, monitoring weather conditions and phasing of construction schedules, managing vehicle activity, providing shaded areas and other worker-safety accommodations, and providing on-site restrooms.

CEQA requires substantial evidence based on facts related to the specific project. Dr. Shukla's analysis, though detailed, is hypothetical and based on worst case scenarios. Notably, Dr. Shukla applies thresholds from the Sacramento Metropolitan AQMD, which do not govern Glenn County and are not adopted by the GCAPCD. The MND reflects a conservative approach, which requires compliance with all GCAPCD limitations, which will be enforced through the ATC process.

C. Dr. Shukla's Report is Based on Speculation and Incorrect Assumptions

In support of its argument that the MND fails to properly address construction or operation emissions, Citizens rely heavily on a report (Exhibit A) prepared by Dr. Shukla that is based on broad, incorrect assumptions. Section 4.1 of Exhibit A contains several statements about how emissions of contaminants "may" occur as a result of the Project. These concerns are based on generalized assumptions associated with the thermochemical processing of biomass, which are not relevant to the actual, specific processes that will be performed at the Project. For example, the first paragraph of Section 4.1 of Exhibit A (pg. 12) states, "The MND fails to include a sufficient description of the facility's operational processes and fails to quantify emissions from key operations, including biomass conversion, syngas production, gas cleanup, flaring, and backup power generation." The Project does not include any equipment or processes for the flaring of gases.

Throughout her report, Dr. Shukla cites references that are invalid and/or irrelevant to the topics being addressed. The table below contains descriptions of the errors associated with each of the problematic citations associated with the inaccurate statements from the report that are addressed in the following discussion.

Citation #	Problems with citation
19, 20	These references were cited in support of the following statement: "These are common processes in ATC operations and are known to emit a range of pollutants, including criteria pollutants, hazardous air pollutants (HAPs), and GHGs.[19,20]". Citation 19 refers to a non-technical, general government website (https://www.eia.gov/energyexplained/biomass/biomass-and-the-environment.php) that includes discussions about waste burning (combustion) and biogas (from anaerobic digestion), but contains no information about or references to gasification. Citation 20 (https://www.sciencedirect.com/science/article/abs/pii/S1352231018308811) refers to an article published in 2019 that presents results from a study using a 20 kW Power Pallet gasifier-generator (All Power Labs, Berkeley, CA) that was operated at a maximum load of 15 kW using chipped woody biomass as a feedstock; however, this is not comparable to the equipment and operations comprising the Project.
21	The footnote for Citation 21 states: "Refer to 'Project Description' Para. 2-3 on Pg. 6 of Glenn County Planning & Community Development Services Agency Staff Report". Page 6 of the Staff Report does not contain any information about particulate matter, dust, or odors associated with biochar.
22	The footnote for Citation 22 states: "Refer to 'Project Description' Para. 3 on Pg. 7 of Glenn County Planning & Community Development Services Agency Staff Report". Page 7 of the Staff Report does not contain any information about trace contaminants in syngas or PG&E's quality standards for RNG.
23	The footnote for Citation 23 states: "Refer to 'Project Description' Para. 3 on Pg. 7 of Glenn County Planning & Community Development Services Agency Staff Report". Page 7 of the Staff Report does not contain any information about the methanation process and the emissions potentially associated with it.
24	Citation 24 is a reference in support of the following statement: "Additionally, CO_2 removed during upgrading may be recirculated to enhance RNG production efficiency. Emissions from backup power generation—used to support facility operations—may include particulate matter from syngas combustion, NO_x and CO from incomplete combustion, and overall greenhouse gas (GHG) emissions, all of which require proper quantification and control measures to mitigate air quality impacts.[24]" This citation refers to a non-technical, general government website (https://www.epa.gov/lmop/renewable-natural-gas) that contains no information related to emissions from backup power generation used to support operations in any type of RNG production facility.

25, 26, 27, 28, 29, 30, 31	These citations are for emission factors reported for CO, CO_2, NO_x, SO_2, $PM_{2.5}$, PM_{10}, and VOCs in Table 1 of Exhibit A (pg. 14; "Emission Factors for Biochar Production"). The reference for Citations 25, 27, and 28 (https://www.epa.gov/sites/default/files/2020-09/documents/1.4_natural_gas_combustion.pdf) is a document with the heading "Natural Gas Combustion" that does not contain any information related to biochar. Table 1.4-1 in the cited document is titled "EMISSION FACTORS FOR NITROGEN OXIDES (NOx) AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION" and contains emissions factors for the combustion of natural gas in boilers and furnaces. The reference for Citations 26, 29, 30, and 31 (https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf) is a document containing information about the combustion of wood residues (e.g., dry wood, wet wood, bark) in boilers. It has no relation to gasification or biochar production In addition, Table 1.6-2 of this document does not contain any information related to emissions of carbon dioxide (CO_2) even though it is cited as the source of the emission factor reported for CO_2. The emission factors referenced here have no relevance to the Applicant's process of gasifying walnut shells to produce syngas and a biochar co-product, which does not involve combustion of natural gas, biomass, biochar, or anything else.
32, 34, 35, 36, 37	These citations are for emission factors reported for CO, NO_x, $PM_{2.5}$, PM_{10}, and VOCs in Table 3 of Exhibit A (pp. 15-16; "Emission Factors for RNG Production"). The reference for these citations (https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf) is the same as the reference for Citations 26, 29, 30, and 31 — i.e., a document containing information about the combustion of wood residues (e.g., dry wood, wet wood, bark) in boilers. The document does not contain any information about emission factors associated with the production or combustion of RNG.
33	Citation 33 is for the emission factor reported for CO_2 in Table 3 of Exhibit A (pp. 15-16; "Emission Factors for RNG Production"). This citation refers to a website (https://www.epa.gov/ghgemissions/assumptions-and-references-household-carbon-footprint-calculator) that gives information about household sources of CO_2 emissions. It includes carbon coefficients for emissions associated with combustion of natural gas in household natural gas consuming devices. This has no relevance to calculating emissions associated with the production of RNG
N/A	In Table 3 of Exhibit A (pp. 15-16; "Emission Factors for RNG Production"), the source for the emission factor for CH_4 is listed as "Given in MND", with no citation or any specific information about where in the MND this emission factor was obtained. No emission factor for CH_4 associated with RNG production appears anywhere in the MND.

Under the first subheading of Section 4.1 of Exhibit A ("Biomass Conversion", pg. 12), the following statement is made:

> "Biomass conversion processes generate fine particulate matter (PM) and dust during the handling, transfer, and storage of materials such as biochar, particularly due to the dry and bulk nature of the feedstock. Biochar, a carbon-rich byproduct of

thermochemical conversion, may also emit odors when exposed to varying moisture levels or atmospheric conditions.[21]"

The Project's automated system for removing the biochar coproduct from the gasifier is a completely closed system that transports biochar into sealed storage containers. There will be no significant release of particulate matter, dust, or odors associated with the handling, transfer, or storage of biochar. In previous projects using BioMax units equipped with the same biochar removal system to gasify walnut shells at Dixon Ridge Farms and Premiere Mushrooms, the Applicant encountered no issues with emissions of particulate matter, dust, or odor from the handling, transfer, and storage of biochar.

Under the second subheading of Section 4.1 of Exhibit A ("Syngas Production", pg. 12), the following statement is made:

> "During syngas production and gas cleanup, raw syngas undergoes multi-stage filtration to remove particulate matter, sulfur compounds, and trace contaminants such as hydrogen sulfide (H_2S) and ammonia (NH_3) to meet Pacific Gas and Electric (PG&E)'s renewable natural gas (RNG) quality standards.[22] However, incomplete filtration may still result in the release of residual PM and sulfur-based emissions."

The Project's gasifiers will be injected with steam and oxygen instead of air. As a result, there will be no atmospheric nitrogen entrained into the gasifiers. The only nitrogen present during the gasification process will come from nitrogenous compounds in the feedstock (walnut shells), which contain only 0.21-0.62% nitrogen by weight (dry basis)[2]. It is not anticipated that nitrogen contained in the walnut shells will be converted to ammonia to an appreciable extent during gasification. But even if that did occur, ammonia would be present in the syngas in only trace amounts and would be readily removed during filtration of the syngas.

The syngas produced in the gasifiers will not contain a significant amount of sulfur-derived compounds because the sulfur content of walnut shells is also low: 0.1-0.13% by weight (dry basis). Any trace amounts of sulfur-derived compounds that may get produced would be readily removed during filtration of the syngas. This is evidenced by results from third-party emissions testing at the Applicant's BioMax facility at Dixon Ridge Farms to verify compliance with the District Rule, regulations, and Permits to Operate granted by the Yolo-Solano Air Quality Management District[3]. TRC Environmental Corporation, Bakersfield, CA, pp. 2-5). The BioMax units at this facility were configured to utilize syngas produced by gasifying walnut shells as fuel in engine/generator sets to produce electricity.

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[2] Antal, M.J., Allen, S.G., Dai, X, Shimizu, B., Tam, M.S. and Grønli (2000), Attainment of the theoretical yield of carbon from biomass. Ind. Eng. Chem. Res. 39, 4024-4031; O. Kitani and C. W. Hall: Biomass Handbook, Gordon and Breach science publishers, New York (1989).

[3] TRC Environmental Corporation (2017, May 5). Test Report: Compliance Testing of Four Natural Gas Fired Internal Combustion Engines, Dixon Ridge Farms, Winters, California (No. 272284.0000.0000.

Applicant's proprietary design of the gasifiers and their operating conditions result in production of a syngas that contains very low levels of tars and particulates, even before filtration. After the filtration process, the syngas is virtually free of tars and particulate matter. Moreover, the syngas production and gas filtration systems are closed to the atmosphere and contain no points of emission, so there will be no release of contaminants possible unless there were leaks in the equipment components that resulted in fugitive emissions. Applicant will have a program in place to regularly inspect and monitor for fugitive emissions throughout the facility to ensure operational safety and verify that there are no significant releases of pollutants.

Under the third subheading of Section 4.1 of Exhibit A ("Gas Cleanup Process", pg. 12), the following statement is made:

> "The methanation process—specifically through the LiquiMax catalytic system—converts methane precursors in the syngas into pipeline-grade RNG by enhancing methane (CH_4) content while removing non-methane gases.[23] This stage can produce emissions of carbon dioxide (CO_2), trace amounts of carbon monoxide (CO) and methane (CH_4), as well as nitrogen oxides (NO_x) potentially generated from catalytic reactions at high temperatures."

In the Project's methanation process, filtered syngas will be sent to a catalyst bed that will convert components of syngas to CH_4. The gas stream exiting the methanation process will also contain CO, CO_2, and H_2O. The gas separation process following the methanation process will: 1) send CH_4 to the cleanup and storage systems for RNG; 2) recirculate CO back to the gasifier to increase the yield of CH_4 from the overall production process; and 3) release CO_2 and H_2O at a single exhaust point. During facility operations, samples collected regularly from the project's single exhaust point after the gas separation process will be analyzed to verify compliance with the emission limits specified in the Permit to Operate issued for the project by the GCAPCD.

Under the third subheading of Section 4.1 of Exhibit A ("Backup Power Generation", pg. 13), the following statement is made:

> "Additionally, CO_2 removed during upgrading may be recirculated to enhance RNG production efficiency. Emissions from backup power generation—used to support facility operations—may include particulate matter from syngas combustion, NO_x and CO from incomplete combustion, and overall greenhouse gas (GHG) emissions, all of which require proper quantification and control measures to mitigate air quality impacts.[24]"

CO_2 will not be recirculated to the gasifiers at the Project, as that would detract from, rather than enhance, the yield of the RNG product. It would also make it more difficult to balance the fluxes of gasses into and out of the gasifiers. As discussed above in the response to the Gas Cleanup Process comments, CO_2 separated from the gas stream after the methanation process will be vented to the atmosphere at the single point of emissions for the system.

The backup power generation system at the Project will be very similar to the configuration of the BioMax units at the Applicant's Dixon Ridge Farm facility. Filtered syngas derived from the gasification of walnut shells will be sent to engine/generator sets to produce electricity. At the Dixon Ridge Farm facility, verification testing was performed by a third party to demonstrate compliance with District Rule, regulations, and Permits to Operate granted by the Yolo-Solano Air Quality Management District[4]. Samples collected from the single exhaust point were analyzed for NO_x, CO, SO_2, and VOC. The concentrations of these pollutants in the engine exhaust were all below the limits specified by YSAQMD.

Section 4.2 of Exhibit A is titled "Air Pollutant Emissions Estimation for Biochar and RNG Production" (pg. 13). The first sentence of the first paragraph of that section (pg. 13) states that, "The ATC production process is expected to generate significant carbon dioxide emissions, primarily as a byproduct of biomass combustion and gasification". This statement reflects a misunderstanding of the Project' process, as there is no combustion of biomass at any point of the production process. In addition, the gasifiers and downstream equipment for filtering the syngas and conveying it to the methanation process comprise a closed system containing no points of emission for any of the gaseous products of the gasification process.

"Biochar Production – Emissions from Biomass Pyrolysis and Combustion" is the first subheading in Section 4.2 of Exhibit A (pg. 13). As stated in the previous paragraph, no combustion of biomass occurs at any point of our production process.

In her calculations of emissions associated with the Project's gasification process, Dr. Shukla misuses EPA emissions data for the combustion of natural gas and wood residues (e.g., dry wood, wet wood, bark) in boilers and furnaces (Citations 25, 26, 27, 28, 29, 30, 31 from Exhibit A[5]). The cited emission factors have no relevance to our ATC process for producing RNG and biochar in a highly controlled, low-oxygen gasification environment. This misrepresents the Project, because burning the feedstock (walnut shells) and products (RNG and biochar) of the process would be antithetical to the purpose of the Project, which is to produce sustainable fuel and capture energy from biomass, not to convert biomass to waste gases that will be emitted to the atmosphere.

Not only are the emission factors listed in Table 1 of Exhibit A ("Emission Factors for Biochar Production") unrepresentative of our process, the subsequent calculations presented by Dr. Shukla using these emission factors are ambiguous and inaccurate. On pg. 14 of Exhibit A, it is stated that the daily emissions of the pollutants emitted from biochar production are calculated "Using the given daily production value of 15 tons/day and multiplying that by the emissions [sic] factor" presented in Table 1 for each pollutant. The resulting values for daily emissions of these pollutants are presented in Table 2 of Exhibit A. The units in the heading for the daily emissions are erroneously stated to be in "tons/day" — the correct units would be lbs/day. For

[4] TRC Environmental Corporation, op. cit., pp. 2-5

[5] https://www.epa.gov/sites/default/files/2020-09/documents/1.4_natural_gas_combustion.pdf; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

example, multiplying 15 tons/day by the given emission factor for CO of 4.6 lbs/ton gives a value of 69 lbs/day, not 69 tons/day (i.e., 138,000 lbs/day, off by a factor of 2000) as shown in Table 2 of Exhibit A.

In addition, the underlying basis for these calculations is invalid. From the subheading "Biochar Production – Emissions from Biomass Pyrolysis and Combustion", the title of the table in which the emission factors appear ("Emission Factors for Biochar Production"), and the statement that the emissions were calculated were made "using the given daily production value of 15 tons/day", it appears that the given emission factors are representing the pounds of each pollutant emitted per ton of biochar produced. Calculating emissions associated with the gasification of walnut shells by multiplying the amount of biochar produced by emission factors for the combustion of natural gas or wood residues (e.g., dry wood, wet wood, bark) in boilers and furnaces is flawed logic. This would imply that 1) gasifying walnut shells in a closed gasifier produces the same amount of emissions as the combustion of natural gas or wood residues (e.g., dry wood, wet wood, bark) in boilers and furnaces; and 2) the products of the gasification process would be released to the atmosphere instead of being sent to the subsequent methanation process, where they are utilized as the raw material for producing RNG.

Alternatively, if the emission factors listed in Table 1 of Exhibit A were supposed to represent the pounds of each pollutant emitted per ton of biochar combusted, that would be an even larger misunderstanding. The biochar produced by our process is collected and stored for export as a valuable co-product. Our process does not involve combustion of biochar or any other material.

The concern that the gasification of walnut shells will result in emissions to the atmosphere is misplaced. No gases will be released to the atmosphere during the gasification process. The purpose of the gasification process is to convert walnut shells to syngas that will be sent to the methanation process to produce RNG. It would be counterintuitive, therefore, to release this valuable gas into the atmosphere. As explained previously, the gasifiers and the downstream equipment for filtering the syngas and conveying it to the methanation process constitute a system that is completely closed to the atmosphere and has no points of emission. The only way that gases could be released to the atmosphere would be from fugitive emissions associated with leaks in valves, seals, pipes, and other equipment components; however, the Applicant will have mitigation measures in place to regularly inspect and monitor for fugitive emissions throughout the facility to ensure operational safety and verify that there are no significant releases of pollutants.

"RNG Production – Emissions from Methanation and Combustion" is the second subheading in Section 4.2 of Exhibit A (pg. 15). The first paragraph under this subheading contains the following statement:

> "Methane slip" may occur during methanation and purification, while RNG combustion emits CO_2, NO_x, CO, PM_{10}, and VOCs."

This demonstrates a misunderstanding of the Project's process. "Methane slip" refers to the release of unburned methane from engines that use natural gas as a fuel, which has no relevance to the Project. As stated previously, no combustion of RNG or any other material occurs at any point of production.

The first paragraph under this subheading also contains the following statement:

> "RNG production involves methanation of syngas, followed by upgrading to meet PG&E's Rule 21. Raw syngas undergoes filtration to remove impurities like hydrogen sulfide (H_2S) and ammonia (NH_3), which can produce CO_2, CO, CH_4, and NOx emissions."

The basis for claiming that the removal of impurities from syngas by filtration will somehow produce CO_2, CO, CH_4, and NO_x emissions is not clear.

In a similar manner to her calculations of emissions associated with the Project's gasification process, Dr. Shukla cites emission factors that have no relevance to the Project's methanation process for upgrading syngas to produce RNG. She once again misuses EPA emissions data for the combustion of wood residues (e.g., dry wood, wet wood, bark) in boilers and furnaces (Citations 32, 34, 35, 36, and 37 from Exhibit A[6]). For her cited emission factor for CO_2 (Citation 33 from Exhibit A), she refers to a website containing information about household sources of CO_2 emissions and data for emissions associated with combustion of natural gas in household natural gas consuming devices[7]. This has no relevance to calculating emissions associated with the production of RNG. The source for her emission factor for CH_4 is reported as "Given in MND", with no citation or any specific information about where in the MND this emission factor was obtained. No emission factor for CH_4 associated with RNG production appears anywhere in the MND.

These emission factors, which are listed in Table 3 of Exhibit A ("Emission Factors for RNG Production"), are not representative of our process. In addition, the subsequent calculations presented by Dr. Shukla using these emission factors are invalid. On pg. 16 of Exhibit A, it is stated that the daily emissions of the pollutants emitted from RNG production are calculated "Using the given daily production value of 2,850 MMBtu/day and multiplying that by the emissions [sic] factor" presented in Table 3 for each pollutant. The resulting values for daily emissions of these pollutants in pounds per day are presented in Table 4 of Exhibit A.

These calculations imply that 1) the conversion of syngas to RNG in the methanation process produces emissions comparable to the combustion of wood residues (e.g., dry wood, wet wood, bark) in boilers; and 2) the RNG produced by the methanation process would be combusted onsite, resulting in the release of combustion products to the atmosphere. These assumptions underlying the calculations are unrelated to the Project. The purpose of the Project is to convert walnut shells into a RNG product that will be sent to the PG&E pipeline network. It is

[6] https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf.
[7] https://www.epa.gov/ghgemissions/assumptions-and-references-household-carbon-footprint-calculator.

not clear why Dr. Shukla portrays emissions from the production of RNG in our methanation process by attempting to calculate the amount of emissions that would be produced by the combustion of all of that RNG product onsite, with the release of the combustion products to the atmosphere.

D. Odor and Construction Impacts Are Adequately Addressed

The MND addresses odor emissions, noting that the facility will be enclosed, subject to air quality regulation, and located in a rural area. There is no indication of odor complaints from existing operations and, as stated previously, no sensitive receptors are within a distance where nuisance thresholds would typically apply. The MND's conclusion of less-than-significant odor impacts is well supported. Dr. Shukla claims that the production process has the potential to emit concerning levels of VOCs, ammonia, hydrogen sulfide, and methane. In reality, the Project's gasification process will not generate any significant amounts of NH_3 or H_2S, nor will there be significant emissions of CH_4 (the desired product of the process — i.e., RNG) or VOCs contained in the syngas produced by the gasification process. Dr. Shukla claims that, "The decomposition of organic materials during the processing stages may result in the emission of malodorous compounds, including ammonia". This is inaccurate. The biochar byproduct of the process will not decompose, nor is there any odor associated with the biochar. The Safety Data Sheet for biochar produced by BioMax units that use walnut shells as feedstock states that it is "odorless" and "stable under normal storage conditions".

Regarding construction impacts, CEQA does not require modeling every emission source when the scale and duration of construction are minor or standard best management practices are in place. Here, the MND includes dust suppression and equipment limitations consistent with regional expectations for rural, short-duration projects. No unusual grading or diesel equipment use is proposed, and the Project's construction timeline is limited.

VI. Best Available Control Technology and Emissions Controls

Citizens raise a concern that the MND fails to adequately analyze the Project's operational emissions and does not apply Best Available Control Technology (BACT) to mitigate significant air quality impacts. They state that the MND's deferral of emissions analysis to future permitting processes constitutes a procedural flaw; however, the MND follows standard CEQA practices by committing to regulatory oversight and ensuring compliance with all necessary air quality standards through the GCAPCD permitting process.

A. The MND Appropriately Defers Detailed Emissions Analysis to the Regulatory Process

The CEQA Guidelines allow for the deferral of certain details when they will be addressed in later stages of the permitting process, as long as the general approach to mitigation is outlined. This is particularly applicable to air quality emissions, where final control technologies, emission

estimates, and operational details are determined through the ATC and PTO processes, overseen by GCAPCD.

The MND specifies that the Project will comply with GCAPCD regulations, which explicitly requires emissions data, air quality control specifications, and an analysis of potential impacts as part of the ATC application. This approach is standard practice in California for industrial projects with potential air quality concerns, particularly when those projects are subject to complex permitting and operational control requirements. As such, the MND has appropriately outlined the regulatory framework and mitigation measures that will ensure the Project's compliance with air quality standards.

Citizens' concerns regarding the deferral of emissions calculations to future permitting are noted, but not in line with the CEQA standard. CEQA does not require exhaustive modeling at the MND stage, especially when regulatory processes, such as the ATC/PTO review, are in place to evaluate and enforce emissions control (CEQA Guidelines § 15126.4(a)(1)(B)). Therefore, the MND's reliance on GCAPCD review and permitting satisfies the CEQA requirement for mitigation and emissions control analysis.

B. BACT Will Be Implemented as Part of the ATC/PTO Process

The MND commits to compliance with BACT through the permitting process. The BACT requirement is outlined in GCAPCD Regulations, which mandate that all new sources of air pollution must demonstrate that BACT is applied to reduce emissions to the lowest possible level.

While the MND does not specify BACT control technologies in detail, it is not unusual for final specifications to be determined during the ATC process, where the Air Pollution Control Officer will review the emissions sources and determine the appropriate control measures. It is important to note that BACT is a legally binding requirement that will be addressed before construction begins.

The Project's compliance with BACT will be ensured during GCAPCD's review process, which is consistent with CEQA guidelines and state law (California Health and Safety Code § 42301.6). Specific equipment design and emission control decisions will be defined in this regulatory process, ensuring that the Project will comply with the most stringent feasible air pollution control measures available. Citizens put forth emission values presented in Tables 2 and 4 of Exhibit A, which are summed together to calculate the total daily emissions from the Project presented in Table 5 of Exhibit A (pg. 17). Based on these calculated values, Dr. Shukla makes several statements about how the Project will exceed emission thresholds for several pollutants and otherwise not comply with various regional air quality standards. However, these statements are based on flawed calculations. Page 18 of Exhibit A states that the calculated

emissions of CO_2 for the Project will exceed "Tehama County's threshold of 900 metric tons CO_2e/year", with the following reference cited (Citation 41):

> Tehema [sic] County Air Pollution Control District, Air Quality Planning & Permitting Handbook, Pg. 3; http://tehcoapcd.net/PDF/CEQA%20Handbook%20Mar%202015%20Final.pdf

It is not clear why Citizens uses the emission thresholds in Tehama County and cites documentation from the Tehama County Air Pollution Control District for a project in Glenn County that falls under the jurisdiction of the GCAPCD.

In summary, the calculation of emissions presented in Dr. Shukla's report is based on erroneous assumptions. These include:

- Claiming that biochar, RNG, and/or biomass will undergo combustion at the facility.
- Claiming methane emissions from the Project as the result of "methane slip", which refers specifically to the emission of unburned methane from engines that use natural gas for fuel.
- Claiming emission factors associated with the generation of biochar as a coproduct of gasifying walnut shells that are based on emission factors reported for the combustion of natural gas and wood residues in boilers and furnaces.
- Claiming emission factors associated with the production of RNG by upgrading syngas that are based on emission factors reported for the combustion of wood residues in boilers.
- Citing values for the claimed emission factors that are not found in any of the references cited as sources for this information.

The calculated emissions estimates and the assumptions on which they are based have no scientific validity and misrepresent the actual processes that will be utilized at the Project.

The Applicant employs emissions control technologies that are more than adequate to remediate any associated emissions. Furthermore, the Applicant has a mitigation plan for regular inspection and monitoring for fugitive emissions as well as emissions from the Project's single point-source (the release of exhaust from the post-methanator gas separation unit, which should consist primarily of CO_2 and water).

VII.__Emissions Estimates and Air Quality Control Systems

The MND provides an overview of the Project's potential emissions based on the best available information and outlines the mitigation measures to be incorporated into the design and

operation of the facility. Although the MND does not offer final emissions calculations or a detailed Health Risk Assessment at this stage, it correctly defers these analyses to the ATC/PTO process where more specific data will be provided and reviewed by GCAPCD.

The ATC process will require:

- Detailed emissions estimates for all operational phase,
- A comprehensive air control plan,
- A review of potential impacts to surrounding communities, include sensitive receptors, and
- A health risk assessment, if necessary.

As discussed previously, this is consistent with CEQA Guidelines, which allow lead agencies (in this case, Glenn County) to rely on future permitting processes when technical details cannot be determined at the MND stage. The MND meets the standards set by CEQA in that it provides an overall approach to mitigation.

The MND's approach to emissions control and application of BACT is fully compliant with CEQA and GCAPCD regulations. The MND properly applies the fair argument standard, and no substantial evidence has been presented to suggest that the Project will exceed air quality thresholds or result in unmitigated significant impacts. Therefore, an EIR is not required for this Project.

A. The MND Adequately Addresses Greenhouse Gas Emissions and Energy Impacts

Citizens' claim that the MND fails to adequately address Greenhouse Gas (GHG) emissions by omitting an analysis of energy consumption. However the Applicant finds that this is a misunderstanding of CEQA's flexibility in evaluating GHGs and energy use and overlooks the nature of the Project, which is energy-generating and carbon-neutral based on a life cycle analysis, because any CO2 emissions from the facility will be compensated for by avoided emissions of CO2 from the fossil fuels displaced by our RNG and CO2/CH4 from disposal of waste walnut shells by combustion, landfilling, or land application. CEQA permits a lead agency (Glenn County) to use either quantitative or qualitative methods for evaluation of GHG emissions, depending on the availability of the data at the time of the permitting process. The MND properly uses qualitative data and concludes that the Project's GHG emissions will be less than significant based on the following evidence:

- The Project processes only on-site agricultural byproduct (walnut shells), rather than imported or fossil-based feedstock;

- It converts biomass into RNG, which displaces fossil fuel use and provides net carbon reductions;
- It produces biochar, a carbon-stable byproduct that can sequester CO_2 in soils or serve as a substitute for more energy-intensive soil amendments;
- It will operate under a strict permitting process with emissions and combustion controls enforced by the GCAPCD; and
- It is sited at an existing agricultural operation, avoiding indirect emissions from transport or off-site processing.
- Results in an immediate and significant reduction in site-specific, local and regional carbon footprint by avoiding the need to transport the WWS shell to distant landfills.

The Project's nature, mitigation and regulatory oversight make conducting a detailed GHG inventory unnecessary. This is especially true because there is no credible evidence showing that the Project will result in significant GHG emissions. The facility will have a single emission point following the gas separation process downstream of the methanation process. Dr. Shukla raises a concern that an estimated methane slip could reach a concerning level with no mitigation despite its global warming potential (GWP) factor; however, a "methane slip" refers to the release of unburned methane from engines that use natural gas as a fuel, which has no relevance to the Project. Due to the nature of the Project, there will be no significant fugitive emissions of CH_4 from the Project's production process, which operates in a closed system. At the points where RNG is on-loaded and offloaded onto trucks and at the point of injection to the PG&E pipeline, there may be small amounts of inadvertent releases, but they will be below the limits specified in the PTO. Likewise, as explained previously there will be no significant NO_x generated by the Project.

B. The Project Will Result in a Net Reduction of Lifecycle GHG Emissions

The RNG exported from the Project is a sustainable fuel for which life cycle analysis (LCA) will demonstrate a net reduction of GHG emissions relative to the natural gas and other fossil fuels that it displaces. This is the result of the Project using a non-fossil resource (i.e., biomass) to produce the RNG and avoiding emissions from conventional methods of disposal for waste walnut shells, such as incineration, landfilling, and application as ground cover (walnut shells sent to the landfill or applied as ground cover are susceptible to anaerobic decomposition, which results in non-point source emissions of methane directly to the atmosphere).

Carbon intensity (CI) is a measure used to assess the reduction in GHG emissions resulting from the use of sustainable fuels relative to the conventional fossil fuels that they replace. The CI value of a fuel is expressed in units of grams of carbon dioxide equivalent per megajoule of energy provided by that fuel (gCO2e/MJ) and accounts for the GHG emissions associated with

all of the steps for producing, transporting, and consuming the fuel. The California Low Carbon Fuel Standard (LCFS) assigns the following CI values for fossil-derived fuels[8]:

Fuel	Carbon Intensity (g CO2e/MJ)
California Reformulated Gasoline Blendstock for Oxygenate Blending (CARBOB)	100.82
California Ultra Low Sulfur Diesel	100.45
Compressed Natural Gas (CNG) derived from North American fossil natural gas	79.21

Fuel pathways currently certified for RNG under the LCFS report CI values for Bio-CNG ranging from -532.74 to 84.83 g CO 2e/MJ and CI values for Bio-LNG ranging from -360.37 to 77.89 g CO 2e/MJ[9]. The Applicant will apply for a fuel pathway and CI value specific to the RNG produced by the Project. While the CI value has not been certified yet, it is anticipated to be towards the lower end of the ranges of CI values reported for the currently certified pathways for Bio-CNG and Bio-LNG.

C. Energy Use Will Not Be Wasteful, Inefficient or Unnecessary

CEQA Guidelines require discussion of energy conservation measures when relevant, and provide the following examples in Appendix F:

- Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated into the project and why other measures were dismissed.
- The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- The potential for reducing peak energy demand.
- Alternate fuels (particularly renewable ones) or energy systems.

[8] California Air Resources Board, CA-GREET3.0 Lookup Table Pathways Technical Support Documentation, Sacramento, CA, August 13, 2018. https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/ca-greet/lut-doc.pdf

[9] California Air Resources Board, LCFS Pathway Certified Carbon Intensities. https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities

- Energy conservation which could result from recycling efforts.

The Project generates its own energy product (RNG) and is designed to operate efficiently within a closed-loop system. It does not rely on continuous external fuel inputs and any electricity demand will be met through standard utility interconnection, subject to Title 24 building efficiency standards.

The MND reasonably concludes that:

- The Project does not involve energy-intensive construction or operational processes,
- Its thermal conversion technology reuses process heat, and
- Its primary function is generating clean fuel from agricultural waste that would otherwise decompose creating methane.

Citizens' response introducing projects such as building a shopping mall or developing commercial land, which are not related to the scale and purpose of the Project. No substantial evidence has been submitted to suggest that this Project would result in energy waste or inefficiency.

The MND's treatment of GHG and energy impacts is both reasonable and compliant with CEQA. It reflects the scale and character of the Project, incorporates existing regulatory safeguards, and supports the conclusion that impacts will be less than significant. Citizens' generalized objections do not constitute substantial evidence requiring preparation of an EIR.

VIII. The MND Adequately Evaluates Hazards, Hazardous Materials and Risk of Upset

Citizens assert that the MND fails to adequately assess the Project's risks related to hazardous materials, including the potential for fire, explosion, and upset conditions. These claims are unsupported by the record. The MND properly identifies all potentially hazardous components of the Project, evaluates their associated risks based on the Project's design, and concludes that, with regulatory compliance and standard safety measures, impacts will be less than significant.

A. The Project Is Not a Hazardous Waste Facility

First, it is important to clarify that the Project does not involve hazardous waste incineration, chemical storage, or the handling of regulated hazardous substances in quantities that would trigger oversight beyond standard safety and fire code requirements. The feedstock (walnut shells) is organic and non-toxic. The conversion process is thermal, not chemical, and occurs in an enclosed, oxygen-limited environment. The entire process of gasification, methanation, gas cleanup/filtration, and conveyance of biochar occurs in completely enclosed equipment. Syngas

production and gas filtration systems are closed to the atmosphere and contain no points of emission as to render a release of contaminants possible.

As described in the Operational Statement and MND:

- Process gases will be treated, scrubbed, and either routed into RNG or burned in enclosed units;
- Condensates will be collected and handled under standard protocols;
- Biochar will be stored dry and in accordance with fire protection guidance; and
- No significant off-site transportation of hazardous waste will occur.

Thus, the Project does not introduce unusual or unregulated hazardous materials. Regarding biochar handling, the automated system for removing the biochar coproduct from the gasifier is a completely closed system that uses an auger to transport the biochar into sealed storage containers. There will be no significant release of particulate matter, dust, or odors associated with the handling, transfer, or storage of biochar. Therefore, any risk of exposure to hazardous materials is mitigated by well-established control measures, including engineering, administrative, and equipment controls, in addition to personal protective equipment (PPE), which all ensure the safe manufacture, handling, and storage of materials.

B. Fire and Explosion Risks Are Addressed Through Design and Code Compliance

The MND acknowledges that the Project includes fuel processing and gas handling and specifically notes that the system will comply with the California Fire Code, National Fire Protection Association (NFPA) standards for combustible gases, and all relevant Occupational Safety and Health Administration (OSHA) safety protocols.

The Project will be subject to the Glenn County Fire Department's check and inspection prior to operation. The system is fully enclosed, regularly inspected, continuously monitored, and pressure-controlled. There is a program in place to control for any fugitive emissions throughout the facility to ensure operational safety and verify that there are no significant releases of pollutants. These design features limit the potential for uncontrolled reactions or explosion. No evidence has been presented that the Project poses a risk beyond that of standard agricultural or light industrial operations, both of which are permitted in the IA zone.

The MND reasonably concludes that with implementation of required safety measures, impacts are less than significant.

C. Project will Follow Emergency Response and Hazardous Materials Handling Plans

The MND correctly identifies that the Project will be required to:

- Submit a Hazardous Materials Business Plan (HMBP) to the Certified Unified Program Agency (CUPA);
- Coordinate with local emergency services on site access, suppression systems, and response planning;
- Ensure workers are trained in hazardous materials handling consistent with Title 8 CCR Section 5192.

These requirements are standard and enforceable conditions of approval. CEQA allows lead agencies to rely on such regulatory programs (CEQA Guidelines § 15126.4(a)(1)(B)), particularly where they are tied to performance standards and enforced through permit conditions.

The MND evaluates the Project's potential hazards using site-specific facts and applicable regulatory standards. It recognizes the presence of combustible gases and materials, but shows through mitigation, engineering controls, and oversight that impacts will be minimized to less-than-significant levels. Therefore, the MND's conclusion is both factually and legally sound and an EIR is not required.

IX. The MND Adequately Evaluates Biological Resource Impacts

Citizens raise concern over the potential impacts on biological resources, stating that the MND does not include sufficient field surveys or habitat evaluations; however, this applies a higher level of analysis than what is appropriate under CEQA.

A. The Project Site Is Highly Disturbed with A Low Habitat Value

The Project is located within a current walnut processing operation, which has been developed, graded, and used for IA support functions for decades. There is no evidence of special-status species habitat, wetlands, or biological corridors in or immediately adjacent to the development footprint. The MND includes a qualitative biological resource assessment that notes the lack of undisturbed vegetation and absence of habitat connectivity.

CEQA does not require formal protocol-level species surveys where the site does not contain suitable habitat and where prior disturbance and land use make species presence unlikely.

B. Project Will Comply with All Required Pre-Construction Surveys

The Applicant appreciates this concern and incorporates mitigation measures that require pre-construction surveys for nesting birds, avoidance buffers if nesting activity is observed, and compliance with applicable Fish and Game Code provisions in the MND. The California Department of Fish and Wildlife reviewed the proposed project and offered no comments or concerns. The Applicant applies CEQA-complaint procedures that ensure any unforeseen encounters with biological resources are addressed through time-of-year restrictions or buffer zones.

No substantial evidence has been presented by Citizens to suggest that special-status species are present or that the Project will degrade a sensitive biological community.

X. The MND Adequately Addresses Public Utilities and Noise Impacts

A. Project Has No Impact on Public Utilities

The MND discloses that the Project will comply with Glenn County Environmental Health standards. Such compliance will ensure that any septic systems are properly operating and any expansion of the system is designed with respect to on-site soil capabilities for the safe treatment and disposal of wastewater and the protection of groundwater quality. As discussed in the MND, the existing onsite wastewater treatment systems (OWTS) will be expanded and/or new OWTS will be installed to accommodate the increase in employees. All OWTS will be permitted and approved by the Environmental Health Department (EHD). The Project site is not served by municipal wastewater services, and any new or expanded septic system must be reviewed and permitted by the County. This is a standard regulatory pathway for rural sites and does not, in and of itself, trigger a significant impact under CEQA. No evidence has been submitted that septic capacity cannot be met. The County has received initial feedback from fire, water, and waste management none of which determined that the impact will be significant.

B. Noise Analysis Is Adequate

The MND finds that construction and operational noise will not exceed thresholds established in the Glenn County Noise Ordinance(Chapter 15.56.100). While the MND does not include noise contour mapping, it does recognize that the facility is located in a low-density area, with a significant setback from the nearest residence (approximately 450 feet). Operational equipment will be housed within enclosed structures and construction activities will occur during standard daytime hours, consistent with County limits. The County's General Plan allows a noise exemption for noise that is typical of "intense agricultural use of the land." The shelling facility is already in use; therefore, the Project will not make more noise than what is already considered 'typical.' The MND properly provided sound maps and noise data from an earlier

Syntech project that used Internal Combustion (IC) engines to produce power. By comparing the differences between this Project and the earlier Syntech project where sound mapping and data had been developed, the Applicant was able to show that, even with the noise from IC engines, the noise levels were still accepted for an IA zone. The Project is subject to current noise restrictions. Should noice become an issue, the Applicant will take further mitigating steps.

CEQA does not mandate baseline noise measurements where existing land use is clearly industrial or agricultural and the Project does not involve high-noise generators such as blasting, pile driving, or aviation activity; therefore, any noise impact will be less than significant.

XI.___Cumulative Impacts Are Fully Considered and Do Not Require an EIR

The MND considers cumulative air emissions and environmental degradation, particularly when combined with the existing shelling operation. This is in line with CEQA's approach to cumulative impacts. The Initial Study and the MND evaluates whether the Project would cause or contribute to cumulative effects in areas such as air quality, energy, and agricultural land use. For air quality, the MND correctly identifies that emissions will be regulated through GCAPCD and kept below the threshold with required controls. The existing Carriere shelling operation is part of the environmental baseline and is separately permitted.

Cumulative impacts are speculative, unless there is evidence of a combined effect that exceeds CEQA thresholds and no such evidence has been presented. The MND reasonably concludes that cumulative contributions will be less than significant.

XII.__Conclusion: The MND is Supported by Substantial Evidence and Remains the Appropriate Environmental Document

The Initial Study/MND was prepared consistent with CEQA's procedural and substantive requirements. It identifies all potentially significant impacts, imposes effective mitigation measures and relies on existing regulatory frameworks for air quality, hazardous materials, and public safety compliance.

The Applicant appreciates Citizens' concerns, but finds they are, respectfully, based on a misunderstanding of the Project and legal arguments that overstate CEQA's review standards. No substantial evidence has been presented that the Project will cause a significant unmitigated environmental impact. Therefore, preparation of an EIR is not warranted.

The record supports adoption of the MND and approval of the Project.

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Re: Agenda Item No. 5a: Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Chair Carriere, Commissioners, Mr. Thomas, and Mr. Popper:

On behalf of Citizens for Responsible Industry ("Citizens" or "Commenters"), we submit these comments on Agenda Item No. 5a, the Carriere/Syntech CF1, LLC, Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). The Planning Commission ("Commission") will consider approval of (1) the Project's Mitigated Negative Declaration ("MND") with the corresponding Mitigation Measures and Conditions of Approval, and (2) the Conditional Use Permit ("CUP").

The Project seeks a CUP to construct and operate an Advanced Thermal Conversion facility 24 hours a day.[1] The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gase ("RNG"),

[1] Mitigated Negative Declaration for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project ("MND"), p. 11, available at: https://ceqanet.opr.ca.gov/2024120076/2/Attachment/l4fGS1.

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which will then be compressed into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline.[2] The Project will draw power from the local utility grid during normal operation.[3] The Project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California.[4] The Project site consists of Assessor Parcel Numbers: 016-030-011 (96.37 ± acres) and 016-090-016 (145.75 ± acres).[5]

Citizens' review of the MND demonstrates that the MND fails to comply with the California Environmental Quality Act ("CEQA").[6] The MND fails as an informational document, fails to disclose or mitigate potentially significant impacts, and lacks substantial evidence to support its conclusions that the Project's significant impacts would be mitigated to less than significant levels. The MND also fails to adequately characterize the Project site's environmental setting, and fails to disclose the Project's inconsistencies with the Glenn County General Plan ("General Plan"). Furthermore, there is substantial evidence supporting a fair argument that the Project's potentially significant environmental impacts are far more extensive than disclosed in the MND.

Citizens reviewed the MND, its technical appendices, and reference document with the assistance of air quality expert Komal Shukla, Ph.D. of Group Delta.[7] Dr. Shukla's comments and curriculum vitae are attached hereto and are fully incorporated by reference as if fully set forth herein and must be considered part of the record for this Project. Dr. Shukla's comments provide substantial evidence supporting a fair argument that the Project's air quality, public health and hazards impacts are significant and unmitigated. The County must prepare an environmental impact report ("EIR") under these circumstances.[8]

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[2] *Id.*
[3] *Id.*
[4] *Id.*
[5] *Id.* at 1.
[6] Pub. Res. Code (or "PRC") §§ 21000 et seq.; 14 Cal. Code Regs. ("CCR" or "CEQA Guidelines") §§ 15000 et seq.
[7] See **Exhibit A**, Komal Shukla, Ph.D., P.E., Comment on the Mitigated Negative Declaration for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (April 14, 2025) ("Shukla Comments").
[8] Pub. Res. Code §§21080(d), 21082.2(d); 14 Cal. Code Reg. §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602.

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Moreover, the County failed to provide Citizens with timely access to the documents referred to and relied upon in the MND. CEQA section 21092(b)(1) and CEQA Guidelines section 15072(g)(4) require that "all documents referenced" and "all documents incorporated by reference" in a negative declaration shall be "readily accessible to the public during the lead agency's normal working hours" during the entire public comment period.[9] Citizens submitted a request for access to the documents referenced in the MND on March 26, 2025. The County failed to produce responsive records. In particular, the County failed to provide access to air pollution emissions data supporting the conclusions in the MND, in violation of CEQA. The County also failed to respond to Citizen's April 4, 2025 request to extend the public comment period or continue the April 16, 2025 Planning Commission hearing on the Project to a later date following disclosure of outstanding records and an extended comment period. Accordingly, the County has not complied with CEQA and the record before the Planning Commission is incomplete.

Prior to approving the Project, CEQA requires the Planning Commission to consider the proposed MND together with comments received during the public review process, and prohibits the Planning Commission from adopting the MND unless "the whole record before it (including the initial study and any comments received)" demonstrates no significant effects.[10] The County Code also requires the Planning Commission to make findings supported by substantial evidence to approve the Project's proposed CUP,[11] and to ensure that the Project complies with County performance standards.[12] The Planning Commission lacks substantial evidence to adopt the MND or approve the Project's local land use permits because there is substantial evidence supporting a fair argument that the Project has significant, unmitigated air quality, public health, hazards and land use impacts. These impacts result in unmitigated detrimental effects to the health, safety and general welfare of persons and property in the County, result in General Plan inconsistencies, and demonstrate that the Project fails to comply with mandatory performance standards related to, *inter alia*, air quality, noise, fire and explosion hazards.[13]

Citizens respectfully requests that the Planning Commission continue its hearing on the Project to a later date, and remand the Project to staff to prepare a legally adequate EIR which complies with CEQA by disclosing and mitigating all of

[9] Pub. Resources Code § 21092(b)(1); 14 CCR § 15072(g)(4).
[10] 14 CCR § 15074(b).
[11] See Glenn County Code § 15.22.020; Staff Report, pp. 5-6.
[12] See Glenn County Code Chapter 15.56; Staff Report, pp. 6-8.
[13] See Glenn County Code §§ 15.22.010, 15.22.020, 15.56.040, 15.56.070, 15.56.100.

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the Project's potentially significant impacts. Citizens reserves the right to submit supplemental comments at any later hearings and proceedings related to the Project.[14]

I. STATEMENT OF INTEREST

Citizens is a coalition of local residents and labor organizations with members who may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. The coalition includes County residents and other members and organizations, including California Unions for Reliable Energy ("CURE") and its local affiliates, and the affiliates' members who live, recreate, work, and raise families in and around Glenn County and in communities near the Project site. Citizens, its participating organizations, and their members stand to be directly affected by the Project's impacts.

Since its founding in 1997, CURE has been committed to building a strong economy and healthier environment and it works to construct, operate, and maintain conventional and renewable energy power plants and other industrial facilities throughout California. CURE supports the development of clean, renewable energy technology, including biomass facilities, where properly analyzed and carefully planned to minimize impacts on public health and the environment.

Citizens encourages sustainable development of California's energy and natural resources. Environmental degradation destroys cultural and wildlife areas, consumes limited water resources, causes air and water pollution, and imposes other stresses on the environmental carrying capacity of the State. This, in turn, jeopardizes future jobs by making it more difficult and more expensive for local industry to expand, and by making it less desirable for businesses to locate and people to live and recreate in and around the County. Continued degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduces future employment opportunities.

Additionally, the individual members of Citizens, and the members of its affiliated labor organizations, would be directly affected by the Project's impacts, and may also work on constructing the Project itself. They would therefore be first in line to be exposed to any health and safety hazards that may be present on the

[14] Gov. Code § 65009(b); Pub. Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* ("*Bakersfield*") (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

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Project site. They each have a personal stake in protecting the Project area from unnecessary, adverse environmental and public health and safety impacts.

II. LEGAL BACKGROUND

CEQA is designed to inform decision-makers and the public about the potential, significant environmental effects of a project.[15] "CEQA's fundamental goal [is] fostering informed decision-making."[16]

The EIR is the very heart of CEQA because it acts as an "environmental 'alarm bell' whose purpose is to alert the public and its responsible officials to environmental changes before they have reached the ecological points of no return."[17] The EIR aids an agency in identifying, analyzing, disclosing, and, to the extent possible, avoiding a project's significant environmental effects through implementing feasible mitigation measures.[18] The EIR also serves "to demonstrate to an apprehensive citizenry that the Agency has analyzed and considered the ecological implications of its action."[19] Thus, an EIR "protects not only the environment but also informed self-government."[20]

In limited circumstances, an agency may avoid preparing an EIR. However, because "[t]he adoption of a negative declaration…has a terminal effect on the environmental review process" by allowing the agency to dispense with the duty to prepare an EIR, negative declarations are allowed only in cases that satisfy the fair argument standard.[21]

The "fair argument" standard is an exceptionally "low threshold" favoring environmental review in an EIR rather than a negative declaration.[22] Under the fair argument standard, a lead agency "shall" prepare an EIR whenever substantial evidence in the whole record before the agency supports a fair argument that a project may have a significant effect on the environment.[23] The phrase "significant

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[15] CEQA Guidelines § 15002.
[16] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 406; Public Resources Code § 21100.
[17] *Dunn-Edwards v. Bay Area Air Quality Management Dist.* (1992) 9 Cal.App.4th 644, 652; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220.
[18] Pub. Res. Code § 21002.1(a); CEQA Guidelines § 15002(a), (f).
[19] *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 86.
[20] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.
[21] *Citizens of Lake Murray v. San Diego* (1989) 129 Cal.App.3d 436, 440; Pub. Res. Code §§ 21100, 21064.
[22] *Consolidated Irrigation District v. City of Selma* (2012) 204 Cal.App.4th 187, 207; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928.
[23] Pub. Res. Code §§21080(d), 21082.2(d); 14 Cal. Code Reg. §§ 15002(k)(3), 15064(f)(1), (h)(1); *Laurel*

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effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment."[24] "Substantial evidence" required to support a fair argument is defined as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."[25] As a matter of law, substantial evidence includes both expert and lay opinion.[26]

Accordingly, a mitigated negative declaration may be prepared only when, after preparing an initial study, a lead agency determines that a project may have a significant effect on the environment, but:

> (1) Revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review ***would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would***, and (2) there is ***no substantial evidence*** in light of the whole record before the public agency that the project, as revised, ***may*** have a significant effect on the environment.[27]

With respect to this Project, the MND fails to satisfy the basic purposes of CEQA. The MND fails to adequately disclose, investigate, and analyze the Project's potentially significant impacts during construction and operation, and fails to provide substantial evidence to support its conclusions that impacts will be mitigated to a less than significant level.[28] Because substantial evidence shows that the Project may result in potentially significant impacts, a fair argument can be made that the Project may cause significant impacts requiring the preparation of an EIR.

III. THE MND FAILS TO DISCLOSE SIGNIFICANT LAND USE INCONSISTENCIES

The Project site consists of two parcels which are located in the Farmland Security Zone ("FS-80") and in the Intensive Agriculture ("IA") land use

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Heights Improvement Assn. v. Regents of the Univ. of Cal. (1993) 6 Cal.4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-151; *Quail Botanical Gardens Found., Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1601-1602.

[24] Pub. Res. Code, § 21068.

[25] CEQA Guidelines § 15384(a).

[26] Pub. Res. Code, § 21080, subd. (e)(1); CEQA Guidelines, § 15064, subd. (f)(5).

[27] Pub. Res. Code § 21064.5 (emphasis added).

[28] Pub. Res. Code § 21064.5.

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designation.[29] The MND concludes that the Project is consistent with both of these designations and thus will have a less than significant impact on land use.[30] Contrary to the MND's conclusion, the proposed Project is not consistent with the General Plan's goals and permitted land uses under the IA designation based on the plain language of the General Plan. This inconsistency constitutes a significant land use impact, which the MND fails to disclose or mitigate.

To comply with CEQA, the MND must discuss "any inconsistencies between the proposed project and applicable general plans."[31] A project is consistent with a general plan if it is compatible with the plan's objectives, policies, general land uses, and programs and will not obstruct their attainment.[32] Here, the MND incorrectly concludes that the Project would not result in significant land use impacts because the "project is consistent with the General Plan land use goals and policies."[33] This completely ignores the plain language of the General Plan.

The General Plan states that the IA land use designation "is used to identify areas suitable for commercial agriculture which provide a major segment of the county's economic base; to protect the agricultural community from encroachment of unrelated agricultural uses which, by their nature, would be injurious to the physical and economic well-being of the agricultural community; to accommodate lands under Williamson Act contracts; to encourage the preservation of agricultural land, both in production and potentially productive, which contain State-designated Important Farmlands or Locally Significant Farmlands."[34] The General Plan also underscores that "[a]griculture is the single most important component of the County's economic base, and forms the cornerstone of the County's heritage and identity."[35] Accordingly, one of the General Plan's primary goals is to "protect and enhance agriculture as the core of the local economy."[36] This includes preventing the approval of "renewable energy projects" that could displace viable agricultural operations, or render prime farmlands unusable for agricultural activities.[37] The

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[29] MND, p. 51.
[30] MND, p. 51.
[31] CEQA Guidelines § 15125(d).
[32] *Orange Citizens for Parks & Recreation v. Superior Court,* (2016) 2 Cal.5th 141, 153; *San Francisco Tomorrow v. City & County of San Francisco* (2014) 229 Cal.App.4th 498, 513; *Clover Valley Found v. City of Rocklin* (2011) 197 Cal.App.4th 200, 238.
[33] MND, p. 51.
[34] Glenn County General Plan Update ("General Plan") (July 18, 2023), p. LU-3, available at: https://glenncounty.generalplan.org/s/GlennCounty_General-Plan-Adopted-7-18-23.pdf.
[35] General Plan, p. LU-0.
[36] General Plan, p. ED-4.
[37] General Plan, p. AG-8 ("renewable energy project should not be approved or developed in such a way as to displace viable agricultural operations, or render prime farmlands unusable for agricultural activities"), ED-6 ("renewable energy project should not be approved or developed in

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General Plan's Agricultural Element plainly states that "renewable energy project[s] should not be approved or developed in such a way as to displace viable agricultural operations, or render prime farmlands unusable for agricultural activities."[38] The General Plan's Economic Development element similarly states that "renewable energy project[s] should not be approved or developed in such a way as to displace viable agricultural operations, or render prime farmlands unusable for agricultural activities."[39] In this case, the Project proposes to construct an ATC facility that would permanently convert approximately 4.3 acres of Prime Farmland into industrial use, directly contradicting the General Plan's stated goal of preserving agricultural land.[40]

While the General Plan does express support for agricultural-related industrial support operations, such as alternative energy systems,[41] the support is limited to energy systems that will produce energy for on-site uses.[42] In contrast, the RNG created by the proposed facility would be injected into a PG&E pipeline for sale to offsite third party purchasers.[43] Therefore, the Project not only conflicts with the General Plan's goal of preserving agricultural land, but also does not qualify as an authorized alternative energy system under the IA land use designation.

For these reasons, the Project, as proposed, is inconsistent with the County's General Plan and requires a general plan amendment. The MND is deficient for failing to discuss or mitigate this land use inconsistency, as required by the General Plan and CEQA. Consequently, the Project application must be revised to include all necessary approvals, and an EIR must be prepared and circulated to address the Project's land use inconsistency.

IV. THE MND'S DESCRIPTION OF THE ENVIRONMENTAL SETTING IS INADEQUATE

such a way as to displace viable agricultural operations, or render prime farmlands unusable for agricultural activities").
[38] General Plan, p. AG-8.
[39] General Plan, p. ED-6.
[40] MND, pp. 3, 17 ("approximately 10 acres of the 96-acre parcel as Urban and Built-Up Land, with the remaining 86 acres as Prime Farmland"); California Department of Conservation, California Important Farmland Finder, available at: https://maps.conservation.ca.gov/DLRP/CIFF/ (last visited 3/27/25) (the second Project parcel is designated as mostly farmland of statewide importance and some prime farmland).
[41] General Plan, pp. AG-7 (Policy AG 3-2), AG-8 (Policy AG 3-5), ED-6 (Policy ED 3-5).
[42] General Plan, pp. AG-7 ("alternative energy systems that provide energy for on-site uses").
[43] MND, pdf p. 114.

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The MND fails to adequately describe the environmental setting against which the Project's impacts are to be measured. This contravenes the fundamental purpose of the environmental review process, which is to determine whether there is a potentially substantial, adverse change compared to the existing setting.[44] CEQA requires that a lead agency include a description of the physical environmental conditions, or "baseline," in the vicinity of the project as they exist at the time environmental review commences.[45] As the courts have repeatedly held, the impacts of a project must be measured against the "real conditions on the ground."[46] The description of the environmental setting constitutes the "baseline" physical conditions against which the lead agency assesses the significance of a project's impacts.[47] An environmental setting is required "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.[48]

A. The MND Fails to Inform Decisionmakers and the Public About Existing Environmental Pollution in the Project's Vicinity

The MND fails to adequately disclose the existing air pollution at the Project site and analyze how the proposed Project will exacerbate these conditions. This renders the Project's air quality impacts analysis inaccurate and incomplete under CEQA.

To properly assess the environmental impacts of a project under CEQA, it is essential to consider the setting in which it takes place.[49] A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.[50] Therefore, the MND's evaluation of the Project's air quality impacts should account for the existing environmental burdens faced by the

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[44] 14 C.C.R. § 15063(d).
[45] 14 C.C.R. § 15063(d)(2); see *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.
[46] *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal. 4th 310, 321.; *Save Our Peninsula Com. V. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 121-22; *City of Carmel-by-the-Sea v. Bd. Of Supervisors of Monterey County* (986) 183 Cal.App.3d 229, 246.
[47] 14 C.C.R. § 15063(d)(2); see 14 C.C.R. § 15125 *Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th at 321.
[48] 14 C.C.R. § 15125(a).
[49] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.
[50] *Id.*; *see* CEQA Guidelines §§ 15125(a), 15126.2(a) (EIR shall analyze any significant environmental effects project might cause or risk exacerbating by bringing development and people into affected area).

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affected community. This includes assessing whether the Project's effects would cause substantial adverse impacts on human beings, either directly or indirectly.[51]

The MND fails to satisfy this requirement. This oversight is especially problematic given the documented health risks associated with the existing facility. For example, Dr. Shukla's comments identify that the existing Carriere Family Farms facility—located on the Project site—has a carcinogenic health risk score of 4.10 according to the 2024 AB 2588 Hot Spots Report.[52] This score categorizes the facility as an intermediate priority and risk.[53] This was not disclosed in the MND's air quality analysis.

Additionally, Dr. Shukla provides data showing that the proposed Project is likely to exceed the regulatory thresholds for several air pollutants, including CO2, CO, PM10, PM2.5, NOx and VOCs.[54] Dr. Shukla explains that the addition of these emission to a site that already presents carcinogenic risks will exacerbate the already elevated levels of air pollutants, further contribute to the formation of ground-level ozone, and lead to additional environmental degradation—particularly from increased methane emissions.[55] The MND fails to analyze or propose mitigation for these potentially significant impacts.

Because the MND does not disclose essential information about the existing environmental, health, and safety conditions at the Project site, it fails to provide decisionmakers and the public with an accurate characterization of the Project's environmental setting. This renders the MND's subsequent analysis of the Project's individual and cumulative air quality and public health impacts unsupported. A full EIR must be prepared that properly discloses the Project's potentially significant impacts on air quality and public health.

B. The MND Fails to Establish Baseline Air Quality Levels

The MND fails to establish the existing air quality conditions at the Project site, rendering its subsequent impact analysis inaccurate. Dr. Shukla explains that

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[51] PRC § 21083(b)(3); *see also* CEQA Guidelines § 15126.2 (project may cause a significant effect by bringing people to hazards).
[52] Shukla Comments, p. 18; County of Glenn Air Pollution Control District, 2024 Annual Report AB 2588 Air Toxics "Hot Spots" Program, pp. 1-2, available at: https://www.countyofglenn.net/sites/default/files/2024%20Hot%20Spots%20Report_0.pdf.
[53].Shukla Comments, p. 18.
[54] Shukla Comments, p. 16.
[55] Shukla Comments, p. 19.

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"[w]ithout a clear baseline, it is impossible to accurately assess the Project's potential to cause environmental harm."[56]

Currently, the Project site is occupied by a walnut processing facility and surrounding walnut orchards.[57] The existing use already contributes to local air emissions. Because of this, Dr. Shukla explains that the addition of the proposed ATC facility could result in increased air pollution, exposure to hazardous materials, and pose new environmental and public health risks to nearby residents and sensitive receptors.[58]

Without an accurate baseline, any analysis of the Project's air quality impacts is inaccurate and potentially misleading. To comply with CEQA, a DEIR must be prepared that establishes an accurate baseline and reanalyzes the Project's potential impacts.

V. AN EIR IS REQUIRED BECAUSE THERE IS SUBSTANTIAL EVIDENCE SUPPORTING A FAIR ARGUMENT THAT THE PROJECT MAY HAVE SIGNIFICANT UNMITIGATED IMPACTS

An MND is improper, and an EIR must be prepared, whenever it can be fairly argued on the basis of substantial evidence that the project may have a significant environmental impact.[59] "[S]ignificant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment."[60] An effect on the environment need not be "momentous" to meet the CEQA test for significance; it is enough that the impacts are "not trivial."[61] Substantial evidence, for purposes of the fair argument standard, includes "fact, a reasonable assumption predicated upon fact, or **expert opinion** supported by fact."[62]

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.[63] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an MND or to disclose information about a project's

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[56] Shukla Comments, p. 6.
[57] Glenn County Staff Report, p. 6.
[58] Shukla Comments, p. 6.
[59] Pub. Res. Code § 21151; CEQA Guidelines § 15064(f)(1); *Citizens for Responsible Equitable Envt'l Dev. V. City of Chula Vista* (2011) 197 Cal.App.4th 327, 330-31; *Communities for a Better Env't v. South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310, 319.
[60] Pub. Res. Code § 21068; CEQA Guidelines § 15382.
[61] *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 83.
[62] Pub. Res. Code § 21080€(1) (emphasis added).
[63] *Sierra Club v. State Bd. of Forestry*(1994) 7 Cal.4th 1215, 1236.

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environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.[64] Reviewing courts will not "uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference."[65]

A. Substantial Evidence Supports a Fair Argument That the Project May Result in Significant Air Quality Impacts

The MND concludes that the Project will not result in significant air quality impacts.[66] However, these conclusions are unsupported by any emissions calculations or emissions data. Dr. Shukla's expert comments provide substantial evidence supporting a fair argument that the proposed Project may result in significant air quality impacts related to both operational and construction emissions. In addition, the MND fails to include a health risk analysis, as required by CEQA. As a result, the MND lacks substantial evidence to support its findings of no significant impact and does not satisfy CEQA's requirements for disclosure, analysis, and mitigation of potentially significant environmental impacts.

1. The County Impermissibly Defers Analysis of the Project's Air Quality Impacts

The MND lacks any emissions calculations to support its conclusions that the Project's construction and operational air quality impacts would be less than significant. Instead, the MND states that the Project will require an Authority to Construct ("ATC") permit from the Glenn County Air Pollution Control District ("GCAPCD"), as well as modifications to the facility owner's existing Permit to Operate ("PTO") in order to commence operations.[67] The MND includes Condition of Approval APCD, which appears to indicate that no such calculations have been performed and will instead be deferred to the ATC application phase with the GCAPCD. The Condition states that "[a]ll new sources of air pollution and the air pollution control equipment including emissions estimates shall be included in the ATC application."[68]

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[64] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[65] *Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1355 [internal citations omitted].
[66] MND, p. 20.
[67] See MND, pp. 3, 23 (Condition of Approval (APCD); Applicant Project Description, p. 12.
[68] See MND, pp. 3, 23 (Condition of Approval (APCD).

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The County cannot rely on subsequent emissions analysis performed for a post-approval permit to address the Project's air quality impacts for purposes of CEQA compliance. CEQA requires disclosure of the severity of a project's impacts and the probability of their occurrence *before* a project can be approved.[69] A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking.[70] Even if a subsequent study is subject to administrative approval, it is the sort of *post hoc* rationalization of agency actions that has been repeatedly rejected by the courts.[71] The County must quantify the Project's construction and operational emissions as part of the CEQA review process. Failure to do so renders the MND inadequate as informational document and demonstrates that the County's significance conclusions regarding the Project's air quality impacts are not supported by any substantial evidence. The County must prepare an EIR to disclose and analyze the Project's air quality impacts.

2. Substantial Evidence Supports a Fair Argument that the Project's Construction Air Quality Impacts Are Potentially Significant and Unmitigated

Dr. Shukla's comments demonstrate that the MND lacks substantial evidence to conclude that the Project will not result in significant construction-related air quality impacts, and provide substantial evidence supporting a fair argument that construction emissions may be significant and unmitigated.[72]

First, the MND fails to quantify expected construction-related emissions and omits critical information necessary to perform such an analysis.[73] Specifically, the MND does not identify the types of construction equipment that will be used, how and when that equipment will operate, or provide details regarding construction phasing, scheduling, on-road and off-road vehicle activity levels, or soil disturbance parameters. [74] As Dr. Shukla explains, without this basic data, it is not possible to accurately model construction emissions using CalEEMod.[75] Therefore, the MND's

[69] 14 CCR §§ 15143, 15162.2(a); *Cal. Build. Indust. Ass'n v. BAAQMD* (2015) 62 Cal.4th 369, 388-90 ("*CBIA v. BAAQMD*") (disturbance of toxic soil contamination at project site is potentially significant impact requiring CEQA review and mitigation); *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal. App. 4th 48, 82; *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs. ("Berkeley Jets")* (2001) 91 Cal.App.4th 1344, 1370-71; CEQA Guidelines, Appendix G.
[70] *Sundstrom v. County of Mendocino*, supra, 202 Cal.App.3d 296, 307.
[71] *Id.*; *No Oil, Inc. v. City of Los Angeles*, supra, 13 Cal.3d 68, 81; *Environmental Defense Fund, Inc. v. Coastside County Water Dist.* (1972) 27 Cal.App.3d 695, 706.
[72] MND, p. 20.
[73] Shukla Comments, pp. 7-11.
[74] Shukla Comments, p. 7.
[75] Shukla Comments, p. 7.

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conclusion that construction impacts will be less than significant is not supported by substantial evidence.

Second, Dr. Shukla presents substantial evidence supporting a fair argument that the Project may result in significant construction-related air quality impacts.[76] For example, construction equipment, including backup generators, can emit diesel particulate matter ("DPM").[77] DPM is a well-known human carcinogen and due to its small aerodynamic diameter, it can penetrate deep into the alveolar region of the lungs, where it can induce inflammation, oxidative stress, and DNA damage, leading to severe respiratory, cardiovascular, and carcinogenic health effects.[78] The MND, however, fails to disclose or analyze these risks.

Additionally, the MND does not address the potential for fugitive dust emissions, which, Dr. Shukla identifies as another potentially significant impact.[79] Dr. Shukla explains that construction activities generate dust through ground disturbance, vehicle movement, material handling, and other sources.[80] Because of this, these activities can contribute substantially to localized PM emissions without effective dust suppression measures.[81] Dr. Shukla further explains that the wind conditions in Glenn County make the Project particularly susceptible to this problem.[82] Average winds range between 5.0 and 7.8 miles per hour ("mph"), with sustained winds recorded at up to 32.2 mph.[83] Under these conditions, airborne dust can easily become entrained in the atmosphere and travel off-site, exacerbating air quality degradation and increasing the risk to nearby sensitive receptors.[84]

Therefore, because substantial evidence supports a fair argument that the Project may result in significant construction-related air quality impacts, the County must prepare an EIR that analyzes these impacts and proposes mitigation for any significant impacts found.

[76] Shukla Comments, pp. 7-11.
[77] Shukla Comments, p. 7.
[78] Shukla Comments, pp. 7-8.
[79] Shukla Comments p. 8.
[80] Shukla Comments, p. 8.
[81] Shukla Comments, p. 8.
[82] Shukla Comments, p. 8.
[83] Shukla Comments, p. 8.
[84] Shukla Comments, p. 8.

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3. Substantial Evidence Supports a Fair Argument that the Project's Operational Air Quality Impacts Are Potentially Significant and Unmitigated

The MND concludes—without evidentiary support—that the Project will not result in significant operational air quality impacts.[85] However, Dr. Shukla's comments provide substantial evidence supporting a fair argument that the Project may result in significant impacts from operation-related emissions that the MND failed to disclose, analyze, and mitigate.[86]

First, the MND lacks substantial evidence to support its significance determination. Dr. Shukla explains that ATC facilities involve several key operations, including biomass conversion, syngas production, gas cleanup, flaring, and backup power generation.[87] These operations are known to emit a range of pollutants, such as criteria pollutants, hazardous air pollutants ("HAPs"), and greenhouse gases ("GHGs").[88] Despite this, the MND fails to include a sufficient description of these operations and fails to estimate emissions from each process.[89] Without detailed emissions data and process specific analysis, Dr. Shukla explains that it is not possible to conclude that Project emissions would be less than significant.[90] As a result, the MND fails to provide the information necessary for the County to evaluate the Project's potential environmental and public health impacts.[91] Additionally, the MND does not follow industry-standard methodologies, such as AERMOD or CalEEMod air dispersion modeling, which Dr. Shukla explains are essential for understanding how emissions will effect surrounding sensitive receptors.[92] Therefore, the MND's conclusion of no significant impact is unsupported.

Second, Dr. Shukla conducted her own calculations to estimate the expected emissions from the Project's biochar and RNG production processes and found that they are likely to exceed established air quality thresholds.[93] Specifically, Dr. Shukla found that the Project's emissions of $PM_{10,}$ $PM_{2.5}$, NOx, VOCs, and CO_2 exceed the thresholds established by the Sacramento Metropolitan Air Quality

[85] MND, p. 20.
[86] Shukla Comments, pp. 11-17, 21-22.
[87] Shukla Comments, p. 11.
[88] Shukla Comments, p. 11.
[89] Shukla Comments, p. 11.
[90] Shukla Comments, p. 12.
[91] Shukla Comments, p. 12.
[92] Shukla Comments, p. 11.
[93] Shukla Comments, pp. 12-17.

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Management District ("SMAQMD").[94] These constitute significant and unmitigated impacts under CEQA, which the MND failed to address.

To address these deficiencies, the County must prepare an EIR that includes a comprehensive quantitative analysis of the Project's operational emissions and proposes mitigation to reduce these impacts to less than significant levels. For example, Dr. Shukla recommends preparation of a Continuous Emissions Monitoring Plan and an Odor and Air Toxics Control Plan to ensure that emissions are properly tracked and managed throughout the Project's operation.[95] Because the MND fails to comply with CEQA, the County cannot approve the Project until a legally adequate EIR is prepared.

4. The Project Does Not Comply with Air District Regulations

The Project fails to comply with the GCAPCD Regulations because the MND fails to require best available control technology ("BACT") to mitigate operational emissions, as required by Section 51 of the GCAPCD Regulations.[96] To receive any ATC or PTO, the applicant must demonstrate to the Air Pollution Control Officer ("APCO") that all proposed new or modified sources having a potential to emit in excess of 25 tons per year are compliant with applicable emission limitations and standards.[97] The APCO must deny an application if the APCO finds that the subject of the application would not comply with the standards set forth in the regulations of the GCAPCD Regulations.[98]

Section 51 of the GCAPCD Regulations states that "[a]n applicant shall apply BACT to any new emissions unit or modification of an existing emissions unit which results in an emissions increase and the potential to emit for the emissions unit is equal to or exceeds the following amounts:

[94] Shukla Comments, pp. 16-17. GCAPCD does not have CEQA significance thresholds. Therefore, Dr. Shukla utilized the regionally appropriate SMAQMD thresholds.
[95] Shukla Comments, p. 22.
[96] *Id.* at 15.
[97] Regulations of the Air Pollution Control District of Glenn County ("GCAPCD Regulations") § 51, p. 16 ,available at: https://www.countyofglenn.net/sites/default/files/Agriculture/AP%20Regs%20Book%201%202010update.pdf
[98] *Id.*

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Pollutant	Pounds per Day
Asbestos	0.030
Beryllium	0.002
Carbon monoxide	500.000
Fluorides	15.000
Hydrogen sulfide	50.000
Lead	3.200
Mercury	0.500
Nitrogen oxides	25.000
Particulate matter (PM-10)	80.000
Reactive organic compounds	25.000
Reduced sulfur compounds	50.000
Sulfur oxides	80.000
Sulfuric acid mist	35.000
Total reduced sulfur compounds	50.000
Vinyl chloride	5.000

[99]

BACT is defined by Section 51 as the more stringent of:

a. The most effective emission control device, emission limit, or technique which has been required or used for the type of equipment comprising such emissions unit unless the applicant demonstrates to the satisfaction of the APCO that such limitations are not achievable; or
b. Any other emission control device or technique, alternative basic equipment, different fuel or process, determined to be technologically feasible and cost-effective by the APCO. The cost-effective analysis shall be performed in accordance with the methodology and criteria specified by the APCO.[100]

The Project's proposed ATC facility will be a new emission unit, which Dr. Shukla estimates will emit 628.5 lbs/day of NOx, 1059 lbs/day of PM10, and 2,206.5 lbs/day of Carbon Monoxide from its Biochar and RNG production processes.[101] Because these emissions exceed the amounts set in the GCAPCD Regulations, BACT must be applied. The MND fails to disclose these exceedances or incorporate any control measures in direct violation of the GCAPCD Regulations. Dr. Shukla's comments provide substantial evidence supporting a fair argument that the Project's operational emissions are significant and unmitigated. The City must prepare an EIR to disclose and mitigate these impacts, and any subsequent application for an ATC or PTO, must include BACT.

[99] *Id.*
[100] *Id.* at 12.
[101] Shukla Comments, p. 16.

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5. The MND Fails to Adequately Analyze the Project's Potentially Significant Impacts Related to Odors

The MND concludes that the Project will not result in significant impacts related to emission of harmful odors.[102] However, Dr. Shukla's comments provide substantial evidence that the Project may result in potentially significant impacts from the emission of harmful odors during the processing and conversion of biomass into RNG ("ATC Process").[103] The MND fails to analyze or propose mitigation to address these potentially significant impacts in violation of CEQA.

Dr. Shukla found that the ATC production process will emit VOCs, ammonia, hydrogen sulfide, and methane.[104] Dr. Shukla explains that the odors from these compounds are known to cause respiratory irritation and headaches from just short term exposure.[105] The decomposition of organic materials during the processing stages may result in the emission of malodorous compounds, including ammonia, which is well-documented to have a sharp, pungent odor that can cause respiratory irritation and a burning sensation in the nose and throat, even at relatively low concentrations.[106] VOCs, ammonia, hydrogen sulfide, and methane are also known to contribute to air quality degradation along with adverse health effects.[107] The MND's failure to disclose this risk is also significant, because construction workers are highly likely to be exposed to these compounds, due to their proximity to the facility and its operating processes.[108] The MND therefore fails to inform workers and the public about the true risks of the facility's operation.

There is substantial evidence supporting a fair argument that the Project may result in significant impacts related to emission of harmful odors. The MND's failure to disclose or analyze these potential impacts renders its impact analysis unsupported. To comply with CEQA, an EIR must be prepared that analyzes these potentially significant impacts and proposes mitigation.

[102] MND, p. 23.
[103] Shukla Comments, p. 19.
[104] Shukla Comments, p. 19.
[105] Shukla Comments, p. 19.
[106] Shukla Comments, p. 19.
[107] Shukla Comments, p. 19.
[108] Shukla Comments, p. 19.

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6. The MND Lacks a Health Risk Analysis

The MND concludes that the Project would not expose sensitive receptors to substantial pollutant concentrations.[109] However, this conclusion is not supported by substantial evidence for several reasons.

First, the MND inaccurately states that "there are no schools, churches, hospitals, recreation areas, or other public facilities within the immediate vicinity of the project site".[110] This is factually incorrect. There are multiple sensitive receptors located nearby, including several residences within one mile of the existing Carriere Family Farms facility. In fact, six of these residences are located directly behind the site, with the nearest residence situated just 450 feet away. Additionally, an assisted living facility is within 1.4 miles, and a church, fire department, and farm are located just .4 miles from the Project site.[111] These receptors would be affected by any health risks posed by the Project and should have been considered in the MND's analysis.

Second, the MND erroneously assumes that the Project's location within an agricultural area—adjacent to an existing agricultural processing facility—and compliance with local, state, and federal regulations – are sufficient to ensure that emissions will remain less than significant. [112] However, these generalized statements do not constitute substantial evidence. As Dr. Shukla's comments demonstrate, the Project site already presents an intermediate carcinogenic risk.[113] According to Glenn County's 2024 Air Toxic Hot Spots Report, a Health Risk Assessment is required when the carcinogenic risk is high, meaning it meets or exceeds 10 in one million. [114] The proposed Project is expected to include emission of Toxic Air Contaminants ("TACs"), including diesel particulate matter ("DPM"), a known carcinogen, during Project construction and operation.[115] Because of this, Dr. Shukla emphasizes the importance of conducting a quantitative analysis of the Project's expected emissions to assess whether they exceed the GCAPCD cancer risk threshold.[116] The MND's failure to include this analysis renders its air quality impact conclusions inadequate and unsupported.

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[109] MND, pp. 22-23.
[110] MND, pp. 22-23.
[111] Shukla Comments, p. 9.
[112] MND, p. 23.
[113] Shukla Comments, p. 18.
[114] Shukla Comments, p. 18; GCAPCD, 2024 Annual Report AB 2588 Air Toxics "Hot Spots" Program; https://www.countyofglenn.net/sites/default/files/2024%20Hot%20Spots%20Report_0.pdf.
[115] Shukla Comments, pp. 7, 20.
[116] Shukla Comments, p. 18-19.

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Furthermore, CEQA requires a detailed analysis of the human health impacts from exposure to air pollutants that would be generated by a development project.[117] CEQA's statutory scheme and legislative intent include an express mandate that agencies consider and analyze human health impacts, acknowledges that human beings are an integral part of the "environment", and mandates that public agencies determine whether a the "*environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.*"[118] CEQA Appendix G specifically requires the lead agency to evaluate whether the Project will "expose sensitive receptors to substantial pollutant concentrations."[119]

The California Supreme Court has upheld CEQA's requirement to disclose the extent to which a project's air emissions may result in adverse health impacts. In *Sierra Club v. County of Fresno*, the County's failure to include a health risk analysis in an EIR enabled the Court to find the CEQA document "insufficient because it failed to explain why it was not feasible to provide an analysis that connected the air quality effects to human health consequences."[120] Similarly, in this case, the MND provides only a qualitative discussion of the Project's health impacts and fails to provide the requisite discussion of the potential public health impacts that are likely to result from emissions of TACs during construction and operation of the Project. Moreover, the MND does not identify the concentration at which such pollutants would trigger adverse health effects. "Without such information, the general public and its responsible officials cannot make an informed decision on whether to approve the project."[121] The County must prepare an EIR which includes a quantified health risk analysis to connect the Project's air quality impacts with human health consequences.

Finally, the MND's failure to analyze operation and construction-related health risks is inconsistent with regulatory agency guidance. The Office of Environmental Health Hazard Assessment's ("OEHHA") *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* recommends that all short-term projects lasting at least 2 months assess cancer risks and exposure from projects lasting more than 6 months should be evaluated

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[117] *Sierra Club v County of Fresno* (2018) 6 Cal.5th 502, 518–522.
[118] Pub. Res. Code § 21083(b)(3), (d) (emphasis added).
[119] CEQA Appendix G, Section III.D.
[120] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 134 Cal.App.4th 1184, 1220 ("After reading the EIRs, the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin. On remand, the health impacts resulting from the adverse air quality impacts must be identified and analyzed in the new EIRs).
[121] GCAPCD 2024 Air Toxic Hot Spots Report, p. 2, available at: https://www.countyofglenn.net/sites/default/files/2024%20Hot%20Spots%20Report_1.pdf.

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for the duration of the project.[122] Here, the MND does not specify the length of the Project's construction phase, and it provides no indication of a decommissioning date. This suggests that the Project is intended to operate indefinitely, which exceeds the 6-month requirements set forth by OEHHA. Because of this, a quantified HRA under OEHHA guidance should have been prepared to evaluate cancer risk for the full life of the Project.

The MND's failure to include an HRA to quantify the adverse health risk impacts from exposure to TACs during construction and operation renders the MND's air quality analysis inadequate. The conclusion that the Project will not result in significant health impacts is not supported by substantial evidence. Therefore, an EIR must be prepared that includes a quantified HRA and evaluates the Project's potentially significant public health risks. The EIR must also include mitigation measures to reduce those risks to less than significant levels.

B. Substantial Evidence Supports a Fair Argument that the Project Will Have Potentially Significant, Unmitigated Impacts Related to Hazards and Hazardous Materials

The MND concludes that the Project's impacts related to hazards and hazardous materials will be less than significant.[123] However, Dr. Shukla's comments demonstrate that the MND fails to disclose, analyze, and propose mitigation for several potentially significant sources of hazards that could arise during both construction and operation of the Project.[124]

First, the MND entirely omits discussion of multiple risk scenarios associated with key components of the ATC process.[125] These include the storage, compression, and transport of RNG; handling and storage of biochar; transport and storage of biomass feedstock; and risks related to thermochemical conversion and reactor emergencies; and syngas upgrading and methanation hazards.[126] Each of these scenarios could result in a potential emergency involving fires, explosions, and/or hazardous gas releases.[127] Dr. Shukla highlights that the ATC process inherently involves the generation and use of highly combustible and toxic substances, such as

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[122] OEHHA, *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*, pp. 8-18, available at: https://oehha.ca.gov/sites/default/files/media/downloads/crnr/2015guidancemanual.pdf.
[123] MND, p. 43.
[124] Shukla Comments, pp. 22-29.
[125] Shukla Comments, pp. 23-24.
[126] Shukla Comments, pp. 23-24.
[127] Shukla Comments, p. 22.

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syngas, methane, hydrogen, carbon monoxide, and reactive catalysts—all of which pose significant risks to human health and the environment.[128]

Second, the MND fails to address risks to workers, who could be exposed to these hazardous substances during routine operations, maintenance, or during an emergency.[129] Dr. Shukla explains that exposure to syngas—specifically carbon monoxide—can result in a range of health symptoms, including headaches, dizziness, shortness of breath. [130] In extreme case, exposure can be fatal due to oxygen displacement or toxicity.[131] Long term exposure can lead to chronic respiratory issues, neurological damage, or other serious health concerns.[132]

Third, the MND fails to propose any mitigation measures to address these potentially significant risks. To reduce impacts from these risks, Dr. Shukla recommends several measures, including preparation of a site safety and evacuation plan,[133] safety measures for workers,[134] emergency response plan,[135] Leak Detection and Repair plan,[136] and a Pipeline Integrity Plan.[137] These measures will provide essential exposure controls, continuous monitoring systems, and worker training and emergency planning to help ensure the safety of workers, nearby communities, and the environment.

For these reasons, the MND lacks substantial evidence to support its significance determination. Because there is substantial evidence supporting a fair argument that the Project may result in significant impacts related to hazards, the County must prepare a DEIR.

C. The MND Fails to Adequately Analyze the Project's Potentially Significant Impacts Related to GHG Emissions

The MND fails to provide substantial evidence to support its conclusion that the Project will not result in significant impacts related to GHG emissions.[138] The MND reasons that impacts from GHG emissions will be less than significant

[128] Shukla Comments, pp. 25.
[129] Shukla Comments, p. 27.
[130] Shukla Comments, p. 27.
[131] Shukla Comments, p. 27.
[132] Shukla Comments, p. 27.
[133] Shukla Comments, p. 28.
[134] Shukla Comments, p. 27.
[135] Shukla Comments, p. 26.
[136] Shukla Comments, p. 25.
[137] Shukla Comments, p. 25.
[138] MND, p. 40.

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because (1) project construction must comply with Title 24, (2) the Project site is located in a part of the County that is used primarily for orchards and agricultural processing, and (3) there is no significant increase in VMT anticipated as a result of the Project.[139] However, none of these reasons directly relate to reducing GHG emissions nor do they provide substantial evidence to support the MND's conclusion that GHG emissions will be less than significant.

First, compliance with Title 24 does not equate to, nor guarantee, a reduction in GHG emissions. Title 24 sets energy efficiency standards for new construction, which can result in a reduction in GHG emissions. However, Projects generate GHG not just from energy use. GHG's can be emitted as a result of several activities, including, but not limited to construction activities, fugitive emissions, or waste generation. Additionally, the MND fails to explain how compliance with Title 24 would directly reduce GHG emissions, nor reliance on Title 24 alone demonstrate that impacts would be less than significant.[140]

Second, the fact that the Project site is located in an area used for orchards and agricultural processing does not mitigate or address the GHG emissions generated by the Project itself. In fact, agriculture and agricultural processing operations can be significant sources of GHGs due to use of gas-powered farm equipment, use of nitrogen-based fertilizers, and use of natural gas or propane burning equipment like walnut dehydrators. Because of this, it is especially important to conduct a comprehensive analysis of both (1) the existing GHG emissions at the Project site and (2) the expected GHG emissions the Project will add.

Third, although VMT is an important consideration when assessing transportation-related GHG emissions, the MND does not adequately demonstrate how reducing VMT alone will ensure that GHG emissions from the Project will be less than significant. Transportation emissions is only one potential source of GHGs. As discussed above, emissions from construction equipment, waste generation, and energy use must also be considered.

Lastly, the MND fails to provide any quantitative analysis to support its conclusion. CEQA requires an MND to "make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."[141] The Supreme Court clarified

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[139] MND, p. 42.
[140] *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 209; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65.
[141] CEQA Guidelines § 15064.4.

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that CEQA does not require quantification of emissions in every instance and that lead agencies may rely on qualitative factors or performance standards if quantification is not possible or appropriate for the particular project.[142] However, in this case, the MND does not quantify the Project's expected GHG emissions and does not provide any evidence demonstrating that calculating emissions is impossible or inappropriate for the particular project, nor does the MND perform a qualitative analysis of the Project's compliance with applicable climate action or GHG reduction plans. As such, the MND does not evaluate the Project's GHG emissions against any applicable significance thresholds. This omission renders the MND deficient under CEQA and makes it impossible to determine whether the Project's GHG emissions will be significant.

To comply with CEQA, an EIR must be prepared that conducts a comprehensive quantitative analysis of the Project's GHG emissions and proposes mitigation for any significant impacts found.

D. The MND Fails to Adequately Analyze and Mitigate Significant Impacts on Agricultural Resources

The proposed Project is located in the Farmland Security Zone ("FS-80) and consist of two parcels: APN 016-030-011 and 016-090-016.[143] According to the California Department of Conservation's ("CDOC") Farmland Mapping and Monitoring Program ("FMMP"), the first Project parcel (APN 016-030-011) is mapped as 10-acres of Urban and Built-Up Land, with the remaining 86 acres as Prime Farmland.[144] The second Project parcel (APN 016-090-016) is designated as mostly Farmland of Statewide Importance ("Important Farmland"), with some portions designated as Prime Farmland.[145]

The proposed Project will convert over 4.3 acres of this Important Farmland to a non-agricultural use, which constitutes a significant impact under CEQA.[146] Despite this, the MND fails to adequately analyze the impacts of this permanent conversion and does not propose sufficient mitigation.

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[142] *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) Cal.App.5th 160, 201.
[143] MND, p. 1.
[144] MND, p. 17.
[145] California Department of Conservation, California Important Farmland Finder, available at: https://maps.conservation.ca.gov/DLRP/CIFF/ (last visited 3/27/25).
[146] MND, p. 17; MND pdf p. 117.

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CEQA requires the lead agency to identify whether the Project will cause significant environmental effects.[147] If so, then the agency must propose and describe mitigation measures to minimize the significant environmental effects identified.[148] CEQA Appendix G requires the County to analyze several impacts to agricultural resources from implementation of the Project, including whether the Project would:

- Convert Prime Farmland, Unique Farmland, or Important Farmland as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use
- Conflict with existing zoning for agricultural use, or a Williamson Act contract
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.[149]

In this case, the MND concludes that the Project will not conflict with existing zoning, asserting that the proposed Project is a permitted use with a conditional use permit within the FS-80 zone. [150] It further asserts that the Project will not conflict with a Williamson Act contract.[151] Specifically, the MND claims that the Project qualifies as an allowable use on contracted lands because it is ancillary to the existing agricultural processing facility, will not significantly compromise the long-term agricultural productivity of the parcel or of adjacent contracted lands, and that no agricultural land will be converted to non-agricultural use since the Project site is already graded and not currently in active orchard.[152] However, these conclusions are inaccurate and unsupported for several key reasons.

1. The MND Mischaracterizes the Land Conversion Type

The MND incorrectly states that the construction of the ATC facility will not result in the conversion of agricultural land to non-agricultural use.[153] This assertion is based solely on the fact that the Project site is currently graded and not in active agricultural production.[154] However, under CEQA and state farmland protection policies, the impact on agricultural land is determined not by whether it

[147] PRC § 21002.
[148] *Id.*; 14 CCR § 15126.4.
[149] CEQA Appendix G, Section II, Agricultural and Forestry Resources; DEIR, p. 3.3-8.
[150] Glenn County Staff Report, pp. 5-6; Development Code § 15.86.020.
[151] MND, p. 18; California Government Code § 51238.1.
[152] MND, p. 18; California Government Code § 51238.1.
[153] MND, p. 18.
[154] MND, p. 18; California Government Code § 51238.1.

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is presently farmed, but by its land use designation and underlying agricultural value.[155]

In this case, the Project site is zoned for agricultural use and is designated as Prime Farmland and Farmland of Statewide Importance. [156] Additionally, even though the Project will use waste walnut shells (an agricultural byproduct) to create RNG, the Project is an industrial use that will preclude future agricultural activity. This is further evidenced by the fact that the RNG generated by the facility is not intended for use on-site, but rather for off-site distribution via injection into a PG&E pipeline and sale to third-party purchasers.[157] Therefore, the Project would permanently remove agricultural land from production and convert it to industrial use, which the MND failed to disclose and analyze.

2. The MND Fails to Analyze the Impacts from Both Project Parcels

The MND does not adequately analyze or disclose the extent of Important Farmland that would be permanently converted on both Project parcels. Specifically, the MND's agricultural resources impact analysis only accounts for the agricultural land that will be converted on the first Project parcel and not the second parcel. The MND states that the Project will construct an RNG decanting and injection station on the second project parcel.[158] The exact acreage this will occupy is not specified in the MND. This means that more than 4.3 acres of important farmland will be converted to non-agricultural uses, which needs to be disclosed and mitigated.

Because of this omission, the MND's proposed mitigation measure—Mitigation Measure AR-1—is also inadequate.[159] Glenn County Code Section 15.86.030(E)(2)(a) states that "[w]hen a proposed power generation use includes [land designated as Prime Farmland, Farmland of Statewide Importance and Unique Farmland] as designated under the FMMP in Agriculture zoning districts or Williamson Act contracted land…mitigation shall be required to secure replacement

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[155] CEQA Appendix G, Section II, Agricultural and Forestry Resources; DEIR, p. 3.3-8 ("In determining whether impacts to agricultural resources are significant environmental effects…[w]ould the project: (a) 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 Resources Agency, to non-agricultural use?").
[156] MND, p. 17; California Department of Conservation, California Important Farmland Finder, available at: https://maps.conservation.ca.gov/DLRP/CIFF/ (last visited 3/27/25).
[157] MND, pdf p. 114.
[158] MND, pdf p. 114.
[159] MND, p. 17.

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land of equal or greater farming potential at a ratio of 1:1. Said mitigation may be accomplished on the same lot." In this case, the Mitigation Measure AR-1 proposes conserving 4.3 acres of Prime Farmland on the project site, but this only accounts for the land that will be converted on the first Project parcel. [160] Thus, this does not satisfy the 1:1 mitigation ratio mandated by Glenn County's development code.

3. Conservation Easements Alone Do Not Reduce Impacts to Less Than Significant Levels

Even if Mitigation Measure AR-1 were amended to meet the 1:1 mitigation ratio, conservation easements alone do not reduce impacts from the conversion of agricultural land to less than significant levels under CEQA. The MND incorrectly concludes that agricultural impacts would be less than significant with mitigation.[161]

In *King & Gardiner Farms, LLC v. County of Kern* determined that agricultural conservation easements ("ACEs") are not effective at reducing the project's conversion of agricultural land to a less than significant level for purposes of CEQA.[162] This holding was later affirmed in *V Lions Farming, LLC v. County of Kern*, which held that ACEs constitute effective mitigation under CEQA by preserving substitute resources even though ACEs may not ensure that the project causes no net loss of farmland.[163]

Accordingly, Mitigation Measure AR-1, alone, does not mitigate the impacts of the Project to a less than significant level. Therefore, as proposed, the Project will result in significant impacts to agricultural resources that need to be disclosed and mitigated in an EIR.

In sum, the MND fails to adequately analyze, disclose, and mitigate the Project's impacts on Important Farmland. It misrepresents the nature of the Project's land use, underreports the total amount of agricultural land conversion, and proposes legally insufficient mitigation. Contrary to the MND's conclusions, the Project will result in the permanent loss of valuable agricultural land, and the impacts remain significant even with mitigation. In order to fix these errors, an EIR needs to be prepared and circulated for public review.

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[160] MND, p. 17.
[161] MND, p. 17.
[162] *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.
[163] *V Lions Farming, LLC v. County of Kern* (2024) 318 Cal.Rptr.3d 879, 884.

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E. The MND Lacks Substantial Evidence to Conclude That the Project Will Not Result in Significant Public Utility Impacts

The MND concludes that the Project will not result in significant impacts related to the expansion of public utility facilities.[164] To support this conclusion, the MND states that "[t]here is no municipal wastewater treatment facility proposed with this project. The project will not require or result in new or expanded municipal facilities that could cause significant environmental effects. The proposal will continue to rely on individual sewage disposal systems for wastewater treatment, if required."[165] However, the comments from Glenn County and the Project's Conditions of approval all mention required expansion/new construction of on-site wastewater treatment systems in order to accommodate the increase in employees.[166] This was not disclosed in the utility section of the MND, nor were its potential environmental impacts discussed.

CEQA requires an EIR to identify and describe the significant direct and indirect environmental impacts that will result from the project in both the short term and the long term.[167] This impact analysis must cover all phases of a project, including planning, acquisition, development, and operation.[168]

Here, the expansion of or construction of new on-site wastewater treatment systems can lead to several environmental impacts such as air quality, ghg, and noise impacts. Accordingly, the MND violates CEQA by failing to analyze the potential air, noise, transportation, and other construction-related impacts that would result from the construction of the Project's expanded/new on-site wastewater treatment system. By not including this in the Project's impact analysis, the MND underestimates and fails to accurately disclose the Project's true impacts.

Therefore, the County must prepare an EIR that analyzes the potential environmental impacts of this required on-site wastewater treatment system expansion.

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[164] MND, p. 66.
[165] MND, p. 66.
[166] Mitigation Monitoring and Conditions of Approval, p. 3, 38; Glenn County Agency Comments, p. 2; Glenn County Environmental Health Department Letter (December 17, 2024), p. 1.
[167] CEQA Guidelines § 15126.2(a).
[168] CEQA Guidelines § 15126.

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F. The MND Lacks Substantial Evidence to Conclude That the Project's Noise Impacts Will Be Less Than Significant

The MND concludes that the Project's noise impacts will be less than significant based on the assumption that noise impacts associated with on-site activities and traffic are not anticipated to exceed noise standards.[169] However, the MND does not provide substantial evidence to support this conclusion.

Under CEQA, the lead agency is required to consider both the "absolute noise level" associated with a project and the increase in the noise level resulting from the project when evaluating noise impacts.[170] This dual consideration is essential to fully understand the potential consequences of the Project's noise on the surrounding environment.

The MND does not adequately address either of these requirements. First, the MND fails to provide sound mapping or estimates of the existing noise conditions at the Project site. According to the Glenn County Noise Ordinance, a significant impact will occur if "the ambient noise level is already above the standards contained in [the noise element], or the project will result in an increase in ambient noise levels by more than 3 dB, whichever is greater."[171] The site is currently developed with a walnut processing facility and surrounding orchards.[172] The proposed Project will add 24 hour operation of an ATC facility to this existing use.[173] Because of this, the existing noise baseline must be considered to properly assess the potential incremental impacts of the Project. Without understanding the current noise environment, it is impossible to determine how the Project will affect noise levels relative to the existing conditions.

Second, the MND does not provide estimates of the Project's expected noise levels. Without these estimates, it is impossible to determine whether the noise generated by construction activities or ongoing operations will exceed the applicable noise thresholds set forth in the Glenn County Development code[174] and Noise Ordinance.[175]

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[169] MND, p. 54.
[170] *Kind & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 887, 893; *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 CA4th 714, 733.
[171] General Plan, p. N-2.
[172] Staff Report, p. 5.
[173] MND, p. 11.
[174] Development Code §15.56.100.
[175] General Plan, pp. N-0–N-8.

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To address these deficiencies and comply with CEQA, an EIR must be prepared that provides a comprehensive and quantitative analysis of both the absolute noise levels and the potential increase in noise over ambient conditions.

G. The MND Lacks Substantial Evidence to Conclude That the Project's Impacts Related to Biological Resources Will Be Less Than Significant

The MND concludes, without substantial evidence, that there will be no significant impacts to biological resources.[176] CEQA requires an agency to set forth the bases for its findings on a project's environmental impacts; a bare conclusion without an explanation of its factual and analytical basis is not a sufficient analysis of an environmental impact.[177]

Here, the MND concludes that the Project's impacts on biological resources will be less than significant because "[a]ccording to the Glenn County Environmental Impact Report, no sensitive species have been known to be located within he project site."[178] However, the County failed to provide access to the Glenn County Environmental Impact Report. The MND also fails to provide any other evidence to support its conclusion, such as: a survey of the site for biological resources, or reviews of literature, databases, and local experts for documented occurrences of special-status species. Without this information, there is no evidence to support the MND's assertion that no sensitive species are on the Project site.[179]

Therefore, to fix this deficiency, the County must prepare and circulate an EIR that provides a comprehensive analysis of potential impacts to biological resources and supports any conclusions with substantial evidence.

H. The MND Lacks Substantial Evidence to Conclude That the Project's Energy Impacts Will Not Be Wasteful, Inefficient, or Unnecessary

The MND concludes that the Project will not result in a significant impact due to wasteful, inefficient or unnecessary energy consumption.[180] However, this conclusion is not supported by substantial evidence and the MND fails to discuss

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[176] MND, p. 24.
[177] *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* (1988) 47 C3d 376, 404; *Sierra Watch v. County of Placer* (2021) 69 CA5th 86, 101; *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 CA4th 362, 393.
[178] MND, p. 26.
[179] MND, p. 26.
[180] MND, p. 32.

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energy conservation measures that might be available or appropriate for the Project, in violation of CEQA.

CEQA requires an environmental document to discuss mitigation measures for significant environmental impacts, including "measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."[181] The CEQA Guidelines require discussion of energy conservation measures when relevant, and provide the following examples in Appendix F:

- Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated into the project and why other measures were dismissed.
- The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.
- The potential for reducing peak energy demand.
- Alternate fuels (particularly renewable ones) or energy systems.
- Energy conservation which could result from recycling efforts.[182]

Courts have rejected CEQA documents that fail to include adequate investigation into energy conservation measures that might be available or appropriate for a project.[183] In *California Clean Energy Commission v. City of Woodland* ("*CCEC*"), the Court of Appeal reviewed an EIR for a shopping center on undeveloped agricultural land.[184] The EIR in *CCEC* concluded that, due to the proposed project's compliance with Title 24 guidelines and regulations, the project would be expected to have a less-than-significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy.[185] But the lead agency's EIR did not include a discussion regarding the different renewable energy options that might be available or appropriate for the project.[186] The Court held "the City's EIRs failed to comply with the requirements of Appendix F to the Guidelines by not discussing or analyzing renewable energy options."[187] The lead agency argued that

[181] PRC § 21100(b)(3); *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 930.
[182] CEQA Guidelines § 15126.4(a)(1)(C) (stating "'Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.").
[183] *Ukiah Citizens,* 248 CA4th 256; *Spring Valley Lake Ass'n v. City of Victorville* (2016) 248 Cal. App. 4th 91.
[184] *CCEC,* 225 Cal.App.4th 173.
[185] *Id.* at 184.
[186] *Id.* at 213.
[187] *Id.* at 213.

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compliance with the Building Code sufficed to address energy impact concerns for the project.[188] But the Court explained:

> Although the Building Code addresses energy savings for components of a new commercial construction, it does not address many of the considerations required under Appendix F of the CEQA Guidelines…These considerations include whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. Here, a requirement that Gateway II comply with the Building Code does not, by itself, constitute an adequate assessment of mitigation measures that can be taken to address the energy impacts during construction and operation of the project.[189]

The Supreme Court of California agreed with the *CCEC* court's decision in *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer* ("*League to Save Lake Tahoe*"), holding that even projects that find a less-than-significant energy impact must "discuss whether any renewable energy features could be incorporated into the project."[190] In *Save Lake Tahoe*, the Court considered an EIR for a land use specific plan and rezoning to permit residential and commercial development and preserve forest land near Truckee and Lake Tahoe.[191] The EIR did not consider whether it was feasible to power the project on 100 percent renewable electrical energy or some lesser percentage, nor evaluate strategies for reducing reliance on fossil fuels, increasing reliance on renewable resources, reducing peak loads, and reducing the impacts of relying on remote generation facilities.[192] The lead agency reasoned that this analysis was not required because energy impacts would be less than significant.[193] Citing CEQA Guidelines Section 15126.2, subdivision (b) and the decision in *CCEC*, the Court held that when an EIR analyzes the project's energy use to determine if it creates significant effects, it should discuss whether any renewable energy features could be incorporated into the project.[194] The Court found that the EIR violated CEQA for not discussing whether the project could increase its reliance on renewable energy sources to meet its energy demand.[195]

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[188] *Id.* at 210, 211.
[189] *Id.* at 211.
[190] *League to Save Lake Tahoe* (2022) 75 CA5th 63, 167–68.
[191] *Id.* at 70.
[192] *Id.* at 165-166.
[193] *Id.* at 166.
[194] *Id.* at 167-168.
[195] *Id.* at 168.

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Here, the MND concludes that energy impacts will be less than significant without quantifying them, based on the assumption that the Project will comply with "California Green Building Standards as well as California Energy Code."[196] However, this conclusion is not supported by substantial evidence for several reasons. First, as the cases above demonstrate, compliance with Title 24 regulations, alone, does not support a conclusion that energy impacts are less than significant. In order to comply with CEQA, available conservation measures that go beyond what is required by Title 24 must be discussed.

Second, compliance with CalGreen Code is also insufficient to support the claim that the Project's energy impacts will not be wasteful, inefficient, or unnecessary. CalGreen is a code with mandatory and voluntary requirements for new residential and nonresidential buildings throughout California.[197] The mandatory requirements address issues like energy efficiency, water efficiency and conservation and sustainable construction practices.[198] None of these measures specifically address how much energy is used during the operational phase of the facility, especially for energy-intensive processes like those used in the advanced thermal conversion process. For example, the proposed ATC facility will use a gasification process to convert biomass into RNG.[199] These processes are energy-intensive because they require high temperatures (>700 degrees Celsius) to break down the material.[200] Additionally, the proposed Project will rely on electricity from the grid to operate.[201] CalGreen does not require specific measures to ensure that the operation itself will minimize reliance on non-renewable energy or focus on renewable energy sources.

Lastly, the MND fails to satisfy CEQA's requirement that a Project's energy impacts analysis must include a discussion regarding the different renewable energy options that might be available or appropriate for the Project. [202] For example: using energy-efficient construction equipment, installing solar panels, re-

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[196] MND, p. 33.
[197] 2022 California Green Buildings Standard Code (CalGreen), available at: https://codes.iccsafe.org/content/CAGBC2022P1/preface.
[198] CalGreen Chapter 5.
[199] Shukla Comments, p. 19.
[200] U.S. Department of Energy, *Hydrogen Production: Biomass Gasification*, available at: https://www.energy.gov/eere/fuelcells/hydrogen-production-biomass-gasification#:~:text=Gasification%20is%20a%20process%20that,%2C%20hydrogen%2C%20and%20carbon%20dioxide.
[201] MND, p. 11.
[202] CEQA Guidelines § 15126.4(a)(1)(C) (stating "'Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant."); *California Clean Energy Commission v. City of Woodland* (2014) 225 Cal.App.4th 173; *League to Save Lake Tahoe* (2022) 75 Cal.App.5th 63.

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using a portion of the RNG produced to power facility operations. The MND also fails to evaluate the feasibility of meeting CalGreen's voluntary standards described in Appendix A5, Nonresidential Voluntary Measures. These standards include energy consumption measures applicable to this Project. Appendix A5 describes two tiers of voluntary measures – Tier 1 and Tier 2. Tier 2 standards would result in greater reductions in energy consumption. CalGreen Section A5.203.1.2 sets energy budgets that are less than permitted by the mandatory Title 24 energy standards.[203] CalGreen Section A5.304.1 requires the use of drought-tolerant landscaping and weather-based irrigation controls around the facility.[204] CalGreen Division A5.4 requires the use of recycled and regionally sourced materials during construction.[205] The MND's statement that the Project will comply with CalGreen does not address consistency with these CalGreen voluntary standards.

Therefore, the MND's analysis of the Project's energy impacts is incomplete and inadequate. It fails to adequately analyze available conservation measures or provide evidence that such measures are inapplicable to the Project or infeasible to implement. It also fails to meaningfully address Appendix F's considerations of whether a building should be constructed at all, how large it should be, where it should be located, whether it should incorporate renewable energy resources, or anything else external to the building's envelope. This analysis must be provided in a revised and recirculated EIR.

VI. THE COUNTY LACKS SUBSTANTIAL EVIDENCE TO APPROVE THE PROJECT'S CONDITIONAL USE PERMIT

As proposed, the County cannot approve the Conditional Use Permit Application because it fails to meet the necessary requirements as outlined in the Glenn County Development Code. Specifically, Development Code Section 15.22.020 states that a Conditional Use permit may only be approved if the following findings can be made:

A. That the proposed use at the particular location is necessary or desirable in providing a service or facility which will contribute to the general well-being of the public;
B. That such use will not, under the circumstances of the particular case, be detrimental to the health, safety or general welfare of persons residing or working in the vicinity, or injurious to property or improvements in the vicinity;

[203] CalGreen §§ A5.203.1.2.1, A5.203.1.2.2.
[204] CalGreen §§ A5.304.6, A5.304.7.
[205] CalGreen §§ A5.4-5.1, A5.406.1.

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C. That the site for the proposed use is adequate in size and shape to accommodate said use and to accommodate all of the yards, setbacks, walls or fences, and other features required herein or by the planning commission
D. Except in the case of the expansion of a nonconforming use, that the granting of the permit shall not adversely affect the general plan or any area plan of the county.[206]

As discussed above, the Project's proposed use will conflict with the General Plan's IA land use designation and Development Code Section 15.86.030, which requires a 1:1 conservation ratio to mitigate for the conversion of Important Farmland. Moreover, there is substantial evidence supporting a fair argument that the Project may result in potentially significant public health and safety issues as explained in our discussion of air quality and hazards. Consequently, the necessary findings for a conditional use permit for the Project cannot be made. An EIR must be prepared to fully analyze and mitigate the significant impacts identified in our comments.

VII. CONCLUSION

For the reasons discussed above, the MND for the Project is inadequate under CEQA. It must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions will necessarily require that an EIR be prepared and circulated for public review. Until an EIR has been prepared and circulated, as described herein, the County may not lawfully approve the Project.

Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Alaura McGuire

Alaura McGuire

Attachments
ARM:acp

[206] Development Code §15.22.020.

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EXHIBIT A

GROUP DELTA

Adams Broadwell Joseph Cardozo

April 14, 2025

601 Gateway Blvd. Suite 1000

Proposal No. EN8511

South San Francisco, CA 94080

Attention: Alaura McGuire

Subject: Comment Letter on Carriere/Syntech CF1, LLC Advanced Thermal Conversion (CSATC) Mitigated Negative Declaration (MND) Glenn County, California

Dear Ms. McGuire,

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Dr. Komal Shukla has reviewed the materials related to the above-referenced project. This document serves as Dr. Shukla's comment letter regarding the comprehensive review of the Mitigated Negative Declaration (MND) for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion (CSATC). Dr. Shukla's review does not imply validation of the conclusions or content within the reviewed documents. The absence of comments on specific items should not be interpreted as acceptance of those items.

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1. Introduction

Carriere/Syntech CF1, LLC (the "Applicant") is proposing to construct and operate a Biomass to Renewable Natural Gas (RNG) Project utilizing Advanced Thermal Conversion (CSATC) in the unincorporated area of Glenn County. The proposed development is located approximately 242 acres at 1640 State Route 45: south of the community of Glenn, east of State Route 45, south of County Road 52, west of the Sacramento River, and north of County Road 54.[1]

The Project is designed to remediate up to 135,000 tons per year of walnut waste shells from the existing Carriere processing facility through continuous 24/7 thermochemical processing. The facility is projected to produce approximately 1,041,000 MMBTU/year of RNG, which will be compressed, stored in mobile transport trailers, and injected into PG&E natural gas pipeline at the existing walnut huller/dryer facility.[2]

The ATC process consists of four main operational components; organic feedstock to syngas conversion, biochar transfer and storage facility, collection of syngas and upgrade to pipeline quality RNG, and pipeline RNG storage and transfer facility. The ATC process utilizes thermochemical conversion to generate syngas, which will undergo a secondary methanation reaction to be upgraded into renewable natural gas (RNG). The Project is projected to produce approximately 2,850 MMBtu/day of RNG.[3]

Upon my review of the air quality and health risk assessment analyses in the MND supplied by the County and Applicant, I have concluded that the analyses are substantially deficient and fail to adhere to CEQA in informing the public of potential impacts. Furthermore, the Project will result in significant impacts that have not been properly addressed or mitigated. My overall review and analysis of the MND indicates that:

- The MND fails to disclose baseline ambient air quality conditions for the Project site.
- The MND's air quality impact assessment fails to incorporate or apply all the applicable regional thresholds of significance for emissions, as required by the California Environmental Quality Act (CEQA) guidelines.
- The MND omits detailed analysis of construction-phase activities, including anticipated emission sources, quantities of pollutants, and duration and phasing of construction.
- Operational emissions associated with Biochar and RNG production, material handling, and onsite vehicle and equipment use are not included.

[1] Refer to Para. 4 on Pg. 2 of Glenn County Planning & Community Development Services Agency Staff Report

[2] Refer to Para. 1 on Pg. 2 of Glenn County Planning & Community Development Services Agency Staff Report

[3] Refer to 'Project Description' Para. 3 on Pg. 7 of Glenn County Planning & Community Development Services Agency Staff Report

- Wind-blown fugitive dust generated during operational and transportation activities are not properly addressed or mitigated within the MND – especially under local meteorological conditions.
- Estimated greenhouse gas (GHG) emissions from Biochar and RNG Production exceed established CEQA thresholds for CO_2. Estimated methane slip reaches a concerning level with no mitigation despite its global warming potential (GWP) factor.[4]
- The MND does not disclose significant operational emissions and does not identify or propose mitigation measures to reduce significant operation-related air quality impacts, contrary to CEQA's requirements to require mitigation for significant impacts.
- The MND fails to assess or disclose potentially significant impacts from operational upsets, such as equipment failure, fires, or explosions, which pose acute health and safety risks to onsite workers and nearby communities.
- The MND does not adhere to Occupational Safety and Health Administration (OSHA) regulations regarding the development of a detailed site safety and evacuation plan.
- Potential odor emissions associated with the RNG conversion process are not addressed, nor are odor control strategies provided, despite the likelihood of adverse health effects disclosed in the MND.

I have 10 years of expertise in environmental engineering, including air emissions analysis and air pollution control strategies; greenhouse gas emissions inventory development and mitigation; and the preparation of Environmental Impact Reports (EIRs) in compliance with CEQA and the National Environmental Policy Act (NEPA) regulations. I have MS and PhD degrees in environmental management and a PhD in air quality modeling. My resume is included in Exhibit 1 to these comments.

Additionally, Group Delta has contributed technical analysis to more than 500 CEQA and NEPA documents, including specialized sections addressing air quality, greenhouse gas emissions, water resources, hazardous waste management, public health, and worker health and safety, among other key environmental areas.

Group Delta has collaborated with the California Energy Commission (CEC) on a range of high-profile projects, including the Rio Vista Master Plan Community, the I-270 Improvements Air Quality Assessment, NYSERDA Project, Dogwood Geothermal Energy Project, and Archaea Landfill Gas-to-Energy Project.

[4] U.S. EPA, Understanding Global Warming Potentials; https://www.epa.gov/ghgemissions/understanding-global-warming-potentials

2. Environmental Setting

2.1 Failure to Provide Baseline Air Quality Conditions

The MND prepared for the Project fails to comply with CEQA when establishing its baseline conditions.

Guidelines § 15063(a) states that:[5]

- Following preliminary review, the lead agency shall conduct an initial study determine if the project may have a significant effect on the environment. If the lead agency can determine that an EIR will clearly be required for the project, an initial study is not required but may still be desirable.
    - (1) All phases of project planning, implementation, and operation must be considered in the initial study of the project.

Guidelines § 15063(d) states that:[6]

- An initial study shall contain in brief form:
    - (1) A description of the project including the location of the project.
    - (2) An identification of the environmental setting.

Despite these requirements, the MND does not provide a sufficient assessment of baseline ambient air quality conditions in the Project vicinity. The existing facility operates as a walnut hulling and drying center that processes raw walnuts. It currently generates up to 135,000 tons per year of walnut shell waste, which is proposed to serve as the primary biomass feedstock for the Project. To ensure a complete and accurate assessment of the proposed Project's impacts, the conditions of the existing facility should be fully disclosed to accurately establish the baseline environmental setting. The MND does not disclose this information.

Any project-related increases in environmental impacts – such as air pollution, traffic, hazardous materials use, and operational intensity should be evaluated with existing conditions. The absence of quantified background pollutant concentrations, such as existing levels of ozone (O_3), particulate matter ($PM_{2.5}$ and PM_{10}), nitrogen oxides (NOx), and other criteria pollutants presents a significant omission of information necessary to evaluate the Project's potential impacts. These key air pollutants are known to contribute to serious environmental and public health impacts. All construction and operational Project-related increases in emissions, hazardous materials use, and operational intensity should be evaluated against existing conditions as well as applicable thresholds. Project-related emissions can result in new or significantly greater environmental

[5] Cal. Code Regs. Tit. 14, § 15063 – Initial Study ; https://www.law.cornell.edu/regulations/california/14-CCR-15063

[6] *Ibid*

impacts. Without a clear baseline, it is impossible to accurately assess the Project's potential to cause environmental harm.

Furthermore, the MND fails to include characterization of existing air quality conditions, including attainment or non-attainment status regarding National and California Ambient Air Quality Standards (NAAQS and CAAQS).

Therefore, because the MND fails to establish an accurate baseline against which to assess the Project's environmental impacts, there is no basis to support the County's determination that the proposed Project will not result in significant environmental impacts with respect to air quality and nearby receptors. This renders the MND's impact analysis inaccurate and unsupported. An EIR should be prepared to correct this deficiency.

3. Construction Emissions

3.1 The MND Fails to Describe Construction Activities and Fails to Quantify Emissions Associated with Construction

The MND fails to quantify expected criteria pollutant emissions or demonstrate compliance with local, regional, State and Federal regulatory thresholds. As discussed previously, Glenn County is classified in nonattainment for PM_{10} by CAAQS. Despite this, the MND fails to quantify expected emissions from construction and does not provide any demonstration of compliance with applicable thresholds.

The MND also omits essential inputs necessary to perform an emissions estimate using the California Emissions Estimator Model (CalEEMod), a standard modeling tool recommended by CARB.[7]

CalEEMod requires detailed, project-specific data inputs to generate reliable emissions estimates. These inputs include:

- Construction equipment specifications such as horsepower ratings and fuel type.
- Anticipated equipment usage, including load factors, hours of operation, quantity of equipment.
- Construction phasing and scheduling, which affects daily and cumulative emissions.
- On-road and off-road vehicle activity levels.
- Soil disturbance parameters, which are directly correlated with fugitive PM_{10} emissions.

[7] See e.g. CAPCOA CalEEMod, https://capcoa.org/caleemod/

Construction equipment, including backup generators, is a significant source of diesel particulate matter (DPM), a toxic air contaminant (TAC) and a recognized human carcinogen.[8,9] DPM consists of a complex mixture of fine particulate matter, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and heavy metals generated from diesel engine combustion.[10] Due to its small aerodynamic diameter (≤2.5 µm), DPM can penetrate deep into the alveolar region of the lungs, where it can induce inflammation, oxidative stress, and DNA damage, leading to severe respiratory, cardiovascular, and carcinogenic effects.[11]

None of this critical data is disclosed in the MND. As a result, any emissions analysis is incomplete, unsupported and in direct violation of CEQA, which requires that environmental documents be supported by substantial evidence. [12] Additionally, no modeling has been conducted and there is no basis to determine whether the Project will exceed regulatory thresholds for PM_{10} and other criteria pollutants. This omission is particularly concerning given the Project's potential to generate significant emissions from construction activities such as grading, excavation, and vehicular travel on unpaved surfaces.

3.2 Potential Impact of Wind-Blown Fugitive Dust from Construction Activities

The MND fails to properly analyze and mitigate the Project's potential air quality impacts resulting from the fugitive dust emissions generated by construction activities. The document also does not provide sufficient detail regarding the control measures that would be implemented to prevent or reduce the generation of airborne particulate matter, which poses known risks to public health.

Construction activities generate dust through ground disturbance, vehicle movement, material handling, and other sources. [13] In the absence of effective dust suppression measures, such as regular watering of disturbed areas, vehicle speed controls, stabilized ingress/egress points, or temporary enclosures – these activities can contribute substantially to localized PM.[14] This issue

[8] Cal/EPA OEHHA and American Lung Association of California, Health Effects of Diesel Exhaust; https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf

[9] Cal/EPA OEHHA and American Lung Association of California, Appendix A: Hot Spots Unit Risk and Cancer Potency Values, p. 1 (DPM unit risk = 3 E-4); https://oehha.ca.gov/media/CPFs042909.pdf

[10] CARB, Diesel Exhaust & Health; Overview: Diesel Exhaust & Health | California Air Resources Board

[11] OEHHA and the American Lung Association of California, Health Effects of Diesel Exhaust; https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf

[12] Cal. Code Regs. Tit. 14, § 15064; https://www.law.cornell.edu/regulations/california/14-CCR-15064

[13] U.S. EPA, 'Fugitive Dust Sources', Fugitive Dust Control Measures and Best Practices; https://www.epa.gov/system/files/documents/2022-02/fugitive-dust-control-best-practices.pdf

[14] U.S. EPA, AP-42 Ch. 13.2, Fugitive Dust Sources; https://www3.epa.gov/ttnchie1/ap42/ch13/final/c13s02.pdf

is of particular concern in Glenn County, which is subject to moderate to high wind conditions throughout the year. Wind speeds in the region average between 5.0 and 7.8 miles per hour and have been recorded at sustained levels up to 32.2 miles per hour.[15] Under such conditions, airborne dust can easily become entrained in the atmosphere and transported off-site, thereby exacerbating air quality degradation and potentially impacting sensitive receptors, resulting in significant air quality and public health impacts.

The MND's omission of enforceable mitigation measures to address fugitive dust emissions is an additional deficiency under CEQA, which requires that a project clearly identify potentially significant environmental effects and propose mitigation measures that can avoid or reduce those effects.[16] The MND fails to demonstrate how the Project would achieve compliance with applicable air quality standards or thresholds of significance established by the regional air districts. The MND also fails to provide:

- Forecasted air quality conditions during construction phases, which are necessary to determine the Project's individual contribution to local air pollution.
- Quantitative air dispersion modeling or emissions estimations for construction phases, which are essential for determining compliance with applicable significance thresholds.
- An analysis of cumulative impacts in relation to nearby sensitive receptors. The MND failed to identify three potential sensitive receptors including a church, a farm, and a fire department – all within a 4-mile radius as seen in Figure 1.

[15] Weather Spark; https://weatherspark.com/y/654/Average-Weather-in-Willows-California-United-States-Year-Round

[16] Cal. Code Regs. Tit. 14, § 15126.4; https://www.law.cornell.edu/regulations/california/14-CCR-15126.4



Figure 1: *Project Site Location and Nearby Sensitive Receptors*

Additionally, the MND asserts that GHG emissions would be less than significant due to technological advances and the fact that the facility is in an area predominantly used for orchards and agricultural processing.[17] However, this assertion lacks sufficient justification due to a lack of emissions estimates. Furthermore, the MND fails to mention that while Glenn County is in federal attainment for PM_{10}, it is designated as nonattainment for PM_{10} under CAAQS, as seen in Figure 2.[18]

[17] Refer to Para. 5-7 on Pg. 42-43 of Glenn County Planning & Community Development Services Agency Mitigated Negative Declaration/Initial Study

[18] CARB, Maps of State and Federal Area Designations; https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.



Figure 2: *CARB Area Designations for State Ambient Air Quality Standards PM_{10} 2023*

Overall, the MND fails to adequately evaluate, quantify, or mitigate air quality impacts associated with construction-phase fugitive dust emissions. The document omits critical details regarding enforceable control measures, and soil exposure risks, and overlooks the region's susceptibility to high wind events that can exacerbate airborne particulate matter dispersion. As such, the MND is insufficient and does not comply with CEQA's standards for environmental disclosure or impact reduction.

4. Operation Emissions

4.1 The MND Fails to Describe Facility Operations and Fails to Quantify Operational Emissions

The MND fails to include a sufficient description of the facility's operational processes and fails to quantify emissions from key operations, including biomass conversion, syngas production, gas cleanup, flaring, and backup power generation. Industry-standard practice for evaluating operational emissions includes detailed air dispersion modeling using tools such as AERMOD or CalEEMod. These tools utilize site-specific inputs and source-specific emission factors to estimate pollutant concentrations at and beyond the project boundary. AERMOD and CalEEMod are widely used and are routinely required by air districts and regulatory agencies for CEQA compliance. These are common processes in ATC operations and are known to emit a range of pollutants, including criteria pollutants, hazardous air pollutants (HAPs), and GHGs.[19,20] For example:

Biomass Conversion

Biomass conversion processes generate fine particulate matter (PM) and dust during the handling, transfer, and storage of materials such as biochar, particularly due to the dry and bulk nature of the feedstock. Biochar, a carbon-rich byproduct of thermochemical conversion, may also emit odors when exposed to varying moisture levels or atmospheric conditions.[21]

Syngas Production

During syngas production and gas cleanup, raw syngas undergoes multi-stage filtration to remove particulate matter, sulfur compounds, and trace contaminants such as hydrogen sulfide (H_2S) and ammonia (NH_3) to meet Pacific Gas and Electric (PG&E)'s renewable natural gas (RNG) quality standards.[22] However, incomplete filtration may still result in the release of residual PM and sulfur-based emissions.

Gas Cleanup Process

The methanation process—specifically through the LiquiMax catalytic system—converts methane precursors in the syngas into pipeline-grade RNG by enhancing methane (CH_4) content while removing non-methane gases.[23] This stage can produce emissions of carbon dioxide (CO_2),

[19] U.S. Energy Information Administration, Biomass and the Environment; https://www.eia.gov/energyexplained/biomass/biomass-and-the-environment.php

[20] Science Direct, Emissions Factors from Distributed, Small-scale Biomass Gasification Power Generation: Comparison to Open Burning and Large-Scale Biomass Power Generation; https://www.sciencedirect.com/science/article/abs/pii/S1352231018308811.

[21] Refer to 'Project Description' Para. 2-3 on Pg. 6 of Glenn County Planning & Community Development Services Agency Staff Report

[22] Refer to 'Project Description' Para. 3 on Pg. 7 of Glenn County Planning & Community Development Services Agency Staff Report

[23] *Ibid*

trace amounts of carbon monoxide (CO) and methane (CH_4), as well as nitrogen oxides (NO_x) potentially generated from catalytic reactions at high temperatures.

Backup Power Generation

Additionally, CO_2 removed during upgrading may be recirculated to enhance RNG production efficiency. Emissions from backup power generation—used to support facility operations—may include particulate matter from syngas combustion, NO_x and CO from incomplete combustion, and overall greenhouse gas (GHG) emissions, all of which require proper quantification and control measures to mitigate air quality impacts.[24]

Without detailed emissions data and process-specific analysis, it is not possible to model potential emissions generated under both normal and upset conditions. It is also not possible to evaluate the potential environmental and public health risks the Project may pose.

In summary, by failing to adequately characterize facility operations and quantify emissions from key processes, the MND fails to accurately assess air quality impacts and lacks substantial evidence to conclude that the Project's air quality impacts will be less than significant.

4.2 Air Pollutant Emissions Estimation for Biochar and RNG Production

The ATC production process is expected to generate significant carbon dioxide emissions, primarily as a byproduct of biomass combustion and gasification. The facility is designed to process 15 tons per day (30,000 lbs/day) of biomass-derived feedstock for biochar production and generate 2,850 MMBtu/day of RNG through methanation and upgrading processes.

Using data from the Applicant's supporting documentation, U.S. EPA AP-42 Emission Factors, and regulatory data from CARB, I have conducted an emissions estimate for the facility's production process.

Biochar Production – Emissions from Biomass Pyrolysis and Combustion

As stated previously, biochar production involves the thermochemical conversion of biomass under low-oxygen conditions, generating syngas, volatiles, and solid carbon residues. Key pollutants from this step include:

- Carbon Monoxide (CO)
- Carbon Dioxide (CO_2)
- Particulate Matter ($PM_{2.5}$ and PM_{10})
- Nitrogen Oxides (NOx)
- Sulfur Dioxide (SO_2)

[24] U.S. EPA, Renewable Natural Gas; https://www.epa.gov/lmop/renewable-natural-gas

- Volatile Organic Compounds (VOCs)

Pollutant	Emission Factor (lbs/ton)	Source
CO	4.6	U.S. EPA AP-42[25]
CO_2	3,800	U.S. EPA AP-42[26]
$PM_{2.5}$	1.5	U.S. EPA AP-42[27]
PM_{10}	2.2	U.S. EPA AP-42[28]
NOx	3.9	U.S. EPA AP-42[29]
SO_2	0.2	U.S. EPA AP-42[30]
VOCs	2.8	U.S. EPA AP-42[31]

Table 1: *Emission Factors for Biochar Production*

Using the given daily production value of 15 tons/day and multiplying that by the emissions factor, the daily emissions of the key pollutants will be:

Pollutant	Emission Factor (lbs/ton)	Daily Emissions (ton/day)
CO	4.6	69
CO_2	3,800	57,000

[25]U.S. EPA, Table 1.4-1, AP-42 1.4 Natural Gas Combustion; https://www.epa.gov/sites/default/files/2020-09/documents/1.4_natural_gas_combustion.pdf

[26]U.S. EPA, Table 1.6-2, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

[27] U.S. EPA, Table 1.4-2, AP-42 1.4 Natural Gas Combustion; https://www.epa.gov/sites/default/files/2020-09/documents/1.4_natural_gas_combustion.pdf

[28] *Ibid*

[29]U.S. EPA, Table 1.6-2, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

[30] *Ibid*

[31]U.S. EPA, Table 1.6-3, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

$PM_{2.5}$	1.5	22.5
PM_{10}	2.2	33
NOx	3.9	58.5
SO_2	0.2	3.0
VOCs	2.8	42

Table 2: *Daily Emissions Calculations for Biochar Production*

RNG Production – Emissions from Methanation and Combustion

RNG production involves methanation of syngas, followed by upgrading to meet PG&E's Rule 21. Raw syngas undergoes filtration to remove impurities like hydrogen sulfide (H_2S) and ammonia (NH_3), which can produce CO_2, CO, CH_4, and NO_x emissions. "Methane slip" may occur during methanation and purification, while RNG combustion emits CO_2, NO_x, CO, PM_{10}, and VOCs. Key pollutants from this step include:

- Carbon Monoxide (CO)
- Carbon Dioxide (CO_2)
- Particulate Matter ($PM_{2.5}$ and PM_{10})
- Nitrogen Oxides (NOx)
- Methane (CH_4)
- Volatile Organic Compounds (VOCs)

Pollutant	Emission Factor (lb/MMBtu)	Source

CO	0.75	U.S. EPA AP-42[32]
CO_2	117	U.S. EPA[33]
$PM_{2.5}$	0.31	U.S. EPA AP-42[34]
PM_{10}	0.36	U.S. EPA AP-42[35]
NOx	0.2	U.S. EPA AP-42[36]
CH_4	0.05	Given in MND
VOCs	0.017	U.S. EPA AP-42[37]

Table 3: *Emission Factors for RNG Production*

Using the given daily production value of 2,850 MMBtu/day and multiplying that by the emissions factor, the daily emissions of the key pollutants will be:

Pollutant	Emission Factor (lb/MMBtu)	Daily Emissions (lb/day)
CO	0.75	2,137.5
CO_2	117	333,450
$PM_{2.5}$	0.31	883.5
PM_{10}	0.36	1,026

[32] U.S. EPA, Table 1.6-2, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

[33] U.S. EPA, Greenhouse Gas Emissions Assumptions; https://www.epa.gov/ghgemissions/assumptions-and-references-household-carbon-footprint-calculator.

[34] U.S. EPA, Table 1.6-1, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

[35] *Ibid*

[36] U.S. EPA, Table 1.6-2, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

[37] U.S. EPA, Table 1.6-3, AP-42 1.6 Wood Residue Combustion in Boilers; https://www.epa.gov/system/files/documents/2022-03/c1s6_final_0.pdf

NOx	0.2	570
CH_4	0.05	142.5
VOCs	0.017	48.45

Table 4: *Daily Emission Calculations for RNG Production*

The summarized results of daily emissions from the production of biochar and RNG are in the table below:

Pollutant	Biochar Production (lb/day)	RNG Production (lb/day)	Total Emissions (lb/day)
CO	69	2,137.5	2,206.5
CO_2	57,000	333,450	390,450
$PM_{2.5}$	22.5	883.5	906
PM_{10}	33	1,026	1059
NOx	58.5	570	628.5
CH_4	N/A	142.5	142.5
SO_2	3.0	N/A	3.0
VOCs	42	48.45	90.45

Table 5: *Total Daily Emissions from Biochar and RNG Production*

The calculated emissions from the proposed biochar and RNG process show an exceedance of multiple daily thresholds of significance established by the Sacramento Metropolitan Air Quality Management District (SMAQMD).[38] Specifically, the Project's operational emissions surpass the established thresholds for NOx, PM_{10} and $PM_{2.5}$, CO, VOCs, and GHGs – including CO_2. SMAQMD's thresholds for operational emissions are:[39]

- NOx: 55 lb/day

[38] SMAQMD thresholds are relevant regional thresholds and compared here in the absence of thresholds from the Glenn County APCD.

[39] SMAQMD, Thresholds of Significance Table; https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf

- PM_{10}: 80 lb/day (with BACT), 0 lb/day (without BACT)
- $PM_{2.5}$: 82 lb/day (with BACT), 0 lb/day (without BACT)
- VOCs: 65 lb/day

The Project's PM_{10} and $PM_{2.5}$ exceed the Sacramento Metropolitan Air Quality Management District's (SMAQMD) default threshold of zero pounds per day (0 lb/day) without Best Available Control Technology (BACT), resulting in a significant impact. The Project also significantly exceeds even the elevated thresholds allowed when BACT is applied. Specifically:

- PM_{10} emissions total 1,059 lb/day, exceeding the 80 lb/day BACT threshold by over 13 times;
- $PM_{2.5}$ emissions total 906 lb/day, exceeding the 82 lb/day BACT threshold by over 11 times.

Additionally, the Project's nitrogen oxide (NOx) emissions are estimated at 628.5 lb/day, more than 11 times the SMAQMD threshold of 55 lb/day. VOC emissions reach 90.45 lb/day, surpassing the 65 lb/day limit by approximately 39%.

With respect to greenhouse gases, the Project is expected to emit 390,450 lb/day of CO_2, which equates to approximately 70,800 metric tons per year. This figure dramatically exceeds SMAQMD's GHG significance threshold of 1,100 metric tons CO_2e/year, as well as Tehama County's threshold of 900 metric tons CO_2e/year.[40,41]

Under CEQA, if a project exceeds relevant, established regional air quality thresholds it must be considered to have a potentially significant environmental impact. The Project's operational emissions exceed nearly all of these thresholds, even under generous assumptions, resulting in significant operational impacts which the MND does not disclose.

Regulatory Considerations

- The facility will emit over 390,450 lb/day of CO_2
- Methane slip is estimated to be 142.5 lb/day which represents a significant GHG emission oversight due to its global warming potential (GWP) being 27 to 30 times higher than CO_2.[42]

[40] SMAQMD, Operational Screening Levels: Notes; https://www.airquality.org/LandUseTransportation/Documents/Ch4+Ch6OperationalScreening4-2018.pdf

[41] Tehema County Air Pollution Control District, Air Quality Planning & Permitting Handbook, Pg. 3; http://tehcoapcd.net/PDF/CEQA%20Handbook%20Mar%202015%20Final.pdf

[42] U.S. EPA, Understanding Global Warming Potentials; https://www.epa.gov/ghgemissions/understanding-global-warming-potentials

- Exceedances when compared to California's operational thresholds for CO, PM (both 10 and 2.5), NOx, and VOCs.

Based on my calculations above, the facility has the potential to emit concerning levels of GHG contributors such as CO_2 and CH_4. Furthermore, when compared to California's operational thresholds, the facilities emissions of CO, PM, NOx, and VOCs exceed permissible limits, which constitute significant and unmitigated impacts under CEQA that the MND did not disclose or analyze.

4.3 MND Fails to Disclose Potential Impacts from Project Combined with Existing Carriere Family Processing Facility

The existing Carriere Family Processing Facility has been identified in a 2024 AB 2588 Hot Spots annual report as having a carcinogenic health risk score of 4.10.[43] Based on the facility's score, it was classified as an intermediate priority and risk, as seen in Table 5 and 6. This report, which was made publicly available on September 17,2024, provides an assessment of potential health risks associated with the emissions from all operating facilities in Glenn County. The emissions associated with the existing facility, particularly air toxics and particulate matter, have already raised concern about potential adverse health effects in the County.

Prioritization Thresholds	Priority Category	Category Requirements
< 1	Low Priority	The facility is conditionally exempt from further AB 2588 requirements
>1 and < 10	Intermediate Priority	The facility is required to provide an update summary on a quadrennial basis
> 10	High Priority	The facility is required to perform a Health Risk Assessment

[43] County of Glenn APCD, 2024 Annual Report AB 2588 Air Toxics "Hot Spots" Program; https://www.countyofglenn.net/sites/default/files/2024%20Hot%20Spots%20Report_0.pdf

Table 5: *AB 2588 Prioritization Threshold and Categories*

Health Risk Thresholds	Risk Category
Cancer risk < 1 in a million, and Total hazard index of < 0.1	Low Risk
1 < Cancer risk <10 in a million, or 0.1 < Total hazard index < 1.0	Intermediate Risk
Cancer risk > 100 in a million, or Total hazard index of > 10.0	Risk Reduction

Table 6: *AB 2588 Health Risk Assessment Thresholds*

When combined with the proposed Project, cumulative emissions could significantly amplify the risks posed to both the environment and public health. As outlined in the previous emissions estimation, the proposed Project alone has the potential to surpass regulatory thresholds for CO_2, CO, PM (both PM_{10} and $PM_{2.5}$), NOx, and VOCs. The addition of these emissions would likely worsen the already elevated levels of air pollutants, further contribute to the formation of ground-level ozone, and lead to additional environmental degradation, particularly from increased methane emissions. The MND failed to evaluate the Project's potentially significant direct and indirect emissions impacts on local ambient air quality, thus it lacks substantial evidence to conclude that impacts will be less than significant, and an EIR must be prepared.

4.4 Unaddressed Potential Odor Issues for Onsite Workers

The MND fails to adequately address the potential for offensive or harmful odors arising during the processing and conversion of biomass into RNG. The MND concludes that the proposed Project will not have adverse effects on sensitive receptors and will not create objectionable odors.[44] The emission of odors from the breakdown of organic materials is a well-documented environmental concern, as ATC processes can generate strong and potentially hazardous odors. As explained in Section 4.2 above, the production process has the potential to emit concerning levels of VOCs, ammonia, hydrogen sulfide, and methane. The odors from these compounds are known to cause respiratory irritation and headaches from short term exposure—which can

[44] MND, p. 23; Refer to Para. 2 on Pg. 10 of Glenn County Planning & Community Development Services Agency Staff Report

potentially become long-term.[45,46,47] VOCs, ammonia, hydrogen sulfide, and methane are also known to contribute to air quality degradation and adverse health effects. The decomposition of organic materials during the processing stages may result in the emission of malodorous compounds, including ammonia, which is well-documented to have a sharp, pungent odor that can cause respiratory irritation and a burning sensation in the nose and throat, even at relatively low concentrations.[48]

Despite this, the MND fails to analyze the potential impacts on workers. Workers at the facility are highly likely to be exposed to various HAPs due to their proximity to the facility and its operating processes, such as biomass processing, gasification, and RNG production. This omission also fails to comply with OSHA regulations regarding exposure limits for hazardous substances.[49] These limits are established to protect workers from acute and chronic health effects, as well as serve as enforceable benchmarks for monitoring, managing, and mitigating exposure to hazardous substances.

To summarize, the MND failed to address numerous issues, including:

- Failure to evaluate potential harm from worker exposure.
- Emissions and health risks associated with known pollutants being emitted.
- Protective measures and mitigation measures are not proposed or evaluated for efficiency.
- Failure to comply with OSHA standards designed to limit worker exposure to hazardous substances.

Therefore, the MND failed to evaluate the full extent of the Project's significant impacts related to odors and propose mitigation to address these significant impacts. The County must prepare an EIR that provides a comprehensive analysis of these issues and mitigates the impacts to the greatest extent feasible.

[45] U.S. EPA, Hydrogen Sulfide ToxFAQs; https://www.epa.gov/sites/default/files/2017-12/documents/appendix_e-atsdr_h2s_factsheet.pdf

[46] U.S. EPA, Volatile Organic Compounds' Impact on Indoor Air Quality; https://www.epa.gov/indoor-air-quality-iaq/volatile-organic-compounds-impact-indoor-air-quality

[47] U.S. EPA, Ammonia; https://www.epa.gov/caddis/ammonia

[48] Centers of Disease Control and Prevention, Ammonia; https://www.cdc.gov/chemical-emergencies/chemical-fact-sheets/ammonia

[49] OSHA, Permissible Exposure Limits; https://www.osha.gov/annotated-pels/table-z-1#notes

4.5 The MND Fails to Incorporate Best Available Control Technology

The MND fails to provide a clear and detailed definition of air quality control measures to be implemented during the operation of the proposed facility. As outlined in Section 4.2, emissions from the proposed Project may exceed regulatory thresholds for pollutants such as carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NOx), and volatile organic compounds (VOCs). In the absence of appropriate control measures – in this case Best Available Control Technology (BACT) – emissions of methane, hydrogen sulfide, and ammonia could be released at levels that pose significant risks to air quality.

Under both federal and state regulations, BACT must be employed when there is a risk of exceeding regulatory pollutant limits. [50] The omission of such effective control measures raises serious concerns regarding the Project's compliance with environmental standards and its potential adverse impact on air quality.[51]

Accordingly, the County should prepare a DEIR that incorporates BACT, such as:

- **Electrostatic Precipitators (ESPs) and Fabric Filters**:[52,53] ESPs pre-treat emissions before they reach baghouse filters, which can achieve removal efficiencies of 99%.
- **Selective Non-Catalytic or Selective Catalytic Reduction**:[54] Utilize ammonia or urea injection to reduce NOx emissions during combustion.
- **Oxidation Catalysts**:[55] Promote the oxidation of CO to CO_2 with efficiency rates over 90%.

[50] For example, the failure to implement BACT may violate requirements for the prevention of significant deterioration of air quality under the Clean Air Act. Code of Federal Regulations, § 52.21 Prevention of Significant Deterioration of Air Quality ; https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21

[51] *Ibid*

[52] U.S. EPA, Monitoring by Control Technique – Fabric Filters; https://www.epa.gov/air-emissions-monitoring-knowledge-base/monitoring-control-technique-fabric-filters

[53] U.S. EPA, Monitoring by Control Technique – Electrostatic Precipitators; https://www.epa.gov/air-emissions-monitoring-knowledge-base/monitoring-control-technique-electrostatic-precipitators

[55] U.S. EPA, Monitoring by Control Technique – Catalytic Oxidizer; https://www.epa.gov/air-emissions-monitoring-knowledge-base/monitoring-control-technique-catalytic-oxidizer

- **Regenerative Thermal Oxidizers (RTOs):** [56]Destroy VOCs, HAPs, and odorous emissions using high-temperature thermal combustion.
- **Activated Carbon Adsorption:**[57,58] Traps pollutant molecules to the surface of carbon and removes them from the airstream.
- **Scrubbers (Wet or Dry):**[59] Removes pollutants like SO_2 and H_2S from exhaust gas by liquid or solid interactions.
- **Biofilters:**[60] Utilizes microorganisms in breaking down pollutants like VOCs, ammonia, and hydrogen sulfide into non-toxic byproducts.

BACT implementation significantly reduces emissions of PM, NOx, CO, and VOCs – all found to exceed thresholds – and is critical to ensuring that the Project remains in compliance.

The Project may also violate federal and state regulations by not implementing BACT to address the Project's potentially significant pollutant emissions.

4.6 Mitigation Measures Should be Implemented to Address the Project's Significant Operation-Related Air Quality Impacts

The MND contains serious errors and omissions in its air quality analysis. My analysis indicates that emissions from the Project exceed relevant thresholds and have the potential to cause serious harm to the environment and nearby sensitive receptors which the MND does not disclose. The MND fails to identify and quantify all sources of emissions, omits estimations of potential emissions from operation, and further fails to demonstrate that the Project would not violate state and federal ambient air quality standards. The MND also lacks adequate mitigation to reduce emissions and health risk below levels of significance.

To ensure compliance with CEQA and applicable air quality regulations, the County should prepare a quantified emissions analysis, disclose significant impacts, and incorporate, at a minimum, the following mitigation measures:

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[56] U.S. EPA, Monitoring by Control Technique – Thermal Oxidizer; https://www.epa.gov/air-emissions-monitoring-knowledge-base/monitoring-control-technique-thermal-oxidizer

[57]U.S. EPA, Control Techniques for VOC Emissions from Stationary Sources; https://www3.epa.gov/airquality/ctg_act/199212_voc_epa453_r-92-018_control_emissions_stationary.pdf

[58]U.S. EPA, Section 5: SO_2 and Acid Gas Controls; https://www.epa.gov/sites/default/files/2021-05/documents/wet_and_dry_scrubbers_section_5_chapter_1_control_cost_manual_7th_edition.pdf

[59] U.S. EPA, Section 6: Particulate Matter Controls; https://www3.epa.gov/ttncatc1/dir1/cs6ch2.pdf

[60] U.S. EPA, Using Bioreactors to Control Air Pollution; https://www3.epa.gov/ttncatc1/cica/files/fbiorect.pdf

1. **Continuous Emissions Monitoring Plan (CEMP):** A CEMP should be developed and implemented to provide real-time tracking and reporting of criteria pollutants. As seen in the analysis performed in Section 4.2, multiple criteria pollutant categories are projected to exceed regulatory thresholds. These exceedances necessitate real-time monitoring to ensure compliance and to trigger responsive mitigation. This plan could include the implementation of Photoionization Detectors (PIDs) and Flame Ionization Detectors (FIDs) for VOCs and hydrocarbons.[61] The U.S. EPA provides information and guidelines to develop and test effective monitoring systems.[62]
2. **Odor and Air Toxics Control Plan:** A detailed plan for identifying and managing potential sources of nuisance odors and air toxics like ammonia and hydrogen sulfide should be implemented. These emissions should be controlled using proven mitigation technologies such as activated carbon filters, biofiltration systems, or vapor control equipment to further minimize the release of these substances. This plan must also provide protocols for worker safety measures, odor complaints, public notifications, and comply with Permissible Exposure Limits (PELs) by OSHA Title 8, CCR § 5155.[63]

5. Hazards and Environmental Risk Assessment

5.1 MND Fails to Disclose Potentially Significant Impacts from Facility Emergencies

The MND fails to include a comprehensive risk-of-upset analysis, thereby neglecting to address credible scenarios involving fires, explosions, and hazardous gas releases associated with the ATC-to-RNG process. This includes flash fires, vapor cloud explosions, and BLEVE events caused by flammable gases like methane, hydrogen, and carbon monoxide. Furthermore, the MND does not provide or reference a Pipeline Integrity Management Plan (IMP) for the proposed 4.5-mile RNG pipeline. The omission of a Leak Detection and Repair (LDAR) plan further exacerbates this deficiency, as it fails to account for fugitive emissions of VOCs, methane, and HAPs. This lack of regulatory compliance directly conflicts with established monitoring, detection, and emissions control requirements established by CARB and the U.S. EPA. Without these essential protections,

[61] U.S. EPA, Analytical Methods TO-14a and TO-15; https://www.epa.gov/sites/default/files/2015-06/documents/to14_15.pdf

[62] U.S. EPA, EMC: Continuous Emission Monitoring Systems; https://www.epa.gov/emc/emc-continuous-emission-monitoring-systems

[63] Department of Industrial Relations, OSHA Title 8, CCR § 5155; https://www.dir.ca.gov/title8/5155.html

the MND leaves workers and nearby communities exposed to unmitigated and foreseeable risks that are neither analyzed nor addressed.

The emergencies associated with RNG Conversion/ATC process include:

1. Feedstock Transport and Storage Risks

- **Combustible Dust Explosions**:[64] The enclosed conveyor system transporting dry walnut shells can generate fine dust particles. In confined areas, airborne biomass dust poses a significant explosion hazard if ignited by static discharge, mechanical friction, or electrical faults.

- **Mechanical Failure or Blockage**: Malfunctions in the enclosed conveyor system can lead to material backup or overheating, increasing fire risk and causing operational delays.

2. Thermochemical Conversion and Reactor Emergencies

- **Thermal Runaway and Overheating**:[65] The ATC process operates under high temperatures. Failures in thermal regulation systems may result in uncontrolled reactions, risking equipment damage, fires, or reactor explosions.

- **Gas Leaks and Explosions**:[66] Syngas is a flammable and potentially explosive mixture of hydrogen, carbon monoxide, and methane precursors. Leaks in pressurized or heated components can lead to fire or detonation hazards.

3. Syngas Upgrading and Methanation Hazards

- **Chemical Exposure**:[67] The multi-stage filtration system removes sulfur compounds, particulates, and other toxic contaminants. Filter failure or rupture could release harmful substances such as hydrogen sulfide (H_2S) or siloxanes into the work environment.

[64] Ecoshell, Safety Data Sheet – Walnut Shell; https://www.ecoshell.com/sds-technical-data/safety-data-sheet

[65] Mitsubishi Critical, Thermal Runaway; https://mitsubishicritical.com/resources/blog/thermal-runaway/

[66] Science Direct, Analysis of Hazards Related to Syngas Production and Transport: Consequences of A Synthesis Gas Release; https://www.sciencedirect.com/science/article/abs/pii/S0960148119312893.

[67] CARB, Sulfate & Health; https://ww2.arb.ca.gov/resources/sulfate-and-health

- **Catalytic Reforming Issues**:[68,69]LiquiMax methanation involves high-temperature catalytic reactions. Emergency scenarios include catalyst poisoning (reducing efficiency), reformer overpressure, or backflow of gas leading to flashback ignition.

4. RNG Storage, Compression, and Transport Risks

- **Overpressure Events**:[70] Compressed RNG is stored in high-pressure vessels prior to transport. Failures in pressure regulation or relief valves can lead to vessel rupture or gas release.

- **Leak During Transfer**:[71] RNG injection into mobile storage trailers must be tightly controlled. Faulty couplings, human error, or sensor malfunction can result in flammable gas leaks during loading operations.

- **Transportation Incidents**:[72] Compressed RNG presents flammability and explosion hazards during road transport, particularly in the event of vehicular collision or trailer damage – leading to a source of ignition.

5. Biochar Handling and Storage Issues

- **Spontaneous Combustion**:[73] Biochar is carbon-rich and can self-ignite if stored while still hot or exposed to oxygen and moisture. Improper cooling, delayed container sealing, or poor ventilation significantly increase this risk.

[68] Science Direct, Catalytic Reforming: 11.6.1 Upgrading Light Hydrocarbons; https://www.sciencedirect.com/topics/engineering/catalytic-reforming

[69] Science Direct, Hydrocracking Reaction: https://www.sciencedirect.com/topics/engineering/hydrocracking-reaction

[70] Harris Products Group, Life Expectancy of Compressed Gas Regulators: Typical Modes of Failure; https://www.harrisproductsgroup.com/en/Resources/Knowledge-Center/Articles/Life-Expectancy-of-Compressed-Gas-Regulators

[71] *Ibid*

[72] Department of Energy and Environmental Protection, What is Natural Gas; https://portal.ct.gov/pura/gas-pipeline-safety/what-is-natural-gas

[73] Cen USA Bio Energy, Master Gardeners' Safety Precautions or Handling, Applying, and Storing Biochar; https://ag-safety.extension.org/wp-content/uploads/2019/05/MasterGardenerSafetySheet2012Final.pdf

- **Particulate Emissions**:[74] Biochar is a fine, powdery material. Improper handling or damaged containers can release airborne particulates, posing respiratory hazards and increasing fire risks.

Mitigation Measures for Emergencies:

Pipeline Integrity Plan

The MND fails to provide a Pipeline Integrity Management Plan (IMP) for the proposed 4.5-mile RNG transmission pipeline. This omission represents a critical oversight, as pipeline integrity is essential for mitigating the risk of mechanical failure, rupture, or third-party damage that could result in fire, explosion, or uncontrolled releases of methane—a highly flammable and potent greenhouse gas. The U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) mandates that operators of gas transmission pipelines implement integrity management programs under 49 CFR Part 192, Subpart O.[75] These programs must include baseline assessments, ongoing monitoring, and periodic re-evaluations of pipeline condition through methods such as in-line inspection (ILI), pressure testing, direct assessment, and corrosion control.[76]

LDAR Plan

The MND also lacks a Leak Detection and Repair (LDAR) plan to control fugitive emissions associated with equipment leaks, maintenance activities, and operational transitions such as start-up and shutdown. An LDAR program is a foundational requirement for emissions control in facilities that handle VOCs, methane, and HAPs, particularly under federal and state air quality regulations. The U.S. EPA requires LDAR implementation under 40 CFR Part 60 and 40 CFR Part 63 for sources subject to New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP), respectively.[77,78] These regulations require systematic monitoring, repair protocols, recordkeeping, and reporting to ensure leaks are identified and mitigated.

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[74] *Ibid*

[75] Title 49 CFR Part 192, Subpart O; https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-D/part-192/subpart-O

[76] *Ibid*

[77] Code of Federal Regulations, Title 40 Subchapter C Part 60; https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60?toc=1

[78] Code of Federal Regulations, Title 40 Subchapter C Part 63; https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63?toc=1

The absence of an LDAR plan in the MND raises the risk of unmonitored fugitive emissions, which can occur from valves, compressors, flanges, and other pressurized components. This may result in avoidable air quality impacts and increased exposure to flammable or toxic gases for on-site personnel and surrounding communities. Additionally, failure to adopt LDAR practices may lead to noncompliance with both federal and state emissions regulations, exposing the Project to enforcement actions.

5.2 Omission of Fire and Explosion Hazard Sources

The MND does not adequately assess or disclose the fire and explosion hazards associated with handling, production, and storage of flammable substances during the ATC process. This oversight is significant due to the process involving the generation and use of highly combustible syngas, methane, hydrogen, carbon monoxide, and reactive catalysts.

Syngas is composed of varying concentrations of hydrogen, carbon monoxide, and methane—all of which have low explosive limits (LELs) and wide flammability ranges and pose explosion risks when exposed to an ignition source. In addition, when RNG is upgraded from syngas it retains the same explosion and fire risks from its methane content. The risk is further heightened by potential fugitive emissions from pressurized piping, compressors, or storage systems.

Without a quantitative hazard analysis like a Fire and Explosion Risk Assessment (FERA) or a Hazard and Operability Study (HAZOP), the MND fails to demonstrate compliance with safety standards and risk mitigation practices prescribed by the California Fire Code (CFC) and OSHA.[79,80] Furthermore, the omission of site-specific information regarding the types, volumes, and containment systems for any catalysts or process chemicals used in the ATC reactors prevents a meaningful evaluation of chemical interaction risks, thermal instability, or accidental release scenarios.

5.3 Inadequate Disclosure of Chemical Spill Risks, Worker Safety, and Health Hazards in the MND

Sources of Chemical Spills and Leaks

The MND lacks a thorough analysis of the potential sources of chemical spills or leaks within the ATC-to-RNG process, particularly from process gases, storage, and associated equipment. Leaks or spills could occur during routine operations, maintenance, or because of equipment malfunctions, and these events carry significant risks to both health and the environment. Given the volatile nature of syngas, RNG, and other chemicals involved in the process, the MND should

[79] California Fire Code, Title 24, Part 9; https://www.dgs.ca.gov/DSA/Resources/Page-Content/Resources-List-Folder/Overview-Title-24-Building-Standards-Code

[80] OSHA Process Safety Management of Highly Hazardous Chemicals, 1910 Subpart H; https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-H/section-1910.119

address how such risks will be managed. This includes the development of spill containment systems, the implementation of leak detection measures, and ensuring that employees are properly trained to respond swiftly and effectively in the event of a release.[81] Spill containment systems should meet standards set by agencies like U.S. EPA and OSHA, while the leak detection system must comply with industry standards for hazardous gas monitoring and response protocols.[82,83,84]

Emergency Response Plan

The MND fails to provide a clear and comprehensive emergency response plan addressing the potential for chemical spills or accidental releases of process gases. These releases, if not contained quickly, could have serious consequences for the health and safety of workers and the local community. An effective emergency response plan is essential to mitigate risks associated with chemical spills, requiring immediate containment measures to prevent exposure to hazardous substances such as syngas and biochar dust. The MND should outline specific spill response protocols, which should include detailed containment measures, the training of emergency personnel, and a communication system that enables timely notification to affected individuals and communities. Additionally, the plan must ensure compliance with regulatory requirements for emergency preparedness under standards such as OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations.[85]

Safety Measures for Workers:

The MND does not provide adequate details regarding the safety measures required for workers who handle biochar, RNG, and syngas. These substances, particularly syngas, pose significant hazards, including respiratory risks and fire exposure, if proper protective measures are not in place. The MND should specify protocols for the safe handling of these materials, including the provision of personal protective equipment (PPE) such as respiratory protection, fire-resistant clothing, and proper ventilation systems to minimize exposure.[86] Additionally, worker training

[81] U.S. EPA, Standard Test Procedures for Evaluating Various Leak Detection Methods; https://www.epa.gov/ust/standard-test-procedures-evaluating-various-leak-detection-methods

[82] Title 40, Part 112, Subpart A § 112.7; https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-112/subpart-A/section-112.7

[83] U.S. EPA, Secondary Containment for Each Container Under SPCC; https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/secondary-containment-each-container-under-spcc

[84] OSHA Process Safety Management of Highly Hazardous Chemicals, 1910 Subpart H; https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-H/section-1910.119

[85] OSHA, Hazardous Waste Operations and Emergency Response (HAZWOPER); https://www.osha.gov/emergency-preparedness/hazardous-waste-operations

[86] OSHA, Personal Protective Equipment; https://www.osha.gov/sites/default/files/publications/osha3151.pdf

programs should be incorporated to ensure personnel are prepared to handle emergencies, including accidental releases or equipment failures.[87] Without these safety measures, the risks to worker health and safety remain unaddressed.

Potential Exposure and Pathways:

Syngas, a mixture of gases including carbon monoxide, methane, and hydrogen sulfide, presents significant toxicity risks, particularly in the event of accidental releases or worker exposure. The MND fails to assess the potential for worker exposure to these hazardous components during routine operations, maintenance, or emergency situations. Exposure to syngas – specifically carbon monoxide – can result in a range of health symptoms, including headaches, dizziness, shortness of breath, and, in extreme cases, can be fatal due to oxygen displacement or toxicity.[88] The MND should identify the pathways through which workers may be exposed to these pollutants—whether through inhalation, dermal contact, or ingestion—and evaluate the potential health effects. Long-term exposure to such substances could lead to chronic respiratory issues, neurological damage, or other serious health concerns. Addressing these risks requires robust exposure controls and monitoring systems, which the MND does not currently include.

Cumulative Health Effects from Multiple Pollutants:

The MND fails to consider the cumulative health effects arising from exposure to multiple pollutants, including syngas, biochar dust, and other emissions associated with the ATC process. Exposure to multiple pollutants—such as respiratory irritants, toxic gases, and particulate matter—may have synergistic effects that exacerbate health risks. For example, prolonged exposure to both particulate matter and VOCs may result in worsened respiratory conditions, cardiovascular disease, and an increased risk of cancer.[89,90] The County must evaluate how these cumulative effects could impact workers and nearby residents, considering the potential for chronic health problems. This evaluation should include a risk assessment of how multiple pollutants may interact to compound the effects of individual exposures. Additionally, the County must outline mitigation strategies designed to reduce overall exposure, including improvements in ventilation, air quality monitoring, and filtration systems.

[87] NIOSH, NIOSH Practices in Occupational Risk Assessment; https://www.cdc.gov/niosh/docs/2020-106

[88] NIOSH, Workplace Carbon Monoxide Hazards; https://www.cdc.gov/niosh/carbon-monoxide/about/index.html

[89] U.S. EPA, Health and Environmental Effects of Particulate Matter; https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm

[90] U.S. EPA, Volatile Organic Compounds' Impact on Indoor Air Quality: Health Effects; https://www.epa.gov/indoor-air-quality-iaq/volatile-organic-compounds-impact-indoor-air-quality#Health_Effects

5.4 MND Lacks Site Safety and Evacuation Plan

The MND fails to provide a comprehensive safety and evacuation plan for the facility, which is a critical oversight in the context of potential emergency scenarios, including fires, explosions, or hazardous gas releases. These incidents, which may arise from the flammable nature of syngas, RNG, or other chemicals used in the ATC process, present substantial risks to workers and public safety. This omission demonstrates a failure to comply with OSHA, which requires that facilities handing hazardous materials to establish detailed emergency response protocols, clear evacuation procedures, and effective communication systems to notify nearby residents and facilities.[91]

At minimum, this emergency plan should include detailed evacuation routes, shelter-in-place instructions, and coordination with local emergency response teams to ensure a timely and effective response in the event of a catastrophic release or fire. The absence of such a plan raises concerns about the preparedness of facility operators to protect human health and the environment during emergencies. Additionally, this omission violates U.S. EPA regulations under 40 CFR Part 68, which emphasizes the necessity of facility-specific emergency response and preparedness plans for operations involving hazardous chemicals.[92]

5.5 Lack of Details on Flare Use and Emergency Gas Venting Procedures

In the event of a system malfunction, emergency gas venting and flaring may be required to safely manage overpressure or the release of hazardous gases. Although not universally mandated for all biomass-to-RNG conversion facilities, these systems serve as critical safety and environmental controls. Controlled venting and flaring of syngas or RNG can prevent the accumulation of combustible gases and reduce the risk of fire, explosion, or uncontrolled atmospheric release.

Flare systems are specifically engineered to ensure high combustion efficiency of VOCs, methane, hydrogen, and other flammable constituents, thereby minimizing emissions of unburned hydrocarbons and HAPs.[93] The inclusion of detailed information regarding flare design, combustion efficiency, operational safeguards, and emissions performance would demonstrate the Project's capacity to contain process upsets and prevent escalation of hazardous conditions.

Moreover, incorporating these details aligns with best practices established by the U.S. EPA, which emphasizes flare efficiency, continuous monitoring, and control of visible and fugitive

[91] OSHA Process Safety Management of Highly Hazardous Chemicals, 1910 Subpart H; https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-H/section-1910.119

[92] U.S. EPA, General RMP Guidance - Appendix A: 40 CFR 68; https://www.epa.gov/sites/default/files/2013-11/documents/appendix-a-final.pdf

[93] U.S. EPA: Composition of Organic Gas Emissions from Flaring Natural Gas; https://www.epa.gov/sites/default/files/2017-11/documents/organic_gas.pdf

emissions.[94] While not required in all cases, providing this information in the Project's CEQA document would strengthen the Applicant's safety case and reassure regulators, workers, and nearby communities that the facility is equipped to mitigate emergency risks effectively.

Conclusion

The expert review clearly identifies substantial deficiencies in the MND, most notably its failure to provide a comprehensive and technically robust assessment of the Project's potential environmental and public health impacts, and failure to disclose and mitigate significant impacts. The document does not adequately evaluate critical elements such as the existing environmental setting, projected air pollutant emissions during both construction and operational phases, or the associated health risks to workers and nearby sensitive receptors. Moreover, the MND lacks the necessary technical documentation and data to substantiate its conclusions or to demonstrate compliance with applicable regional and federal air quality regulations. Given these issues, we can conclude that this Project will cause significant harm to the local population and the environment if it is allowed to proceed.

Sincerely,

GROUP DELTA CONSULTANTS, INC.



Dr. Komal Shukla

Technical Director – Air Quality

[94] U.S. EPA, Title 40, Part 60: Standards of Performance for New Stationary Sources; https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60



GROUP DELTA AN NV5 COMPANY | ENVIRONMENTAL
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EDUCATION

Doctor of Philosophy, Photochemical Modeling of Air Pollution, Environmental Engineering, University of Birmingham, UK and IIT Delhi

Master of Science, Environmental Management, University School of Environment Management

Bachelor of Science, (Honors) Chemistry, University of Delhi

EXPERIENCE

8 years
2 years w/ Group Delta

KOMAL SHUKLA, PhD

Technical Director - Air Quality

Dr. Shukla holds a PhD in air quality and atmospheric phenomenon modeling, specializing in environmental solutions for industrial and urban settings, and the impact of trace gases and particulate matter on human health and climate. With 8 years of experience, she provides expert guidance in air emissions analysis, air pollution control, greenhouse gas (GHG) emissions inventory development, and CEQA/NEPA compliance. She is highly skilled in air quality assessments, regulatory compliance, and litigation support, with in-depth knowledge of environmental regulations.

Dr. Shukla has extensive experience working with construction, utility, and data storage clients, conducting CEQA assessments for projects in renewable energy, industrial sectors, and large-scale infrastructure. She has evaluated air quality impacts and health risks for projects such as the Elmore North, Morton Bay, and Dogwood Geothermal Projects, as well as the Willow Rock Energy Storage Center. She has led numerous geothermal energy projects, providing data-driven solutions to ensure compliance with air quality standards and public health protection. As the lead modeling scientist for NYSERDA's clean energy initiatives, Dr. Shukla developed the ZAPPA tool to support clean energy efforts.

Dr. Shukla has contributed to multiple documents, including EIRs, EISs, ISs, NDs, and MNDs, covering areas such as air quality, GHG emissions, hazardous waste management, and risk assessments. She has collaborated with the California Energy Commission on high-profile projects and provided technical expertise for CURE on geothermal and energy storage projects, ensuring compliance with environmental regulations and effective risk management.

Project Experience

ELMORE NORTH GEOTHERMAL PROJECT (ENGP) with Adams Broadwell Joseph & Cardozo (ABJC) for California Unions for Reliable Energy (CURE)

RENEWABLE ENERGY| CLIENT | IMPERIAL COUNTY, CALIFORNIA

Dr. Shukla reviewed the Preliminary Staff Assessment (PSA) for the Elmore North Geothermal Project, focusing on emissions projections, mitigation measures, and health risks to nearby communities. She also assessed the applicant's response to California Unions for Reliable Energy (CURE) comments and reviewed regulatory compliance with CEQA and the Clean Air Act. In addition, she examined the accuracy of the applicant's rebuttals, and any additional data provided.

Project Experience

MORTON BAY GEOTHERMAL PROJECT (MBGP) with ABJC for CURE

RENEWABLE ENERGY| CLIENT | MORTON BAY, CALIFORNIA

Dr. Shukla reviewed the Preliminary Decision of Compliance (PDOC) for the Morton Bay Geothermal Project in relation to Imperial County Air Pollution Control District (ICAPCD) regulations. She evaluated emissions from the construction and operational phases, the effectiveness of mitigation measures, and the potential health risks to vulnerable populations.

BLACK ROCK GEOTHERMAL PROJECT (BRGP) with ABJC for CURE

RENEWABLE ENERGY| CLIENT | IMPERIAL COUNTY, CALIFORNIA

Dr. Shukla reviewed the Preliminary Decision of Compliance (PDOC) for the Black Rock Geothermal Project, which includes a geothermal resource production and power generation facility. She assessed the project's environmental impacts, emissions, compliance with air quality standards, and potential health risks to sensitive receptors.

RIO VISTA MASTER PLAN COMMUNITY DEIR REVIEW with Adams Broadwell Joseph & Cardozo (ABJC)

PUBLIC WORKS | CLIENT | RIVERSIDE, CALIFORNIA

Materials sections of the Draft Environmental Impact Report (DEIR) for the Rio Vista Master Plan, a large residential and industrial development project. The review focused on assessing air quality impacts from the proposed facilities, including potential hazardous material concerns, and ensuring compliance with environmental regulations. Recommendations for mitigating air quality impacts were also provided.

RECYCLE WISE INDUSTRIAL RECYCLING FACILITY AND WAREHOUSE with Adams Broadwell Joseph & Cardozo (ABJC)

SECTOR | CLIENT | PERRIS, CALIFORNIA

Study/Mitigated Negative Declaration (MND) for a 46,910-square-foot industrial recycling facility and a 159,190-square-foot warehouse in Perris, California. Her review focused on determining whether the project could result in significant environmental impacts, particularly regarding air quality and CEQA compliance. She recommended mitigation measures where necessary to minimize potential environmental impacts.

I-270 IMPROVEMENTS AIR QUALITY ASSESSMENT with Department of Transportation Colorado

TRANSPORTATION | CLIENT | COLORADO

Dr. Shukla conducted air quality dispersion modeling and particulate matter (PM) hot-spot analysis for the proposed I-270 improvements. The assessment focused on PM2.5 and PM10 emissions, ensuring compliance with NEPA, U.S. EPA guidance, and Colorado Department of Transportation (CDOT) regulations. The study analyzed potential impacts on sensitive receptors and provided recommendations for mitigation strategies.

SIERRA CLUB OZONE ASSESSMENT ON THE EAST COAST with Sierra Club

SECTOR | CLIENT | EAST COAST, USA

Dr. Shukla led a study to evaluate the role of nitrogen oxides (NOx) and volatile organic compounds (VOCs) from power plants in ozone formation along the Eastern Coast. The study assessed the contribution of these emissions to ozone pollution, analyzed the effectiveness of current regulatory measures, and provided recommendations for improving air quality management strategies in the region.

AIR QUALITY MODELING AND COMPLIANCE with Environment and Climate Change Canada

OIL & GAS | CLIENT | ALBERTA, CANADA

Dr. Shukla conducted high-resolution air quality modeling simulations to assess emissions from the oil sands region in Alberta, Canada. The study focused on photochemical transport modeling to understand winter ozone formation and its environmental impacts, contributing to regional air quality management and regulatory decisions.

NYSERDA PROJECT with New York State Energy Research & Development Authority New York

PUBLIC WORKS | CLIENT | NEW YORK CITY, NY

Dr. Shukla led a project funded by the New York State Energy Research and Development Authority (NYSERDA) that focused on air quality modeling and health exposure sciences. The project evaluated emissions from city-level sources and their impact on vulnerable populations, informing policy decisions aimed at improving urban air quality.

TRECH PROJECT with TCI Harvard University

TRANSPORTATION | CLIENT | CITY, STATE

Dr. Shukla participated in the TRECH (Transportation, Equity, Climate & Health) project, a multi-university initiative analyzing the impact of transportation-related carbon pollution on health outcomes. The project explored policy scenarios to reduce emissions and examined how changes in mobility could improve air quality and health, with an emphasis on social justice and equity for vulnerable communities.

WILLOW ROCK ENERGY STORAGE CENTER PROJECT with Adams Broadwell Joseph & Cardozo (ABJC)

RENEWABLE ENERGY| CLIENT | CALIFORNIA

Dr. Shukla conducted a CEQA/NEPA assessment of the Willow Rock Energy Storage Center, a 500 MW compressed air energy storage facility in California. The review focused on air quality and greenhouse gas emissions, ensuring compliance with regulatory requirements, and evaluating potential impacts on local air quality and public health. Mitigation strategies were also recommended.

DOGWOOD GEOTHERMAL ENERGY PROJECT with Adams Broadwell Joseph & Cardozo (ABJC)

RENEWABLE ENERGY | CLIENT | IMPERIAL COUNTY, CALIFORNIA

Dr. Shukla performed a technical review of the Dogwood Geothermal Energy Project, evaluating air quality, greenhouse gas emissions, and health risks associated with the 25 MW geothermal power plant and 7 MW solar facility. She identified emission sources, assessed potential health risks, and recommended mitigation measures to minimize adverse effects, including a Valley fever risk assessment.

ARCHAEA LANDFILL GAS TO ENERGY PROJECT with Adams Broadwell Joseph & Cardozo (ABJC)

RENEWABLE ENERGY| CLIENT | ORANGE COUNTY, CALIFORNIA

Dr. Shukla conducted a comprehensive analysis of air quality and greenhouse gas emissions associated with the construction and operation of the Archaea renewable natural gas processing facility and pipeline interconnection infrastructure. Her assessment included identifying potential human health risks, analyzing operational emissions, and recommending mitigation strategies to minimize harmful pollutants.

ENTRADA SOUTH AND VALENCIA COMMERCE CENTER PROJECT with Adams Broadwell Joseph & Cardozo (ABJC)

SECTOR | CLIENT | LOS ANGELES COUNTY, CALIFORNIA

Dr. Shukla evaluated the Draft Supplemental Environmental Impact Report and emissions modeling for the modified Entrada South and Valencia Commerce Center Project. The focus was on assessing diesel particulate matter emissions and ensuring compliance with the California Environmental Quality Act. She recommended mitigation measures to reduce environmental impacts associated with the development of a 4.3 million square-foot area.

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

April 21, 2025

Andy Popper
Glenn County Planning & Community Development
225 North Tehama Street
Willows, CA 95988

Re: CUP 2024-004 Carriere/Syntech CF1, LLC
APNs 016-030-011 & 016-090-016

Dear Andy,

Thank you for providing PG&E the opportunity to review the proposed plans for CUP 2024-004 dated April 6, 2025. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: https://www.pge.com/cco/.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director
715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

04/08/2025

County: Glenn - Planning and Community Development Services Agency
Andy Popper
225 North Tehama Street, Glenn, CA 95988, USA
planning@countyofglenn.net

Construction Site Well Review (CSWR) ID: 1013241

Assessor Parcel Number(s): 0160300110, 0160900169

Property Owner(s): Carriere Farms

Project Location Address: State Highway 45 and County road 54 Glenn, California 95988

Project Title: SCH - 20244120076

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 4/8/2025. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Glenn County, within the boundaries of the following fields:

Willows-Beehive Bend Gas

SCH 202420076

Our records indicate there are 1 known oil or gas wells located within the project boundary as identified

in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0

- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 1

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak.

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or

visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells

located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (916) 322-1110 or via email at Erwin.Sison@conservation.ca.gov.

Sincerely,

Erwin Sison
Senior Oil and Gas Supervisor

cc: Andy Popper - Plan Checker

Wells Abandoned to Current Division Requirements as Prescribed by Law & Not Projected to be Built Over or Have Future Access Impeded

The wells listed below are abandoned to current Division requirements as prescribed by law, and based upon information provided, are not projected to be built over or have future access impeded.

API	Well Designation	Operator	Well Evaluations
0402100208	Sunray-General Pet. W-M Unit 1	Oryx Energy Company	The well is Plugged & Abandoned to Current Regulations. Well is not in area of disturbance and not impacted by field activities.

GLENN COUNTY
Planning & Community Development Services Agency

225 N. Tehama Street
Willows, CA 95988
530.934.6540
www.countyofglenn.net

Mardy Thomas, Director

STAFF REPORT

MEETING DATE: April 16, 2025

TO: Glenn County Planning Commission

FROM: Andy Popper, Principal Planner

SUBJECT: **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion**

Attachments:

1. Conditions of Approval and Mitigation Measures
2. Mitigated Negative Declaration and Initial Study
3. Request for Review, Application, and Comments
4. Syntech Responses to Agency Pre-Consultation Comments
5. Syntech Traffic Analysis and Internal Circulation Plan

1 PROJECT SUMMARY

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

The General Plan land use designation is “Intensive Agriculture” and the zoning designation is “FS-80” Farmland Security Zone (72-acre minimum parcel size). The proposed project is a permitted use with a conditional use permit in the “FS-80” zone. Detailed project information is included in the Mitigated Negative Declaration and Initial Study attached to this report.

Location:
The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

Assessor’s Parcel Numbers (APNs):

016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

1.1 RECOMMENDATIONS

That the Planning Commission grant the proposed Conditional Use Permit 2024-004 a Mitigated Negative Declaration with the Findings as presented in the Staff Report.

Also, that the Planning Commission approve Conditional Use Permit 2024-004 with the Findings as presented in the Staff Report and the corresponding Mitigation Measures and Conditions of Approval.

2 ANALYSES

2.1 ENVIRONMENTAL DETERMINATION

A copy of the proposed Mitigated Negative Declaration and Initial Study is attached. The Initial Study is a detailed discussion of the project and a discussion of the project's potential environmental impacts as required by the California Environmental Quality Act (CEQA). The Initial Study concludes that this project will result in no Potentially Significant Impacts to the environment with the mitigations incorporated as proposed. Therefore, a Mitigated Negative Declaration has been prepared for adoption by the Planning Commission.

2.2 GENERAL PLAN AND ZONING CONSISTENCY (TITLE 15)

The site is designated "Intensive Agriculture" in the Glenn County General Plan and is zoned "FS-80" Farmland Security Zone, the minimum parcel size is 72-acre. The site is in an area of existing agriculture uses and is a permitted use in the "FS-80" Farmland Security Zone (Glenn County Code Chapter 15.47.020). The proposal will not adversely affect any surrounding uses in the area and will not adversely affect the General Plan.

2.2.1 "FS" Farmland and Security Zone (Glenn County Code Chapter 15.47):

Permitted Uses (Glenn County Code §15.47.020):

The proposed facility is similar in scope to the permitted use under Glenn County Code §15.47.020 (E), (I), &(J).

Maximum Building Height (Glenn County Code §15.47.060):

The peak heights of the proposed structures are listed in the submitted application and shall not exceed the maximum height of fifty feet; therefore, the proposal will meet the height requirement for the Farmland Security Zone. §15.47.060.

Minimum Yard Requirements (Glenn County Code §15.47.080):

Based on the discussion above, the project site is adequate in size, shape, location, and physical characteristics to accommodate the proposal.

2.2.2 15.86 Power Generation Facilities

15.86.020 Definitions
As used in this Chapter: (B) "Uses Allowed" means one of the following:
(4) Secondary Use – a power generation facility that is not the Primary Use of the property and occupies less than 50% of the lot area. This type of use would be considered conjunctive.

The project site footprint is approximately 187,500 sq. ft. (4.3 acres). The project site property is 96 acres; therefore, the project is a conjunctive secondary use and the project site is approximately 4.8% of the overall property.

15.86.030 Standards

(E.) Conditional Use Permit (CUP) Secondary Use and Primary Use power generation facilities shall require an applicant to first secure a conditional use permit in accordance with Chapter 15.220 and the applicable zoning district. Issuance of said permit is subject to the following:

1. Secondary Uses on Agriculture (AE and FA) zoning districts and Williamson Act contracted land shall be subject to California Government Code, Section 51238.1.

   As discussed in the Initial Study for this proposal will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves because the existing facility is reliant upon the long-term use of walnut orchards.

2. Proposed power generation projects in Agriculture zoning districts and Williamson Act contracted lands, as defined in Section 15.86.030(A), shall be subject to the following requirements:

   a. Land designated as Prime Farmland, Farmland of Statewide Importance and Unique Farmland under the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP) shall be avoided. When a proposed power generation use includes these lands as designated under the FMMP in Agriculture zoning districts or Williamson Act contracted lands specified under Section 15.86.030(A), mitigation shall be required to secure replacement land of equal or greater farming potential at a ratio of 1:1. Said mitigation may be accomplished on the same lot.

   The most recent online Farmland Mapping and Monitoring Program (FMMP 2020) depicts approximately 10 acres of the 96-acre parcel as Urban and Built-Up Land; with the remaining 86 acres as Prime Farmland. However, the

existing facility footprint (which includes the proposed location of this project) is 28 acres in size. The entire property is under a Farmland Security Contract. Therefore, in order to offset the 4.3-acre footprint of the proposal, and to meet the above code, the following Mitigation Measure will be made as a part of the project.

Mitigation Measure AR -1 (Agricultural Resources):
The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).

Timing/Implementation:
In perpetuity of the project

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

b. Proposals for Secondary Use facility shall clearly demonstrate that the power generation use is subordinate to, practicable, and compatible with the primary agricultural use.

The project for the power generation use is subordinate to, practicable, and compatible with the primary agricultural use because it is reliant on the existing processing facility and surrounding orchards for the feedstock of the power generation facility.

2.2.3 Conditional Use Permit (Glenn County Code Chapter 15.220)

Conditional Use Permit (Glenn County Code §15.22.010)

The planning commission may grant a conditional use permit for the uses listed in Division 3: Development Districts after notice and hearing as provided in Chapter 15.04 and after making findings as required in section 15.22.020.

Findings (Glenn County Code §15.22.020)

The approving authority, prior to recommending approval of a development permit shall find as follows:

A. That the proposed use at the particular location is necessary or desirable in providing a service or facility which will contribute to the general well-being of the public;

The project would improve agricultural processing for the existing facility and surrounding walnut orchards while creating energy from an agricultural resource.

B. That such use will not, under the circumstances of the particular case, be detrimental to the health, safety or general welfare of persons residing or working in the vicinity, or injurious to property or improvements in the vicinity.

This project will not be subjected to hazardous conditions due to flooding, adverse geologic conditions, proximity to airports, fire hazards, or topography. Impacts from hazards on the project are further discussed in the Initial Study. The analysis in the Initial Study concludes that this project will not be detrimental to the health, safety, or general welfare of persons or property in the vicinity of the project.

C. That the site for the proposed use is adequate in size and shape to accommodate said use and to accommodate all of the yards, setbacks, walls or fences, and other features required herein or by the planning commission.

The primary project site is approximately 4.3 acres in size; of a 96± acre property. The parcel is adequate in size and shape to accommodate the proposed project.

D. Except in the case of the expansion of a nonconforming use, that the granting of the permit will not adversely affect the general plan or any area plan of the county.

The proposed project is consistent with the Land Use Designation of "Intensive Agriculture" and the zoning of "FS-80". The proposed project will meet the land use and zoning requirements of the General Plan and the Zoning Code.

2.2.4 Performance Standards (Glenn County Code Chapter 15.56)

The performance standards contained in the following subsections are only an excerpt of the required minimum. They shall not be construed as preventing the review authority, as part of any approval, to require more restrictive standards as deemed necessary; including the operator/applicant's requirement to meet the corresponding performance standards that may not be specifically reviewed in this report.

Air Quality (Glenn County Code §15.56.040)

All uses shall comply with applicable local, state, and federal laws and regulations regarding contaminants and pollutants. This requirement includes, but is not limited to, emissions of suspended particles, carbon monoxide, hydrocarbons, odors, toxic or obnoxious gases and fumes. The Glenn County Air Pollution Control District (GCAPCD) is responsible for the planning and maintenance/attainment of these standards at the local level. Air quality impacts are further discussed in the Conditions of Approval and Initial Study for the project.

Erosion Control (Glenn County Code §15.56.060)

The project is zoned FS-80; Erosion Control Standards shall be met. In addition, the following will be in place:

Mitigation Measure H & WQ-1 (Hydrology & Water Quality)

Prior to zone clearance/building permit, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Fire and Explosion Hazards (Glenn County Code §15.56.070)

All uses involving the use or storage of combustible, explosive, caustic or otherwise hazardous materials shall comply with all applicable local, state and federal safety standards and shall be provided with adequate safety devices against the hazard of fire and explosion, and adequate fire-fighting and fire suppression equipment.

All of the fire protection regulations of the California Building Codes and Glenn-Codora Fire Protection District will be complied with. Hazards are further discussed in the Initial Study for the project.

Glare and Heat (Glenn County Code §15.56.080)

A. All exterior lighting accessory to any use shall be hooded, shielded, or opaque. No unobstructed beam of light shall be directed beyond any exterior lot line. Buildings and structures under construction are exempt from this provision.
B. No use shall generate heat so that increased ambient air temperature or radiant heat is measurable at any exterior lot line.

Any exterior lighting at the site shall comply with the glare and heat standards.

Liquid, Solid, and Hazardous Wastes (Glenn County Code §15.56.090)

A. All uses are prohibited from discharging liquid, solid, toxic or hazardous wastes onto or into the ground and into streams, lakes or rivers. Discharge into a public or private waste disposal system in compliance with applicable local, state and federal laws and regulations is permitted.
B. Wastes detrimental to a public sewer system or a sewage treatment plant shall not be discharged to a public sewer system unless they have been pretreated to the degree required by the authority having jurisdiction over the sewer system.
C. The handling and storage of hazardous materials the discharge of hazardous materials into the air and water and disposal of hazardous waste in connection with all uses shall be in conformance with all applicable local, state and federal regulations.

D. All burning of waste materials accessory to any use shall be in compliance with the county air pollution control district rules and regulations.
E. The disposal or dumping of solid wastes accessory to any use including, but not limited to, slag, paper and fiber wastes or other industrial wastes shall be in compliance with applicable local, state, and federal laws and regulations.

The Glenn County Air Pollution Control District (GCAPCD) is the Administering Agency and the Certified Unified Program Agency (CUPA) for Glenn County with responsibility for regulating hazardous materials handlers, hazardous waste generators, underground storage tank facilities, above ground storage tanks, and stationary sources handling regulated substances. The storage and handling of hazardous materials are closely monitored by the GCAPCD.

The project will be subject to the conditions and regulations of the Glenn County Environmental Health Department, and Glenn County Air Pollution Control District. Liquid, solid, and hazardous wastes are further discussed in the Initial Study for the project.

Noise (Glenn County Code §15.56.100)

The project is required to conform to all noise standards.

Open and Outdoor Storage, Sales and Display (Glenn County Code §15.56.110)

Glenn County Code §15.56.110(A): General. Outdoor storage in any district shall be maintained in an orderly manner and shall not create a fire, safety, health or sanitary hazard. The project does not depict open and outdoor sales or storage. If outdoor storage is to occur, such storage shall meet the Open and Outdoor Storage standards.

3 OTHER REQUIREMENTS

There is a ten (10) calendar day appeal period following Planning Commission action on this conditional use permit (Glenn County Code §15.05.020).

The appeal made to the Glenn County Board of Supervisors must be made in accordance with Section 15.05.020 of the Glenn County Code. The Board of Supervisors will hear the appeal as outlined by this code. The decision of the Board of Supervisors may then be challenged in court.

An approved conditional use permit expires one (1) year from the date of granting unless substantial physical construction and/or use of the property in reliance on the permit has commenced prior to its expiration. An approved conditional use permit may be extended by the director for an additional sixty (60) calendar days provided that the applicant/owner submits a written request for extension to the director at least twenty-one (21) calendar days prior to the expiration date. Only one (1) extension shall be allowed for each permit (Glenn County Code §15.09.100.A).

The necessary permits shall be secured in all affected federal, state, and local agencies. It is the responsibility of the applicant/operator to make certain all requirements are met, and permits are obtained from all other agencies.

Flood Zone Designation:

Flood Zone "A" according to Flood Insurance Rate Map (FIRM) No. 06021C0650D, dated August 8, 2010, issued by the Federal Emergency Management Agency (FEMA). Flood Zone "A" (unshaded) consists of areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown. Since the project site is within Flood Zone "A" as designated by FEMA, a Flood Elevation Certificate will be required before issuance of a Building Permit in accordance to Glenn County Code §15.54.

In addition to the Mitigation Measures and Conditions of Approval, the applicant's and his/her technical or project management representative's attention is directed to the project comments from other agencies reviewing the application. The items noted are a guide to assist the applicant in meeting the requirements of applicable government codes. Project comments may also note any unusual circumstances that need special attention. The items listed are a guide and not intended to be a comprehensive summary of all codified requirements or site-specific requirements.

4 FINDINGS

4.1 FINDINGS FOR MITIGATED NEGATIVE DECLARATION

An Initial Study has been prepared by the Glenn County Planning & Community Development Services Agency. Based on this study, it is determined that the proposed project will not have a significant effect on the environment. The following Findings are made based on the Initial Study to support a Mitigated Negative Declaration:

Finding 1 (Aesthetics)

The project will not have a significant impact on aesthetics. The adopted standards for lighting and construction will minimize impacts from future development. Impacts are considered less than significant.

Finding 2 (Agricultural and Forest Resources)

The project will not have a significant impact on agriculture or forest resources. The proposed project will not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. The entire property is under a Farmland Security Contract. In order to offset the 4.3-acre footprint of the proposal, and

to meet county code, the following Mitigation Measure will be made as a part of the project.

> Mitigation Measure AR -1 (Agricultural Resources):
> The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).
>
> Timing/Implementation: In perpetuity of the project
>
> Enforcement/Monitoring:
> Glenn County Planning & Community Development Services Agency

Finding 3 (Air Quality)

The project will not have a significant impact on air quality because the project will not violate air quality standards or contribute substantially to an existing air quality violation. Additionally, the project will not adversely impact sensitive receptors, nor would it create objectionable odors. Impacts are considered less than significant.

Finding 4 (Biological Resources)

The project will not have a significant impact on biological resources. There are no identified sensitive habitats or natural communities, therefore the project will have a less than significant impact on 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 Wildlife or U.S. Fish and Wildlife Service. Impacts are considered less than significant.

Finding 5 (Cultural Resources)

The project will not have significant impact on cultural resources. State laws are in place in case of accidental discoveries made during future ground disturbing activities. Impacts are considered less than significant with the Mitigation Measure.

Mitigation Measure CR-1 (Cultural Resources)
If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work

radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either:

1) is not eligible for the NRHP or CRHR; or
2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify Glenn County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented.

- If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Finding 6 (Energy)

The project will not have a significant impact on energy. The project will comply with California Green Building Standards as well as California Energy Code. The project will not conflict or obstruct with, and is required to meet state or local plans for, renewable or efficient energy.

Finding 7 (Geology and Soils)

The project will not have a significant impact on geology and soils because geologic hazards in the area are minimal, and the building codes will require new construction to meet standards for soil conditions. Impacts are considered less than significant.

Finding 8 (Greenhouse Gas Emissions)

The project will not have a significant impact on global climate change as a result of greenhouse gas emissions. The project is not in conflict with existing guidelines or standards. The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No significant change in the current use of the land will result. The project will not create significant changes in GHG emissions. Impacts are considered less than significant.

Finding 9 (Hazards and Hazardous Materials)

Hazards and hazardous materials will not have a significant impact on the environment as a result of the proposed project. The project will not interfere with an adopted emergency response plan nor expose people to risk of loss, injury, or death. Impacts are considered less than significant.

Finding 10 (Hydrology/Water Quality)

The project will not have a significant impact on hydrology and water quality because the project will not significantly alter the drainage pattern of the area. The project will not significantly interfere with groundwater recharge in the area. The project will not substantially deplete groundwater supplies or expose people or structures to a significant risk of loss, injury, or death involving flooding. The project will not violate water quality standards or waste discharge requirements. Impacts are considered less than significant with mitigation incorporated:

Mitigation Measure H & WQ-1 (Hydrology & Water Quality)
Prior to site disturbance, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Finding 11 (Land Use and Planning)

The project will not have a significant impact on land use and planning because the project would not physically divide an established community. The project site will meet the size and density requirements of the General Plan and Title 15 of the Glenn County Code and is consistent with the surrounding area. The project is also compatible with the Glenn County General Plan land use designation of “Intensive Agriculture”. The project will not conflict with an existing habitat conservation plan or natural community conservation plan. Impacts are considered less than significant.

Finding 12 (Mineral Resources)

The project will not have a significant impact on mineral resources; according to the California Department of Conservation Mineral Lands Classification Map, the property does not contain Concrete-Grade Mineral Aggregates; In addition, based on the relative size of the project footprint impacts are considered less than significant.

Finding 13 (Noise)

The project will not have a significant impact on people residing or working in the area from excessive noise levels. The proposed project will not substantially increase noise levels in the area or expose people in the area to excessive noise levels. Any future noise generating activities are required to meet the established standards prescribed by the County Code. The project site is not directly within an airport land use plan and not in the vicinity of a private airstrip which would expose people in the area to unacceptable noise levels. Impacts are considered less than significant.

Finding 14 (Population and Housing)

The project will not have a significant impact on population and housing because the project will not displace people or housing. The project does not induce population growth. Impacts are considered less than significant.

Finding 15 (Public Services)

The project will not have a significant impact on public services. The services of fire protection, police protection, schools, parks, and other public facilities are sufficient to accommodate the proposed project. Existing requirements for taxes and developmental impact fees are implemented to offset impacts. Less than significant impacts are anticipated.

Finding 16 (Recreation)

The project will not have a significant impact on recreation because it would not substantially increase the use of existing recreational facilities nor does the project include such facilities. No impacts are anticipated.

Finding 17 (Transportation/Traffic)

The project will not have a significant impact on transportation/circulation because it will not significantly increase traffic volumes on existing roads. The project will not change air traffic patterns. There is adequate access to the project site. Public roads will provide adequate emergency access to the project site. Alternative transportation plans will not be impacted. Impacts are considered less than significant.

Finding 18 (Tribal Cultural Resources)

The project will not have a significant impact on Tribal Cultural Resources. The project will not have a significant impact on Tribal Cultural Resources with mitigation measures incorporated. Native Tribes were sent project documentation and invited to review and comment on the project. It is concluded this proposal will not have a significant impact with mitigation measures incorporated.)

Mitigation Measure TCR -1 (Tribal Cultural Recourses):
In the event that any prehistoric or historic subsurface cultural (including Tribal) resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and the applicant/operator shall consult with the County and a qualified archaeologist (as approved by the County) and corresponding tribal representative to assess the significance of the find per CEQA Guidelines Section 15064.5. The qualified archaeologist shall determine the nature of the find, evaluate its significance, and, if necessary, suggest preservation or mitigation measures. Appropriate mitigation measures, based on recommendations listed in the archaeological survey report and tribal representative, will be determined by the Glenn County Planning & Community Development Services Agency. Work may proceed on other parts of the project site while mitigation for historical resources, unique archaeological resources, and/or tribal resources is carried out.

All significant cultural materials recovered shall be, at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, tribal representative, and documented according to current professional standards.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

Finding 19 (Utilities and Service Systems)

The project will not have a significant impact on utilities and service systems. The project will not require or result in new or expanded municipal facilities that could cause significant environmental effects. Impacts are considered less than significant.

Finding 20 (Wildfire)

The project will not have a significant impact on wildfires. The project will not impair an adopted emergency response plan or emergency evacuation plan. Impacts are considered less than significant.

Finding 21 (Mandatory Findings of Significance)

There is no substantial evidence in light of the whole record that the project may have a significant impact on the environment either cumulatively or individually. Impacts are considered less than significant.

4.2 FINDINGS FOR CONDITIONAL USE PERMIT

According to Glenn County Code Sections 15.22.010 and 15.22.030, the following Findings listed in Glenn County Code Section 15.22.020 shall be made prior to recommending approval of a conditional use permit:

Finding 1

That the proposed use at the particular location is necessary or desirable in providing a service or facility, which will contribute to the general well-being of the public.

Finding 2

That such use will not, under the circumstances of the particular case, be detrimental to the health, safety, or general welfare of persons residing or working on the vicinity, or injurious to property or improvements in the vicinity. The proposed project will not have adverse effects on nearby residents, uses, or the public in general.

Finding 3

That the site for the proposed use is adequate in size and shape to accommodate said use and to accommodate all of the yards, setbacks, walls or fences, and other features required herein or by the Planning Commission.

Finding 4

That granting the permit will not adversely affect the General Plan or any area plan of the County because the proposed project conforms to the General Plan and County Code.

5 SAMPLE MOTIONS:

Environmental Determination:
I move that the Planning Commission adopt a Mitigated Negative Declaration for Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion with the Findings as presented in the Staff Report.

Conditional Use Permit:
I (further) move that the Planning Commission approve Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion with the Findings as presented in the Staff Report and the Mitigation Measures and Conditions of Approval as attached.

GLENN COUNTY PLANNING AND

COMMUNITY DEVELOPMENT SERVICES AGENCY

CONDITIONS OF APPROVAL AND MITIGATION MONITORING PROGRAM

Conditional Use Permit 2024-004,
Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Pursuant to the approval of the Glenn County Planning Commission, **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion** is hereby granted subject to the Mitigation Measures and Conditions of Approval set forth herein. Pending final approval by the Glenn County Planning Commission the applicant shall file a signed copy of these Conditions of Approval with the Glenn County Planning & Community Development Services Agency.

Project Description:

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

Location:

The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

APNs: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

CONDITIONS OF APPROVAL AND MITIGATION MEASURES

CONDITIONS OF APPROVAL:

Glenn County Planning Division:

Condition of Approval (Planning Division):
The applicant/operator shall provide bi-annual (due by January 1 and July 1 of each year) reporting to the Planning Division evidencing the following:

- That no more than 135,000 tons a year of waste walnut shells (WWS) from the existing onsite walnut shelling facility shall be processed.

- That no more than 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), is transported from the existing onsite walnut shelling facility per year.

- That the waste walnut shells (WWS) are sourced only from the existing onsite walnut shelling facility.

Condition of Approval (Planning Division):
That the areas of operation and uses shall be confined to as listed in these Mitigation Measures and Conditions of Approval, and delineated as on file with the Glenn County Planning & Community Development Services Agency.

Condition of Approval (Planning Division):
The applicant/operator shall provide a bi-annual (due by January 1 and July 1 of each year) Conditions of Approval and Mitigation Measure Compliance monitoring fee of $250.00 to the Planning Division.

Condition of Approval (Planning Division):
Prior to receiving a Building Permit (Zone Clearance) and operations, the Applicant/Landowner shall submit a copy of a recorded (by Glenn County Recorder's office) Agriculture Statement of Acknowledgement to the Planning Division.

Glenn County Building Division:

Condition of Approval (Building Division):
All construction shall require a building permit issued by the Glenn County Building Division.

Condition of Approval (Building Division):
All setbacks to the property lines for existing and proposed structures shall be maintained according to the California Building Code.

Condition of Approval (Building Division):
All existing structures shall comply with the original permitted use, any change of use shall be approved through the permitting process to assure code compliance.

Glenn County Air Pollution Control District (APCD):

Condition of Approval (APCD):
The applicant/operator shall modify their existing District Permit to Operate; complete and submit an Authorization to Construct (ATC) application prior to construction. All new sources of air pollution and the air pollution control equipment including emissions estimates shall be included in the ATC application.

Glenn County Environmental Health Department (EHD):

Condition of Approval (EHD):
The applicant/operator shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.

Condition of Approval (EHD):
The existing onsite wastewater treatment systems (OWTS) shall be expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the Environmental Health Department (EHD).

Condition of Approval (EHD):
Restroom facilities shall be provided to accommodate workers during construction of the project and shall be approved by the EHD.

Condition of Approval (EHD):
Water wells used to supply potable water shall meet current construction requirements, be permitted and regulated by the EHD or the State Water Resource Control Board (SWRCB), Division of Drinking Water.

Condition of Approval (EHD):
All garbage, rubbish and refuse created, produced or accumulated during construction, at the proposed facility and/or on the property shall be removed by a permitted waste hauler or taken to a permitted facility at least once each week. All garbage shall be kept in a container with a close-fitting cover, without leakage or escape of odors.

California Department of Transportation (Caltrans):

Condition of Approval (Caltrans):
The applicant/operator shall be responsible to complete all Caltrans requirements and improvements; including a (Final) Traffic Impact Study (TIS) that includes information regarding project trip generations, trip distributions, and queuing using the Institute of Transportation Engineering (ITE) Trip Generation Manual for the analysis.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans any requested information regarding driveway access to and from both sites. This information shall be in site plans showing proper dimension of all driveways as outlined in the California Highway Design Manual (HDM) with Auto Turn CAD templates, using the correct design vehicle, showing the design vehicle entering and exiting the site plans.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans mapping for all connections to the State Highway System (SHS) showing the State right of way (ROW) delineated with bearings, distances along with State Route (SR) boundary determination.

Condition of Approval (Caltrans):
The applicant/operator shall ensure with Caltrans that the design vehicle is appropriate, based off the Truck Networks on California State Highways Map for District 3 including information about the design vehicle(s) used at the sites.

Condition of Approval (Caltrans):
The applicant/operator shall be responsible for an encroachment permit issued by Caltrans for any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW).

MITIGATION MEASURES:

Mitigation Measure AFR -1 (Agriculture and Forest Resources):

The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).

Timing/Implementation: In perpetuity of the project

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

Mitigation Measure H & WQ-1 (Hydrology & Water Quality):

Prior to permit issuance, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Timing/Implementation:
Prior to site disturbance (including moving dirt, leveling and grading)

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency &
Central Valley Regional Water Quality Control Board

Mitigation Measure CR-1 (Cultural Resources):

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work

radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner.

  The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either:
  1) is not eligible for the NRHP or CRHR; or
  2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify Glenn Butte County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

  Timing/Implementation: During Construction/Excavation Activities

  Enforcement/Monitoring:
  Glenn County Planning & Community Development Services Agency

Mitigation Measure TCR -1 (Tribal Cultural Recourses):

In the event that any prehistoric or historic subsurface cultural (including Tribal) resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and the applicant/operator shall consult with the County and a qualified archaeologist (as approved by the County) and corresponding tribal representative to

assess the significance of the find per CEQA Guidelines Section 15064.5. The qualified archaeologist shall determine the nature of the find, evaluate its significance, and, if necessary, suggest preservation or mitigation measures. Appropriate mitigation measures, based on recommendations listed in the archaeological survey report and tribal representative, will be determined by the Glenn County Planning & Community Development Services Agency. Work may proceed on other parts of the project site while mitigation for historical resources, unique archaeological resources, and/or tribal resources is carried out.

All significant cultural materials recovered shall be, at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, tribal representative, and documented according to current professional standards.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

Acknowledgment:

I hereby declare under penalty of perjury that I have read the foregoing conditions, which are in fact the conditions that were imposed upon the granting of the Conditional Use Permit, and that I agree to abide fully by said conditions. Additionally, I have read the Staff Report and I am aware of codified county, state, and/or federal standards and regulations that shall be met with the granting of this permit. I have the proper legal authority to, and am signing on the behalf of, those with interest in:

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC
Advanced Thermal Conversion.

Signed: _____ Date: _____

Wayne McFarland, Applicant/Operator, Syntech

Signed: _____ Date: _____

William Carriere, Carriere Family Farms, Landowner

Conditional Use Permit 2024-004,
Carriere/Syntech CF1, LLC Advanced Thermal Conversion
Mitigated Negative Declaration and Initial Study

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MITIGATED NEGATIVE DECLARATION

MEETING DATE: April 16, 2025

PROJECT TITLE: **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion**

LEAD AGENCY: Glenn County Planning & Community Development Services Agency
225 N. Tehama St.
Willows, California 95988

CONTACT: Andy Popper, Principal Planner
(530) 934-6540
apopper@countyofglenn.net

LOCATION: The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

APN: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

APPLICANT: Wayne McFarland
1625 Broadway Street
Suite 119
Fresno, CA 93721
(815) 513-3363
wmcf@syntechbioenergy.com

LANDOWNER: Carriere Family Farms
1640 State Highway 45
Glenn, CA 95943
(530) 934-8200
wcarriere@carrierefarms.com

ENGINEER: Jason Vine
1767 Market Street, Suite C1
Redding, CA 96001
(530) 526-7493
jason@realm-engineering.com

ZONING: “FS-80” Farmland Security Zone

GENERAL PLAN: “Intensive Agriculture”

PROPOSAL:

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC
Advanced Thermal Conversion

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

Additional project information is included in the application and documents

Surrounding Land Uses and Setting:

Surrounding land uses and setting is further described in Section 2 below.

Other Public Agencies whose Approval is Required (e.g. permits, financing approval, or participation agreement.):

Other agencies may require permits that were not specifically listed or have yet to be recognized through the Initial Study and Glenn County permitting process. It is the responsibility of the applicant/agent to recognize and acquire any/all necessary permit approvals.

FINDINGS FOR MITIGATED NEGATIVE DECLARATION:

An Initial Study has been prepared by the Glenn County Planning & Community Development Services Agency. Based on this study, it is determined that the proposed project will not have a significant effect on the environment. The following Findings are made based on the Initial Study to support a Mitigated Negative Declaration:

Finding 1 (Aesthetics)

The project will not have a significant impact on aesthetics. The adopted standards for lighting and construction will minimize impacts from future development. Impacts are considered less than significant.

Finding 2 (Agricultural and Forest Resources)

The project will not have a significant impact on agriculture or forest resources. The proposed project will not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. The entire property is under a Farmland Security Contract. In order to offset the 4.3-acre footprint of the proposal, and to meet county code, the following Mitigation Measure will be made as a part of the project.

> Mitigation Measure AR -1 (Agricultural Resources):
> The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).
>
> Timing/Implementation: In perpetuity of the project
>
> Enforcement/Monitoring:
> Glenn County Planning & Community Development Services Agency

Finding 3 (Air Quality)

The project will not have a significant impact on air quality because the project will not violate air quality standards or contribute substantially to an existing air quality violation. Additionally, the project will not adversely impact sensitive receptors, nor would it create objectionable odors. Impacts are considered less than significant.

Finding 4 (Biological Resources)

The project will not have a significant impact on biological resources. There are no identified sensitive habitats or natural communities, therefore the project will have a less

than significant impact on 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 Wildlife or U.S. Fish and Wildlife Service. Impacts are considered less than significant.

Finding 5 (Cultural Resources)

The project will not have significant impact on cultural resources. State laws are in place in case of accidental discoveries made during future ground disturbing activities. Impacts are considered less than significant with the Mitigation Measure.

Mitigation Measure CR-1 (Cultural Resources)

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- *If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.*
- *If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either:*

1) is not eligible for the NRHP or CRHR; or
2) that the treatment measures have been completed to their satisfaction.

- *If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify Glenn County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented.*

- *If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording*

the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Finding 6 (Energy)

The project will not have a significant impact on energy. The project will comply with California Green Building Standards as well as California Energy Code. The project will not conflict or obstruct with, and is required to meet, state or local plans for renewable or efficient energy.

Finding 7 (Geology and Soils)

The project will not have a significant impact on geology and soils because geologic hazards in the area are minimal, and the building codes will require new construction to meet standards for soil conditions. Impacts are considered less than significant.

Finding 8 (Greenhouse Gas Emissions)

The project will not have a significant impact on global climate change as a result of greenhouse gas emissions. The project is not in conflict with existing guidelines or standards. The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No significant change in the current use of the land will result. The project will not create significant changes in GHG emissions. Impacts are considered less than significant.

Finding 9 (Hazards and Hazardous Materials)

Hazards and hazardous materials will not have a significant impact on the environment as a result of the proposed project. The project will not interfere with an adopted emergency response plan nor expose people to risk of loss, injury, or death. Impacts are considered less than significant.

Finding 10 (Hydrology/Water Quality)

The project will not have a significant impact on hydrology and water quality because the project will not significantly alter the drainage pattern of the area. The project will not significantly interfere with groundwater recharge in the area. The project will not substantially deplete groundwater supplies or expose people or structures to a significant risk of loss, injury, or death involving flooding. The project will not violate water quality standards or waste discharge requirements. Impacts are considered less than significant with mitigation incorporated:

Mitigation Measure H & WQ-1 (Hydrology & Water Quality)
Prior to site disturbance, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Finding 11 (Land Use and Planning)

The project will not have a significant impact on land use and planning because the project would not physically divide an established community. The project site will meet the size and density requirements of the General Plan and Title 15 of the Glenn County Code and is consistent with the surrounding area. The project is also compatible with the land use designation of "Intensive Agriculture". The project will not conflict with an existing habitat conservation plan or natural community conservation plan. Impacts are considered less than significant.

Finding 12 (Mineral Resources)

The project will not have a significant impact on mineral resources; according to the California Department of Conservation Mineral Lands Classification Map, the property does not contain Concrete-Grade Mineral Aggregates; In addition, based on the relative size of the project footprint impacts are considered less than significant.

Finding 13 (Noise)

The project will not have a significant impact on people residing or working in the area from excessive noise levels. The proposed project will not substantially increase noise levels in the area or expose people in the area to excessive noise levels. Any future noise generating activities are required to meet the established standards prescribed by the County Code. The project site is not directly within an airport land use plan and not in the vicinity of a private airstrip which would expose people in the area to unacceptable noise levels. Impacts are considered less than significant.

Finding 14 (Population and Housing)

The project will not have a significant impact on population and housing because the project will not displace people or housing. The project does not induce population growth. Impacts are considered less than significant.

Finding 15 (Public Services)

The project will not have a significant impact on public services. The services of fire protection, police protection, schools, parks, and other public facilities are sufficient to accommodate the proposed project. Existing requirements for taxes and developmental impact fees are implemented to offset impacts. Less than significant impacts are anticipated.

Finding 16 (Recreation)

The project will not have a significant impact on recreation because it would not substantially increase the use of existing recreational facilities, nor does the project include such facilities. No impacts are anticipated.

Finding 17 (Transportation/Traffic)

The project will not have a significant impact on transportation/circulation because it will not significantly increase traffic volumes on existing roads. The project will not change air traffic patterns. There is adequate access to the project site. Public roads will provide adequate emergency access to the project site. Alternative transportation plans will not be impacted. Impacts are considered less than significant.

Finding 18 (Tribal Cultural Resources)

The project will not have a significant impact on Tribal Cultural Resources. The project will not have a significant impact on Tribal Cultural Resources with mitigation measures incorporated. Native Tribes were sent project documentation and invited to review and comment on the project. It is concluded this proposal will not have a significant impact with mitigation measures incorporated.)

Mitigation Measure TCR -1 (Tribal Cultural Recourses):
In the event that any prehistoric or historic subsurface cultural (including Tribal) resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and the applicant/operator shall consult with the County and a qualified archaeologist (as approved by the County) and corresponding tribal representative to assess the significance of the find per CEQA Guidelines Section 15064.5. The qualified archaeologist shall determine the nature of the find, evaluate its significance, and, if necessary, suggest preservation or mitigation measures. Appropriate mitigation measures, based on recommendations listed in the archaeological survey report and tribal representative, will be determined by the Glenn County Planning & Community Development Services Agency. Work may proceed on other parts of the project site while mitigation for historical resources, unique archaeological resources, and/or tribal resources is carried out.

All significant cultural materials recovered shall be, at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, tribal representative, and documented according to current professional standards.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

Finding 19 (Utilities and Service Systems)

The project will not have a significant impact on utilities and service systems. The project will not require or result in new or expanded municipal facilities that could cause significant environmental effects. Impacts are considered less than significant.

Finding 20 (Wildfire)

The project will not have a significant impact on wildfires. The project will not impair an adopted emergency response plan or emergency evacuation plan. Impacts are considered less than significant.

Finding 21 (Mandatory Findings of Significance)

There is no substantial evidence in light of the whole record that the project may have a significant impact on the environment either cumulatively or individually. Impacts are considered less than significant.

CHAPTER 1
INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study has been prepared by the County of Glenn to evaluate the potential impacts on the environment that could result from the implementation of the proposed project and to identify, if necessary, any mitigation measures that will reduce, offset, minimize, avoid, or otherwise compensate for significant environmental impacts.

This Initial Study has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA), encoded in Sections 21000 *et seq.* of the Public Resources Code (PRC) with Guidelines for Implementation codified in the California Code of Regulations (CCR), Title 14, Chapter 3, Sections 15000 *et seq*.

An initial study is conducted by a lead agency to determine if a project may have a significant effect on the environment [CEQA Guidelines §15063(a)]. If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the lead agency determines that there is no substantial evidence that the project may have a significant effect on the environment, a Negative Declaration may be prepared [CEQA Guidelines §15064(f)(3)]. The lead agency prepares a written statement describing the reasons a proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This document conforms to the content requirements under CEQA Guidelines §15071.

Alternatively, a Mitigated Negative Declaration may be prepared if the Initial Study identifies a potentially significant effect for which the project's proponent, before public release of a proposed Mitigated Negative Declaration, has made or agrees to make project revisions that mitigate the effects [CEQA Guidelines §15064(f)(2)].

Approval of the proposed project requires discretionary action by the County. According to CEQA Guidelines, a discretionary action or project must be reviewed by the lead agency, to determine its potential effects on the environment. Prior to preparation of the Initial Study, a Request for Review, which included a copy of the application and project description, was sent out by the County of Glenn to responsible and trustee state agencies, and local agencies and organizations to identify issues to be addressed in the Initial Study. Comments that were received were considered during the preparation of the Initial Study.

1.2 LEAD AGENCY

The lead agency is the public agency with primary approval authority over the proposed project. In accordance with CEQA Guidelines §15051(b)(1), "the lead agency will normally be an agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose."

The lead agency for the proposed project is Glenn County Planning & Community Development Services Agency. The contact person for the lead agency to whom all inquiries and comments on this environmental document should be addressed is:

Andy Popper, Principal Planner
Glenn County Planning & Community Development Services Agency
225 North Tehama Street, Willows, CA 95988
(530) 934-6540, apopper@countyofglenn.net

1.3 SUMMARY OF FINDINGS

Chapter 3 of this document contains the Environmental (Initial Study) Checklist that identifies the potential environmental impacts (by environmental issue) and a brief discussion of each impact resulting from implementation of the proposed project.

In accordance with §15064(f)(3) of the CEQA Guidelines, a Negative Declaration shall be prepared if there is no substantial evidence that the project may have a significant effect on the environment. Based on the available project information and the environmental analysis presented in this document, there is no substantial evidence that the proposed project would have a significant effect on the environment. It is proposed that a Mitigated Negative Declaration be adopted in accordance with the CEQA Guidelines.

CHAPTER 2
PROJECT DESCRIPTION

2.1 Project Description

This Initial Study has been prepared for Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

5. Organic Feedstock to Syngas Conversion
6. Biochar Transfer and Storage Facility
7. Collection of Syngas and Upgrade to Pipeline Quality RNG
8. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment.

2.2 Location

The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

2.3 Surrounding Land Uses and Setting

The majority of the project site is being utilized for agriculture and residences. **Table 1** identifies the existing uses, General Plan designation and Zoning designations for the subject property and neighboring properties. All of the surrounding parcels are zoned agriculture.

Table 1: Existing Uses and Land Use Designations

	Existing Uses	General Plan	Zoning Designations
Project Site	Agriculture	Intensive Agriculture	FS-80
North	Agriculture/Residential	Intensive Agriculture	FS-80/AE40
East	Agriculture	Intensive Agriculture	FS-80
South	Agriculture/Residential	Intensive Agriculture	FS-80/AE-40
West	Agriculture/Residential	Intensive Agriculture	FS-80

CHAPTER 3

ENVIRONMENTAL CHECKLIST

PURPOSE OF THIS INITIAL STUDY

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the project, as proposed, may have a significant effect upon the environment.

A significant impact is considered a substantial adverse effect, one that exceeds some critical and accepted threshold for negative environmental effects. CEQA defines a significant effect on the environment as "...a substantial, or potentially substantial, adverse (i.e., negative) change in any of the physical conditions within the area directly or indirectly caused by the Project, including effects on land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic "significance" (CEQA Guidelines, §15382). As recommended in the CEQA Guidelines, impacts are also identified as "potentially significant" prior to mitigation.

Mitigation Measures are measures to mitigate, avoid, or substantially lessen impacts identified as significant or potentially significant. According to CEQA, the term "mitigation measures" refers to those items that are in addition to standard conditions, uniform codes, or project features that may also reduce potential impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist, and corresponding discussion on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:	
☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	**I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.**
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Andy Popper

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Signature

Andy Popper, Principal Planner

April 10, 2025

Date

I. AESTHETICS

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista can be defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. There is no designated scenic vista on or adjacent to the proposal site, therefore there will be no impact.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. Scenic resources are defined as those landscape patterns and features that are visually or aesthetically pleasing and that, therefore, contribute affirmatively to the definition of a distinct community or region. Scenic areas, open spaces, rural landscapes, vistas, country roads, and other factors interact to produce a net visual benefit upon individuals or communities. Those visual resources that uniquely contribute to that public benefit are scenic resources under CEQA.

The proposed project would not remove scenic resources such as buildings (historic or otherwise), rock outcroppings, or trees. There are no unique scenic

resources or structures located at the project site. The roadways in Glenn County are not listed as Eligible or as Officially Designated Scenic Highways according to the California Department of Transportation.[1] The project as proposed will not damage scenic resources in the area. It is concluded that there will be a less than significant impact.

c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. Visual character is descriptive and non-evaluative, which means it is based on defined attributes that are neither good nor bad in and of themselves. It is the objective composition of the visible landscape within a viewshed. It is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers. The existing visual character of the specific project location will change but would not substantially be degraded.

Compliance with the Glenn County Code provides standards for building height and placement of future structures to ensure the visual quality of the area. Therefore, the existing visual character of the project site would not substantially change or be degraded. It is concluded that there will be a less than significant impact on the existing visual character and quality of the site and its surroundings as a result of this project.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The proposal is not anticipated to produce glare, which may adversely affect day or nighttime views in the area. Therefore, glare from the project site would not be substantial enough to alter the existing characteristics of the area.

Installation of future lighting will be required to conform to the Glenn County Code. Glenn County Code §15.56.080 (Glare and Heat) states the following: *All exterior lighting accessory to any use shall be hooded, shielded or opaque. No unobstructed beam of light shall be directed beyond any exterior lot line.* New exterior lighting will be required to be hooded to reduce glare and retain light to limited areas. Additionally, the light shall not be directed beyond the property lines. It is concluded that there will be a less than significant impact.

[1] California Department of Transportation. *Officially Designated State Scenic Highways.* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:		**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a)	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 Resources Agency, to non-agricultural use?	☐	☒	☐	☐
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Would the project 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 Resources Agency, to non-agricultural use?

Less Than Significant With Mitigation Incorporated. The California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP), tracks and categorizes land with respect to agricultural resources. Farmland is classified according to its ability to support crops or livestock. Land is designated as one of the following and each has a specific definition: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Farmland of Local Potential, Grazing Land, Urban and Built-Up Land, and Other Land. Based on the most recent FMMP map (2020), the proposed project site with the existing facility is designated Urban and Built-up Land as well as Prime Farmland.

California Department of Conservation defines Urban and Built-Up Land as, "Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Defined as land used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

The footprint of the proposed location is no longer in orchard. In addition, the proposed use is for an agricultural processing facility; therefore, no land will be removed from agricultural uses as a result of this proposal. However, in accordance with Glenn County code when a proposed power generation use includes these lands as designated under the FMMP in Agriculture zoning districts or Williamson Act contracted lands specified under Section 15.86.030(A), mitigation shall be required to secure replacement land of equal or greater farming potential at a ratio of 1:1. Said mitigation may be accomplished on the same lot.

The most recent online Farmland Mapping and Monitoring Program (FMMP 2020) depicts approximately 10 acres of the 96-acre parcel as Urban and Built-Up Land, with the remaining 86 acres as Prime Farmland. However, the existing facility footprint (which includes the proposed location of this project) is 28 acres in size. The entire property is under a Farmland Security Contract. Therefore, in order to offset the 4.3-acre footprint of the proposal, and to meet the above County code, the following Mitigation Measure will be made as a part of the project.

<u>Mitigation Measure AR -1 (Agricultural Resources):</u>
The applicant/landowner shall provide bi-annual reporting (in the form of a map/site plan) to the Planning Division evidencing that no less than 4.3 acres of the project site property remains in orchard, or other food or fiber production; thereby maintaining said 4.3-acre portion of the property in Prime Farmland status (according to the most recent California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP)).

Timing/Implementation:
In perpetuity of the project

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less Than Significant Impact. The project site is subject to an agricultural contract under the Williamson Act, as a result of a Farmland Security Act Contract. The property is used as a walnut facility and this project will be ancillary to the exiting agricultural processing facility. This proposal will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves because the existing facility is reliant upon the long-term use of walnut orchards. The location for the proposal is currently graded in preparation for development and not being used for orchard; therefore, the proposal would not convert agricultural land to non-agricultural use. The project site will be used in conjunction with the agricultural operations on the site; therefore, will not result in the removal of contracted land from an agricultural use. It is concluded that there will be a less than significant impact on the existing zoning for agricultural use or a Williamson Act contract.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The proposed project will not conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production. The project site is zoned “FS-80” Farmland Security Zone (Chapter 15.47 Glenn County Code) and is meant to protect intensive and extensive agricultural activities. The project does not involve construction or conversion of forestland; therefore, it is concluded that the project will have no impact.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Forest land is defined in Public Resources Code section 12220(g) as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity,*

water quality, recreation, and other public benefits. This project will not result in the loss of forest land therefore, there will be no impact as a result of this project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. There will be no changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impacts are anticipated.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	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)?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. Examples of criteria pollutants (according to California Ambient Air Quality Standards) include ozone (O_3), carbon monoxide (CO), sulfur oxides (SO_x) and nitrogen dioxide (NO_2).[2]

Geographic areas are classified under the federal and California Clean Air Act (CCAA) as in either attainment or nonattainment for each criteria pollutant based on whether the Ambient Air Quality Standards have been achieved. The CCAA requires air districts which have been designated as a nonattainment area for California Ambient Air Quality Standards for ozone, carbon monoxide, sulfur dioxide, or nitrogen dioxide to prepare and submit a plan for attaining and maintaining the standards. Glenn County is within the Northern Sacramento Valley Planning Area air district.

The California Clean Air Act of 1988 also requires that districts review their progress toward attaining the CAAQS every three years. The 2018 Triennial Air Quality Attainment

[2] Northern Sacramento Valley Planning Area 2018 Triennial Air Quality Attainment PLAN http://airquality.org/SVBAPCC/Documents/2018%20Triennial%20Report.pdf

Plan is the latest Air Quality Attainment Plan that has been prepared for the Northern Sacramento Valley Planning Area.

The 2018 plan assesses the progress made in implementing the previous triennial update completed in 2015 and proposes modifications to the strategies necessary to attain the CAAQS by the earliest practicable date. The 2018 plan includes the following:

1. Assessment of progress towards achieving the control measure commitments in the previous Triennial Plan.
2. Summary of the last three years of ozone data to demonstrate improvement of air quality.
3. Comparison of the expected versus actual emission reductions for each measure committed to in the previous Triennial Plan.
4. Updated control measure commitments and growth rates of population, industry, and vehicle related emissions.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. Air quality standards are set at both the federal and state levels. The Glenn County Air Pollution Control District (GCAPCD) is responsible for the planning and maintenance/attainment of these standards at the local level. The GCAPCD sets operational rules and limitations for businesses that emit significant amounts of criteria pollutants. The GCAPCD is supervised by the U.S. Environmental Protection Agency. Under the federal Clean Air Act, local air quality districts must produce and implement plans for cleaning up any pollutant that exceeds federal standards.

The proposal will not conflict with or obstruct implementation of an applicable air quality plan. Glenn County has been designated as an attainment area for ozone[3]; additionally, there have been no exceedances of the maximum ozone values for 1- hour or 8-hour standard since 2010.

There may be a minimal increase in local vehicle trips. Particulate matter emissions can be expected during future construction from the transport of workers and machinery to and from the site as well as operation of equipment on-site. All equipment used shall be maintained in compliance with the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board engine standards.

The project would not significantly contribute to air quality impacts during future construction. All future development is to comply with the requirements of the GCAPCD. Given this information, it is concluded that the impact from the proposal is less than significant.

[3] California Air Resources Board. *Maps of State and Federal Area Designations.* https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations

b) Would the project 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?

Less Than Significant Impact.
See Section III a)

Each project with emissions falling under regulatory standards must individually comply with the GCAPCD regulations. In addition, each project would be required to utilize the best available control technology to mitigate impacts to air quality.

Glenn County has been designated as an attainment area for ozone; additionally, there have been no exceedances of the maximum ozone values for 1- hour or 8-hour standard since 2010. An "Attainment" area is defined as a geographic area that meets or exhibits values lower than the level of a criteria air pollutant allowed by the federal standards; a "Nonattainment" area is defined as a geographic area in which the level of a criteria air pollutant is higher than the level allowed by the federal standards.

There will not be a significant increase in Vehicle Miles Traveled (VMT) as a result of this project. Northern Sacramento Valley Planning Area 2018 Triennial Air Quality Attainment Plan estimated Glenn County would have VMT/1000 people of approximately 988 by 2020. This project is not anticipated to significantly increase VMT due to the number of people coming on site. It is also not anticipated to increase population. The WWS are currently transported by truck to Anderson for disposal. Based on information provided by the applicant team, near-term estimates for 2027 indicate that the walnut processing facility would require an anticipated 6,000 truckloads per year to dispose of about 135,000 tons of WWS using trucks with a carrying capacity of 45,000 pounds. This equates to an average of 16 trucks per day, or 32 trips accounting for one trip when leaving the site and one trip when returning. With the implementation of the project as proposed, trips required for WWS disposal would be eliminated and replaced with RNG trips to the injection site and trips for biochar removal. When fully operational, the facility would remediate 135,000 tons of WWS annually and generate 2,850 MMBtu of RNG and 15 tons of biochar biproduct per day.

Both VMT and population growth are contributors to pollutants, in this case the impacts from the proposal for VMT and population growth are considered less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Neither California statutes nor regulations define "sensitive receptors" but this term normally refers to locations where uses and/or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). Examples of sensitive receptors may include schools, hospitals, churches, recreation and residential areas.

The proposed project is adjacent to the existing agricultural processing facility and in an area zoned for agriculture uses. Land use within the vicinity of the project site is primarily intensive agricultural activities. There are no schools, churches, hospitals, recreation areas, or other public facilities within the immediate vicinity of the project site.

All uses at the site are required to comply with applicable local, state and federal laws and regulations regarding contaminants and pollutants (Glenn County Code §15.56.040). These requirements include, but are not limited to, emissions of suspended particles, carbon monoxide, hydrocarbons, odors, toxic or obnoxious gases and fumes. As there are no sensitive receptors in the immediate vicinity, impacts are anticipated to be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The proposal is being located adjacent to the north of an existing walnut shelling facility; thereby being set away from the few residences to the southwest of the proposal. There are no residences within 1,000 feet of the proposal. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

All uses at the site are required to comply with applicable local, state and federal laws and regulations regarding contaminants and pollutants during construction (Glenn County Code §15.56.040). Impacts are anticipated to be less than significant. In addition to the above Initial Study items the following Condition of Approval will be a requirement for the project:

Condition of Approval (APCD):
The applicant/operator shall modify their existing District Permit to Operate; complete and submit an Authorization to Construct (ATC) application prior to construction. All new sources of air pollution and the air pollution control equipment including emissions estimates shall be included in the ATC application.

IV. BIOLOGICAL RESOURCES

	Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b)	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 California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☒	☐
c)	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?	☐	☐	☒	☐
d)	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?	☐	☐	☒	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Regulatory Background

Special-Status Species

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed and proposed species. In addition, California Department of Fish and Wildlife (CDFW) Species of Special Concern, which

are species that face extirpation in California if current population and habitat trends continue, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, and CDFW special-status invertebrates are all considered special-status species. Although CDFW Species of Special Concern generally have no special legal status, they are given special consideration under the California Environmental Quality Act (CEQA). In addition to regulations for special-status species, most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918. Under this legislation, destroying active nests, eggs, and young is illegal. Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (Inventory) with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA. Rank 3 and Rank 4 species are afforded little or no protection under CEQA.

Waters of the United States

The U.S. Army Corps of Engineers (Corps) regulates "Waters of the United States" under Section 404 of the Clean Water Act. Waters of the U.S. are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *Corps of Engineers Wetlands Delineation Manual*[4], are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Areas that are inundated at a sufficient depth and for a sufficient duration to exclude growth of hydrophytic vegetation are subject to Section 404 jurisdiction as "other waters" and are often characterized by an ordinary high-water mark. Other waters, for example, generally include lakes, rivers, and streams. The placement of fill material into Waters of the U.S generally requires an individual or nationwide permit from the Corps under Section 404 of the Clean Water Act.

Waters of the State

The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The Regional Water Quality Control Board (RWQCB) protects all waters in its regulatory scope and has special responsibility for wetlands, riparian areas, and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes "isolated" wetlands and waters that may not be regulated by the Corps under Section 404. Waters of the State are regulated by the RWQCB under the State Water Quality Certification Program, which regulates discharges of fill and dredged material under Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the State, are required to comply with the terms of the Water Quality Certification determination. If a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the RWQCB has the option to

[4] Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual*. Department of the Army, Waterways Experiment Station, Vicksburg, Mississippi 39180-0631.

regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements.

Streams, Lakes, and Riparian Habitat

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by CDFW under Sections 1600-1616 of California Fish and Game Code. Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream", which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). In addition, the term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. Riparian is defined as "on, or pertaining to, the banks of a stream." Riparian vegetation is defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself". Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

a) Would the project 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. This project will not have a substantial adverse effect on species identified as a candidate, sensitive, or special status species. According to the Glenn County Environmental Impact Report, no sensitive species have been known to be located within the project site.

Many of the plant and wildlife species occur in specialized habitats, such as riparian, wetlands, marshes, ponds, and other aquatic habitats. The project site does not contain any riparian habitats, wetlands, or other sensitive natural community. No endangered plant species are known to exist within the project site due to previous grading disturbance.

It is concluded that the project will have a less than significant impact on 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 Wildlife or U.S. Fish and Wildlife Service.

b) Would the project 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 California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less Than Significant Impact. Riparian communities formerly occupied extensive stands within Glenn County, and the current riparian communities are principally located along the Sacramento River, Willow Creek, and Walker Creek. The project site is located about 0.6 miles from the Sacramento River. Although the project is located within the vicinity of the Sacramento River, according to the National Wetland Inventory Map of the U.S. Fish and Wildlife Service, the project site does not contain any wetlands or riparian areas.

The project does not involve changes to the physical environment, which would alter or destroy sensitive natural communities. The current land use of the site will not change and future development would not be significant. It is concluded that there would be a less than significant impact on riparian habitat or other sensitive natural community.

c) Would the project 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?

Less Than Significant Impact. Since the 1970s, the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency have used the following definition for wetlands for regulatory purposes: *"Wetlands are areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."*

According to the National Wetlands Inventory of the U.S. Fish and Wildlife Service, wetlands do not exist at the project site.[5] The project will not directly remove, fill, interrupt the hydrology of, or otherwise affect federally protected wetlands. Therefore, it is concluded that there will be less than significant impact on federally protected wetlands as a result of this project.

d) Would the project 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?

Less Than Significant Impact. According to the Existing Conditions Report, the California Department of Fish and Wildlife has divided the State into 11 Deer Assessment Units (DAUs). Glenn County's is located within Unit 5 (Central Sierra) and Unit 8 (Central Coast-North). The deer herds of Unit 5 are largely migratory deer located within the west slope of the Sierra Nevada Mountain range, with

[5] United States Fish and Wildlife Service. *National Wetlands Inventory*: http://www.fws.gov/nwi.

smaller resident populations along the Sacramento Valley floor including Colusa County. The deer herds of Unit 8 are largely resident animals that exhibit some upslope/downslope movement with seasonal changes in weather and forage conditions. Deer within Glenn County are common within the forest communities where common habitat includes several oak species, western mountain mahogany, chamise, riparian-wetland areas, willow/birch, ceanothus, and manzanita. Deer are also common in the foothill communities where common habitat includes oak-woodland, oak-annual grass savanna, and chaparral shrub stands. Deer are less common, but can be found in the valley floor in agricultural fields, pastures, and riparian areas. Based on the project site's location in the eastern portion of the County, there will be a less than significant impact on migration corridors.

Glenn County is located within the Pacific Flyway; a migratory corridor for birds moving between their winter and summer ranges. Winter waterfowl habitat is located within and surrounding the Sacramento National Wildlife Refuge, which is located in the southern part of the County. Many of these birds are protected by the Migratory Bird Treaty Act which prohibits killing, possessing, or trading in migratory birds except in accordance with regulations prescribed by the United States Secretary of the Interior. The project would have less than significant impact on migratory waterfowl and other birds migrating through the region because the project does not include features, which would draw migratory fowl to the area.

The project activities would not alter or destroy migratory wildlife corridors. The project site does not contain native wildlife nursery habitat. The project would not significantly impede migratory wildlife corridors. The proposed project would have a less than significant impact upon the movement of any native resident or migratory wildlife species.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The proposed project would not create a conflict with local policies or ordinances protecting biological resources because there are none within the area of the project. Therefore, it is concluded that there will be less than significant impact.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. The proposed project would not create a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan because no plans have been adopted for this specific area. Therefore, it is concluded that there will be less than significant impact.

V. CULTURAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Cultural resources include prehistoric and historic period archeological sites; historical features, such as rock walls, cemeteries, water ditches and flumes, and architectural features. Cultural resources consist of any human-made site, object (i.e., artifact), or feature that defines and illuminates the past.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

a), b), and c) Less Than Significant Impact with Mitigations Incorporated

In compliance with CEQA Guideline §15064.5 (Determining the Significance of Impacts to Archaeological and Historical Resources), a request for a records search was submitted to the Northeast Information Center (NEIC), a member of the California Historic Resources Information System (CHRIS), to determine if any cultural places are located within the project site.

Future development would be required to comply with the required procedures of conduct following the accidental discovery of human remains as mandated in the Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA).

Section 7050.5 of the California Health and Safety Code states that if human remains are found during construction activities, all operations are to cease until the County coroner has determined that the remains are not subject to the provisions of law concerning investigation of the circumstances in the manner provided in Section 5097.98 of the Public Resources Code. The potential exists to

possibly uncover previously unidentified resources; therefore, it is concluded that there is a less than significant impact with mitigation measure incorporated.

Mitigation Measure CR-1 (Cultural Resources):

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the lead federal agency, the lead CEQA agency, and applicable landowner.

  The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either:

  3) is not eligible for the NRHP or CRHR; or
  4) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify Glenn Butte County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located

(AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

VI. ENERGY

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The proposal will not result in a significant impact due to wasteful, inefficient or unnecessary consumption. The project must comply with California Green Building Standards as well as California Energy Code. Future development shall comply with California Green Building Standards as well as California Energy Code. Impacts are anticipated to be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. This proposal will not conflict with any state or local renewable energy plan or efficiency. Construction of this project would be required to comply with the updated Title 24 of the California Code of Regulations established by the Energy Commission regarding emergency conservation standards. Impacts are anticipated to be less than significant.

VII. GEOLOGY AND SOILS

Would the project:			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
	i)	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.	☐	☐	☒	☐
	ii)	Strong seismic ground shaking?	☐	☐	☒	☐
	iii)	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv)	Landslides?	☐	☐	☒	☐
b)	Result in substantial soil erosion or the loss of topsoil?		☐	☐	☒	☐
c)	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?		☐	☐	☒	☐
d)	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?		☐	☐	☒	☐
e)	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?		☐	☐	☒	☐
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		☐	☐	☒	☐

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) 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.

Less Than Significant Impact. Fault rupture occurs when an active fault displaces in two separate directions during an earthquake. The State of California passed the Alquist-Priolo Special Studies Zone Act in 1972 to address seismic hazards associated with faults and to establish criteria for developments for areas with identified seismic hazard zones. Sudden surface rupture from severe earthquakes can cause extensive property damage, but even the slow movement known as "fault creep" can cause displacement that results in offset or disfiguring of curbs, streets, and buildings.

According to The California of Conservation Earthquake Zones of Required Investigation map, the project site is not located in a fault zone, and fault rupture is not anticipated.[6] Given this data, seismic related activities such as rupture of known earthquake faults would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. According to the Glenn County Existing Conditions Report, Glenn County is in a relatively inactive seismic area, and no significant earthquakes have been identified. There are no Alquist-Priolo Special Studies Zones within the County. Glenn County is in a Seismic Design Category "D" according to the California Building Code (CBC). This category requires that special precautions be taken, in accordance with the CBC, during construction to avoid or minimize earthquake damage. All construction in the County is required to meet the standard set by the CBC for this area.

The California Building Code (CBC) establishes standards for structures to survive earthquakes of an intensity of VII with little or no damage. Seismic risk categories are based, in part, on the distribution of earthquakes and the Modified Mercalli Intensity Scale rating of known earthquakes.

According to the Glenn County Existing Conditions Report, Glenn County is considered to be within an area that is predicted to have a 10 percent

[6] California Department of Conservation. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/

probability that a seismic event would produce horizontal ground shaking of 10 to 20 percent within a 50-year period. This level of ground shaking correlates to a Modified Mercalli intensity of V to VII, light to strong.

The seismic history of Glenn County shows the area to be generally stable. Glenn County's stability can be correlated with its location away from tectonic plate boundary convergence/divergence and its location away from major active faults with high slip rates. Adherence to the California Building Code will prevent potential impacts on future construction. Given this data, seismic related activities such as strong seismic ground shaking would have a less than significant impact on people and structures in the area of the project.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is defined as the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pour water pressure. Ground shaking resulting from an earthquake is capable of providing the mechanism for liquefaction.

Due to the lack of seismic activity in Glenn County, it is unlikely that liquefaction or other ground failure of this type would occur. Liquefaction generally occurs in low-lying areas with saturated soils and its effects are commonly observed near water bodies. Soils with a loose structure, such as sand, are more susceptible to liquefaction when saturated.

According to The California of Conservation Earthquake Zones of Required Investigation map, the project site is not located in a Liquefaction Zone. Further, the California Geologic Survey does not list Glenn County as an area where seismic activity affects soil stability. It is concluded that there is less than significant impact.

Also see a) i-ii) above.

iv) Landslides?

Less Than Significant. Landslides include phenomena that involve the downslope displacement and movement of material, either triggered by static (gravity) or dynamic (earthquake) forces. Areas susceptible to landslides are typically characterized by steep, unstable slopes in weak soil or bedrock units.

According to The California Department of Conservation Earthquake Zones of Required Investigation map, the project site is not in a Landslide Zone. The topography of the site and surrounding area is relatively flat; therefore,

it is not susceptible to slope failures and landslides. Therefore, it is concluded that there will be less than significant impact.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil erosion occurs through either water or wind action. Erosion by water includes sheet, rill, ephemeral gully, classical gully, and streambank erosion. Severe erosion typically occurs on moderate slopes of sand and steep slopes of clay subjected to concentrated water runoff. These topographic conditions do not exist at the site.

Disruption of soils on the site is not expected to create significant soil erosion. The project would therefore not result in substantial soil erosion or the loss of topsoil. It is concluded that there will be a less than significant impact.

c) Would the project 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 Impact. This proposal will have a less than significant impact on soil involving unstable soils that may result in onsite or offsite landslides, lateral spreading, subsidence, liquefaction, or collapse. Soils and the geology of the project site are generally stable because of the area's seismic stability and low relief (see Section VI. a) i) above).

On or Off-Site Landslide
Landslide potential in the County generally correlates with relief. According to The California Department of Conservation Earthquake Zones of Required Investigation map, the project site is not in a Landslide Zone. Landslides are not a threat because the site is not located in an area with a great amount of relief.

Lateral Spreading
There is a low probability for lateral spreading to occur because of the area's seismic stability. All future construction is required to meet the standards set by the California Building Code, which will reduce impacts from lateral spreading.

Subsidence
Land subsidence is a gradual settling or sudden sinking of the Earth's surface owing to subsurface movement of earth materials. The principal causes of subsidence are aquifer-system compaction, drainage of organic soils, underground mining, hydro compaction, natural compaction, sinkholes, and thawing permafrost.[7]

[7] U.S. Geological Survey. December 2000. *Land Subsidence in the United States,* USGS Fact Sheet -165-00. http://water.usgs.gov/ogw/pubs/fs00165/.

Subsidence has been shown to occur within Glenn County and widespread affecting the valley floor. All future construction is required to meet the standards set by the California Building Code, which will reduce impacts from subsidence.

Liquefaction/Collapse

Liquefaction occurs when loosely packed sandy or silty materials saturated with water are shaken hard enough to lose strength and stiffness. Liquefied soils behave like a liquid and are responsible for damage during an earthquake, causing pipes to leak, roads and airport runways to buckle, and building foundations to be damaged. There is a low probability for liquefaction and ground collapse to occur because of the area's seismic stability. Future construction in compliance with the California Building Code will reduce impacts from liquefaction and collapse.

Based on the information provided above, it is concluded that there will be a less than significant impact.

d) Would the project 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 Impact. Expansive soils are those that shrink or swell with the change in moisture content. The volume of change is influenced by the quantity of moisture, by the kind and amount of clay in the soil, and by the original porosity of the soil.

According to the Glenn County Existing Conditions Report, most of Glenn County has expansive soils.[8] Soils containing a high clay content often exhibit a relatively high potential to expand when saturated, and contract when dried out. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support.

There would be no substantial risks to life or property from this project because future development will require compliance with the California Building Code (CBC) to avoid potential unstable earth conditions or changes in geologic substructures. As part of the building permit process for future structures on the project site, the Glenn County Building Division will ensure that the foundations of all new structures are adequately designed for the shrink/swell characteristics of expansive soils and no significant impacts to life or property are expected. An engineer will be required to design the footings for all future structures to address soil conditions. California Building Code compliance reduces potential impacts from expansive soils to less than significant. Therefore, it is concluded that there is a less than significant impact.

[8] Glenn County. *Glenn County Existing Conditions Report.* 2020. https://static1.squarespace.com/static/5c8a73469b7d1510bee16785/t/5e556b56c253f84cdc287783/1582656403698/GlennCounty-ECR-Final-Feb2020.pdf

In coordination with the items discussed in this section of the initial study the following Conditions of Approval will also be required:

Condition of Approval (Building Division):
All construction shall require a building permit issued by the Glenn County Building Division.

Condition of Approval (Building Division):
All setbacks to the property lines for existing and proposed structures shall be maintained according to the California Building Code.

Condition of Approval (Building Division):
All existing structures shall comply with the original permitted use, any change of use shall be approved through the permitting process to assure code compliance.

e) Would the project 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?

Less Than Significant Impact. Compliance with Glenn County Environmental Health standards would ensure that any septic systems are properly operating, and any expansion of the system is designed with respect to on-site soil capabilities for the safe treatment and disposal of wastewater and the protection of groundwater quality. Furthermore, the following conditions of approval were made from the comments received from the Glenn County Environmental Health Department.

Condition of Approval (EHD):
The applicant/operator shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.

Condition of Approval (EHD):
The existing onsite wastewater treatment systems (OWTS) shall be expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the Environmental Health Department (EHD).

Condition of Approval (EHD):
Restroom facilities shall be provided to accommodate workers during construction of the project and shall be approved by the EHD.

Condition of Approval (EHD):
Water wells used to supply potable water shall meet current construction requirements, be permitted and regulated by the EHD or the State Water Resource Control Board (SWRCB), Division of Drinking Water.

Condition of Approval (EHD):
All garbage, rubbish and refuse created, produced or accumulated during construction, at the proposed facility and/or on the property shall be removed by a permitted waste hauler or taken to a permitted facility at least once each week. All garbage shall be kept in a container with a close-fitting cover, without leakage or escape of odors.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The project site contains no known paleontological resources or unique geologic sites. It is concluded there will be a less than significant impact. Also see the Cultural and Tribal Cultural Resources sections.

VIII. GREENHOUSE GAS EMISSIONS

	Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Legislative/Regulatory

The Governor of California signed Executive Order S-3-05 (EO), in June 2005, which established statewide reduction targets for greenhouse gases. The EO states that emissions shall be reduced to 2000 levels by 2010, to 1990 levels by 2020, and by 2050 reduced to 80 percent of the 1990 levels. Assembly Bill 32, the California Global Warming Solutions Act, 2006 (AB 32), was signed into law in September 2006. AB 32 finds that global warming poses a serious threat to the economic wellbeing, public health, natural resources, and the California environment. It establishes a state goal of reducing greenhouse gas emissions to 1990 levels by the year 2020, which would be a 25 percent reduction from forecasted emission levels.

Senate Bill 97 (SB 97) was approved by the Governor of California in August 2007. SB 97 requires the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit guidelines to the Resources Agency for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions, as required by CEQA. In April 2009, OPR submitted to the Secretary for Natural Resources its proposed amendments to the CEQA Guidelines for greenhouse gas emissions, as required by Senate Bill 97 (Chapter 185, 2007). The Natural Resources Agency (Resources Agency) conducted formal rulemaking prior to certifying and adopting the amendments, as required by Senate Bill 97. The Resources Agency adopted the proposed amendments, and transmitted the amendments to the Office of Administrative Law on December 31, 2009. The Office of Administrative Law reviewed the Adopted Amendments and the Natural Resources Agency's rulemaking file. The Adopted Amendments were filed with the Secretary of State, and became effective March 18, 2010.

These CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of greenhouse gas emissions in draft CEQA documents. The greenhouse gas guidelines fit within the existing CEQA framework by amending existing Guidelines to reference climate change.

Greenhouse gases (GHGs), as defined by the Health and Safety code, include but are not limited to water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), and chlorofluorocarbons (CFCs) (Health and Safety Code §38500 et seq.). These gases all act as effective global insulators, reflecting back to earth visible light and infrared radiation.

GHGs are present in the atmosphere naturally, released by natural sources, or formed from secondary reactions taking place in the atmosphere. In the last 200 years, substantial quantities of GHGs have been released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere, enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), some (like CFCs) are completely new to the atmosphere.

Natural sources of carbon dioxide (CO_2) include respiration (breathing) of animals and plants and evaporation from the oceans. Together, these natural sources release about 150 billion tons of CO_2 each year, far outweighing the seven billion tons of manmade emissions from fossil fuel burning, waste incineration, deforestation, and cement manufacture. Nevertheless, natural removal processes such as photosynthesis by land and ocean-dwelling plant species cannot keep pace with this extra input of manmade CO_2, and consequently the gas is building up in the atmosphere.

Methane (CH_4) is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Manmade sources include the mining and burning of fossil fuels, digestive processes in ruminant animals such as cattle, rice paddies, and the burying of waste in landfills. Total annual emissions of CH_4 are about 500 million tons, with manmade emissions accounting for the majority. The major removal process of atmospheric methane – chemical breakdown in the atmosphere – cannot keep pace with source emissions, and CH_4 concentrations in the atmosphere are increasing. [9]

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. A project cannot generate enough GHG emissions to influence global climate change on its own. A project participates in potential climate change by its incremental contribution (positive or negative) of GHG emissions that, when combined with the cumulative increase of all other natural and anthropogenic sources of GHGs, impact global climate change. Therefore, global climate change is a type of cumulative impact and a project's participation in this cumulative impact is through its incremental contribution of GHG emissions.

[9] State of California. September 2006. *Assembly Bill 32 California Global Warming Solutions Act of 2006*, http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf

Energy efficiency standards have been updated, and new technology has allowed construction to be more energy efficient. Future construction would be required to comply with the updated Title 24 of the California Code of Regulations established by the Energy Commission regarding emergency conservation standards.

This part of the County is used primarily for orchards and agricultural processing. There is not anticipated to be a significant increase in Vehicle Miles Traveled (VMT) as a result of this proposal. Based on the analysis provided above, it is concluded that the proposed project would have a less than significant impact on emissions of GHG's and climate change.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. See discussion in section VII a) above. AB 32 is the State of California's primary GHG emissions regulation. The project would not conflict with the state's ability to achieve the reduction targets under AB 32. Impacts are anticipated to be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	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?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	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?	☐	☐	☐	☒
e)	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?	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The California Health and Safety Code defines a Hazardous Material as “any material that because of its quantity, concentration, or physical or chemical characteristics poses a significant present or potential hazard

to human health and safety or the environment if released into the workplace or environment". Thus, hazardous material is a broad term for all substances that may be hazardous and includes hazardous substances and hazardous wastes. Substances that are flammable, corrosive, reactive oxidizers, radioactive, combustible, or toxic are considered hazardous. Examples include: oil, fuels, paints, thinners, cleaning solvents, compressed gasses (acetylene, carbon dioxide, oxygen, nitrogen, etc.), radioactive materials, and pesticides.

The Glenn County Air Pollution Control District (GCAPCD) is the Administering Agency and the Certified Unified Program Agency (CUPA) for Glenn County with responsibility for regulating hazardous materials handlers, hazardous waste generators, underground storage tank facilities, above ground storage tanks, and stationary sources handling regulated substances.

The project site is subject to Glenn County Code §15.56.070 for fire and explosion hazards. This section states: *All uses involving the use or storage of combustible, explosive, caustic or otherwise hazardous materials shall comply with all applicable local, state and federal safety standards and shall be provided with adequate safety devices against the hazard of fire and explosion, and adequate fire-fighting and fire suppression equipment.*

The transport, use, and storage of hazardous materials during construction and during operations or transport would be subject to, and therefore conducted in accordance with, all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 8 and Title 22. Additionally, a facility that plans to store hazardous material such as diesel or batteries in reportable quantities, must submit a business plan in CERS (California Environmental Reporting System).

Due to the existing county requirements the project has a less than significant impact related to the use of hazardous materials.

b) Would the project 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 Impact. Uses involving the storage and handling of hazardous materials are monitored by the Glenn County Air Pollution Control District (GCAPCD), which is the Certified Unified Program Agency (CUPA) for Glenn County.

According to the GCAPCD, businesses that handle hazardous materials are required by law to provide an immediate verbal report of any release or threatened release of hazardous materials. Local, state, and federal regulations for use and handling of hazardous materials will reduce impacts to the public and the

environment. It is concluded that the project would have a less than significant impact.

c) Would the project 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 Impact. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. There are no schools located within one-quarter mile of the project sites. Therefore, it is concluded that there will be less than significant impact as a result of this project.

d) Would the project 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?

No Impact. The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to California Government Code §65962.5. According to the database of cleanup sites provided through the California Department of Toxic Substance Control (DTSC), there are no cleanup sites within the vicinity of the project.[10] Therefore, it is concluded that there will be no impact.

e) 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?

No Impact. There are no public or private airports within the vicinity of the project site. The project would not result in a safety hazard for people residing or working in the project area because it is located outside of the overflight zone. Therefore, it is concluded that there is no impact.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The project would not interfere with an adopted emergency response or evacuation plan. All roads in the area would remain open. The project site is located on private property with adequate access to roads. The project will not interfere with adjacent roadways that may be used for emergency response or evacuation. The project will not prohibit subsequent plans from being established

[10] California Department of Toxic Substance Control. *Envirostor: Cleanup Sites and Hazardous Waste Permitted Facilities*. http://www.envirostor.dtsc.ca.gov/public/.

or prevent the goals and objectives of existing plans from being carried out. Therefore, it is concluded that there is no impact.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. The project site is not within Cal Fire's State Responsibility Area; the site is within Glenn-Codora Fire Protection District. According to Figure 4.3-1 of the Glenn County Existing Conditions Report, the project site is not within fire hazard severity zone. The most severe wildland fires occur in the western portion of the County within the Mendocino National Forest. It is concluded that there will be a less than significant impact on the project from wildland fires.

X. HYDROLOGY AND WATER QUALITY

Would the project:			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		☐	☐	☐	☒
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		☐	☐	☐	☒
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
	i)	result in a substantial erosion or siltation on- or off-site	☐	☒	☐	☐
	ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☒	☐	☐
	iii)	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; or	☐	☒	☐	☐
	iv)	impede or redirect flood flows?	☐	☐	☒	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?		☐	☐	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements?

No Impact. The proposed project will not violate water quality standards or waste discharge requirements set forth by the Central Valley Regional Water Quality Control Board. The proposed project is not in an area of integrated sewer systems, and onsite septic systems require environmental health oversight and approval; therefore, it is concluded that there will be no impact as a result of this project.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The proposed project would not deplete groundwater supplies or interfere with groundwater recharge. No increases in groundwater use are planned. It is concluded that there will be no impact as a result of this project.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site;
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
iii) 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; or

Less Than Significant With Mitigation. There will not be a significant increase in surface runoff, which would result in erosion or siltation on- or off-site. No streams or rivers flow through the project sites. Future construction is required to conform to the Glenn County Code, which includes Glenn County Code Section 15.70 (Leveling of Land-Drainage Changes). As is the case under current land use designations and zoning, development would be required to adhere to standard practices designed to prevent erosion and siltation, such as slope protection and dust control. Any future drainage changes shall meet the requirements of Chapter 15.65 of the County Code. The project will not generate substantial additional sources of polluted runoff. It is concluded that there will be a less than significant impact with the following mitigation measure incorporated.

Mitigation Measure H & WQ-1 (Hydrology & Water Quality):
Prior to permit issuance, the Applicant shall provide Glenn County Planning Division a copy of a Construction General Permit (or written exemption thereof) from Central Valley Regional Water Quality Control Board.

Timing/Implementation:

Prior to site disturbance (including moving dirt, leveling and grading)

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency &
Central Valley Regional Water Quality Control Board

iv) impede or redirect flood flows?

Less Than Significant Impact. This project will not impede or redirect flood flows. The project site is in Flood Zone "A" according to Flood Insurance Rate Map (FIRM) No. 06021C0165D, dated August 8, 2010, issued by the Federal Emergency Management Agency (FEMA). Flood Zone "A" (unshaded) consists of areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown. Since the project site is within Flood Zone "A" as designated by FEMA, a Flood Certificate will be required before issuance of a Building Permit in accordance to Glenn County Code 15.54. The project will not have a significant impact in impeding or redirecting flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are potentially hazardous when the wave action created in lakes or swimming pools is strong enough to threaten life and property. Tsunamis are large ocean waves generated by major seismic events and mudflows are landslide events in which a mass of saturated soil flows downhill as a very thick liquid. There would be no impact on the project site from inundation by seiche or tsunami because the project area is not located near large bodies of water that would pose a seiche or tsunami hazard.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The proposal will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The proposed project will not substantially degrade water quality. No source of pollution affecting water quality would be generated with approval of this project. Construction activities resulting in a land disturbance of greater than one acre must be permitted by Central Valley Regional Water Quality Control Board. The proposed project would not substantially decrease groundwater supplies or interfere with groundwater recharge as no significant increases in groundwater use are planned.

Compliance with Glenn County Environmental Health standards would ensure the safe treatment and disposal of wastewater and the protection of groundwater quality. It is concluded that there will be a less than significant impact.

XI. LAND USE AND PLANNING

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?	☐	☐	☒	☐
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Less than Significant. The proposed project is not of the scale or nature that could physically divide an established community. The project would not block a public street, trail, or other access route or result in a physical barrier that would divide a community. It is concluded that there will be less than significant impact as a result of this project.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant. The General Plan land use designation is "Intensive Agriculture" and the zoning designation is "FS-80" (Farmland Security (72-acre minimum parcel size)). The proposed project would meet the density requirements for this designation. This project is consistent with and will not conflict with the "FS-80" zoning designation (Glenn County Code Chapter 15.47). The project is consistent with the General Plan land use goals and policies and no significant land use impacts will occur. It is concluded that there will be less than significant impact on land use. In addition, the following Condition of Approval will apply:

Condition of Approval (Planning Division):
Prior to receiving a Building Permit (Zone Clearance) and operations, the Applicant/Landowner shall submit a copy of a recorded (by Glenn County Recorder's office) Agriculture Statement of Acknowledgement.

XII. MINERAL RESOURCES

	Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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?	☐	☐	☒	☐
b)	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?	☐	☐	☒	☐

The purpose of the Mineral Resources section is to identify and evaluate the potential for the project to adversely affect the availability of known mineral resources. The mineral resources of concern include metals, industrial minerals (e.g., aggregate, sand and gravel), oil and gas, and geothermal resources that would be of value to the region and residents of the State of California. Notable mineral resources in Glenn County include natural gas and construction grade aggregate material. In addition, published reports indicate past attempts to exploit deposits of chromite, molybdenite and copper. Primary areas for gravel extraction occur along Stony Creek and the Sacramento River, although there are other pockets of gravel scattered throughout the County.

Several gas fields contribute to a significant quantity of natural gas production in Glenn County. Of these, the Malton-Black Butte field located on the border with Tehama County in eastern Glenn County, and the Willows-Beehive Bend field located in southeastern Glenn County account for nearly 80 percent of total gas production in the County. No oil or geothermal resources have been discovered in the County. Mining in Glenn County was primarily related to the extraction of strategic minerals during World Wars I and II. According to the Glenn County Existing Conditions Report, the extraction of chrome and manganese essentially ended in the late 1940s with the loss of government demand and subsidies.

a) Would the project 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?

b) Would the project 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?

Less Than Significant Impact. According to the Mined Land Classification Map for Concrete-Grade Aggregate Resources Central Glenn County, produced by the California Department of Conservation no mineral rights are located on the project

site. [11] According to the USDA Natural Resources Conservation Service (NRCS), Web Soil Survey, the 96-acre parcel contains 100% of Zamora Silty clay loam, 0 to 3 percent slopes.

Mineral extraction activities are not present at the project site and no such activities have occurred on the project site in the past. There is no other evidence that any of the project areas have mineral resources that may add value to the region and residents of the state, or are important mineral resource recovery sites. Therefore, no significant impacts to mineral resources are anticipated.

[11] *California Department of Conservation. 1997. Mined Land Classification Map for Central Glenn County.*https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

XIII. NOISE

	Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b)	Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c)	For a project located within the vicinity of a private airstrip or 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?	☐	☐	☒	☐

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The County also enforces its Noise Ordinance (Chapter 15.56.100) in the County Code. This ordinance contains noise level standards for residential and non-residential land uses.

There may be periodic increases in noise during future construction activities. Construction-related noises between the hours of 7 A.M. and 7 P.M. are exempt from the local noise standards per Glenn County Code §15.56.100(F)(5). Construction-related noise levels at other times are regulated by the above-referenced County Code section. Noise impacts associated with on-site activities and traffic is not anticipated to exceed noise standards, therefore impacts are considered less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The proposed project would not generate excessive ground-borne vibrations. Vibrations are regulated by Glenn County Code §15.56.130, which states that no use shall generate ground vibrations which are perceptible without instruments beyond the lot line. Ground vibration caused

by motor vehicles, aircraft, temporary construction work or agricultural equipment are exempt from the vibration performance standard as stated under Glenn County Code §15.56.130. Construction work in the future would not cause significant ground-borne vibration. Since the duration of impact would be brief and would occur during less sensitive daytime hours (i.e., between 7:00 a.m. and 7:00 p.m.), the impact from construction-related ground-borne vibration and ground-borne noise is considered less than significant.

c) For a project located within the vicinity of a private airstrip or 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?

Less than Significant. There are no private airports or private airstrips located within the vicinity of the project site. According to topographic maps and aerial photos, the project site is not located within the vicinity of a private airstrip. Additionally, the project site is outside of the noise contour based on the Community Noise Equivalent Level (CNEL) as defined in the Willows Glenn County Airport Master Plan. It is concluded that there will be a less than significant impact as a result of this project.

XIV. POPULATION AND HOUSING

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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)?	☐	☐	☒	☐
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Population impacts are often associated with substantial increases in population from a project. Housing impacts may result directly from the construction of new housing units or indirectly from changes in housing demand associated with new non-residential development, such as office, manufacturing, and industrial uses that increase employment in an area.

a) Would the project 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)?

Less Than Significant Impact. The proposed project would not induce substantial population growth directly or indirectly. In accordance with Existing Conditions Report (Intensive Agriculture), the proposed project will not violate the population density standard of 100 persons per square mile (640 acres). New businesses and/or the extension of public roads that may lead to significant population growth are considered less than significant. The proposed project would not induce substantial population growth directly or indirectly. Therefore, it is concluded that there will be a less than significant impact on population growth.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposal would not displace existing housing or people within the area of the project. Construction of replacement housing would not be necessary with this proposal. Therefore, it is concluded that there will be no impact.

XV. PUBLIC SERVICES

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project 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:					
i)	Fire protection?	☐	☐	☒	☐
ii)	Police protection?	☐	☐	☒	☐
iii)	Schools?	☐	☐	☐	☒
iv)	Parks?	☐	☐	☐	☒
v)	Other public facilities?	☐	☐	☒	☐

a) Would the project 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:

i) Fire protection?

Less Than Significant Impact. This topic is also discussed in section VIII above.

The project site is serviced by the Glenn-Codora Fire Protection District, which is located approximrley one mile south of the facility. State and County roads with provide adequate transportation routes to reach the project site in the event of a fire. Response time is not anticipated to be affected by the proposed project. Compliance with state laws will reduce impacts from fire. Therefore, it is concluded that the impact from the proposal is less than significant.

ii) Police protection?

Less Than Significant Impact. Law enforcement for unincorporated portions of Glenn County, including the project site, is provided by the Glenn County Sheriff's Department. There is a sheriff's office located in the City of Willows and substations located in the City of Orland. The California Highway Patrol is responsible for patrolling interstate and state highways. Transportation routes to the project site are adequate for law enforcement to reach the area in the event of an emergency. Response time would not be affected by the proposed project. This project is not anticipated to require the staffing of additional peace officers or the purchase of additional equipment to support law enforcement activities. The project will not generate substantial additional population in the area and therefore would not require additional police surveillance over existing conditions. Based on this information, it is concluded that the project would have a less than significant impact on police protection.

iii) Schools?

No Impact. The construction permitted with the approval of this project would not result in an increase in demand on the public school system. It is concluded that there is no impact from the project.

iv) Parks?

No Impact. The County provides maintenance and upkeep of the existing parks within the unincorporated area. The County has no park facilities within the area of the project. The proposed project would have no impact on the County's ability to maintain its parks and no new substantial demands on the current facilities would be generated by this proposal.

v) Other public facilities?

Less Than Significant Impact. The project will not generate substantial additional population to the area and therefore will not have a need for public facilities such as libraries, postal service, hospitals, etc. Public agencies have reviewed this proposal for impacts to public services and facilities and a potentially significant impact has not been identified for this proposed project. Therefore, it is concluded that there is a less than significant impact to other public facilities.

XVI. RECREATION

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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?	☐	☐	☐	☒
b)	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?	☐	☐	☐	☒

a) 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?

No Impact. The project will have no impact on recreation. No new demand will be generated for the use of the existing area parks. The project does not include recreation facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

b) 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?

No Impact. The project does not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

XVII. TRANSPORTATION

Would the project:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b)	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

Glenn County Roads Overview:

The major north-south road is Interstate 5 (I-5), which provides major connection between Glenn County and major cities to the north, such as Red Bluff and Redding, and to the south to cities such as Sacramento. East of I-5, Routes 32 and 162 are the major east-west roads. Route 32 provides a connection through Orland to Chico, the closest of the major urban areas of California to Glenn County residents. To the south Highway 162 provides a similar connection to Oroville. The next major east-west road to the south is Highway 20, which provides a connection to the Yuba City- Marysville area. Highway 45 is the major north-south road east of I-5. It serves adjoining land uses as well as providing a connection between State Routes 32 and 162.

State Route 162 is the state route west of the City of Willows and I-5. The route originally began at Highway 101 in Mendocino County and continued into Glenn County, but a 70-mile break currently exists (34 miles of which is in Mendocino County and 36 miles in Glenn County). The intermediate mileage is a seasonal road. The jurisdictions responsible for public roads within Glenn County include the County of Glenn, incorporated cities (Orland, Willows), the State of California, and the U.S. Forest Service.

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.

Access to the project site is provided by State Highway 45 as well as County Road 54. Highway 45 has limited volumes of pedestrians and bicyclists due to the sparse local population and distance from primary residential areas of the County. There is no housing or other population inducing developments proposed with this project. The construction and operation phases of the project may create increases in existing traffic.

The project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account the existing facility, and all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. It is concluded that there will be less than significant impact.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)

§ 15064.3 Determining the Significance of Transportation Impacts

(b) Criteria for Analyzing Transportation Impacts

(1) Land Use Projects. "*Vehicle's miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transportation stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant impact".*

Less Than Significant Impact. Section 15064.3 of the CEQA Guidelines states that "vehicle miles traveled" (VMT) is the preferred method for evaluating transportation impacts. However, according to Headway Transportations study "[t]he Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, published by the Governor's Office of Planning and Research (OPR) provides screening thresholds for land use projects, including a "Screening Threshold for Small Projects" which states:

"Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Community Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact."

Based on this information, and the information provided by the overall VMT is expected to not significantly, therefore, it is concluded that there will be less than significant impact.

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

Less Than Significant Impact. The proposed project would not substantially increase traffic hazards due to geometric design feature or incompatible uses because the existing facility has been in operation for over 10 years. The project does not include potentially hazardous design features such as sharp curves or dangerous intersections. State Highway 45, along with County Road 54, will provide adequate ingress and egress to the proposed site. It is concluded that there will be a less than significant impact.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. The project would not result in inadequate emergency access because State and County roads provide adequate ingress and egress to the site. Emergency services agencies have been contacted and had no objections to the proposal. It is concluded that there will be a less than significant impact on emergency access.

In addition to the above Initial Study discussion, and based on comments received from California Department of Transportation (Caltrans), the following Conditions of Approval are made a part of the project:

Condition of Approval (Caltrans):
The applicant/operator shall be responsible to complete all Caltrans requirements and improvements; including a (Final) Traffic Impact Study (TIS) that includes information regarding anticipated project trip generations, trip distributions, and anticipated queuing using the Institute of Transportation Engineering (ITE) Trip Generation Manual for the analysis.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans any requested information regarding driveway access to and from both sites. This information shall be in site plans showing proper dimension of all driveways as outlined in the California Highway Design Manual (HDM) with Auto Turn CAD templates, using the correct design vehicle, showing the design vehicle entering and exiting the site plans.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans mapping for all connections to the State Highway System (SHS) showing the State right of way (ROW) delineated with bearings, distances along with State Route (SR) boundary determination.

Condition of Approval (Caltrans):
The applicant/operator shall ensure with Caltrans that the design vehicle is appropriate, based off the Truck Networks on California State Highways Map for District 3 including information about the design vehicle(s) used at the sites.

Condition of Approval (Caltrans):
The applicant/operator shall be responsible for an encroachment permit issued by Caltrans for any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW).

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
	i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
	ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

i) and ii) Less than significant with Mitigations Incorporated.

In compliance with CEQA Guideline §15064.5 (Determining the Significance of Impacts to Archaeological and Historical Resources), a request for a records search was submitted to local native tribes and the Northeast Information Center (NEIC), a member of the California Historic Resources Information System (CHRIS), to determine if any cultural places are located within the project site.

If any site excavation occurs in the future and any artifacts uncovered, that project would be subject to laws governing the accidental discovery. It is concluded the proposal will have a less than significant impact with mitigations incorporated.

Discovery of Cultural Resources
In accordance with State and Federal Laws if any potentially prehistoric, protohistoric, and/or historic cultural resources are accidentally encountered during future excavation of the site, all work shall cease in the area of the find pending an examination of the site and materials by a qualified archaeologist.

Mitigation Measure TCR -1 (Tribal Cultural Recourses):
In the event that any prehistoric or historic subsurface cultural (including Tribal) resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and the applicant/operator shall consult with the County and a qualified archaeologist (as approved by the County) and corresponding tribal representative to assess the significance of the find per CEQA Guidelines Section 15064.5. The qualified archaeologist shall determine the nature of the find, evaluate its significance, and, if necessary, suggest preservation or mitigation measures. Appropriate mitigation measures, based on recommendations listed in the archaeological survey report and tribal representative, will be determined by the Glenn County Planning & Community Development Services Agency. Work may proceed on other parts of the project site while mitigation for historical resources, unique archaeological resources, and/or tribal resources is carried out.

All significant cultural materials recovered shall be, at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, tribal representative, and documented according to current professional standards.

Timing/Implementation: During Construction/Excavation Activities

Enforcement/Monitoring:
Glenn County Planning & Community Development Services Agency

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c)	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 provider's existing commitments?	☐	☐	☒	☐
d)	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The proposed project will not exceed wastewater treatment requirements of the Regional Water Quality Control Board. There is no municipal wastewater treatment facility proposed with this project. The project will not require or result in new or expanded municipal facilities that could cause significant environmental effects. The proposal will continue to rely on individual sewage disposal systems for wastewater treatment, if required.

The proposed project would not require or result in the construction of new municipal storm water drainage facilities or the expansion of existing facilities; therefore, no significant environmental damage would result from the construction

of such facilities. Current land drainage will not change, any leveling of land or drainage changes must comply with Chapter 15.70 of the Glenn County Code, as well as State and Federal regulations. The project will not require significant alterations to existing electric power, natural gas, or telecommunications facilities. It is concluded there will be a less than significant impact as a result of this project.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. It is concluded the project will have sufficient water supplies available to serve the project and reasonably foreseeable future, therefore impacts will be considered less than significant.

c) 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 provider's existing commitments?

Less Than Significant Impact. There is no municipal wastewater treatment provider for the area. Individual sewage disposal systems are currently the long-term method of providing sewage disposal for the project area. New sewage disposal systems would be required to meet the standards set forth in Chapter 7.10 of the Glenn County Code and by the Glenn County Environmental Health Department. Glenn County Environmental Health Department was supplied with the projects request for review; Glenn County Environmental Health submitted comments. It is concluded there will be a less than significant impact.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste generated by the project is transported to Glenn County Transfer Station. In 2019 Glenn County closed the landfill and is currently utilizing a transfer station. At this time, waste disposal is not anticipated to be a significant issue. The cumulative impacts on the transfer station will be minimal and will be offset in the future from increased requirements for sorting, recycling, diversion, and increases in disposal costs. Additionally, the following condition of approval is established.

Condition of Approval

All garbage, rubbish, and refuse created, produced or accumulated at the proposed facility and on the property shall be removed by a permitted waste hauler or taken to a permitted facility at least once each week. All garbage shall be kept in a container with a close-fitting cover, without leakage or escape of odors.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. In compliance with guidelines set forth by AB 939 (California Integrated Waste Management Act of 1989), the County of Glenn has adopted a Source Reduction and Recycling Element (SRRE) to define goals and objectives for waste reduction, recycling, and diversion. The SRRE defines guidelines to implement these goals and objectives through seven main programs, consisting of Source Reduction, Recycling, Composting, Special Waste Materials, Public Education, Policy Incentives, and Facility Recovery. The proposed project will be required to comply with all federal, state, and local statutes and regulations related to solid waste disposal. As a result, there would be no impact on solid waste regulations.

XX. WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project would not interfere with an adopted emergency response or emergency evacuation plan. All roads in the area would remain open. The project site is located on private property with adequate access to State Highway 45 and County Road 54. The project will not interfere with adjacent roadways that may be used for emergency response or evacuation. The project will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

The proposed project does not pose a unique or unusual use or activity that would impair the effective and efficient implementation of an adopted emergency response or evacuation plan. According to Figure 4.3-1 of the Glenn County Existing Conditions Report, the project site is not located within a fire hazard severity zone or within Cal Fire's State Responsibility Zone. The severe wildland fires occur in the western portion of the County within the Mendocino National Forest.

The project will not obstruct or compromise the safety of emergency response vehicles or aircraft and their ability to effectively respond in an emergency. Therefore, it is concluded that there is a less than significant impact.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The project site has no features that would exacerbate wildfire risk including slope or prevailing winds; therefore, it is concluded there will be a less than significant impact.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. This project would not require the installation or maintenance of additional infrastructure that may exacerbate fire risk impacts to the environment. The project does not include new infrastructure or maintenance that may exacerbate fire risks or result in temporary or ongoing impacts to the environment. Glenn-Codora Fire Department, located approximately one mile south of the proposal, was notified of this proposal. It is concluded there will be a less than significant Impact.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The drainage pattern of the site is not anticipated to significantly change as a result of this project. No people or structures will be exposed to a significant risk due to post-fire slope instability or drainage changes. It is concluded there will be a less than significant impact.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. All impacts associated with the project have been identified in this document. Impacts on biological resources and cultural resources were discussed in sections IV and V above. The project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. All uses at the site are subject to applicable codified federal, state, and local laws and regulations. It is concluded that there will be a less than significant impact.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. As listed in this document, the proposed project would have a less than significant impact. Total impacts from the project will not be cumulatively considerable. Therefore, impacts are considered less than significant. In addition, in order to ensure Conditions of Approval and Mitigation Measure Compliance, the following Conditions of Approval will apply to the project:

Condition of Approval (Planning Division):
The applicant/operator shall provide bi-annual (due by January 1 and July 1 of each year) reporting to the Planning Division evidencing the following:

- That no more than 135,000 tons a year of waste walnut shells (WWS) from the existing onsite walnut shelling facility shall be processed.

- That no more than 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), is transported from the existing onsite walnut shelling facility per year.

- That the waste walnut shells (WWS) are sourced only from the existing onsite walnut shelling facility.

Condition of Approval (Planning Division):
That the areas of operation and uses shall be confined to as listed in these Mitigation Measures and Conditions of Approval, and delineated as on file with the Glenn County Planning & Community Development Services Agency.

Condition of Approval (Planning Division):
The applicant/operator shall provide a bi-annual (due by January 1 and July 1 of each year) Conditions of Approval and Mitigation Measure Compliance monitoring fee of $250.00 to the Planning Division.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The proposed project would not create significant hazards or health safety concerns. Aspects of this project, which have the potential to have an effect on human beings or the environment, have been discussed in this document. The impacts of the project have been concluded to be less than significant. The project as proposed will not have substantial adverse effects on human beings, either directly or indirectly. It is concluded that there will be a less than significant impact.

REFERENCES

In addition to the resources listed below, Initial Study analysis may also be based on on-site field observations, discussions with the affected agencies, analyses of adopted plans and policies, review of existing studies, and specialized environmental studies. Resource materials are available to the public and/or on file in the office of the Glenn County Planning & Community Development Services, 225 North Tehama Street, Willows, CA 95988, Phone (530) 934-6540.

Records of, or request for commenting or consultation with the possible following:

Applicant:
Wayne McFarland
1625 Broadway Street
Suite 119
Fresno, CA 93721
(815) 513-3363
wmcf@syntechbioenergy.com

Landowner:
Carriere Family Farms
1640 State Highway 45
Glenn, CA 95943
(530) 934-8200
wcarriere@carrierefarms.com

Engineer:
Jason Vine
1767 Market Street, Suite C1
Redding, CA 96001
(530) 526-7493
jason@realm-engineering.com

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources
California Department of Fish and Wildlife
California Department of Food and Agriculture
California Department of Transportation (Caltrans)
Central Valley Regional Water Quality Control Board
Colusa Indian Community Council Cachi Dehe Band of Wintun Indians
Glenn Codora Fire Protection District
Glenn County Agricultural Commissioner
Glenn County Air Pollution Control District/Certified Unified Program Agency
Glenn County Assessor
Glenn County Building Inspection Division
Glenn County Environmental Health Department

Glenn County Public Works, Engineering & Surveying Division
Glenn County Resource Conservation District
Glenn County Sheriff's Office
Grindstone Rancheria of Wintun-Wailaki
Mechoopda Indian Tribe of Chico Rancheria
Northeast Information Center (NEIC) of the
California Historical Resources Information System (CHRIS)
Pacific Gas and Electric Company (PG&E)
Paskenta Band of Nomlaki Indians

California Air Resources Board. *Maps of State and Federal Area Designations.* https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations

California Department of Conservation. *Earthquake Zones of Required Investigation*. https://maps.conservation.ca.gov/cgs/EQZApp/app/.

California Department of Conservation. *Farmland Mapping & Monitoring Program.* https://www.conservation.ca.gov/dlrp/fmmp

California Department of Conservation. 1997. *Mined Land Classification Map for Concrete-Grade Aggregate Resources Central Glenn County.* https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc

California Department of Toxic Substance Control. *Envirostor: Cleanup Sites and Hazardous Waste Permitted Facilities*. http://www.envirostor.dtsc.ca.gov/public/

California Department of Transportation. *Officially Designated State Scenic Highways.* https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual*. Department of the Army, Waterways Experiment Station, Vicksburg, Mississippi 39180-0631. https://www.sac.usace.army.mil/portals/43/docs/regulatory/1987_wetland_delineation_manual_reg.pdf

Glenn County. *Glenn County General Plan, Existing Conditions Report*. 2020. https://static1.squarespace.com/static/5c8a73469b7d1510bee16785/t/5e556b56c253f84cdc287783/1582656403698/GlennCounty-ECR-Final-Feb2020.pdf

Glenn County Airport Land Use Commission. February 27, 1991. *Comprehensive Airport Land Use Plan: Orland-Haigh Field Airport.* *https://www.countyofglenn.net/sites/default/files/Airports/Orland_Airport_Land_Use_Plan-1991.pdf*

Northern Sacramento Valley Planning Area 2018 Triennial Air Quality Attainment PLAN http://airquality.org/SVBAPCC/Documents/2018%20Triennial%20Report.pdf

State of California. September 2006. *Assembly Bill 32 California Global Warming Solutions Act of 2006*, http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf

United States Department of Agriculture, Natural Resources Conservation Service,

Web Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

United States Fish and Wildlife Service. *National Wetlands Inventory*: http://www.fws.gov/nwi.

U.S. Geological Survey. December 2000. *Land Subsidence in the United States,* USGS Fact Sheet -165-00. http://water.usgs.gov/ogw/pubs/fs00165/.

GLENN COUNTY
Planning & Community Development Services Agency

225 North Tehama Street
Willows, CA 95988
530.934.6540
www.countyofglenn.net

Mardy Thomas, Director

REQUEST FOR REVIEW / EARLY CONSULTATION

COUNTY DEPARTMENTS/DISTRICTS

- ☒ Glenn County Agricultural Commissioner
- ☒ Glenn County Air Pollution Control District/CUPA
- ☒ Glenn County Assessor
- ☒ Glenn County Building Inspector
- ☒ Glenn County Engineering & Surveying Division
- ☒ Glenn County Environmental Health Department
- ☒ Glenn County Sheriff's Department
- ☐ Glenn County Board of Supervisors
- ☐ Glenn County Counsel
- ☐ Glenn County Planning Commission
- ☐ Glenn LAFCO

FEDERAL AGENCIES

- ☐ U.S. Army Corps of Engineers
- ☐ U.S. Fish and Wildlife Service
- ☐ U.S. Department of Agriculture
- ☐ U.S. Bureau of Reclamation – Willows
- ☐ Federal Aviation Administration
- ☐ Federal Communications Commission

OTHER

- ☐ California Water Service Co. (Chico)
- ☐ Sacramento River National Wildlife Refuge

- ☐ Comcast Cable (Chico Office)
- ☐ Community Services District:
- ☒ Pacific Gas and Electric Company (PG&E)
- ☒ Fire Protection District: Glenn-Codora
- ☒ Glenn County Resource Conservation District

STATE AGENCIES

- ☒ Central Valley Flood Protection Board
- ☒ Central Valley Regional Water Quality Control Board (RWQCB)
- ☐ State Water Resources Control Board – Division of Drinking Water
- ☐ Department of Alcoholic Beverage Control (ABC)
- ☐ Department of Conservation, Office of Mine Reclamation (OMR)
- ☒ Department of Conservation, Division of Oil, Gas, and Geothermal Resources
- ☒ Department of Fish and Wildlife
- ☒ Department of Food and Agriculture
- ☒ Department of Air Resource Board (CARB)
- ☒ Department Environmental Protection Agency (CalEPA)
- ☐ Department of Public Health
- ☒ Department of Toxic Substances Control (DTSC)
- ☒ Department of Transportation (Caltrans)
- ☐ Department of Water Resources (DWR)
- ☒ Office of the State Fire Marshall
- ☒ Cal Recycle

- ☒ Northeast Center of the California Historical Resources Information System
- ☒ Grindstone Rancheria of Wintun-Wailaki
- ☒ Paskenta Band of Nomlaki Indians
- ☒ Mechoopda Indian Tribe of Chico Rancheria
- ☒ Colusa Indian Community Council Cachi Dehe Band of Wintun Indians

DATE: November 26, 2024

PROJECT: **Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion**

PLANNER: Andy Popper, Principal Planner; apopper@countyofglenn.net

APPLICANT: Wayne McFarland
1625 Broadway Street
Suite 119
Fresno, CA 93721
(815) 513-3363
wmcf@syntechbioenergy.com

LANDOWNER: Carriere Family Farms
1640 State Highway 45
Glenn, CA 95943
(530) 934-8200
wcarriere@carrierefarms.com

ENGINEER: Jason Vine
1767 Market Street, Suite C1
Redding, CA 96001
(530) 526-7493
jason@realm-engineering.com

PROPOSAL: **Conditional Use Permit 2024-004,**
Carriere/Syntech CF1, LLC Advanced Thermal Conversion
Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

LOCATION: The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

ZONING: "FS-80" Farmland Security Zone

GENERAL PLAN: "Intensive Agriculture"

APN: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

FLOOD ZONE: Both project sites are in Flood Zone "A" according to Flood Insurance Rate Map (FIRM) No. 06021C0650D, dated August 8, 2010 issued by the Federal Emergency Management Agency (FEMA). Flood Zone "A" (unshaded) consists of areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown. Since the project site is within Flood Zone "A" as designated by FEMA, a Flood Elevation Certificate will be required before issuance of a Building Permit in accordance to Glenn County Code §15.54.

The Glenn County Planning Division is requesting comments on this proposal for determination of completeness, potential constraints, and/or proposed conditions of approval. If comments are not received by **Tuesday, December 17, 2024,** it is assumed that there are no specific comments to be included in the initial analysis of the project. Comments submitted by e-mail are welcomed. Thank you for considering this matter.

AGENCY COMMENTS:

Please consider the following:

1. Is the information in the application complete enough to analyze impacts and conclude review?

2. Comments may include project-specific code requirements unique to the project. Cite code section and document (i.e. General Plan, Subdivision Map Act, etc.).

3. What are the recommended Conditions of Approval for this project and justification for each Condition? When should each Condition be accomplished (i.e. prior to any construction at the site, prior to recording the parcel map, filing the Final Map, or issuance of a Certificate of Occupancy, etc.)?

4. Are there significant environmental impacts? What mitigation(s) would bring the impacts to a less than significant level? When should mitigation(s) be accomplished (i.e. prior to recording parcel map, filing Final Map, or Certificate of Occupancy, etc.)?

Date Submitted:_____

GLENN COUNTY
PLANNING AND COMMUNITY
DEVELOPMENT SERVICES AGENCY

255 Tehama Street
Willows, CA 95988
(530) 934-6540
planning@countyofglenn.net

APPLICATION FOR CONDITIONAL USE PERMIT

NOTE: FAILURE TO ANSWER APPLICABLE QUESTIONS AND REQUIRED ATTACHMENTS COULD DELAY THE PROCESSING OF YOUR APPLICATION.

1. Applicant(s)

   Name: Wayne McFarland

   Address: 1625 Broadway Street, Suite 119, Fresno, CA 93721

   Phone: 815-513-3363 E-Mail wmcf@syntechbioenergy.com

2. Property Owner(s)

   Name: Carriere Family Farms

   Address: 1640 CA-45 Glenn, CA 95943

   Phone: (530) 934-8200 E-Mail wcarriere@carrierefarms.com

3. Engineer/Person who Prepared Site Plan (if applicable):

   Name: Jason Vine

   Address: 1767 Market Street, Suite C1

   Phone: 530.526.7493 E-Mail jason@realm-engineering.com

4. Name and address of property owner's duly authorized agent (if applicable) who is to be furnished with notice of hearing (§65091 California Government Code).

   Name: N/A

   Mailing Address: _____

5. Existing Use of Property: Walnut hulling, drying, shelling and packaging

6. Request or Proposal:
Conditional Use Permit to operate a renewable energy gasification process that uses the walnut shell waste stream from the walnut shelling facility on the same site.

7. Address and Location of Project: 1640 State Highway 45, Glenn, CA 95943, 7693 HWY 162, Willows, CA 95988

8. Current Assessor's Parcel Number(s): 016-030-011, 016-090-016

9. Existing Zoning (http://gis.gcppwa.net/zoning/): FS-80

10. Provide any additional information that may be helpful in evaluating your proposal. *Example - number of employees, hours of operation, number of truck deliveries/loadings per day:*
Please refer to the attached Project Description.

11. Setback Dimensions (Distance from property line to proposed structure)

North: 75 ft. South: 1075 ft.

East: 1515 ft. West: 185 ft.

Other Setback/s: _____ ft.

12. Provide the following informatio

Size of Assessor Parcel: _____ sq.ft. 96 acres

Mean height of structure: 25 ft. Peak height of structure: 35 ft.

Dimensions of proposed including overhangs: 150 ft. x 150 ft.

Total Square Footage (Existing): 423,950 sq.ft.

Total Square Footage (Proposed): 25,000 sq.ft.

Project _____ **Date Submitted:**_____

GLENN COUNTY
PLANNING AND COMMUNITY
DEVELOPMENT SERVICES AGENCY

225 Tehama Street
Willows, CA 95988
(530) 934-6540
planning@countyofglenn.net

ENVIRONMENTAL INFORMATION FORM

To be completed by applicant or engineer
Use extra sheets if necessary

NOTE: FAILURE TO ANSWER APPLICABLE QUESTIONS AND REQUIRED ATTACHMENTS COULD DELAY THE PROCESSING OF YOUR APPLICATION.

This list is intended to meet the requirements of State of California Government Code Section 65940.

I. GENERAL INFORMATION:

1. Applicant(s):

   Name: Wayne McFarland

   Address: 1625 Broadway Street, Suite 119, Fresno, CA 93721

   Phone: 815-513-3363 E-Mail wmcf@syntechbioenergy.com

2. Property Owner(s):

   Name: Carriere Family Farms

   Address: 1640 CA-45 Glenn, CA 95943

   Phone: (530) 934-8200 E-Mail wcarriere@carrierefarms.com

3. Engineer/Person who Prepared Site Plan (if applicable):

   Name: Jason Vine

   Address: 1767 Market Street, Suite C1

   Phone: 530.526.7493 E-Mail jason@realm-engineering.com

4. Name and address of property owner's duly authorized agent (if applicable) who is to be furnished with notice of hearing (§65091 California Government Code).

   Name: N/A

   Mailing Address: _____

5. Existing Use of Property: Walnut hulling, drying, shelling and packaging

6. Request or Proposal:
   Conditional Use Permit to operate a renewable energy gasification process that uses the walnut shell waste stream from the walnut shelling facility on the same site.

7. Address and Location of Project: 8106 County RD 54, Glen CA 95943/7693 Highway 162, Willows, CA 95988

8. Current Assessor's Parcel Number(s): 016-030-011, 016-090-016

9. Existing Zoning (http://gis.gcppwa.net/zoning/): FS-80

10. Indicate the type of permit(s) application(s) to which this form pertains:
    Conditional Use Permit

11. If the project involves a variance, conditional use permit, or rezoning application, state this and indicate clearly why the application is required:
    The project is an approved agricultural use on the site, where it is processing agricultural waste produced on site. However, the project will not be providing power to the existing walnut processing facility on the same site. The project will delivering the power generated to the PG&E grid.

12. List and describe any other related permit(s) and other public approvals required for this project, including those required by city, regional, state, and federal agencies:
    See the attached Project Description.

13. List any special studies been prepared for the project site that are related to the proposed project including, but not limited to traffic, biology, wetlands delineation, archaeology, etc?

II. ENVIRONMENTAL SETTING:

1. Describe in detail the project site as it exists before the project, including information on topography, soil stability, plants and animals (wetlands, if any), different crops, irrigation systems, streams, creeks, rivers, canals, water table depth, and any cultural historical or scenic aspects. Describe any existing structures on the site, and the use of the structures. Attach photographs of the site. Snapshots or Polaroid photos will be accepted.
   Previously used as orchards and walnut shell storage.

2. Describe the surrounding properties, including information on plants, animals, and any cultural, historical or scenic aspects. Indicate the type of land use (residential, commercial, agricultural, etc.), intensity of land use (one-family, apartment houses, shops, department stores, dairy, row crops, orchards, etc.) Attach photographs of the vicinity. Snapshots or Polaroid photos will be accepted.

   North:

   East:

   North: 8106 County RD 54, Glen CA 95943, Intensive agricultural land use surrounding the property.

   North: 7693 Highway 162, Willows CA, 95988, Intensive agricultural land use surrounding the property.

3. Describe noise characteristics of the surrounding area (include significant noise sources):
   Walnut shelling and processing equipment noise. Industrial fans, blowers, conveyance equipment.

III. SPECIFIC ITEMS OF IMPACT:

1. Drainage:

(a) Describe how increased runoff will be handled (on-site and off-site):
To be handled by existing drainage system at the site already installed.

(b) Will the project change any drainage patterns? (Please explain):
No.

(c) Will the project require the installation or replacement of storm drains or channels? If yes, indicate length, size, and capacity:
No.

(d) Are there any gullies or areas of soil erosion? (Please explain):
No.

(e) Do you plan to grade, disturb, or in any way change swales, drainages, ditches, gullies, ponds, low lying areas, seeps, springs, streams, creeks, river banks, or other area on the site that carries or holds water for any amount of time during the year?
No.

If yes, you may be required to obtain authorization from other agencies such as the Army Corps of Engineers or California Department of Fish and Game.

2. Water Supply:

(a) Indicate and describe source of water supply (domestic well, irrigation district, private water company):
Will use existing supply already on-site.

(b) Will the project require the installation or replacement of new water service mains?
no.

3. Liquid Waste Disposal:

(a) Will liquid waste disposal be provided by private on-site septic system or public sewer?
Private on-site septic

(b) If private on-site septic system, describe the proposed system (leach field or seepage pit) and include a statement and tests explaining percolation rates, soil types, and suitability for any onsite sewage disposal systems:
leach field

(c) Will any special or unique sewage wastes be generated by this project other than normally associated with resident or employee restrooms? Industrial, chemical, manufacturing, animal wastes? (Please describe)
None

(d) Should waste be generated by the proposed project other than that normally associated with a single family residence, Waste Discharge Requirements may be required by the Regional Water Quality Control Board.
Only waste discharge will be from office building into a septic system.

4. Solid Waste Collection:

(a) How will solid waste be collected? Individual disposal, private carrier, city?
Private carrier

5. Source of Energy:

(a) What is the source of energy (electricity, natural gas, propane)?:
Electricity

(b) If electricity, do any overhead electrical facilities require relocation? Is so, please describe:
No

(c) If natural gas, do existing gas lines have to be increased in size? If yes, please describe:
N/A

(d) Do existing gas lines require relocation? If yes, please describe:
N/A

6. Fire Protection:

(a) Indicate number and size of existing and/or proposed fire hydrants and distance from proposed buildings:
See supplied site plans

(b) Indicate number and capacity of existing and/or proposed water storage facilities and distance from proposed buildings:
See supplied site plans

IV. FOR ZONE CHANGE, ZONE VARIANCE, AND SPECIAL USE PERMIT APPLICATION:

1. Number and sizes of existing and proposed structures:

   New proposed structures 4: Office building 1250sqft, Flat storage 22500sqft, Processing site 68,080sqft, pipeline injection site 11,250sqft

2. Square footage (structures) 103,080 S.F.; 423,950 S.F.
   (New) (Existing)

3. Percentage of lot coverage:

4. Amount of off-street parking provided: 15 spcaes

5. Will the project be constructed in phases? If so, please describe each phase briefly:

   Yes, CF1 and CF2 phases. More detail explanation available in project description document.

6. If residential, include the number of units, schedule of unit sizes, range of sale prices or rents, and type of household size expected:

7. If commercial, indicate type, estimated employment per shift, days and hours of operation, estimated number of daily customers/visitors on site at peak time, and loading facilities:

8. If industrial, indicate type, estimated employment per shift, and loading facilities:

   Construction jobs 100-200. Permanent direct Jobs 35-45. Permanent indirect 120-240. More detail available on page 8 of project description.

9. If institutional, indicate the major function, estimated employment per shift, estimated occupancy, loading facilities, and community benefits to be derived from the project:

10. List types and quantities of any hazardous or toxic materials, chemicals, pesticides, flammable liquids, or other similar product used as a part of the operation and storage container sizes:

    Submit Material Safety Data Sheets (MSDS) for any proposed hazardous materials. If hazardous materials are proposed, it is recommended that the applicant contact the Air Pollution Control District/CUPA for permitting requirements.

11. Describe any earthwork (grading) to be done and dust control methods to be used during construction:

12. Describe any potential noise or vibration sources associated with the project (i.e. compressor, machine noise, heavy equipment).
    While site will have compressors and auger motors it will not exceed the existing noise and vibration already on-site.

13. Describe source, type, and amount of air pollutant emissions (smoke, odors, steam, gases, water vapor, dust, chemicals) from the project. Describe what methods would be used to reduce emissions:
    Water vapor and backup power generation equipment, NG or propane generators and respective emissions. These emissions are catalytic control by generators regulations.

V. CERTIFICATION:

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Date: October 10, 2024 Signature: _____

For: Syntech Energy Services

According to Section 65943 for the California Government Code, your application will be reviewed within 30 days and you or your agent will receive written notice regarding the completeness of your application. Any reviewing agency may, in the course of processing the application, request the applicant to clarify, amplify, correct, or otherwise supplement the information required for the application.

According to Section 65944 (C), additional information may be requested in order to comply with Division 13 of the State of California Public Resources Code.

DECLARATION UNDER PENALTY OF PERJURY

(Must be signed by Applicant(s) and Property Owner(s))
(Additional sheets may be necessary)

The Applicant(s) and/or Property Owner(s), by signing this application, shall be deemed to have agreed to defend, indemnify, release and hold harmless the County, its agents, officers, attorneys, employees, boards and commissions from any claim, action or proceeding brought against the foregoing individuals or entities, the purpose of which is to attack, set aside, void or null the approval of this development entitlement or approval or certification of the environmental document which accompanies it, or to obtain damages relating to such action(s). This indemnification agreement shall include, but not be limited to, damages, costs expenses, attorney fees or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of the entitlement whether or not there is concurrent passive or active negligence on the part of the County.

Applicant(s):

Signed: Wayne McFarland

Print: Wayne McFarland

Date: October 10, 2024

Address: P.O. Box 107 Morris, IL 60435

I am (We are) the owner(s) of property involved in this application and I (We) have completed this application and all other documents required.

I am (We are) the owner(s) of the property involved in this application and I (We) acknowledge the preparation and submission of this application.

I (We) declare under penalty of perjury that the foregoing is true and correct.

Property Owner(s):

Signed: William D Carriere

Print: William D. Carriere

Date: October 10, 2024

Address: 1640 State Highway 45, Glenn, CA 95943

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CARRIERE/SynTech CF1, LLC
ADVANCED THERMAL CONVERSION

PROJECT DESCRIPTION

I. EXECUTIVE SUMMARY

The applicant, SynTech CF1, LLC, an Illinois limited liability company ("CF1") registered to do business in California, is proposing a project in the County of Glenn, that will convert an agricultural waste (waste walnut shells, "WWS") into Renewable Natural Gas ("**Renewable Natural Gas**", also known as "RNG"), which will be injected into a PG&E pipeline, to be sold to third party purchasers. The RNG project, referred to as SynTech CF1 (sometimes referred to as "**Project**" or "**CF1**") will consist of the following four main operational components; each component being particularly described in Section III below:

i. Organic Feedstock to Syngas Conversion
ii. Biochar Transfer and Storage Facility
iii. Collection of Syngas and Upgrade to Pipeline Quality RNG
iv. Pipeline RNG Storage and Transfer Facility

The Advanced Thermal Conversion (ATC[1]) process used in this project was developed by and is proprietary to an affiliate entity of CF1. While a form of gasification, SynTech's proprietary ATC technologies and processes rely on rigid and precise control throughout the entire process, another aspect of SynTech's proprietary IP, technology and process, which allows the system to maintain significantly higher operating temperatures than traditional gasification types. This results in an ability to produce an ultra-clean and virtually tar-free Syngas of much higher quality than traditional gasification, pyrolysis and other less evolved technologies.

It is the high quality of this Syngas[2] which allows SynTech to upgrade it directly to RNG ready for pipeline injection. The ATC process technology proprietary to SynTech is commonly known as "BioMax®. SynTech has over 126,000 commercial operating hours on these systems, to date, most of which have historically been accumulated in California meeting even California's stringent environmental emission requirements.

The WWS will be fed into the BioMax® ATC Systems, where it will be converted to Syngas via the ATC process, and to RNG in a secondary methanation process, also proprietary to SynTech, commonly known as LiquiMax®. The RNG is then processed by separating out carbon dioxide and other impurities to produce RNG meeting PG&E pipeline quality standards. The RNG is then tested, metered and compressed to inject into a RNG mobile storage trailer, which is then transported 4.5 miles to the Carriere Drying and Hulling facility. There the RNG is again tested, metered, compressed to pipeline pressure and injected into the PG&E pipeline distribution system.

The only byproduct of the ATC process will be high value biochar that will be stored and transferred to another site to produce Graphene and other carbon-negative industrial materials and agricultural products. The biochar volume will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Biochar produced by the BioMax® process is completely organic, non-toxic and is transferred into sealable storage containers via an enclosed conveyance system.

CF1 will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The project will produce no waste which needs to be transported, landfilled or sent out for other methods of disposal.

The project site is strategically located near a utility interconnection and the source of the organic feedstock (WWS). WWS will be provided to the BioMax® ATC process from the adjacent Carriere Family Farms walnut processing facility and waste shell storage building. Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell flat storage building used specifically for the ATC process. All organic agricultural waste streams (WWS) will be sourced from walnut growers in the area. See the attached site plan (***Appendix A, Phase 1 Site Plan***). [Note: All process infrastructure, including RNG mobile storage trailer infrastructure, will be placed on the four-acre site located adjacent to and north of the existing Carriere Family Farms walnut shelling facility.] The RNG from the Upgrade Facility will be injected into mobile storage trailers and moved 4.5 miles to an approved utility gas pipeline interconnection point. PG&E Interconnection Application is still being reviewed, but the initial study has identified PG&E line L172A as a pipeline with sufficient capacity for the RNG volumes produced in this project. That pipeline crosses the Carriere Hulling and Drying facility property. which will be utilized as the injection site. CF1 will locate and build a RNG decanting and injection station on this site.

CF1 proposes a Site Plan Review for this project.

II. SynTech CF1, LLC ("CF1")

CF1 is a wholly owned project Special Purpose Vehicle ("SPV") subsidiary of SynTech Holdings, LLC ("SynTech"), a privately held Illinois limited liability company located at 711 Briar Lane, Morris, IL 60450. SynTech is focused on the development of solid waste to renewable and sustainable clean energy projects which provide a sustainable, practical and economically sound path to remediation of agricultural solid waste materials and reduction of carbon pollution. CF1 is registered to do business in California at 1625 Broadway Street, Suite 119, Fresno, CA 93721. CF1 is presently actively developing renewable energy projects that focus on their patented BioMax® ATC and LiquiMax® Advanced Sustainable Fuels processes, producing valuable, sustainable products such as:

I. Pipeline quality RNG production by means of SynTech's patented BioMax® ATC process and a secondary but equally proprietary LiquiMax® methanation process, and commercially proven gas separation and purification processes.

II. Production of other renewable energy and organic carbon products, which include Syngas, electricity, Sustainable Aviation Fuel (SAF), Green Hydrogen ("GH2") and high value biochar that is upgraded to marketable graphene or other industrial and agricultural products.

SynTech's project opportunities involve the utilization of SynTech's BioMax® ATC process with various other organic agricultural raw materials that are classified as waste streams that are substantial in quantities, dependable in their availability and can be acquired with consistent quality, that will efficiently convert to RNG and high value biochar that will be upgraded to valuable graphene or other industrial and agricultural products.

CF1 has successfully entered long-term (10 years) supply agreements with United Energy Trading for the entire production from the CF1 Facility.

III. PROJECT DETAIL

CF1 proposes to permit, fund, construct and operate the CF1 ATC and RNG Facility as a "pipeline quality" (PG&E Rule 21 compliance) renewable natural gas ("**RNG**") production facility in Glenn County, California. All the project facilities will operate on a 24/7 basis, producing noise levels of no more than 85 dBa on the industrial noise scale, within 10 meters of the BioMax® process. This is comparable to existing noise levels at both project sites. This project will process solid organic waste feedstock in the form of WWS produced as a waste stream from the adjacent Carriere Family Farms walnut processing facility in Glenn. The process of converting organic feedstock is as follows:

Step 1. Organic Feedstock to Syngas Conversion

BioMax® ATC Facility.

CF1 will construct and operate a co-located ATC facility designed and engineered to accept and process agricultural solid waste products, in the form of WWS produced by the processing of locally grown walnuts at the adjacent Carrier Family Farms walnut shelling facility. The ATC Facility will be built in two phases (see ***APPENDIX A and B***), the ATC process is illustrated in ***APPENDIX***

C. The ATC facility will utilize SynTech's patented and proprietary BioMax® (further explained in footnote [1]) technology to produce a Syngas product[2].

The ATC Facility, when at full scale, will remediate up to approximately 135,000 tons of Organic Feedstock (WWS) yearly to produce approximately 1,041,000 MMBtu/year (MMBtu = one million British Thermal Units) of renewable natural gas. The WWS will come from the adjacent Carriere Family Farms walnut shelling facility. The walnuts from which those waste walnut shells are produced are all grown within a short proximity of the Carriere shelling operation. The Organic WWS Feedstock will be presorted and processed by Carriere to provide a suitable organic feedstock to process prior to the WWS entering the CF1 shell storage building on our project site. All WWS received will be tested and confirmed to meet Organic Feedstock product specifications, as guaranteed by the feedstock supplier, prior to usage at the ATC Facility.

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[1] **Advanced Thermal Conversion (ATC)** - SynTech's BioMax® system employs advanced thermochemical conversion (ATC) technology to transform solid agricultural, forest, and other waste materials like nut shells and wood into a combustible Syngas, known as producer gas. This process takes place in a low-oxygen, meticulously controlled, high-temperature environment, where biomass undergoes high heat, releasing carbon and hydrogen compounds as gases. The resulting Syngas is then cooled and conditioned before being directed to an internal combustion reciprocating engine, generating power for the CF1 facility, and to SynTech's proprietary LiquiMax® Advanced Sustainable Fuels components for further refinement into renewable natural gas (RNG), ensuring environmentally friendly operations. BioMax® distinguishes itself from biomass incineration/combustion, where all combustible biomass materials are consumed in a single combustor, converting them into heat and non-combustible gases using ample air for complete oxidation. Typically, biomass combustion leads to emissions such as nitrogen oxides, volatile organic compounds (VOCs), smoke, and particulates due to challenges in controlling solid fuel combustion. However, BioMax® mitigates these issues through its design and control systems, producing virtually tar-free Syngas (producer gas) in a closed-loop system that complies with all relevant California environmental emission regulations.

[2] **SYNGAS** – The gas product resulting from the ATC process is commonly referred to as Syngas. Its composition typically includes hydrogen, carbon monoxide, carbon dioxide, methane, nitrogen, and water vapor, with proportions varying depending on the biomass and the gasification or ATC method utilized. Following the ATC process, Syngas undergoes nominal gas cooling and conditioning to eliminate residual particulates, sulfur compounds, and other trace substances. Subsequently, it is directed to engine/generators to generate power for the entire facility, enabling grid independence and alleviating strain on the local utility grid. The primary Syngas output is further refined to produce renewable natural gas (RNG), which undergoes separation and purification in the final gas upgrade system to meet Rule 21 pipeline injection standards.

TYPICAL SYNTECH ATC FACILITY



The tested and delivered Organic Feedstock products will be directed to their specially designed receiving and storage/feed systems. The solid Organic Feedstock products are moved from the flat shell storage building into feedstock silos that hold three days of processed feedstock. The Organic Feedstock is then moved from the feedstock silos into the BioMax® ATC process. As the advanced thermochemical conversion process occurs, the gases liberated from the feedstock (Syngas) move into the secondary methanation process and are reformed into RNG. The residual solids from the ATC process (biochar) exit the bottom of the reactor and are conveyed into storage containers that are fully enclosed and held onsite until transfer to other locations for upgrade to graphene or other industrial and agricultural products.

Step 2. Biochar Transfer and Storage Facility

Biochar Facility

After the ATC process, the remaining solid material is a product commonly known as biochar. Biochar is a high carbon content, high surface area material that has a variety of uses and is high in value.

Biochar from the ATC process is transferred from the BioMax® equipment through an enclosed auger system to storage containers that include a high temperature foil liner inside of a hard storage and shipping container. These containers will normally be filled to about 500 lbs. of biochar, then sealed and moved from the production location to a storage area on site. While in storage, the containers remain sealed to protect them from the elements. At full production capacity for this site, the units should produce just under 30,000 lbs./day of biochar, or about 15 tons per day. Since this material is

intended to supply other processes at other locations, storage at this site is intended to be short term and should not be longer than is required to complete quantities necessary for full truckload shipment. At full production, that is expected to be 1-2 days. 100% of the biochar produced at this site will be shipped to other locations.

Uses of SynTech produced biochar, which has been branded "SynChar" due to its carbon density, extreme surface area and adsorption capacity and other characteristics, include the manufacture of Graphene, graphite, activated carbon, carbon black, and other valuable industrial and agricultural materials and supplies. Biochar is also valuable as a soil amendment, adding nutrients to soils and enhancing soil water retention characteristics through its high surface area.

Step 3. Collection of Syngas and Upgrade to Pipeline Quality RNG

Syngas and RNG Upgrade Facility

Syngas produced in the ATC process passes through filtration and conditioning equipment to remove any residual particulates, sulfur compounds or other unwanted trace compounds prior to moving to the secondary LiquiMax® methanation (RNG) process. LiquiMax® uses a proprietary catalyst technology to reform the syngas to RNG. State of the art membrane technology will then be utilized to remove carbon dioxide, and any other unwanted compounds from the gas stream to provide an RNG stream meeting Utility pipeline quality standards. The gas exiting the ATC and methanation processes is approximately 50% RNG. Carbon dioxide and other gas constituents not converted to RNG are recirculated in the process for further conversion or may be consumed in backup power generation.

Step 4. Pipeline Grade RNG

Pipeline Injection

The Project will produce approximately 2,850 MMBtu/day of RNG meeting PG&E's Pipeline Rule 21 specifications. The Syngas product, produced by the BioMax® process will be delivered to the LiquiMax® methanation (RNG) process via piping, located on the same site as the BioMax® process.

The RNG will be directed through a pressure regulation temporary gas storage vessel. Once in the gas storage vessel the pipeline quality RNG will be tested and certified to meet Rule 21 specifications, then compressed and injected into a mobile storage trailer that will move the RNG to the CF1 RNG compression and injection station located at 7693 Highway 162, Carriere Family Farms Drying and Hulling facility. This site provides an interconnection point on PG&E's system that will be located on PG&E's Line 172A, which runs through the Carriere Drying and Hulling property. This site is illustrated in ***APPENDIX D***.

Once at the interconnection point, the RNG will be compressed to meet Utility Pipeline injection standards that include a suggested maximum average operating pressure of 800 pounds. If needed, the RNG Rule 21 product will be directed to a gas chilling heat exchanger after exiting the

compressor station to ensure the temperature is from 60 – 100 degrees Fahrenheit. The Rule 21 RNG product will then be injected into the PG&E natural gas pipeline via a short high pressure gas line that will transfer the RNG from Syntech's injection station to PG&E's injection and transfer infrastructure. ("High Pressure Biomethane Pipeline").

IV. Emergency Conditions and Site Mitigation Plan

Fire Prevention: The site will be provided with on-site fire protection per instructions of the Fire Marshal. Roadways will be provided for fire truck access to the site.

RNG Injection Interruption: At the RNG production site, located at the Carriere shelling facility, the ATC process is a thermochemical process and can be shut down immediately. Shut down may be required in the case of a utility interconnection interruption due to our RNG not meeting the PG&E Rule 21 requirement or some other process infrastructure failure. Fugitive gas in the process will be consumed through the on-site power generation, while the sales gas (RNG) will remain in the low-pressure pipelines for future transfer to the Utility interconnection point at the Carriere Drying facility. Backup power at the site will provide for the compression necessary for the storage trailers, until they can be moved to the injection site.

In the case of RNG injection interruption at the Utility injection site, the RNG will move to an alternative injection site located in Ceres, California, roughly 160 miles south of the Carriere Drying facility. Possible causes of interruption would include infrastructure failure (e.g. compressor or other equipment failure) or power interruption.

V. Significant Environmental and Economic Benefits

The Project is poised to significantly improve the economic landscape and environmental state of Glenn County, bolstering its agricultural sector.

a. Economic Benefits for the Glenn County Region

The SynTech CF1 ATC project will provide a boost to the local economy by providing the following projected increase in jobs:

PROJECTED JOB CREATION OF PROJECT & FUTURE SITES

JOB TYPES	NUMBER OF JOBS
Construction Jobs	**100-200**
Permanent Direct Jobs (On-site)	**35-45**
Permanent Indirect Jobs	**120-240**
Permanent Admin. & Management Jobs (Off-site)	**2-4**
Potential Duplicate Opportunity Sites	**8-12**

Table 1- Projected Job Creation Table

b. Environmental Benefits for the Glenn County Region

The most significant environmental benefits are immediate and significant reduction in site-specific, local and regional carbon footprints. The benefits are the product of the reductions in methane emissions and transportation emissions resulting from the need to transport the WWS shell to distant, less environmentally efficient disposal sites, which might include burning, combustion, composting, landfilling, or natural decay. By converting Carriere's waste walnut shell into RNG, it eliminates any possibility of the waste stream going to landfill, additionally, this will significantly reduce the total number of travel miles per truck trip from 400 total miles to 9 miles. Additionally, the RNG produced from this project will be used to fuel transportation in various forms, possibly including the production of renewable power for the charging of electrical vehicles within the State of California and/or sold into local, regional and/or international renewable energy markets, all of which represent a major environmental benefit from the SynTech CF1 project. The California agricultural industry is growing and doing so in a sustainable manner. California agricultural producers are subject to the most stringent environmental regulations in the U.S. Agriculture in California has been recognized as a model in the industry, all driven by engaged local lead agencies who understand the needs of their community and environment. The CF1 project furthers each of the goals and mandates of California and its lead agencies in this area.

c. Benefits to Host Site Provider

The partnership between SynTech CF1 and Carriere Family Farms promises substantial benefits for the latter in various dimensions. Foremost among these advantages is the elimination of the need to transport waste walnut shells (WWS) to off-site locations for remediation. With the project situated directly adjacent to Carriere's existing walnut processing facility where the waste is generated, Carriere Family Farms stands to reap significant savings by circumventing transportation costs, mitigating truck congestion, and reducing the carbon footprint associated with transportation activities, as well as any costs required to dispose of the WWS in landfills or other disposal options. This localized approach not only streamlines operations but also enhances Carriere's environmental sustainability efforts, aligning with its commitment to responsible stewardship of resources. By minimizing logistical complexities and optimizing resource utilization, Carriere Family Farms can focus on core agricultural activities while enjoying the economic and environmental benefits afforded by this collaborative venture.

d. Expansion Possibilities

Indeed, the ample supply of waste walnut shells (WWS) from Carriere Family Farms sets a solid foundation for the success of the CF1 project. With the current stockpile and ongoing production of WWS exceeding the project's requirements, CF1 enjoys a robust and sustainable source of feedstock, ensuring operational viability and longevity. Moreover, the project holds promising prospects for expansion, leveraging the potential to collaborate with neighboring farming and/or nut processing operations. By extending the benefits of RNG production to other farms and processors in the surrounding area, CF1 not only strengthens its regional partnerships but also fosters a collaborative ecosystem centered on sustainable waste management and renewable energy production. This inclusive

approach not only enhances the project's economic resilience but also amplifies its positive impact on the local agricultural community and the broader environment. As CF1 explores avenues for growth and collaboration, it emerges as a beacon of innovation and sustainability in the agricultural landscape, driving positive change and fostering resilience in the face of evolving energy and environmental challenges.

As our projects grow, start running smoothly, and prove successful, they'll naturally pave the way for expansion. Our timeline goal is simple: as things progress, we aim to keep growing. Below is a target timeline for expansion in the area:

1. CF1, a 24-unit RNG project
    a. Start date: in process.
    b. Begin manufacture date: beginning Q3, 2024
    c. Equipment delivery date:
        i. Starting: end of Q4, 2024
        ii. Completed: mid of Q2, 2025
    d. Substantial Completion/Commissioning date: beginning Q2, 2025
    e. Commercial Operating date: Q3, 2025

2. CF2, a 24-unit RNG project
    a. Start date: Q4, 2024
    b. Begin manufacture date: beginning of Q1, 2025
    c. Equipment delivery date:
        i. Starting: beginning of Q2, 2025
        ii. Completed: beginning of Q3, 2025
    d. Substantial Completion/Commissioning date: Q4, 2025
    e. Commercial Operating date: end of Q4, 2025

e. Truck Traffic Impact

Another significant benefit of the CF1 and CF2 projects will be the reduction of truck traffic in the area, along with a substantial decrease in CO2 emissions. Currently, Carriere Farms alone transports 460 truckloads of waste (WWS) annually, covering distances up to 400 miles (round trip) for disposal. This figure is expected to double in the coming years. Including other WWS producers in the area, the total WWS output will necessitate 2,920 truckloads each year, resulting in 1,889 Tons of CO2 emissions just for transportation to disposal sites.

Once the CF1 project is fully completed, the current 584,000 truck miles will be replaced by just 9,855 miles driven by electric trucks powered by renewable energy, resulting in zero emissions.

With the completion of the 2nd phase of this project (CF2) project, the improvements will be even more significant. CF1 & CF2 will handle the equivalent of 6,000 truckloads per year, which would have otherwise produced 3,881 Tons of CO2 from 2.4 million miles driven annually. This will be reduced to just 19,710 miles, all with zero emissions. The table below shows the contrast between current operations using diesel trucks to the new operation with electric trucks.

Projects		Truck Loads	Distance Traveled Per Truck	Total Distance Traveled	Total Carbon Emissions Tons
CF1	Carriere Today	460	400	92,000	298
	Carriere 2025 Projection	920	400	184,000	595
	Surrounding area	2,000	400	400,000	1,294
	Total	**2,920**	**400**	**584,000**	**1,889**
	Electric Trucks Carrying RNG	**1,095**	**9**	**9,855**	**0**
CF1 & CF2	Equivalent Truck Loads	6,000	400	2,400,000	3,881
	Electric Trucks Carrying RNG	2,190	9	19,710	0

Table 2: Comparing truck trips of WWS vs RNG Electric Trucks

VI. OTHER PERMITS REQUIRED

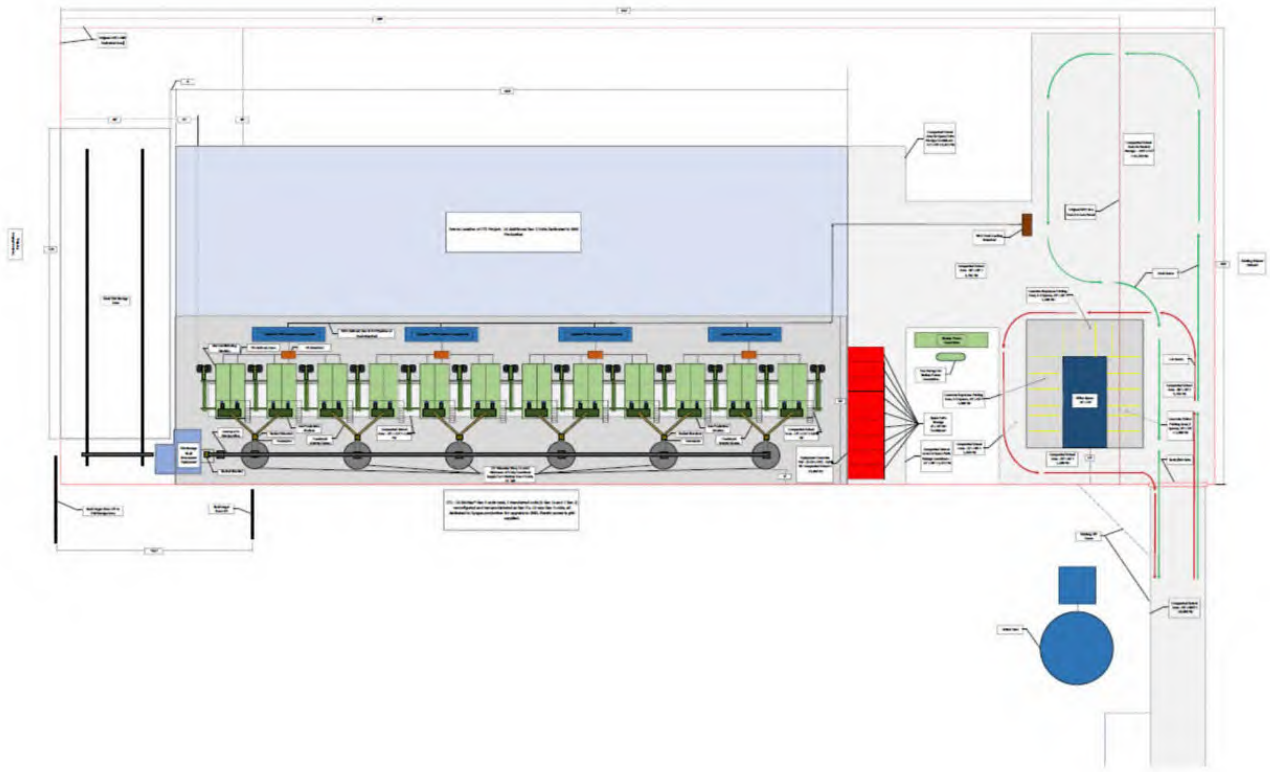
Several agencies will be involved in the permitting and approval of the SynTech CF1 facility. A preliminary list of the agencies, and the permits and approvals required for the facilities, are summarized below.

Table 2- Permit Process

PERMIT TYPE	AGENCY	TIMING TO PREPARE AND FILE	TIMING TO PROCESS AND APPROVE	DOCUMENTS	RESPONSIBILITY
NTP PERMITS					
Authority to Construct Air Permit (ATC)	Glenn County APCD	3-4 months	3-6 months	Project Operational Statement, GCAPCD Application, Air Emission Calculation Table, See Checklist	FCR
Conditional Use Permit*	County of Glenn (Lead Agency)	1 month		Project Operational Statement, Development Application, Environmental Review Checklist	FCR
CEQA Review - if Mitigated Negative Declaraion (MND) Required		4-6 months	2-4 months	Initial Study, Site Drawings, Signage & Landscape Plan	FCR
CEQA Review -if Environmental Impact Report (EIR) Required		6-10 months	2-4 months	TBD	FCR
Solid Waste Permit	Glenn County Environmental Health	2-4 months	4-6 months	Application Package	FCR
Pipeline Interconnect Permit	PGE	6-8 months	3-4 months	TBD	FCR
Waste Discharge Requriement (WDR) Perimt	North Coast Regional Water Quality Control Board	3-4 months	3-6 months	Form 200	FCR
EPC-CONSTRUCTION (Post Financing/Pre-Construction)					
Storm Water Pollution Prevention Control Permit	North Coast Regional Water Quality Control Board	<30 days after application	<30 days after application	Grading Plan and SWPP Plan, Application	FCR/EPC
Grading Permit	County of Glenn (Lead Agency)	<30 days after application	<30 days after application	Application, Grading Plan, SWPP, Inspection	FCR/EPC
Building Permit (can be split to foundation vs. building permits if needed)	County of Glenn, Fire Department	3-4 months	3-4 months	Application, Structural Drawings, Site Layout with fire protection systems	FCR/EPC

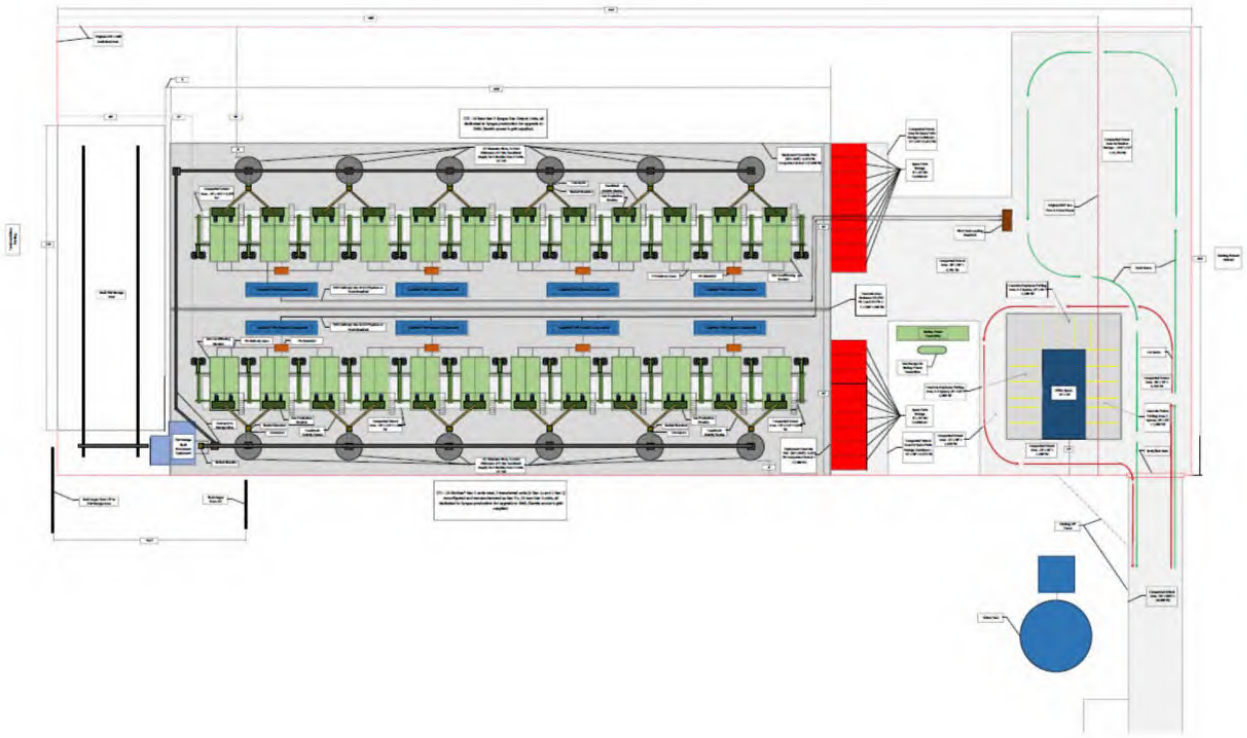
APPENDIX “A”

SITE LAYOUT CF1, PHASE 1



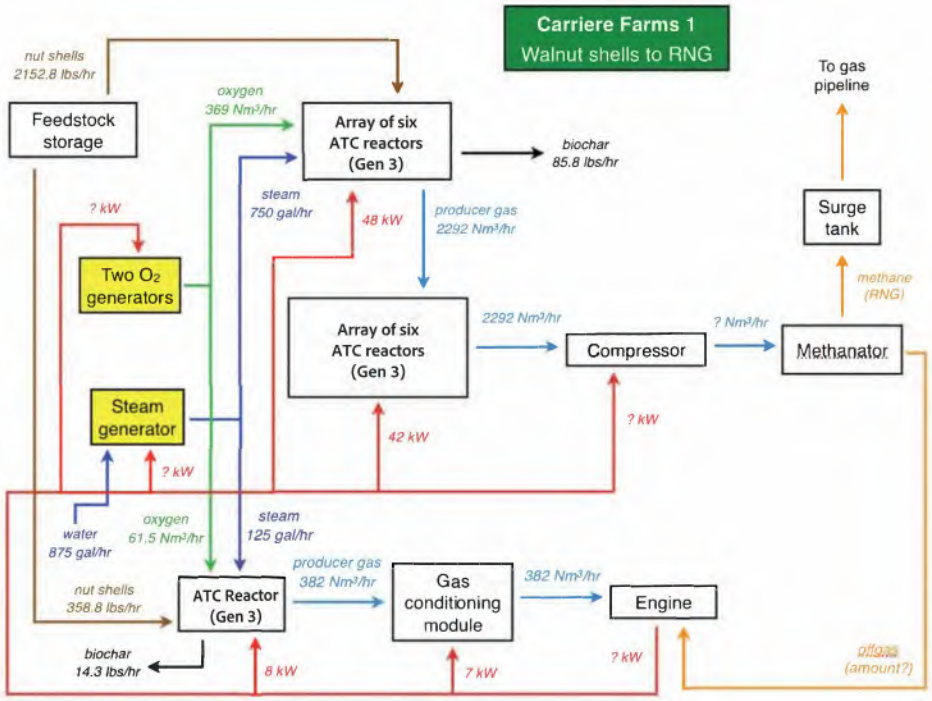
APPENDIX “B”

SITE LAYOUT CF2, PHASE 2



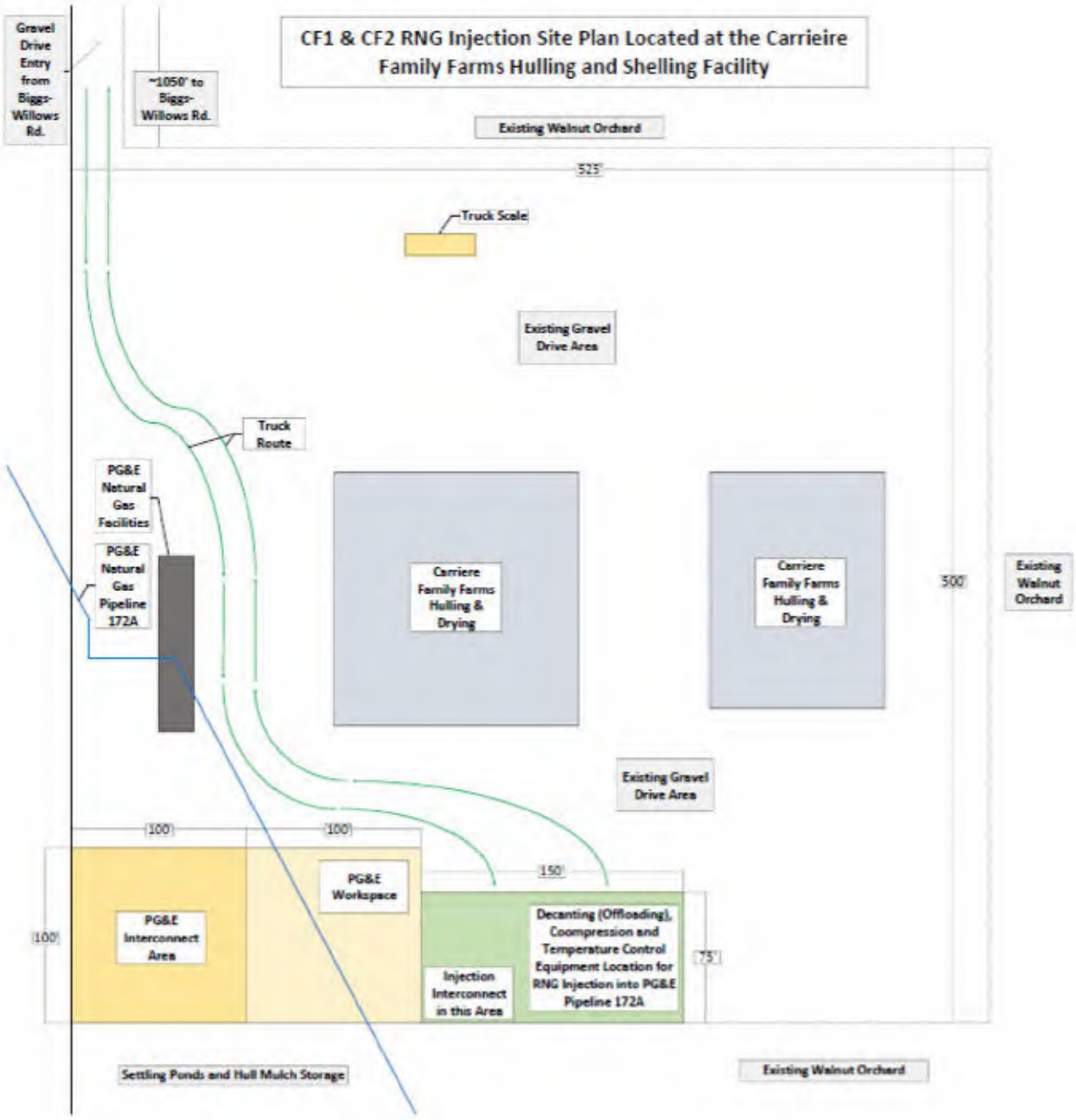
APPENDIX "C"

ATC RNG PROCESS DIAGRAM



APPENDIX "D"

SITE PLAN



PRELIMINARY REPORT

To:
CHICAGO TITLE COMPANY
2220 DOUGLAS BLVD., SUITE 190
ROSEVILLE, CA 95661
ATTN: KARISA D. LYKE

Title Officer:
TITLE OFFICER: RON CAMPBELL
TIMIOS TITLE
250 W. SYCAMORE ST.
WILLOWS, CA 95988
PHONE: (530) 934-3338

ESCROW NO: FSJP-6062400268

Property Address:
1640 STATE HIGHWAY 45
GLENN, CA, 95943-9649

Title No:
71-00241392

In response to the above referenced application for a policy of title insurance, this company hereby reports that it is prepared to issue, or cause to be issued, as of the date hereof, a policy or policies of title insurance describing the land and the estate or interest therein hereinafter set forth, insuring against loss which may be sustained by reason of any defect, lien or encumbrance not shown or referred to as an exception below or not excluded from coverage pursuant to the printed Schedules, Conditions and Stipulations of said Policy Forms.

The printed Exceptions and Exclusions from the coverage and Limitations on Covered Risks of said policy or policies are set forth in Exhibit A attached. The policy to be issued may contain an arbitration clause. When the Amount of Insurance is less than that set forth in the arbitration clause, all arbitrable matters shall be arbitrated at the option of either the Company or the Insured as the exclusive remedy of the parties. Limitations on Covered Risks applicable to the CLTA and ALTA Homeowner's Policies of Title Insurance which establish a Deductible Amount and a Maximum Dollar Limit of Liability for certain coverages are also set forth in Exhibit A. Copies of the policy forms should be read. They are available from the office which issued this report.

Please read the exceptions shown or referred to below and the exceptions and exclusions set forth in Exhibit A of this report carefully. The exceptions and exclusions are meant to provide you with notice of matters which are not covered under the terms of the title insurance policy and should be carefully considered.

It is important to note that this preliminary report is not a written representation as to the condition of title and may not list all liens, defects, and encumbrances affecting title to the land.

This report (and any supplements or amendments hereto) is issued solely for the purpose of facilitating the issuance of a policy of title insurance and no liability is assumed hereby. If it is desired that liability be assumed prior to the issuance of a policy of title insurance, a binder or commitment should be requested.

The form of Policy of title insurance contemplated by the report is:
ALTA STANDARD OWNER'S POLICY 2021
ALTA LOAN POLICY 2021
Issued by: FIRST AMERICAN TITLE INSURANCE COMPANY

Dated as of: Feb 23, 2024 at 8:00 a.m.

The Estate or Interest in the land hereinafter described or referred to covered by this report is:

A LEASEHOLD ESTATE

Title to said estate of interest at the date hereof is vested in:

CARRIERE LAND, LLC

At the date hereof exceptions to coverage in addition to the printed exceptions and exclusions contained in said policy form would be as follows:

1. PROPERTY TAXES, INCLUDING ANY ASSESSMENTS COLLECTED WITH TAXES, TO BE LEVIED FOR THE FISCAL YEAR 2024-2025 THAT ARE A LIEN NOT YET DUE.

2. PROPERTY TAXES AND ANY ASSESSMENTS COLLECTED WITH TAXES, FOR THE FISCAL YEAR 2023-2024.

1ST INSTALLMENT:	**$3,827.26**	PAID 12/08/2023
2ND INSTALLMENT:	**$3,827.26**	DUE 04/10/2024
ASSESSMENT NO.:	**016-030-011-000**	
1ST INSTALLMENT:	**$3,294.42**	PAID 12/08/2023
2ND INSTALLMENT:	**$3,294.42**	DUE 04/10/2024
ASSESSMENT NO.:	**920-000-114-000**	
FEE NO.:	**016-030-011-000**	
1ST INSTALLMENT:	**$24,154.08**	PAID 12/08/2023
2ND INSTALLMENT:	**$24,154.08**	DUE 04/10/2024
ASSESSMENT NO.:	**920-000-115-000**	
FEE NO.:	**016-030-011-000**	
1ST INSTALLMENT:	**$16,684.97**	PAID 12/08/2023
2ND INSTALLMENT:	**$16,684.97**	DUE 04/10/2024
ASSESSMENT NO.:	**920-000-167-000**	
FEE NO.:	**016-030-011-000**	

3. THE LIEN OF SUPPLEMENTAL OR ESCAPED ASSESSMENTS OF PROPERTY TAXES, IF ANY, MADE PURSUANT TO THE PROVISIONS OF PART 0.5, CHAPTER 3.5 OR PART 2, CHAPTER 3, ARTICLES 3 AND 4 RESPECTIVELY (COMMENCING WITH SECTION 75) OF THE REVENUE AND TAXATION CODE OF THE STATE OF CALIFORNIA AS A RESULT OF THE TRANSFER OF TITLE TO THE VESTEE NAMED IN SCHEDULE A; OR AS A RESULT OF CHANGES IN OWNERSHIP OR NEW CONSTRUCTION OCCURRING PRIOR TO THE DATE OF THE POLICY.

4. THE PROPERTY HEREIN DESCRIBED LIES WITHIN MAINTENANCE AREA NO. 2 AND IS SUBJECT TO ASSESSMENTS LEVIED IN CONNECTION THEREWITH. SUCH ASSESSMENTS ARE PAYABLE WITH COUNTY TAXES.

5. THE LAND HEREIN DESCRIBED LIES WITHIN THE BOUNDARIES OF SACRAMENTO-SAN JOAQUIN DRAINAGE DISTRICT AND IS SUBJECT TO ALL TAXES, ASSESSMENTS AND OBLIGATIONS THEREOF.

6. THE LAND HEREIN DESCRIBED LIES WITHIN THE BOUNDARIES OF RECLAMATION DISTRICT NO. 2047 AND IS SUBJECT TO ALL TAXES, ASSESSMENTS AND OBLIGATIONS THEREOF. ANY AND ALL ASSESSMENTS ARE COLLECTED WITH COUNTY TAXES.

7. RIGHT OF WAY AS SET FORTH IN DEED FROM N. W. HANSON AND BETHENA A. HANSON TO SACRAMENTO AND SAN JOAQUIN DRAINAGE DISTRICT, A PUBLIC AGENCY, DATED FEBRUARY 25, 1942 AND RECORDED JUNE 10, 1942 IN BOOK 149 OF OFFICIAL RECORDS, AT PAGE 291.

8. OIL AND GAS LEASE DATED DECEMBER 6, 1951 FROM MANUEL E. DIAS AND MARY E. DIAS, HIS WIFE TO THE OHIO OIL COMPANY, AN OHIO CORPORATION, RECORDED JANUARY 7, 1952 IN BOOK 271 OF OFFICIAL RECORDS, AT PAGE 327 AND RE-RECORDED DECEMBER 9, 1952 IN BOOK 281 OF OFFICIAL RECORDS, AT PAGE 224 TO INCLUDE ADDITIONAL PROPERTY.

   THE PRESENT OWNERSHIP OF SAID LEASEHOLD AND OTHER MATTERS AFFECTING THE INTEREST OF THE LESSEE ARE NOT SHOWN HEREIN. (AFFECTS A PORTION)

9. EASEMENT TO CONSTRUCT, RECONSTRUCT, OPERATE, MAINTAIN, AND USE AN ACCESS ROAD AND APPURTENANCES THERETO AS GRANTED TO THE SACRAMENTO AND SAN JOAQUIN DRAINAGE DISTRICT, RECORDED JUNE 12, 1986 IN BOOK 795 OF OFFICIAL RECORDS, AT PAGE 135.

10. TERMS, EXCEPTIONS AND RESERVATIONS AS CONTAINED IN THE DEED FROM HERBERT A. CARRIERE ET

UX TO THE SACRAMENTO AND SAN JOAQUIN DRAINAGE DISTRICT, RECORDED JUNE 12, 1986 IN BOOK 795 OF OFFICIAL RECORDS, AT PAGE 135.

11. FARMLAND SECURITY ZONE CONTRACT RESOLUTION NO. 2000-144, BY AND BETWEEN AILEEN R. CARRIERE, INDIVIDUALLY AND AS EXECUTOR OF THE ESTATE OF HERBERT A. CARRIERE AND COUNTY OF GLENN, A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA, DATED DECEMBER 5, 2000, RECORDED DECEMBER 12, 2000, GLENN COUNTY RECORDER'S FILE NO. 2000-6527.

12. OIL AND GAS LEASE MEMORANDUM UPON THE TERMS, COVENANTS AND CONDITIONS CONTAINED IN AN UNRECORDED LEASE REFERRED TO THEREIN DATED SEPTEMBER 1, 2006, RECORDED DECEMBER 20, 2007, GLENN COUNTY RECORDER'S FILE NO. 2007-7725.

LESSOR: AILEEN R. CARRIERE, TRUSTEE OF THE AILEEN R. CARRIERE TRUST DATED JANUARY 12, 2001; AILEEN R. CARRIERE, TRUSTEE OF THE HERBERT A. CARRIERE TRUST, DATED JANUARY 5, 2001
LESSEE: VENOCO INC., A DELAWARE CORPORATION

THE PRESENT OWNERSHIP OF SAID LEASEHOLD AND OTHER MATTERS AFFECTING THE INTEREST OF THE LESSEE ARE NOT SHOWN HEREIN.

13. RESERVATION OF ANY AND ALL OIL, GAS, MINERALS, AND OTHER HYDROCARBON SUBSTANCES TOGETHER WITH THE RIGHT TO REMOVE THE SAME, AS RESERVED IN THE DEED BY AILEEN R. CARRIERE, AS TRUSTEE OF THE HERBERT A. CARRIERE TRUST AND AILEEN R. CARRIERE, AS TRUSTEE OFF THE AILEEN R. CARRIERE TRUST, RECORDED SEPTEMBER 12, 2012 AS INSTRUMENT NO. 2012-3777

14. A DEED OF TRUST TO SECURE AN INDEBTEDNESS IN THE ORIGINAL AMOUNT SHOWN BELOW.

AMOUNT: $3,000,000.00
DATED: DECEMBER 14, 2017
TRUSTOR: CARRIERE LAND, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY ET AL
TRUSTEE: GOLDEN STATE FARM CREDIT, PCA
BENEFICIARY: GOLDEN STATE FARM CREDIT, PCA
RECORDED: JANUARY 13, 2021 AS INSTRUMENT NO. 2021-0184 OF OFFICIAL RECORDS
(ALSO COVERS OTHER PROPERTY)

A DOCUMENT RECORDED SEPTEMBER 29, 2021 AS INSTRUMENT NO. 2021-4405 OF OFFICIAL RECORDS PROVIDES THAT THE DEED OF TRUST OR THE OBLIGATION SECURED THEREBY HAS BEEN MODIFIED.

A DOCUMENT RECORDED DECEMBER 29, 2022 AS GLENN COUNTY INSTRUMENT NO. 2022-4978 OF OFFICIAL RECORDS PROVIDES THAT THE LIEN OR CHARGE OF THE DEED OF TRUST WAS SUBORDINATED TO THE LIEN OR CHARGE OF THE DEED OF TRUST RECORDED JANUARY 13, 2021 AS INSTRUMENT NO. 2021-0184 AND MODIFIED SEPTEMBER 29, 2021 AS GLENN COUNTY INSTRUMENT NO. 2021-4405 AND MODIFIED DECEMBER 29, 2022 AS GLENN COUNTY INSTRUMENT NO. 2022-4975 OF OFFICIAL RECORDS

15. A DEED OF TRUST TO SECURE AN INDEBTEDNESS IN THE ORIGINAL AMOUNT SHOWN BELOW.

AMOUNT: $42,891,398.17
DATED: DECEMBER 14, 2020
TRUSTOR: CARRIERE LAND, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY ET AL
TRUSTEE: GOLDEN STATE FARM CREDIT, FLCA
BENEFICIARY: GOLDEN STATE FARM CREDIT, FLCA
RECORDED: JANUARY 13, 2021 AS INSTRUMENT NO. 2021-0183 OFFICIAL RECORDS
(ALSO COVERS OTHER PROPERTY)

A DOCUMENT DISCLOSING AN ADDITIONAL ADVANCE IN THE AMOUNT OF $15,500,000.00, RECORDED SEPTEMBER 20, 2021 AS INSTRUMENT NO. 2021-4267 OF OFFICIAL RECORDS.

A DOCUMENT DISCLOSING AN ADDITIONAL ADVANCE IN THE AMOUNT OF $7,000,000.00, RECORDED DECEMBER 29, 2022 AS INSTRUMENT NO. 2022-4975 OF OFFICIAL RECORDS.

16. RIGHTS AND CLAIMS OF PARTIES IN POSSESSION.

17. WATER RIGHTS, CLAIMS OR TITLE TO WATER, WHETHER OR NOT THE MATTERS ARE SHOWN BY THE PUBLIC RECORDS.

18. EVIDENCE MUST BE PROVIDED THAT THERE ARE NO COMMITMENT STATEMENTS IN EFFECT UNDER CIVIL CODE SECTION 850 ET SEQ. WITH RESPECT TO THE PROPERTY.

IN ORDER TO REMOVE THIS STATEMENT, THE LANDOWNER WILL NEED TO PROVIDE US WITH AN AFFIDAVIT STATING THAT THEY ARE NOT AWARE OF ANY RELEASE REPORTS OR COMMITMENT STATEMENTS WHICH HAVE BEEN ISSUED UNDER THIS STATUTE WITH RESPECT TO THE PROPERTY.

19. ANY CLAIM THAT THE TITLE IS SUBJECT TO A TRUST OR LIEN CREATED UNDER THE PERISHABLE AGRICULTURAL COMMODITIES ACT (7 U.S.C. 499A, ET SEQ), THE PACKERS AND STOCKYARDS ACT (7 U.S.C. 181, ET SEQ) OR UNDER SIMILAR FEDERAL OR STATE LAWS.

20. THE REQUIREMENT THAT A MEMORANDUM OF LEASE BE RECORDED IN THE PUBLIC RECORDS.

21. NOTE: THE LEGAL DESCRIPTION CONTAINED HEREIN IS FOR THE PURPOSE OF A LEASEHOLD ESTATE AND MAY NOT BE USED AS A LEGAL PARCEL FOR THE PURPOSE OF A SALE.

22. WITH RESPECT TO CARRIERE LAND, LLC, A LIMITED LIABILITY COMPANY:

A. A COPY OF ITS OPERATING AGREEMENT AND ANY AMENDMENTS THERETO;

B. IF IT IS A CALIFORNIA LIMITED LIABILITY COMPANY, THAT A CERTIFIED COPY OF ITS ARTICLES OF ORGANIZATION (LLC-1) AND ANY CERTIFICATE OF CORRECTION (LLC-11), CERTIFICATE OF AMENDMENT (LLC-2), OR RESTATEMENT OF ARTICLES OF ORGANIZATION (LLC-10) BE RECORDED IN THE PUBLIC RECORDS;

C. IF IT IS A FOREIGN LIMITED LIABILITY COMPANY, THAT A CERTIFIED COPY OF ITS APPLICATION FOR REGISTRATION (LLC-5) BE RECORDED IN THE PUBLIC RECORDS;

D. WITH RESPECT TO ANY DEED, DEED OF TRUST, LEASE, SUBORDINATION AGREEMENT OR OTHER DOCUMENT OR INSTRUMENT EXECUTED BY SUCH LIMITED LIABILITY COMPANY AND PRESENTED FOR RECORDATION BY THE COMPANY OR UPON WHICH THE COMPANY IS ASKED TO RELY, THAT SUCH DOCUMENT OR INSTRUMENT BE EXECUTED IN ACCORDANCE WITH ONE OF THE FOLLOWING, AS APPROPRIATE:

(I) IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES THROUGH OFFICERS APPOINTED OR ELECTED PURSUANT TO THE TERMS OF A WRITTEN OPERATING AGREEMENT, SUCH DOCUMENT MUST BE EXECUTED BY AT LEAST TWO DULY ELECTED OR APPOINTED OFFICERS, AS FOLLOWS: THE CHAIRMAN OF THE BOARD, THE PRESIDENT OR ANY VICE PRESIDENT, AND ANY SECRETARY, ASSISTANT SECRETARY, THE CHIEF FINANCIAL OFFICER OR ANY ASSISTANT TREASURER;

(II) IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES THROUGH A MANAGER OR MANAGERS IDENTIFIED IN THE ARTICLES OF ORGANIZATION AND/OR DULY ELECTED PURSUANT TO THE TERMS OF A WRITTEN OPERATING AGREEMENT, SUCH DOCUMENT MUST BE EXECUTED BY AT LEAST TWO SUCH MANAGERS OR BY ONE MANAGER IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES WITH THE EXISTENCE OF ONLY ONE MANAGER.

E. OTHER REQUIREMENTS WHICH THE COMPANY MAY IMPOSE FOLLOWING ITS REVIEW OF THE MATERIAL REQUIRED HEREIN AND OTHER INFORMATION WHICH THE COMPANY MAY REQUIRE

NOTICE

Section 12413.1 of the California Insurance Code, effective January 1, 1990, requires that any title insurance company, underwritten title company, or controlled escrow company handling funds in an escrow or sub-escrow capacity, wait a specified number of days after depositing funds, before recording any documents in connection with the transaction or disbursing funds. This statute allows for funds deposited by wire transfer to be disbursed the same day as deposit. In the case of cashier's checks or certified checks, funds may be disbursed the next day after deposit. In order to avoid unnecessary delays of three to seven days, or more, please use wire transfer, cashier's checks, or certified checks whenever possible.

NOTES:

A. THE POLICY TO BE ISSUED MAY CONTAIN AN ARBITRATION CLAUSE. WHEN THE AMOUNT OF INSURANCE IS LESS THAN THE CERTAIN DOLLAR AMOUNT SET FORTH IN ANY APPLICABLE ARBITRATION CLAUSE, ALL ARBITRABLE MATTERS SHALL BE ARBITRATED AT THE OPTION OF EITHER THE COMPANY OR THE INSURED AS THE EXCLUSIVE REMEDY OF THE PARTIES. IF YOU DESIRE TO REVIEW THE TERMS OF THE POLICY, INCLUDING ANY ARBITRATION CLAUSE THAT MAY BE INCLUDED, CONTACT THE OFFICE THAT ISSUED THIS COMMITMENT OR REPORT TO OBTAIN A SAMPLE OF THE POLICY JACKET FOR THE POLICY THAT IS TO BE ISSUED IN CONNECTION WITH YOUR TRANSACTION.

LEGAL DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATE LYING IN THE UNINCORPORATED AREA, COUNTY OF GLENN, STATE OF CALIFORNIA, BEING DESCRIBED AS FOLLOWS:

All that certain real property situated in the County of Glenn, State of California, described as follows: Being a portion of Section 68 as shown on that certain map entitled "Subdivisions of the Glenn Ranch", Glenn County, California, surveyed by H.B. Shackelford, and on file in Book 1 of Maps and Surveys, at Page 110, records of said County of Glenn; also being a portion of Parcel I, as said Parcel I is described in Official Records Document 2012-3777, records of said County of Glenn, more particularly described as follows,

Parcel One (lease area): COMMENCING at a point on the North line of the Southeast quarter of Section 68 of said Subdivisions of the Glenn Ranch, said point being marked by a 1 1/2" iron pipe, as shown on Book 15 of Maps and Surveys, Page 62, records of said County of Glenn, thence along said North line, South 89° 59' 25" East, 261.35 feet; thence leaving said North line, South 00° 16' 27" West, 7.79 feet, to the True Point of Beginning; thence South 89° 43' 33" East, 652.55 feet; thence South 00° 16' 27" West, 250.00 feet, to a point hereinafter referred to as "Point A"; thence North 89° 43' 33" West, 65.00 feet, to a point hereinafter referred to as "Point "B" thence continuing North 89° 43' 33" West, 587.55 feet; thence North 00° 16' 27" East, 250.00 feet, more or less, to the True Point of Beginning. Containing 3.75 acres, more or less.

Parcel Two (easement area): Being a non-exclusive easement for ingress and egress, for road purposes, and the installation, operation and maintenance of a low-pressure gas line, more particularly described as follows; Beginning at the hereinabove described "Point A", thence South 00° 00' 18" West, 503.72 feet, to the beginning of a curve to the right; thence along said curve having a radius of 220.00 feet, through a central angle of 30° 00' 00", for an arc length of 115.19 feet to the end of said curve and the beginning of a curve to the left; thence along said curve having a radius of 190.00 feet, through a central angle of 29° 32' 00", for an arc length of 97.94 feet to the end of said curve; thence South 00° 28' 18" West, 348.39 feet, more or less to a point on the centerline of Glenn County Road 54; thence along said centerline, North 89° 59' 55" West, 30.00 feet; thence leaving said centerline, North 00° 28' 18" East, 348.63 feet, to the beginning of a curve to the right; thence along said curve having a radius of 220.00 feet, through a central angle of 29° 32' 00", for an arc length of 113.40 feet, to the end of said curve and the beginning of a curve to the left; thence along said curve having a radius of 190.00 feet, through a central angle of 30° 00' 00", for an arc length of 99.48 feet to the end of said curve; thence North 00° 00' 18" East, 473.98; thence North 49° 21' 20" West, 46.12 feet, more or less, to "Point B", described hereinabove; thence South 89° 43' 33" East , 65.00 feet, to "Point A", described hereinabove.

EXHIBIT A
LIST OF PRINTED EXCEPTIONS AND EXCLUSIONS (BY POLICY TYPE)

CLTA/ALTA HOMEOWNER'S POLICY OF TITLE INSURANCE (02-03-10)
EXCLUSIONS

In addition to the Exceptions in Schedule B, You are not insured against loss, costs, attorneys' fees, and expenses resulting from:

1. Governmental police power, and the existence or violation of those portions of any law or government regulation concerning:
   (a) building; (b) zoning; (c) land use; (d) improvements on the Land; (e) land division; and (f) environmental protection.
   This Exclusion does not limit the coverage described in Covered Risk 8.a., 14, 15, 16, 18, 19, 20, 23 or 27.
2. The failure of Your existing structures, or any part of them, to be constructed in accordance with applicable building codes. This Exclusion does not limit the coverage described in Covered Risk 14 or 15.
3. The right to take the Land by condemning it. This Exclusion does not limit the coverage described in Covered Risk 17.
4. Risks:
   (a) that are created, allowed, or agreed to by You, whether or not they are recorded in the Public Records;
   (b) that are Known to You at the Policy Date, but not to Us, unless they are recorded in the Public Records at the Policy Date;
   (c) that result in no loss to You; or
   (d) that first occur after the Policy Date - this does not limit the coverage described in Covered Risk 7, 8.e., 25, 26, 27 or 28.
5. Failure to pay value for Your Title.
6. Lack of a right:
   (a) to any land outside the area specifically described and referred to in paragraph 3 of Schedule A; and
   (b) in streets, alleys, or waterways that touch the Land.
   This Exclusion does not limit the coverage described in Covered Risk 11 or 21.
7. The transfer of the Title to You is invalid as a preferential transfer or as a fraudulent transfer or conveyance under federal bankruptcy, state insolvency, or similar creditors' rights laws.

LIMITATIONS ON COVERED RISKS

Your insurance for the following Covered Risks is limited on the Owner's Coverage Statement as follows: For Covered Risk 16, 18, 19, and 21 Your Deductible Amount and Our Maximum Dollar Limit of Liability shown in Schedule A.

	Your Deductible Amount	Our Maximum Dollar Limit of Liability
Covered Risk 16:	1% of Policy Amount or $2,500.00 (whichever is less)	$10,000.00
Covered Risk 18:	1% of Policy Amount or $5,000.00 (whichever is less)	$25,000.00
Covered Risk 19:	1% of Policy Amount or $5,000.00 (whichever is less)	$25,000.00
Covered Risk 21:	1% of Policy Amount or $2,500.00 (whichever is less)	$5,000.00

ALTA RESIDENTIAL TITLE INSURANCE POLICY (6-1-87)
EXCLUSIONS

In addition to the Exceptions in Schedule B, you are not insured against loss, costs, attorneys' fees, and expenses resulting from:

1. Governmental police power, and the existence or violation of any law or government regulation. This includes building and zoning ordinances and also laws and regulations concerning:
   (a) and use
   (b) improvements on the land
   (c) and division
   (d) environmental protection
   This exclusion does not apply to violations or the enforcement of these matters which appear in the public records at Policy Date.
   This exclusion does not limit the zoning coverage described in Items 12 and 13 of Covered Title Risks.
2. The right to take the land by condemning it, unless:
   (a) a notice of exercising the right appears in the public records on the Policy Date
   (b) the taking happened prior to the Policy Date and is binding on you if you bought the land without knowing of the taking
3. Title Risks:
   (a) that are created, allowed, or agreed to by you
   (b) that are known to you, but not to us, on the Policy Date -- unless they appeared in the public records
   (c) that result in no loss to you
   (d) that first affect your title after the Policy Date -- this does not limit the labor and material lien coverage in Item 8 of Covered Title Risks
4. Failure to pay value for your title.
5. Lack of a right:
   (a) to any land outside the area specifically described and referred to in Item 3 of Schedule A OR
   (b) in streets, alleys, or waterways that touch your land
   This exclusion does not limit the access coverage in Item 5 of Covered Title Risks.

2006 ALTA LOAN POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
   (i) the occupancy, use, or enjoyment of the Land;
   (ii) the character, dimensions, or location of any improvement erected on the Land;
   (iii) the subdivision of land; or
   (iv) environmental protection;

   or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
   (b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
   (a) created, suffered, assumed, or agreed to by the Insured Claimant;
   (b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
   (c) resulting in no loss or damage to the Insured Claimant;
   (d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 13, or 14); or
   (e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.
4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law.
6. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
   (a) a fraudulent conveyance or fraudulent transfer, or
   (b) a preferential transfer for any reason not stated in Covered Risk 13(b) of this policy.
7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the Insured Mortgage in the Public Records. This Exclusion does not modify or limit the coverage provided under Covered Risk 11(b).

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) that arise by reason of:

1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

2006 ALTA OWNER'S POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
   (i) the occupancy, use, or enjoyment of the Land;
   (ii) the character, dimensions, or location of any improvement erected on the Land;
   (iii) the subdivision of land; or
   (iv) environmental protection;

   or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
   (b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters

(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 9 or 10); or
(e) in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Title.

4. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction vesting the Title as shown in Schedule A, is
(a) a fraudulent conveyance or fraudulent transfer, or
(b) a preferential transfer for any reason not stated in Covered Risk 9 of this policy.
5. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the deed or other instrument of transfer in the Public Records that vests Title as shown in Schedule A.

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) that arise by reason of:
1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

ALTA EXPANDED COVERAGE RESIDENTIAL LOAN POLICY (07-26-10)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:
1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
(i) the occupancy, use, or enjoyment of the Land;
(ii) the character, dimensions, or location of any improvement erected on the Land;
(iii) the subdivision of land; or
(iv) environmental protection;
or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
(b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27 or 28); or
(e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.
4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law. This Exclusion does not modify or limit the coverage provided in Covered Risk 26.
6. Any claim of invalidity, unenforceability or lack of priority of the lien of the Insured Mortgage as to Advances or modifications made after the Insured has Knowledge that the vestee shown in Schedule A is no longer the owner of the estate or interest covered by this policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11.
7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching subsequent to Date of Policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11(b) or 25.
8. The failure of the residential structure, or any portion of it, to have been constructed before, on or after Date of Policy in accordance with applicable building codes. This Exclusion does not modify or limit the coverage provided in Covered Risk 5 or 6.

9. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
   (a) a fraudulent conveyance or fraudulent transfer, or
   (b) a preferential transfer for any reason not stated in Covered Risk 27(b) of this policy.

CALIFORNIA LAND TITLE ASSOCIATION STANDARD COVERAGE POLICY – 1990
SCHEDULE B

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) which arise by reason of:
1. Taxes or assessments which are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the public records. Proceedings by a public agency which may result in taxes or assessments, or notice of such proceedings, whether or not shown by the records of such agency or by the public records.
2. Any facts, rights, interest, or claims which are not shown by the public records but which could be ascertained by an inspection of the land or which may be asserted by persons in possession thereof.
3. Easements, liens or encumbrances, or claims thereof, which are not shown by the public records.
4. Discrepancies, conflicts in boundary lines, shortage in area, encroachments, or any other facts which a correct survey would disclose, and which are not shown by the public records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the public records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy and the Company will not pay loss or damage, costs, attorneys' fees or expenses which arise by reason of:
1. (a) Any law, ordinance or governmental regulation (including but not limited to building and zoning laws, ordinances, or regulations) restricting, regulating, prohibiting or relating to (i) the occupancy, use, or enjoyment of the land; (ii) the character, dimensions or location of any improvement now or hereafter erected on the land; (iii) a separation in ownership or change in the dimensions or area of the land or any parcel of which the land is or was a part; or (iv) environmental protection, or the effect of any violation of these laws, ordinances or governmental regulations, except to the extent that a notice of the enforcement thereof or a notice of a defect, lien or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
   (b) Any governmental police power not excluded by (a) above, except to the extent that a notice of the exercise thereof or a notice of a defect, lien or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
2. Rights of eminent domain unless notice of the exercise thereof has been recorded in the public records at Date of Policy, but not excluding from coverage any taking which has occurred prior to Date of Policy which would be binding on the rights of a purchaser for value without knowledge.
3. Defects, liens, encumbrances, adverse claims or other matters:
   (a) whether or not recorded in public records at Date of Policy, but created, suffered, assumed or agreed to by the insured claimant;
   (b) not known to the Company, not recorded in public records at Date of Policy, but known to the insured claimant and not disclosed in writing to the Company by the insured claimant prior to the date the insured claimant became an insured under this policy;
   (c) resulting in no loss or damage to the insured claimant;
   (d) attaching or created subsequent to Date of Policy; or
   (e) resulting in loss or damage which would not have been sustained if the insured claimant had paid value for the insured mortgage or for the estate or interest insured by this policy.
4. Unenforceability of the lien of the insured mortgage because of the inability or failure of the insured at Date of Policy, or the inability or failure of any subsequent owner of the indebtedness, to comply with applicable "doing business" laws of the state in which the land is situated.
5. Invalidity or unenforceability of the lien of the insured mortgage, or claim thereof, which arises out of the transaction evidenced by the insured mortgage and is based upon usury or any consumer credit protection or truth in lending law.
6. Any claim which arises out of the transaction vesting in the insured the estate or interest insured by their policy or the transaction creating the interest of the insured lender, by reason of the operation of federal bankruptcy, state of insolvency or similar creditors' rights laws.

PRIVACY INFORMATION

We Are Committed to Safeguarding Customer Information
In order to better serve your needs now an in the future, we may ask you to provide us with certain information. We understand that you may be concerned about what we will do with such information. We agree that you have right to know how we will utilize the personal information you provide to us. Therefore, together with our subsidiaries we have adopted this Privacy Policy to govern the use and handling of your personal information.

Applicability
This Privacy Policy governs our use of the information that you provide to us. It does not govern the manner in which we may use information we have obtained from any other sources, such as information obtained from a public record or from another person or entity. First American has also adopted broader guidelines that govern our use of personal information regardless of its source. First American calls these guidelines its Fair Information Values.

Types of Information
Depending upon which of our services you are utilizing, the types of nonpublic personal information that we may collect include:

- Information we receive from you on applications, forms and in other communications to us, whether in writing, in person, by telephone or any other means;
- Information about your transactions with us, our affiliated companies, or others; and
- Information we receive from a consumer reporting agency.

Use of Information
We request information from you for our own legitimate business purposes and not for the benefit of any nonaffiliated party. Therefore, we will not release your information to nonaffiliated parties except: (1) as necessary for us to provide the product or service you have requested of us; or (2) as permitted by law. We may, however, store such information indefinitely, including the period after which any customer relationship has ceased. Such information may be used for any internal purpose, such as quality control efforts or customer analysis. We may also provide all of the types of nonpublic personal information listed above to one or more of our affiliated companies. Such affiliated companies include financial service providers, such as title insurers, property and casualty insurers, and trust and investment advisory companies, or companies involved in real estate services, such as appraisal companies, home warranty companies and escrow companies. Furthermore, we may also provide all the information we collect, as described above, to companies that perform marketing services on our behalf, on behalf of our affiliated companies or to other financial institutions with whom we or our affiliated companies have joint marketing agreements.

Former Customers
Even if you are no longer our customer, our Privacy Policy will continue to apply to you.

Confidentiality and Security
We will use our best efforts to ensure that no unauthorized parties have access to any of our information. We restrict access to nonpublic personal information about you to those individuals and entitles who need to know that information to provide products or services to you. We will use our best efforts to train and oversee our employees and agents to ensure that your information will be handled responsibly and in accordance with this Privacy Policy and First American's Fair Information Values. We currently maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Information Obtained Through Our Web Site

Business Relationships
First American Financial Corporation's site and it's affiliates' sites may contain links to other Web sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites.

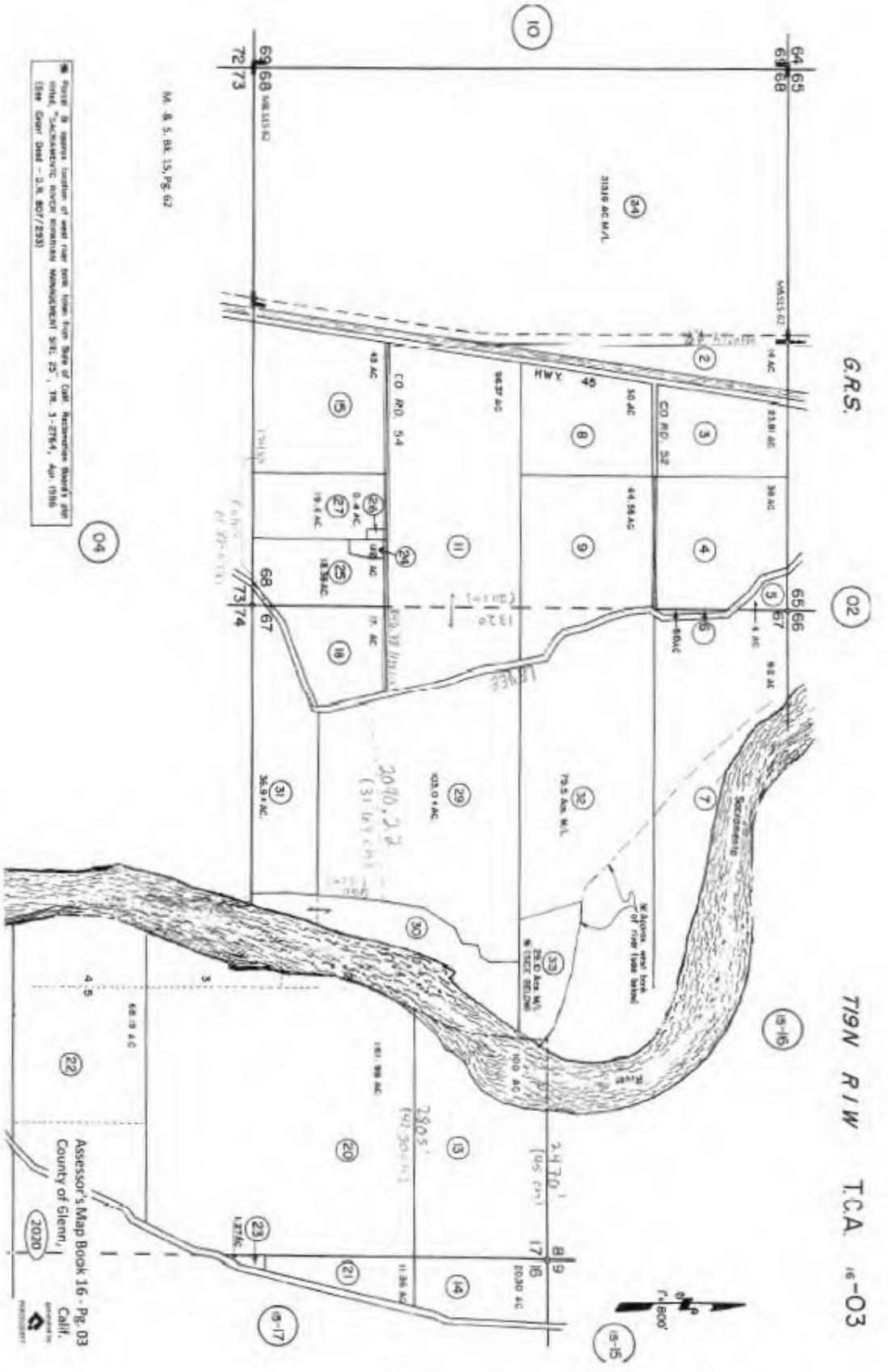
Cookies
Some of First American's Web site may make use of "cookie" technology to measure site activity and to customize information to your personal tastes. A cookie is an element of data that a Web site can send to your browser, which may then store the cookie on your hard drive. FirstAm.com uses stored cookies. The goal of this technology is to better serve you when visiting our site, save you time when you are here and to provide you with a more meaningful and productive Web site experience.

Fair Information Values
Fairness We consider consumer expectations about their privacy in all our businesses. We only offer products and services that assure a favorable balance between consumer benefits and consumer privacy.
Public Record We believe that an open public record creates significant value for society, enhances consumer choice and creates consumer opportunity. We actively support an open public record and emphasize its importance and contribution to our economy.
Use We believe we should behave responsibly when we use information about a consumer in our business. We will obey the laws governing the collection, use and dissemination of data.
Accuracy We will take reasonable steps to help assure the accuracy of the data we collect, use and disseminate. Where possible, we will take reasonable steps to correct inaccurate information. When, as with the public record, we cannot correct inaccurate information, we will take all reasonable steps to assist consumers in identifying the source of the erroneous data so that the consumer can secure the required corrections.

Education We endeavor to educate the users of our products and services, our employees and others in our industry about the importance of consumer privacy. We will instruct our employees on our fair information values and on the responsible collection and use of data. We will encourage others in our industry to collect and use information in a responsible manner.
Security We will maintain appropriate facilities and systems to protect against unauthorized access to and corruption of the data we maintain.

The map attached, if any, may or may not be a survey of the land depicted hereon. Timios Title and it's Underwriters expressly disclaims any liability for loss or damage which may result from reliance on this map except to the extent coverage for such loss or damage is expressly provided by the terms and provisions of the title insurance policy, if any, to which this map is attached.

MAP



PRELIMINARY REPORT

To:
CHICAGO TITLE COMPANY
2220 DOUGLAS BLVD, SUITE 190
ROSEVILLE, CA 95661
ATTN: KARISA D. LYKE

Title Officer:
TITLE OFFICER: RON CAMPBELL
TIMIOS TITLE
250 W. SYCAMORE ST.
WILLOWS, CA 95988
PHONE: (530) 934-3338

ESCROW NO: 71-00243599

Property Address:
7693 HIGHWAY 162
WILLOWS, CA, 95988

Title No:
71-00243598

In response to the above referenced application for a policy of title insurance, this company hereby reports that it is prepared to issue, or cause to be issued, as of the date hereof, a policy or policies of title insurance describing the land and the estate or interest therein hereinafter set forth, insuring against loss which may be sustained by reason of any defect, lien or encumbrance not shown or referred to as an exception below or not excluded from coverage pursuant to the printed Schedules, Conditions and Stipulations of said Policy Forms.

The printed Exceptions and Exclusions from the coverage and Limitations on Covered Risks of said policy or policies are set forth in Exhibit A attached. The policy to be issued may contain an arbitration clause. When the Amount of Insurance is less than that set forth in the arbitration clause, all arbitrable matters shall be arbitrated at the option of either the Company or the Insured as the exclusive remedy of the parties. Limitations on Covered Risks applicable to the CLTA and ALTA Homeowner's Policies of Title Insurance which establish a Deductible Amount and a Maximum Dollar Limit of Liability for certain coverages are also set forth in Exhibit A. Copies of the policy forms should be read. They are available from the office which issued this report.

Please read the exceptions shown or referred to below and the exceptions and exclusions set forth in Exhibit A of this report carefully. The exceptions and exclusions are meant to provide you with notice of matters which are not covered under the terms of the title insurance policy and should be carefully considered.

It is important to note that this preliminary report is not a written representation as to the condition of title and may not list all liens, defects, and encumbrances affecting title to the land.

This report (and any supplements or amendments hereto) is issued solely for the purpose of facilitating the issuance of a policy of title insurance and no liability is assumed hereby. If it is desired that liability be assumed prior to the issuance of a policy of title insurance, a binder or commitment should be requested.

The form of Policy of title insurance contemplated by the report is:
ALTA STANDARD OWNER'S POLICY 2021
ALTA LOAN POLICY 2021
Issued by: FIDELITY NATIONAL TITLE INSURANCE COMPANY

Dated as of: Oct 25, 2024 at 8:00 a.m.

The Estate or Interest in the land hereinafter described or referred to covered by this report is:

A LEASEHOLD

Title to said estate of interest at the date hereof is vested in:

CARRIERE LAND, LLC, A LIMITED LIABILITY COMPANY

At the date hereof exceptions to coverage in addition to the printed exceptions and exclusions contained in said policy form would be as follows:

1. PROPERTY TAXES AND ANY ASSESSMENTS COLLECTED WITH TAXES, FOR THE FISCAL YEAR 2024-2025.

1ST INSTALLMENT:	**$1,498.49**	DUE 12/10/2024
2ND INSTALLMENT:	**$1,498.49**	DUE 04/10/2025
ASSESSMENT NO.:	**016-090-016-000**	
1ST INSTALLMENT:	**$11,145.36**	DUE 12/10/2024
2ND INSTALLMENT:	**$11,145.36**	DUE 04/10/2025
ASSESSMENT NO.:	**920-000-187-000**	
FEE NO.:	**016-090-016-000**	
1ST INSTALLMENT:	**$222.98**	DUE 12/10/2024
2ND INSTALLMENT:	**$222.98**	DUE 04/10/2025
ASSESSMENT NO.:	**016-090-017-000**	
1ST INSTALLMENT:	**$567.24**	DUE 12/10/2024
2ND INSTALLMENT:	**$567.24**	DUE 04/10/2025
ASSESSMENT NO.:	**920-000-188-000**	
FEE NO.:	**016-090-017-000**	

2. THE LIEN OF SUPPLEMENTAL OR ESCAPED ASSESSMENTS OF PROPERTY TAXES, IF ANY, MADE PURSUANT TO THE PROVISIONS OF PART 0.5, CHAPTER 3.5 OR PART 2, CHAPTER 3, ARTICLES 3 AND 4 RESPECTIVELY (COMMENCING WITH SECTION 75) OF THE REVENUE AND TAXATION CODE OF THE STATE OF CALIFORNIA AS A RESULT OF THE TRANSFER OF TITLE TO THE VESTEE NAMED IN SCHEDULE A; OR AS A RESULT OF CHANGES IN OWNERSHIP OR NEW CONSTRUCTION OCCURRING PRIOR TO THE DATE OF THE POLICY.

3. THE PROPERTY HEREIN DESCRIBED LIES WITHIN MAINTENANCE AREA NO. 2 AND IS SUBJECT TO ALL ASSESSMENTS LEVIED IN CONNECTION THEREWITH. SUCH ASSESSMENTS ARE PAYABLE WITH COUNTY TAXES.

4. THE LAND HEREIN DESCRIBED LIES WITHIN THE BOUNDARIES OF RECLAMATION DISTRICT NO. 2047 AND IS SUBJECT TO ALL TAXES, ASSESSMENTS AND OBLIGATIONS THEREOF. ANY AND ALL ASSESSMENTS ARE COLLECTED WITH COUNTY TAXES.

5. THE HEREIN DESCRIBED PROPERTY LIES WITHIN THE BOUNDARIES OF THE PROVIDENT IRRIGATION DISTRICT AND IS SUBJECT TO ALL TAXES, ASSESSMENTS AND OBLIGATIONS THEREOF.

6. ROAD RESERVATION AS SET FORTH IN DEED FROM N. D. RIDEOUT, ADMINISTRATOR OF THE ESTATE OF H. J. GLENN, DECEASED TO E. H. WHYLER RECORDED OCTOBER 4, 1904 IN BOOK 21 OF DEEDS, PAGE 188 .

7. AN OIL AND GAS LEASE EXECUTED BY WILLIAM HENRY WHYLER, A SINGLE MAN; ELLSWORTH HOWARD WHYLER, A MARRIED MAN DEALING WITH HIS SEPARATE PROPERTY; HAZEL WHYLER, A SINGLE WOMAN AND GLADYS WHYLER, A SINGLE WOMAN AS LESSOR AND SUNRAY OIL CORPORATION AS LESSEE, RECORDED OCTOBER 13, 1953 IN BOOK 300 OFFICIAL RECORDS, PAGE 269.

   THE PRESENT OWNERSHIP OF SAID LEASEHOLD AND OTHER MATTERS AFFECTING THE LEASE ARE NOT SHOWN HEREIN.

8. AN EASEMENT FOR PIPE LINES AND INCIDENTAL PURPOSES CONVEYED TO PACIFIC GAS AND ELECTRIC COMPANY IN THE DOCUMENT RECORDED MARCH 6, 1957 IN BOOK 352 OF OFFICIAL RECORDS, PAGE 45.

9. THE TERMS, CONDITIONS AND PROVISIONS CONTAINED IN THE AGREEMENT BY AND BETWEEN RICHARDS R. WHYLER AND CARRIERE & SONS, A PARTNERSHIP RECORDED DECEMBER 30, 1992 AS INSTRUMENT NO. 92-6989 OF OFFICIAL RECORDS.

10. FARMLAND SECURITY ZONE CONTRACT REPLACING WILLIAMSON ACT CONTRACT, RESOLUTION NO. 2000-144, BY AND BETWEEN CARRIERE & SONS, A PARTNERSHIP AND COUNTY OF GLENN, A POLITICAL SUBDIVISION OF THE STATE OF CALIFORNIA, DATED DECEMBER 5, 2000, RECORDED DECEMBER 12, 2000,GLENN COUNTY RECORDER'S FILE NO. 2000-6569.

11. A DEED OF TRUST TO SECURE AN INDEBTEDNESS IN THE ORIGINAL AMOUNT SHOWN BELOW.

AMOUNT:	$5,000,000.00
DATED:	MAY 10, 2017
TRUSTOR:	CARRIERE LAND, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY AND RICHARD W. CARRIERE AND INGER A. CARRIERE, AS TRUSTEES OF THE RICHARD AND NINA CARRIERE TRUST ESTABLISHED ON MAY 2, 2003
TRUSTEE:	GOLDEN STATE FARM CREDIT, FLCA
BENEFICIARY:	GOLDEN STATE FARM CREDIT, FLCA
RECORDED:	MAY 17, 2017 AS INSTRUMENT NO. 2017-2113 OF OFFICIAL RECORDS

A DOCUMENT DISCLOSING AN ADDITIONAL ADVANCE IN THE AMOUNT OF $500,000.00, RECORDED DECEMBER 16, 2019 AS INSTRUMENT NO. 2019-5069 OF OFFICIAL RECORDS.

A DOCUMENT DISCLOSING AN ADDITIONAL ADVANCE IN THE AMOUNT OF $750,000.00, RECORDED SEPTEMBER 17, 2020 AS INSTRUMENT NO. 2020-3661 OF OFFICIAL RECORDS.

A DOCUMENT DISCLOSING AN ADDITIONAL ADVANCE IN THE AMOUNT OF $1,000,000.00, RECORDED MARCH 29, 2023 AS INSTRUMENT NO. 2023-0864 OF OFFICIAL RECORDS.

12. RIGHTS AND CLAIMS OF PARTIES IN POSSESSION.

13. WATER RIGHTS, CLAIMS OR TITLE TO WATER, WHETHER OR NOT THE MATTERS ARE SHOWN BY THE PUBLIC RECORDS.

14. EVIDENCE MUST BE PROVIDED THAT THERE ARE NO COMMITMENT STATEMENTS IN EFFECT UNDER CIVIL CODE SECTION 850 ET SEQ. WITH RESPECT TO THE PROPERTY.

IN ORDER TO REMOVE THIS STATEMENT, THE LANDOWNER WILL NEED TO PROVIDE US WITH AN AFFIDAVIT STATING THAT THEY ARE NOT AWARE OF ANY RELEASE REPORTS OR COMMITMENT STATEMENTS WHICH HAVE BEEN ISSUED UNDER THIS STATUTE WITH RESPECT TO THE PROPERTY.

15. ANY CLAIM THAT THE TITLE IS SUBJECT TO A TRUST OR LIEN CREATED UNDER THE PERISHABLE AGRICULTURAL COMMODITIES ACT (7 U.S.C. 499A, ET SEQ), THE PACKERS AND STOCKYARDS ACT (7 U.S.C. 181, ET SEQ) OR UNDER SIMILAR FEDERAL OR STATE LAWS.

16. WITH RESPECT TO CARRIERE LAND, LLC, A LIMITED LIABILITY COMPANY:

A. A COPY OF ITS OPERATING AGREEMENT AND ANY AMENDMENTS THERETO;

B. IF IT IS A CALIFORNIA LIMITED LIABILITY COMPANY, THAT A CERTIFIED COPY OF ITS ARTICLES OF ORGANIZATION (LLC-1) AND ANY CERTIFICATE OF CORRECTION (LLC-11), CERTIFICATE OF AMENDMENT (LLC-2), OR RESTATEMENT OF ARTICLES OF ORGANIZATION (LLC-10) BE RECORDED IN THE PUBLIC RECORDS;

C. IF IT IS A FOREIGN LIMITED LIABILITY COMPANY, THAT A CERTIFIED COPY OF ITS APPLICATION FOR REGISTRATION (LLC-5) BE RECORDED IN THE PUBLIC RECORDS;

D. WITH RESPECT TO ANY DEED, DEED OF TRUST, LEASE, SUBORDINATION AGREEMENT OR OTHER DOCUMENT OR INSTRUMENT EXECUTED BY SUCH LIMITED LIABILITY COMPANY AND PRESENTED FOR RECORDATION BY THE COMPANY OR UPON WHICH THE COMPANY IS ASKED TO RELY, THAT SUCH DOCUMENT OR INSTRUMENT BE EXECUTED IN ACCORDANCE WITH ONE OF THE FOLLOWING, AS APPROPRIATE:

(I) IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES THROUGH OFFICERS APPOINTED OR ELECTED PURSUANT TO THE TERMS OF A WRITTEN OPERATING AGREEMENT, SUCH DOCUMENT MUST BE EXECUTED BY AT LEAST TWO DULY ELECTED OR APPOINTED OFFICERS, AS FOLLOWS: THE

CHAIRMAN OF THE BOARD, THE PRESIDENT OR ANY VICE PRESIDENT, AND ANY SECRETARY, ASSISTANT SECRETARY, THE CHIEF FINANCIAL OFFICER OR ANY ASSISTANT TREASURER;

(II) IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES THROUGH A MANAGER OR MANAGERS IDENTIFIED IN THE ARTICLES OF ORGANIZATION AND/OR DULY ELECTED PURSUANT TO THE TERMS OF A WRITTEN OPERATING AGREEMENT, SUCH DOCUMENT MUST BE EXECUTED BY AT LEAST TWO SUCH MANAGERS OR BY ONE MANAGER IF THE LIMITED LIABILITY COMPANY PROPERLY OPERATES WITH THE EXISTENCE OF ONLY ONE MANAGER.

E. OTHER REQUIREMENTS WHICH THE COMPANY MAY IMPOSE FOLLOWING ITS REVIEW OF THE MATERIAL REQUIRED HEREIN AND OTHER INFORMATION WHICH THE COMPANY MAY REQUIRE.

17. THE ATTACHED LEGAL DESCRIPTION IS NOT A LEGAL PARCEL ACCORDING TO THE SUBDIVISION MAP ACT AND CANNOT BE SOLD OR ENCUMBERED AS A FEE ESTATE.

NOTICE

Section 12413.1 of the California Insurance Code, effective January 1, 1990, requires that any title insurance company, underwritten title company, or controlled escrow company handling funds in an escrow or sub-escrow capacity, wait a specified number of days after depositing funds, before recording any documents in connection with the transaction or disbursing funds. This statute allows for funds deposited by wire transfer to be disbursed the same day as deposit. In the case of cashier's checks or certified checks, funds may be disbursed the next day after deposit. In order to avoid unnecessary delays of three to seven days, or more, please use wire transfer, cashier's checks, or certified checks whenever possible.

NOTES:

A. THE INSURANCE CONTEMPLATED BY THIS TRANSACTION SHALL BE ISSUED IN FAVOR OF TBD ITS SUCCESSORS AND/OR ITS ASSIGNS IN THE AMOUNT OF $.00 PURSUANT TO A DEED OF TRUST FROM TBD , AND AN OWNER'S POLICY IN THE AMOUNT OF $.00 PURSUANT TO A DEED EXECUTED BY

B. ACCORDING TO THE PUBLIC RECORDS, THERE HAS BEEN NO CONVEYANCE OF THE LAND WITHIN A PERIOD OF TWENTY-FOUR MONTHS PRIOR TO THE DATE OF THIS REPORT, EXCEPT AS FOLLOWS:

NONE

C. NONE OF THE ITEMS SHOWN IN THIS REPORT WILL CAUSE THE COMPANY TO DECLINE TO ATTACH CLTA ENDORSEMENT FORM 100 TO AN ALTA POLICY, WHEN ISSUED.

D. THE POLICY TO BE ISSUED MAY CONTAIN AN ARBITRATION CLAUSE. WHEN THE AMOUNT OF INSURANCE IS LESS THAN THE CERTAIN DOLLAR AMOUNT SET FORTH IN ANY APPLICABLE ARBITRATION CLAUSE, ALL ARBITRABLE MATTERS SHALL BE ARBITRATED AT THE OPTION OF EITHER THE COMPANY OR THE INSURED AS THE EXCLUSIVE REMEDY OF THE PARTIES. IF YOU DESIRE TO REVIEW THE TERMS OF THE POLICY, INCLUDING ANY ARBITRATION CLAUSE THAT MAY BE INCLUDED, CONTACT THE OFFICE THAT ISSUED THIS COMMITMENT OR REPORT TO OBTAIN A SAMPLE OF THE POLICY JACKET FOR THE POLICY THAT IS TO BE ISSUED IN CONNECTION WITH YOUR TRANSACTION.

LEGAL DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATE LYING IN THE UNINCORPORATED AREA, COUNTY OF GLENN, STATE OF CALIFORNIA, BEING DESCRIBED AS FOLLOWS:

ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE COUNTY OF GLENN, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEING A PORTION OF SECTION 63 AS SHOWN ON THAT CERTAIN MAP ENTITLED "SUBDIVISIONS OF THE GLENN RANCH", GLENN COUNTY, CALIFORNIA, SURVEYED BY H.B. SHACKELFORD, AND ON FILE IN BOOK 1 OF MAPS AND SURVEYS, AT PAGE 110, RECORDS OF SAID COUNTY OF GLENN; ALSO BEING A PORTION OF THE LANDS AS DESCRIBED IN OFFICIAL RECORDS DOCUMENT NO. 2004-7802, MORE PARTICULARLY DESCRIBED AS FOLLOWS, AND ALSO SHOWN ON ATTACHED EXHIBIT "B":

PARCEL ONE (OFFLOADING AND TRANSFER SITE):

COMMENCING AT THE SOUTHEAST CORNER OF LOT 887 OF THE SACRAMENTO VALLEY COMPANY'S SUBDIVISION OF THE JACINTO UNIT, AS SAID SUBDIVISION IS SHOWN ON BOOK 2 OF MAPS AND SURVEYS, PAGE 205, RECORDS OF SAID COUNTY OF GLENN, ALSO BEING A POINT ON THE SOUTH LINE OF SAID SECTION 63, AND AS DESCRIBED IN SAID OFFICIAL RECORDS DOCUMENT NO. 2004-7802, THENCE LEAVING SAID SOUTH LINE OF SECTION 63 AND ALONG THE EAST LINE OF SAID LOT 887, NORTH 00° 11' 00" EAST, 870.00 FEET;

THENCE LEAVING SAID EAST LINE, SOUTH 89° 49' 00" EAST, 5.00 FEET, TO THE TRUE POINT OF BEGINNING;

THENCE NORTH 00° 11' 00" EAST, 300.00 FEET;

THENCE SOUTH 89° 49' 00" EAST, 100.00 FEET;

THENCE SOUTH 00° 11' 00" WEST, 200.00 FEET;

THENCE SOUTH 89° 49' 00" EAST, 100.00 FEET;

THENCE SOUTH 00° 11' 00" WEST, 100.00 FEET, TO A POINT HEREINAFTER REFERRED TO AS "POINT A";

THENCE NORTH 89° 49' 00" WEST, 200.00 FEET, TO THE TRUE POINT OF BEGINNING.

CONTAINING 0.92 ACRES, MORE OR LESS.

PARCEL TWO (SITE ACCESS ROAD):

A STRIP OF LAND FOR INGRESS, EGRESS AND ROAD PURPOSES, BEING 20.00 FEET WIDE, AS MEASURED 20.00 FEET RIGHT OF, PARALLEL WITH AND PERPENDICULAR TO THE FOLLOWING DESCRIBED LINE;

BEGINNING AT THE HEREINABOVE DESCRIBED "POINT A", THENCE NORTH 00° 11' 00" EAST, 189.07 FEET, TO THE BEGINNING OF A CURVE TO THE LEFT;

THENCE ALONG SAID CURVE, HAVING A RADIUS OF 50.00 FEET, THROUGH A CENTRAL ANGLE OF 30° 00' 00", FOR AN ARC LENGTH OF 26.18 FEET TO THE END OF SAID CURVE;

THENCE NORTH 29° 49' 00" WEST, 184.65 FEET, TO THE BEGINNING OF A CURVE TO THE RIGHT;

THENCE ALONG SAID CURVE HAVING A RADIUS OF 70.00 FEET, THROUGH A CENTRAL ANGLE OF 30° 00' 00", FOR AN ARC LENGTH OF 36.65 FEET TO THE END OF SAID CURVE;

THENCE NORTH 00° 11' 00" EAST, 78.84 FEET, TO THE BEGINNING OF A CURVE TO THE LEFT;

THENCE ALONG SAID CURVE HAVING A RADIUS OF 50.00 FEET, THROUGH A CENTRAL ANGLE OF 30° 00' 00", FOR AN ARC LENGTH OF 26.18 FEET TO THE END OF SAID CURVE;

THENCE NORTH 29° 49' 00" WEST, 150.58 FEET, TO THE BEGINNING OF A CURVE TO THE RIGHT;

THENCE ALONG SAID CURVE HAVING A RADIUS OF 70.00 FEET, THROUGH A CENTRAL ANGLE OF 29° 44' 39", FOR AN ARC LENGTH OF 36.34 FEET, TO THE END OF SAID CURVE;

THENCE NORTH 00° 04' 21" WEST, 1025.58 FEET, MORE OR LESS, TO A POINT ON THE SOUTH LINE OF STATE HIGHWAY 162, AS DESCRIBED IN BOOK 376 OFFICIAL RECORDS, PAGE 428, RECORDS OF SAID COUNTY OF GLENN.

SUBJECT TO EASEMENTS OF RECORD.

THE SIDELINE OF SAID EASEMENT IS TO BE LENGTHENED OR SHORTENED, AS NECESSARY, TO BEGIN ON THE EASTERLY PROLONGATION OF THE SOUTH LINE OF PARCEL ONE, DESCRIBED HEREINABOVE, AND TO END ON THE SOUTH LINE OF SAID BOOK 376 OFFICIAL RECORDS, PAGE 428.

EXHIBIT A
LIST OF PRINTED EXCEPTIONS AND EXCLUSIONS (BY POLICY TYPE)

CLTA/ALTA HOMEOWNER'S POLICY OF TITLE INSURANCE (02-03-10)
EXCLUSIONS

In addition to the Exceptions in Schedule B, You are not insured against loss, costs, attorneys' fees, and expenses resulting from:

1. Governmental police power, and the existence or violation of those portions of any law or government regulation concerning:
   (a) building; (b) zoning; (c) land use; (d) improvements on the Land; (e) land division; and (f) environmental protection.
   This Exclusion does not limit the coverage described in Covered Risk 8.a., 14, 15, 16, 18, 19, 20, 23 or 27.
2. The failure of Your existing structures, or any part of them, to be constructed in accordance with applicable building codes. This Exclusion does not limit the coverage described in Covered Risk 14 or 15.
3. The right to take the Land by condemning it. This Exclusion does not limit the coverage described in Covered Risk 17.
4. Risks:
   (a) that are created, allowed, or agreed to by You, whether or not they are recorded in the Public Records;
   (b) that are Known to You at the Policy Date, but not to Us, unless they are recorded in the Public Records at the Policy Date;
   (c) that result in no loss to You; or
   (d) that first occur after the Policy Date - this does not limit the coverage described in Covered Risk 7, 8.e., 25, 26, 27 or 28.
5. Failure to pay value for Your Title.
6. Lack of a right:
   (a) to any land outside the area specifically described and referred to in paragraph 3 of Schedule A; and
   (b) in streets, alleys, or waterways that touch the Land.
   This Exclusion does not limit the coverage described in Covered Risk 11 or 21.
7. The transfer of the Title to You is invalid as a preferential transfer or as a fraudulent transfer or conveyance under federal bankruptcy, state insolvency, or similar creditors' rights laws.

LIMITATIONS ON COVERED RISKS

Your insurance for the following Covered Risks is limited on the Owner's Coverage Statement as follows: For Covered Risk 16, 18, 19, and 21 Your Deductible Amount and Our Maximum Dollar Limit of Liability shown in Schedule A.

	Your Deductible Amount	Our Maximum Dollar Limit of Liability
Covered Risk 16:	1% of Policy Amount or $2,500.00 (whichever is less)	$10,000.00
Covered Risk 18:	1% of Policy Amount or $5,000.00 (whichever is less)	$25,000.00
Covered Risk 19:	1% of Policy Amount or $5,000.00 (whichever is less)	$25,000.00
Covered Risk 21:	1% of Policy Amount or $2,500.00 (whichever is less)	$5,000.00

ALTA RESIDENTIAL TITLE INSURANCE POLICY (6-1-87)
EXCLUSIONS

In addition to the Exceptions in Schedule B, you are not insured against loss, costs, attorneys' fees, and expenses resulting from:

1. Governmental police power, and the existence or violation of any law or government regulation. This includes building and zoning ordinances and also laws and regulations concerning:
   (a) and use
   (b) improvements on the land
   (c) and division
   (d) environmental protection
   This exclusion does not apply to violations or the enforcement of these matters which appear in the public records at Policy Date.
   This exclusion does not limit the zoning coverage described in Items 12 and 13 of Covered Title Risks.
2. The right to take the land by condemning it, unless:
   (a) a notice of exercising the right appears in the public records on the Policy Date
   (b) the taking happened prior to the Policy Date and is binding on you if you bought the land without knowing of the taking
3. Title Risks:
   (a) that are created, allowed, or agreed to by you
   (b) that are known to you, but not to us, on the Policy Date -- unless they appeared in the public records
   (c) that result in no loss to you
   (d) that first affect your title after the Policy Date -- this does not limit the labor and material lien coverage in Item 8 of Covered Title Risks
4. Failure to pay value for your title.
5. Lack of a right:
   (a) to any land outside the area specifically described and referred to in Item 3 of Schedule A OR
   (b) in streets, alleys, or waterways that touch your land
   This exclusion does not limit the access coverage in Item 5 of Covered Title Risks.

2006 ALTA LOAN POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
   (i) the occupancy, use, or enjoyment of the Land;
   (ii) the character, dimensions, or location of any improvement erected on the Land;
   (iii) the subdivision of land; or
   (iv) environmental protection;

   or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
   (b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
   (a) created, suffered, assumed, or agreed to by the Insured Claimant;
   (b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
   (c) resulting in no loss or damage to the Insured Claimant;
   (d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 13, or 14); or
   (e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.
4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law.
6. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
   (a) a fraudulent conveyance or fraudulent transfer, or
   (b) a preferential transfer for any reason not stated in Covered Risk 13(b) of this policy.
7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the Insured Mortgage in the Public Records. This Exclusion does not modify or limit the coverage provided under Covered Risk 11(b).

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) that arise by reason of:

1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

2006 ALTA OWNER'S POLICY (06-17-06)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
   (i) the occupancy, use, or enjoyment of the Land;
   (ii) the character, dimensions, or location of any improvement erected on the Land;
   (iii) the subdivision of land; or
   (iv) environmental protection;

   or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5.
   (b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 6.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters

(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 9 or 10); or
(e) in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Title.

4. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction vesting the Title as shown in Schedule A, is
(a) a fraudulent conveyance or fraudulent transfer, or
(b) a preferential transfer for any reason not stated in Covered Risk 9 of this policy.
5. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching between Date of Policy and the date of recording of the deed or other instrument of transfer in the Public Records that vests Title as shown in Schedule A.

The above policy form may be issued to afford either Standard Coverage or Extended Coverage. In addition to the above Exclusions from Coverage, the Exceptions from Coverage in a Standard Coverage policy will also include the following Exceptions from Coverage:

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) that arise by reason of:
1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the Public Records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

ALTA EXPANDED COVERAGE RESIDENTIAL LOAN POLICY (07-26-10)
EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy, and the Company will not pay loss or damage, costs, attorneys' fees, or expenses that arise by reason of:
1. (a) Any law, ordinance, permit, or governmental regulation (including those relating to building and zoning) restricting, regulating, prohibiting, or relating to
(i) the occupancy, use, or enjoyment of the Land;
(ii) the character, dimensions, or location of any improvement erected on the Land;
(iii) the subdivision of land; or
(iv) environmental protection;
or the effect of any violation of these laws, ordinances, or governmental regulations. This Exclusion 1(a) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
(b) Any governmental police power. This Exclusion 1(b) does not modify or limit the coverage provided under Covered Risk 5, 6, 13(c), 13(d), 14 or 16.
2. Rights of eminent domain. This Exclusion does not modify or limit the coverage provided under Covered Risk 7 or 8.
3. Defects, liens, encumbrances, adverse claims, or other matters
(a) created, suffered, assumed, or agreed to by the Insured Claimant;
(b) not Known to the Company, not recorded in the Public Records at Date of Policy, but Known to the Insured Claimant and not disclosed in writing to the Company by the Insured Claimant prior to the date the Insured Claimant became an Insured under this policy;
(c) resulting in no loss or damage to the Insured Claimant;
(d) attaching or created subsequent to Date of Policy (however, this does not modify or limit the coverage provided under Covered Risk 11, 16, 17, 18, 19, 20, 21, 22, 23, 24, 27 or 28); or
(e) resulting in loss or damage that would not have been sustained if the Insured Claimant had paid value for the Insured Mortgage.
4. Unenforceability of the lien of the Insured Mortgage because of the inability or failure of an Insured to comply with applicable doing-business laws of the state where the Land is situated.
5. Invalidity or unenforceability in whole or in part of the lien of the Insured Mortgage that arises out of the transaction evidenced by the Insured Mortgage and is based upon usury or any consumer credit protection or truth-in-lending law. This Exclusion does not modify or limit the coverage provided in Covered Risk 26.
6. Any claim of invalidity, unenforceability or lack of priority of the lien of the Insured Mortgage as to Advances or modifications made after the Insured has Knowledge that the vestee shown in Schedule A is no longer the owner of the estate or interest covered by this policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11.
7. Any lien on the Title for real estate taxes or assessments imposed by governmental authority and created or attaching subsequent to Date of Policy. This Exclusion does not modify or limit the coverage provided in Covered Risk 11(b) or 25.
8. The failure of the residential structure, or any portion of it, to have been constructed before, on or after Date of Policy in accordance with applicable building codes. This Exclusion does not modify or limit the coverage provided in Covered Risk 5 or 6.

9. Any claim, by reason of the operation of federal bankruptcy, state insolvency, or similar creditors' rights laws, that the transaction creating the lien of the Insured Mortgage, is
   (a) a fraudulent conveyance or fraudulent transfer, or
   (b) a preferential transfer for any reason not stated in Covered Risk 27(b) of this policy.

CALIFORNIA LAND TITLE ASSOCIATION STANDARD COVERAGE POLICY – 1990
SCHEDULE B

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage (and the Company will not pay costs, attorneys' fees or expenses) which arise by reason of:
1. Taxes or assessments which are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the public records. Proceedings by a public agency which may result in taxes or assessments, or notice of such proceedings, whether or not shown by the records of such agency or by the public records.
2. Any facts, rights, interest, or claims which are not shown by the public records but which could be ascertained by an inspection of the land or which may be asserted by persons in possession thereof.
3. Easements, liens or encumbrances, or claims thereof, which are not shown by the public records.
4. Discrepancies, conflicts in boundary lines, shortage in area, encroachments, or any other facts which a correct survey would disclose, and which are not shown by the public records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b), or (c) are shown by the public records.
6. Any lien or right to a lien for services, labor or material not shown by the public records.

EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy and the Company will not pay loss or damage, costs, attorneys' fees or expenses which arise by reason of:
1. (a) Any law, ordinance or governmental regulation (including but not limited to building and zoning laws, ordinances, or regulations) restricting, regulating, prohibiting or relating to (i) the occupancy, use, or enjoyment of the land; (ii) the character, dimensions or location of any improvement now or hereafter erected on the land; (iii) a separation in ownership or change in the dimensions or area of the land or any parcel of which the land is or was a part; or (iv) environmental protection, or the effect of any violation of these laws, ordinances or governmental regulations, except to the extent that a notice of the enforcement thereof or a notice of a defect, lien or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
   (b) Any governmental police power not excluded by (a) above, except to the extent that a notice of the exercise thereof or a notice of a defect, lien or encumbrance resulting from a violation or alleged violation affecting the land has been recorded in the public records at Date of Policy.
2. Rights of eminent domain unless notice of the exercise thereof has been recorded in the public records at Date of Policy, but not excluding from coverage any taking which has occurred prior to Date of Policy which would be binding on the rights of a purchaser for value without knowledge.
3. Defects, liens, encumbrances, adverse claims or other matters:
   (a) whether or not recorded in public records at Date of Policy, but created, suffered, assumed or agreed to by the insured claimant;
   (b) not known to the Company, not recorded in public records at Date of Policy, but known to the insured claimant and not disclosed in writing to the Company by the insured claimant prior to the date the insured claimant became an insured under this policy;
   (c) resulting in no loss or damage to the insured claimant;
   (d) attaching or created subsequent to Date of Policy; or
   (e) resulting in loss or damage which would not have been sustained if the insured claimant had paid value for the insured mortgage or for the estate or interest insured by this policy.
4. Unenforceability of the lien of the insured mortgage because of the inability or failure of the insured at Date of Policy, or the inability or failure of any subsequent owner of the indebtedness, to comply with applicable "doing business" laws of the state in which the land is situated.
5. Invalidity or unenforceability of the lien of the insured mortgage, or claim thereof, which arises out of the transaction evidenced by the insured mortgage and is based upon usury or any consumer credit protection or truth in lending law.
6. Any claim which arises out of the transaction vesting in the insured the estate or interest insured by their policy or the transaction creating the interest of the insured lender, by reason of the operation of federal bankruptcy, state of insolvency or similar creditors' rights laws.

PRIVACY INFORMATION

We Are Committed to Safeguarding Customer Information
In order to better serve your needs now an in the future, we may ask you to provide us with certain information. We understand that you may be concerned about what we will do with such information. We agree that you have right to know how we will utilize the personal information you provide to us. Therefore, together with our subsidiaries we have adopted this Privacy Policy to govern the use and handling of your personal information.

Applicability
This Privacy Policy governs our use of the information that you provide to us. It does not govern the manner in which we may use information we have obtained from any other sources, such as information obtained from a public record or from another person or entity. First American has also adopted broader guidelines that govern our use of personal information regardless of its source. First American calls these guidelines its Fair Information Values.

Types of Information
Depending upon which of our services you are utilizing, the types of nonpublic personal information that we may collect include:

- Information we receive from you on applications, forms and in other communications to us, whether in writing, in person, by telephone or any other means;
- Information about your transactions with us, our affiliated companies, or others; and
- Information we receive from a consumer reporting agency.

Use of Information
We request information from you for our own legitimate business purposes and not for the benefit of any nonaffiliated party. Therefore, we will not release your information to nonaffiliated parties except: (1) as necessary for us to provide the product or service you have requested of us; or (2) as permitted by law. We may, however, store such information indefinitely, including the period after which any customer relationship has ceased. Such information may be used for any internal purpose, such as quality control efforts or customer analysis. We may also provide all of the types of nonpublic personal information listed above to one or more of our affiliated companies. Such affiliated companies include financial service providers, such as title insurers, property and casualty insurers, and trust and investment advisory companies, or companies involved in real estate services, such as appraisal companies, home warranty companies and escrow companies. Furthermore, we may also provide all the information we collect, as described above, to companies that perform marketing services on our behalf, on behalf of our affiliated companies or to other financial institutions with whom we or our affiliated companies have joint marketing agreements.

Former Customers
Even if you are no longer our customer, our Privacy Policy will continue to apply to you.

Confidentiality and Security
We will use our best efforts to ensure that no unauthorized parties have access to any of our information. We restrict access to nonpublic personal information about you to those individuals and entitles who need to know that information to provide products or services to you. We will use our best efforts to train and oversee our employees and agents to ensure that your information will be handled responsibly and in accordance with this Privacy Policy and First American's Fair Information Values. We currently maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

Information Obtained Through Our Web Site

Business Relationships
First American Financial Corporation's site and it's affiliates' sites may contain links to other Web sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites.

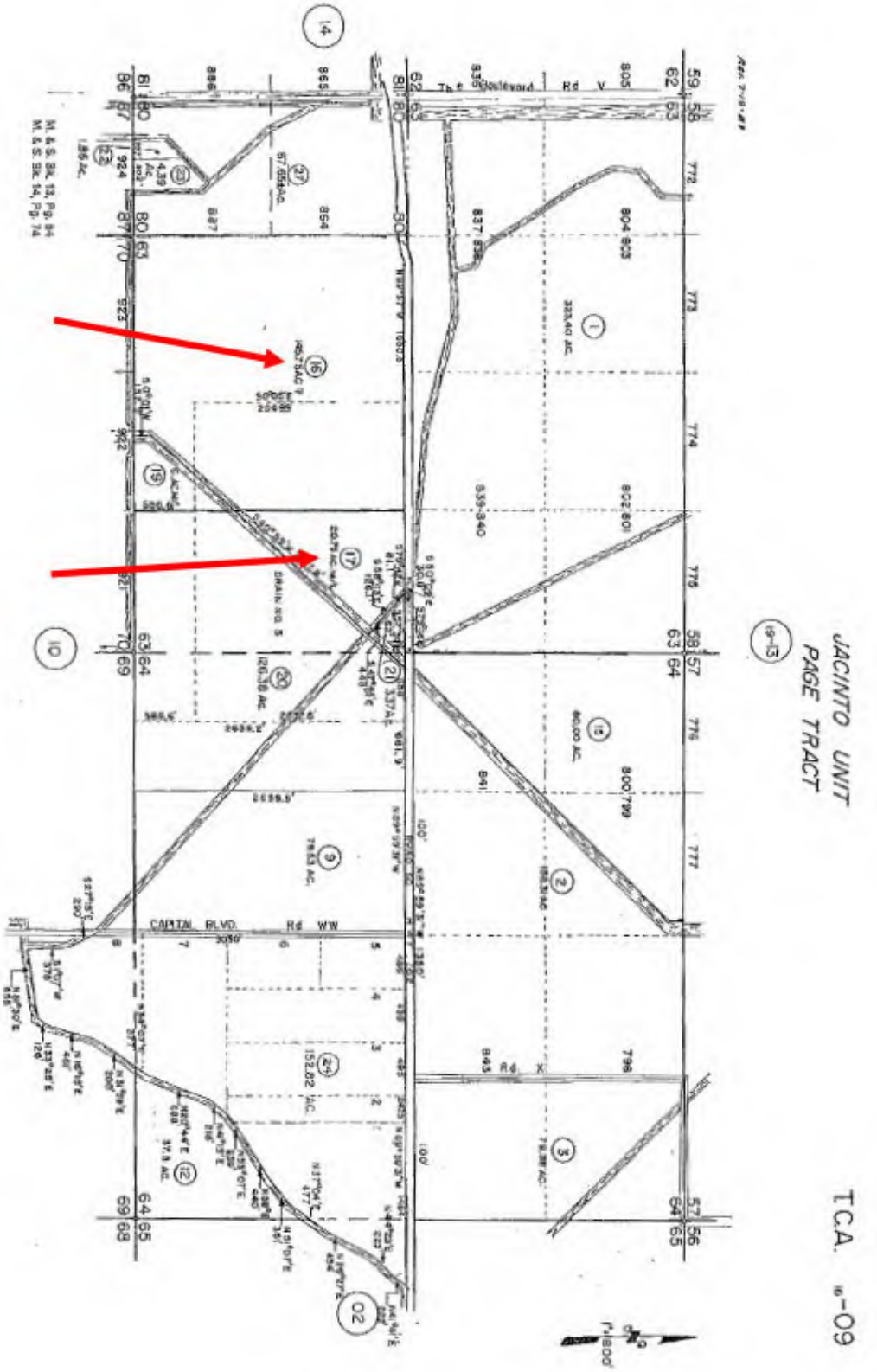
Cookies
Some of First American's Web site may make use of "cookie" technology to measure site activity and to customize information to your personal tastes. A cookie is an element of data that a Web site can send to your browser, which may then store the cookie on your hard drive. FirstAm.com uses stored cookies. The goal of this technology is to better serve you when visiting our site, save you time when you are here and to provide you with a more meaningful and productive Web site experience.

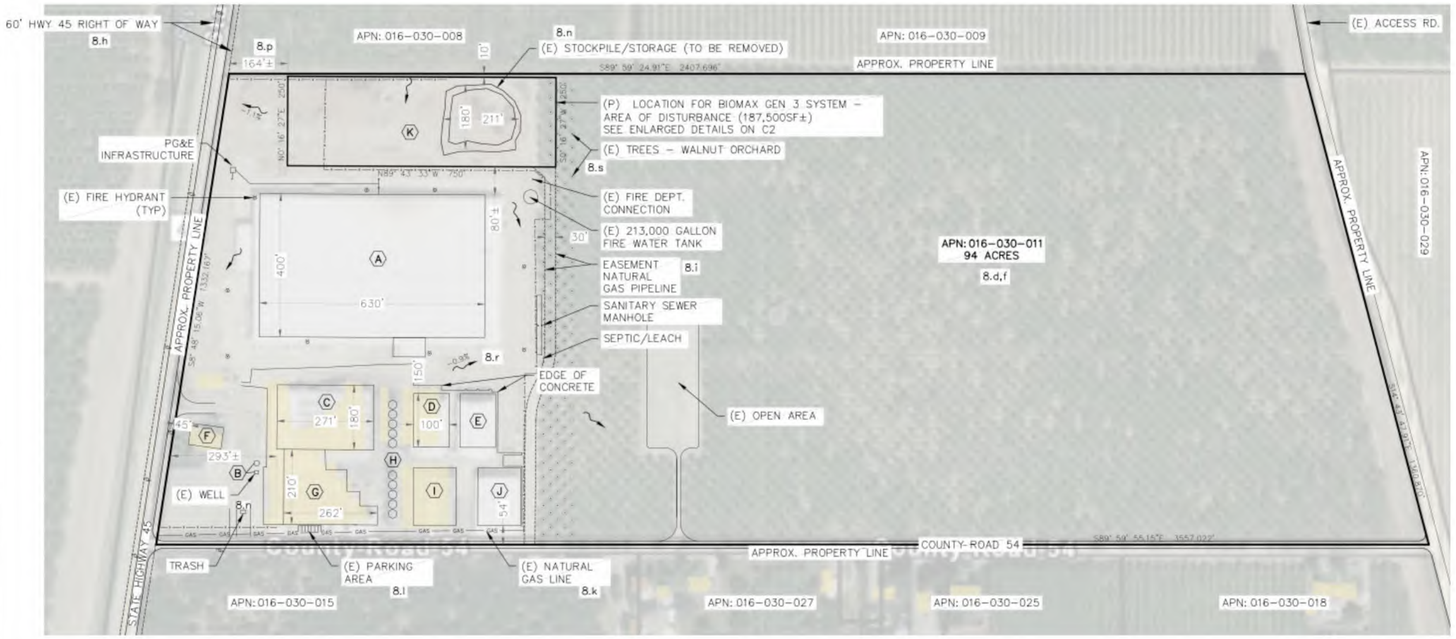
Fair Information Values
Fairness We consider consumer expectations about their privacy in all our businesses. We only offer products and services that assure a favorable balance between consumer benefits and consumer privacy.
Public Record We believe that an open public record creates significant value for society, enhances consumer choice and creates consumer opportunity. We actively support an open public record and emphasize its importance and contribution to our economy.
Use We believe we should behave responsibly when we use information about a consumer in our business. We will obey the laws governing the collection, use and dissemination of data.
Accuracy We will take reasonable steps to help assure the accuracy of the data we collect, use and disseminate. Where possible, we will take reasonable steps to correct inaccurate information. When, as with the public record, we cannot correct inaccurate information, we will take all reasonable steps to assist consumers in identifying the source of the erroneous data so that the consumer can secure the required corrections.

Education We endeavor to educate the users of our products and services, our employees and others in our industry about the importance of consumer privacy. We will instruct our employees on our fair information values and on the responsible collection and use of data. We will encourage others in our industry to collect and use information in a responsible manner.
Security We will maintain appropriate facilities and systems to protect against unauthorized access to and corruption of the data we maintain.

The map attached, if any, may or may not be a survey of the land depicted hereon. Timios Title and it's Underwriters expressly disclaims any liability for loss or damage which may result from reliance on this map except to the extent coverage for such loss or damage is expressly provided by the terms and provisions of the title insurance policy, if any, to which this map is attached.

MAP



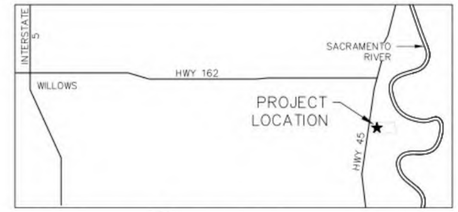


SITE PLAN

GRAPHIC SCALE

200 0 100 60

(IN FEET)
1 inch = 200 ft.



8.t VICINITY MAP
NO SCALE

CONDITIONAL USE PERMIT APPLICATION CHECKLIST - SITE PLAN

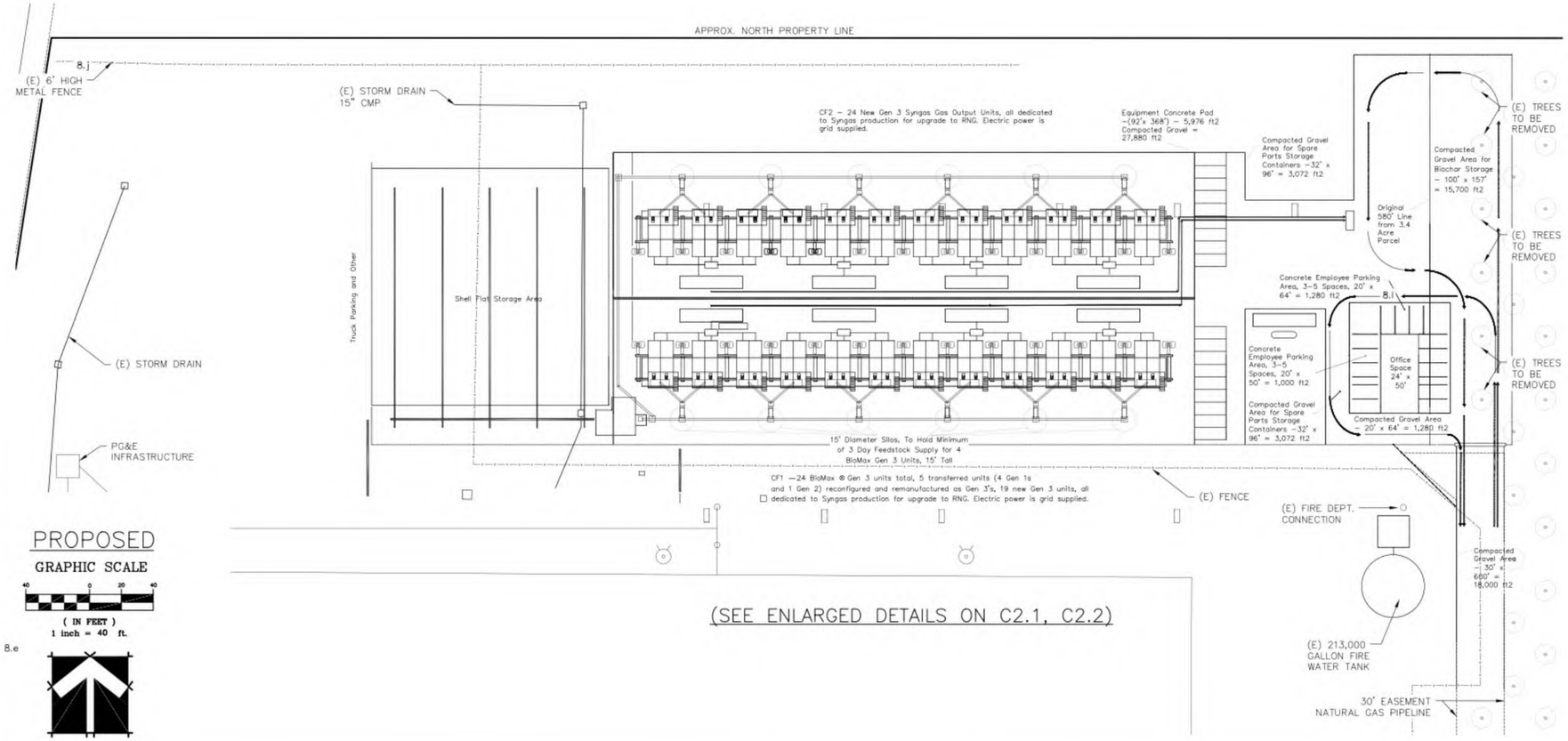
- 8.a ☐ APPLICANT-NAME, PHONE, ETC.
- 8.b ☐ OWNER-NAME, PHONE, ETC.
- 8.c ☐ ENGINEER-NAME, PHONE, ETC.
- 8.d ☐ GLENN COUNTY APN'S
- 8.e ☐ NORTH ARROW, SCALE, ETC.
- 8.f ☐ PROP. DIMENSIONS/ACREAGE
- 8.g ☐ (E)/(P) BUILDINGS DIMS., ETC.
- 8.h ☐ LOCATION OF ROADS/RIGHT OF WAYS
- 8.i ☐ LOCATION OF EASEMENTS
- 8.j ☐ (E)/(P) WALLS, FENCES, ETC.
- 8.k ☐ (E)/(P) UTILITIES, WELLS, ETC.
- 8.l ☐ (E)/(P) PARKING, ETC.
- 8.m ☐ N/A - PROPOSED SIGNAGE
- 8.n ☐ OUTDOOR STORAGE/TRASH ENCLOSURES
- 8.o ☐ LANDSCAPING (SEE L SHEETS)
- 8.p ☐ N/A - ADJACENT LAND USE/DISTANCES
- 8.q ☐ N/A - HAZMAT/CHEMICAL STORAGE
- 8.r ☐ DRAINAGE ARROWS/SLOPE %
- 8.s ☐ WATERCOURSES, RESERVOIRS, ETC.
- 8.t ☐ VICINITY MAP
- 8.u ☐ N/A - OTHER INFO

8.a,b,d

CARRIERE LAND, LLC
1640 STATE HIGHWAY 45
GLENN, CA 95943
APN: 016-030-011

LEGEND:

- 1530 CONTOUR ELEVATION
- FENCE
- ASPHALT
- GRAVEL
- EARTH
- (E) POWER POLE
- (E) HYDRANT
- DRAINAGE DIRECTION
- APN ASSESSOR'S PARCEL NUMBER
- APPROX. APPROXIMATELY
- DWY DRIVEWAY
- (E) EXISTING
- (P) PROPOSED
- RD ROAD
- SF SQUARE FEET
- (A) (E) PROCESSING WAREHOUSE/BULK STORAGE
- (B) (E) WELL/TANK
- (C) (E) DRY WAREHOUSE
- (D) (E) BULK STORAGE
- (E) (E) BULK STORAGE
- (F) (E) OFFICE
- (G) (E) DRY WAREHOUSE
- (H) (E) SILO STORAGE
- (I) (E) PROCESSING WAREHOUSE
- (J) (E) DRY STORAGE
- (K) (P) LOCATION FOR BIOMAX GEN 3 SYSTEM - AREA OF DISTURBANCE (187,500SF±) SEE ENLARGED DETAILS ON C2



(SEE ENLARGED DETAILS ON C2.1, C2.2)

PROPOSED

GRAPHIC SCALE

40 0 20 40

(IN FEET)
1 inch = 40 ft.

8.e

CUT / FILL (CU. YD.)		
CUT	FILL	NET
80	80	0

ELEVATION DATUM

ELEVATIONS SHOWN ARE IN THE NGVD 1929 DATUM BASE FLOOD ELEVATION FOR THIS SITE IS 90.0' NGVD 1929

ENGINEER'S CERTIFICATION:

THIS PLAN WILL NOT IMPOSE A DRAINAGE, GRADING OR FLOODING HAZARD TO ITSELF AND SURROUNDING PROPERTIES.

JASON B. VINE, P.E. LICENSE NO: C67800 — DATE EXPIRATION DATE: 06-30-25

PLANS REVIEWED OR APPROVED BY:

GLENN COUNTY ENGINEER

Revisions:

REALM ENGINEERING
CIVIL ENGINEERING, SURVEYING & PLANNING
1767 MARKET STREET SUITE c
REDDING, CA. 96001
530-526-7493

8.c

PLANS PREPARED UNDER THE SUPERVISION OF:

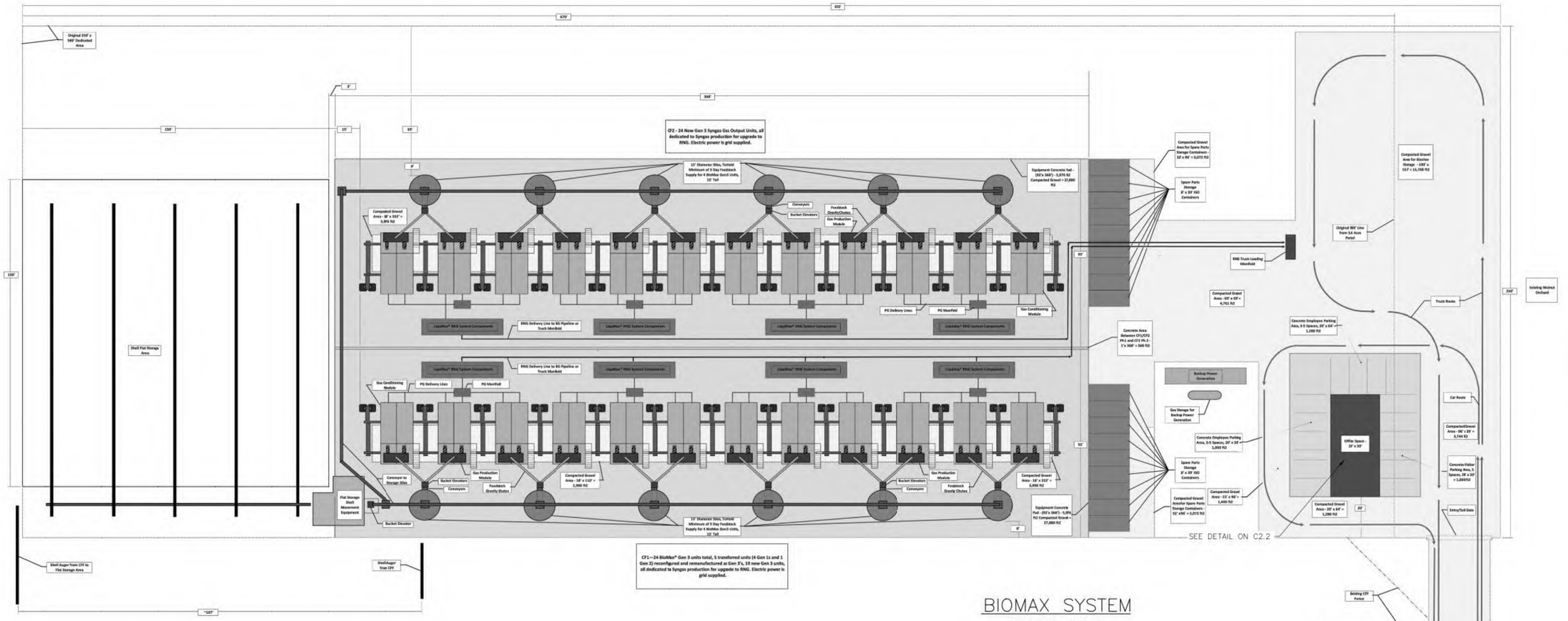
REGISTERED PROFESSIONAL ENGINEER JASON B. VINE No. 67800 Exp. 6/30/25 CIVIL STATE OF CALIFORNIA

CONDITIONAL USE PERMIT SITE PLAN

8.a,b,d

CARRIERE LAND, LLC.
1640 STATE HIGHWAY 45
GLENN, CA 95943-9649
(559) 217-8335
GLENN COUNTY APN: 016-030-011

PLOTTED BY:
DATE PLOTTED: 10/09/24 — 8.c
SCALE OF DRAWING: SEE PLAN
JOB NUMBER:
CADD FILE:
SHEET: C1

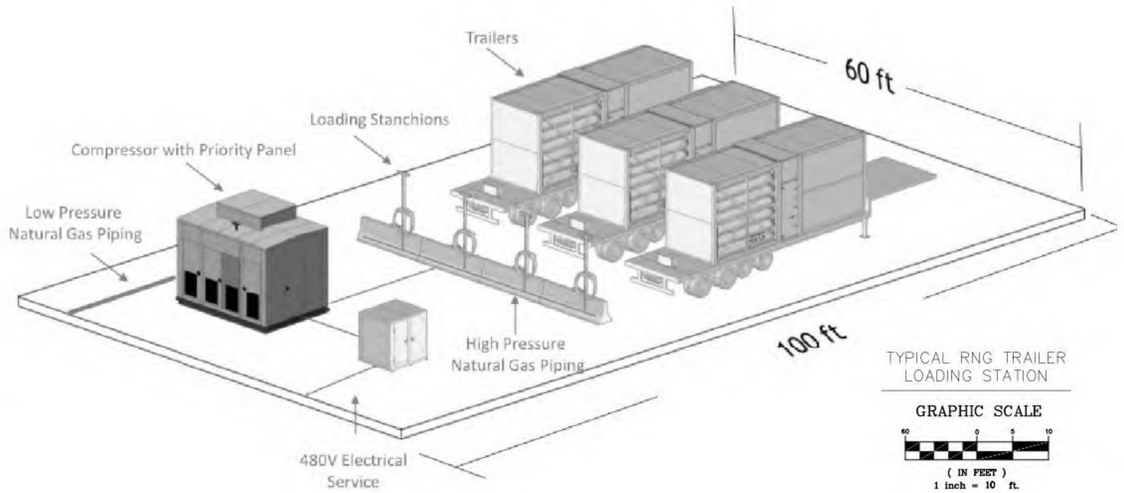


BIOMAX SYSTEM

GRAPHIC SCALE

25 0 12.5 25

(IN FEET)
1 inch = 25 ft.

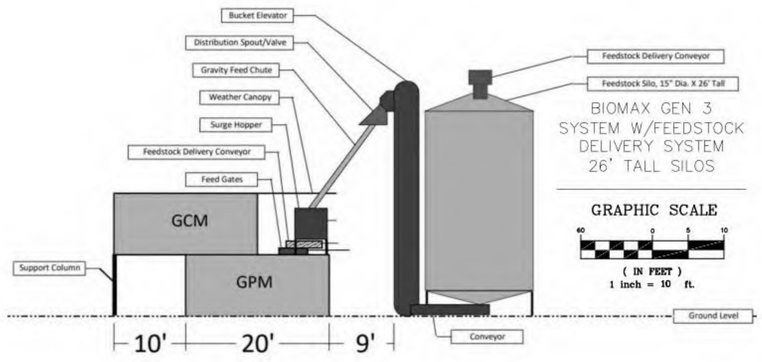


TYPICAL RNG TRAILER LOADING STATION

GRAPHIC SCALE

60 0 5 10

(IN FEET)
1 inch = 10 ft.



BIOMAX GEN 3 SYSTEM W/FEEDSTOCK DELIVERY SYSTEM 26' TALL SILOS

GRAPHIC SCALE

60 0 5 10

(IN FEET)
1 inch = 10 ft.

Revisions:

REALM ENGINEERING
CIVIL ENGINEERING, SURVEYING & PLANNING
1767 MARKET STREET SUITE c
REDDING, CA. 96001
530-526-7493

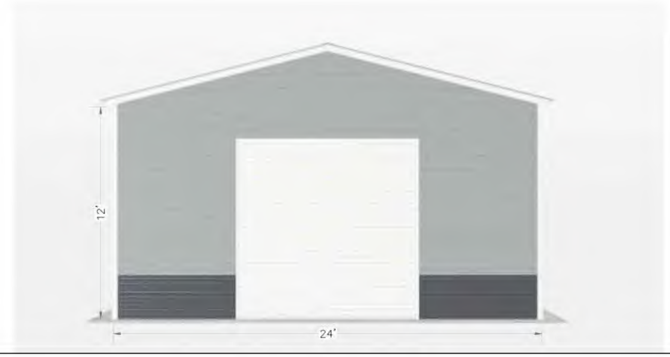
PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER
JASON B. VINE
No. 67800
Exp. 6/30/25
CIVIL
STATE OF CALIFORNIA

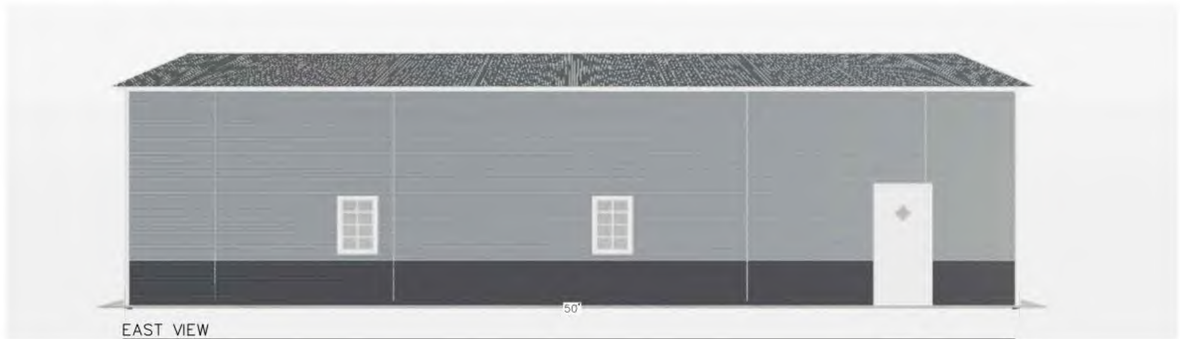
CONDITIONAL USE PERMIT SITE PLAN - DETAILS

CARRIERE LAND, LLC.
1640 STATE HIGHWAY 45
GLENN, CA 95943-9649
(559) 217-8335
GLENN COUNTY APN: 016-030-011

PLOTTED BY: ---
DATE PLOTTED: 10/09/24
SCALE OF DRAWING: SEE PLAN
JOB NUMBER:
CADD FILE:
SHEET: C2.1



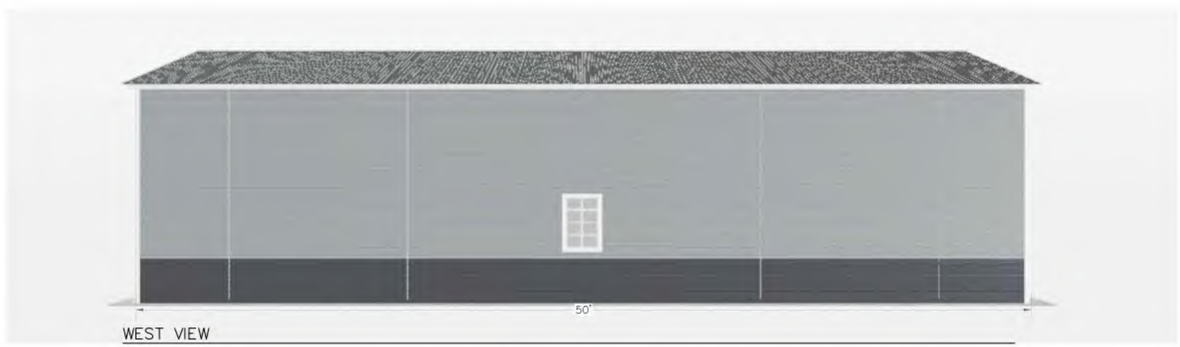
SOUTH VIEW



EAST VIEW



NORTH VIEW



WEST VIEW

STRUCTURE DETAILS

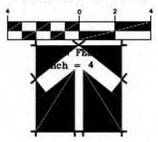
SIZE: 24'X50'
INSTALLATION SURFACE: CONCRETE
ROOF: ZINC GREY
TRIM COLORS: BRIGHT WHITE
SIDING: PEWTER GRAY
GABLE ENDS WAINSCOT: ZINC GREY
SIDE WALLS WAINSCOT: ZINC GREY
ROOF STYLE: A-FRAME VERTICAL
ROOF PITCH: 3/12
TRUSSES: STANDARD
LEG STYLE: STANDARD
GAUGE: 14-GAUGE FRAMING
LEG HEIGHT: 12'
LEFT SIDE: FULLY ENCLOSED
LEFT SIDE SIDING: HORIZONTAL
RIGHT SIDE: FULLY ENCLOSED
RIGHT SIDE SIDING: HORIZONTAL
FRONT END: FULLY ENCLOSED
FRONT END SIDING: HORIZONTAL
BACK END: FULLY ENCLOSED
BACK END SIDING: HORIZONTAL
ANCHOR PACKAGE: CONCRETE ANCHORS
ROLL DOORS & RAMPS
10' X 10' ROLLUP DOOR

DOORS & RAMPS

WALK-IN DOOR W/ WINDOW (36" X 80")
WINDOWS & ACCESSORIES
24W X 36H WINDOW
24W X 36H WINDOW
24W X 36H WINDOW
24W X 36H WINDOW

24'x50' METAL BUILDING OFFICE SPACE

GRAPHIC SCALE



Revisions:

REALM ENGINEERING
CIVIL ENGINEERING, SURVEYING & PLANNING
1767 MARKET STREET SUITE c
REDDING, CA. 96001
530-526-7493

PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER
JASON B. VINE
No. 67800
Exp. 6/30/25
CIVIL
STATE OF CALIFORNIA

CONDITIONAL USE PERMIT SITE PLAN - DETAILS

CARRIERE LAND, LLC.
1640 STATE HIGHWAY 45
GLENN, CA 95943-9649
(559) 217-8335
GLENN COUNTY APN: 016-030-011

PLOTTED BY: ---
DATE PLOTTED: 10/09/24
SCALE OF DRAWING: SEE PLAN
JOB NUMBER:
CADD FILE:
SHEET: C2.2

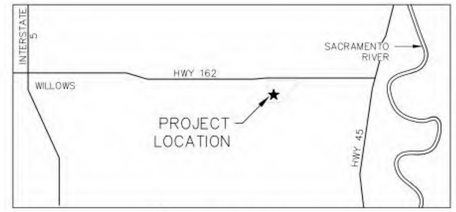


SITE PLAN

GRAPHIC SCALE

200 0 100 200

(IN FEET)
1 inch = 200 ft.



8.t VICINITY MAP
NO SCALE

8.a,b,d

CARRIERE LAND, LLC
7693 HIGHWAY 162
WILLOWS, CA 95988
APNS: 016-090-016, 016-090-017

LEGEND:

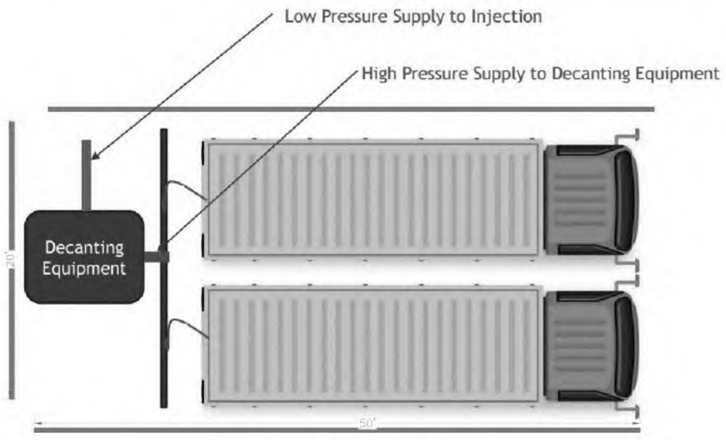
1530	CONTOUR ELEVATION
	FENCE
	ASPHALT
	GRAVEL
	EARTH
	(E) POWER POLE
APN	ASSESSOR'S PARCEL NUMBER
APPROX	APPROXIMATELY
DWY	DRIVEWAY
(E)	EXISTING
(P)	PROPOSED
RD	ROAD
SF	SQUARE FEET

(A) (E) HULLER
(B) (E) DRYER
(C) (E) VAULT/GAS REGULATOR
(D) (E) BOLLARDS/GAS VALVES
(E) (E) 12" LID GAS VALVE
(F) (E) GAS LINE MARKERS
(G) (P) LOCATION FOR PG&E, CNS TRANSFER STATION
(H) (P) LOCATION FOR SYNTECH SITE
(I) (E) DOMESTIC WELL (220GPM)
(J) (E) AG WELL (1600GPM)

CONDITIONAL USE PERMIT APPLICATION CHECKLIST – SITE PLAN

8.a	☐	APPLICANT–NAME, PHONE, ETC.
8.b	☐	OWNER–NAME, PHONE, ETC.
8.c	☐	ENGINEER–NAME, PHONE, ETC.
8.d	☐	GLENN COUNTY APN'S
8.e	☐	NORTH ARROW, SCALE, ETC.
8.f	☐	PROP. DIMENSIONS/ACREAGE
8.g	☐	(E)/(P) BUILDINGS DIMS., ETC.
8.h	☐	LOCATION OF ROADS/RIGHT OF WAYS
8.i	☐	LOCATION OF EASEMENTS
8.j	☐	N/A – (E)/(P) WALLS, FENCES, ETC.
8.k	☐	(E)/(P) UTILITIES, WELLS, ETC.
8.l	☐	(E)/(P) PARKING, ETC.
8.m	☐	N/A – PROPOSED SIGNAGE
8.n	☐	OUTDOOR STORAGE/TRASH ENCLOSURES
8.o	☐	LANDSCAPING (SEE L SHEETS)
8.p	☐	N/A – ADJACENT LAND USE/DISTANCES
8.q	☐	N/A – HAZMAT/CHEMICAL STORAGE
8.r	☐	DRAINAGE ARROWS/SLOPE %
8.s	☐	WATERCOURSES, RESERVOIRS, ETC.
8.t	☐	VICINITY MAP
8.u	☐	N/A – OTHER INFO

8.e



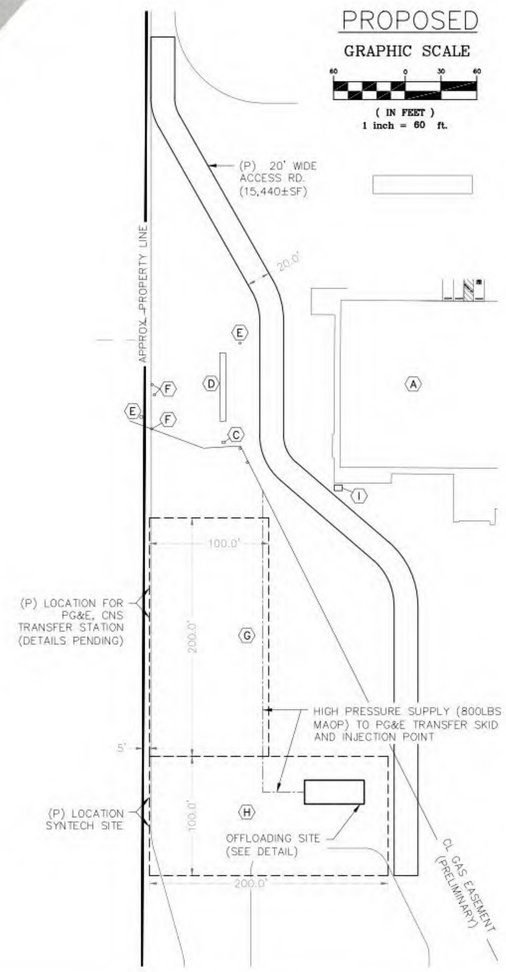
OFFLOADING SITE
NOT TO SCALE

PROPOSED

GRAPHIC SCALE

60 0 30 60

(IN FEET)
1 inch = 60 ft.



CUT / FILL (CU. YD.)

CUT	FILL	NET
80	80	0

ELEVATION DATUM

ELEVATIONS SHOWN ARE IN THE NGVD 1929 DATUM BASE FLOOD ELEVATION FOR THIS SITE IS 90.0' NGVD 1929

ENGINEER'S CERTIFICATION:

THIS PLAN WILL NOT IMPOSE A DRAINAGE, GRADING OR FLOODING HAZARD TO ITSELF AND SURROUNDING PROPERTIES.

JASON B. VINE, P.E.
LICENSE NO: C67800

DATE
EXPIRATION DATE: 06-30-25

PLANS REVIEWED OR APPROVED BY:

GLENN COUNTY ENGINEER

Revisions:

REALM ENGINEERING
CIVIL ENGINEERING, SURVEYING & PLANNING
1767 MARKET STREET SUITE c
REDDING, CA. 96001
530-526-7493

8.c

PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER JASON B. VINE No. 67800 Exp. 6/30/25 CIVIL STATE OF CALIFORNIA

CONDITIONAL USE PERMIT SITE PLAN

8.a,b,d

CARRIERE LAND, LLC.
7693 HIGHWAY 162
WILLOWS, CA 95988
(559) 217-8335
SUTTER COUNTY APN: 016-090-016, 016-090-017

PLOTTED BY: ---
DATE PLOTTED: 10/09/24 8.c
SCALE OF DRAWING: SEE PLAN
JOB NUMBER:
CADD FILE:
SHEET: C1

GLENN COUNTY
Planning & Community Development Services Agency

225 N. Tehama Street
Willows, CA 95988
530.934.6540 Fax 530.934.6533
www.countyofglenn.net

Mardy Thomas, Director

Wayne McFarland
1625 Broadway Street
Suite 119
Fresno, CA 93721

wmcf@syntechbioenergy.com
(815) 513-3363

RE: Conditional Use Permit 2024-004,
Carriere/Syntech CF1, LLC Advanced Thermal Conversion
SCH#: 2024120076

December 20, 2024

To Applicant,

This letter is to provide (attached) agency comments received to date as a result of the Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion Request for Review / Early Consultation process. It should be noted that the comments received to date are the preliminary comments and additional comments may be received during further required review processes.

Transportation:
Caltrans has commented that a Traffic Impact Study (TIS) among other times includes information regarding anticipated project trip generations, trip distributions, and anticipated queuing. This project analysis will also require review/environmental analysis regarding vehicle miles traveled, vehicle routes, Green House Gas Emissions, and the existing/proposed route conditions.

Therefore, in order to support the environmental review data of possible impacts from the project traffic on the road system, the applicant shall submit a completed Traffic Impact Study/Analysis conducted by a professional transportation consulting firm. The Traffic Impact Study/Analysis shall also include, but not limited to, all items as noted in the Caltrans comment letter(s) as well as, recommended Conditions of Approval and/or Mitigation Measures to offset plausible traffic and road impacts.

Water Quality/Onsite Septic Capacity:
The total water usage/wastewater volumes are not specifically addressed in the application documents. This is not being required at this time; however, it is yet to be determined if the property can support the proposed number of persons and ancillary wastewater uses. The Glenn County the Environmental Health Department (EHD) has

commented that, existing onsite wastewater treatment systems (OWTS) shall be expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the EHD.

Water Supply:
Onsite ground water wells used to supply water to the proposed facility, construction workers, and operation employees shall be permitted and regulated by the Glenn County EHD and/or the State Water Resource Control Board (SWRCB), Division of Drinking Water. Although comments from the State Water Resources Control Board have yet to be received; based on the projected persons at the location, this facility may be classified as a Public Water System, and may be required to obtain a drinking water permit from the State Water Resources Control Board, Division of Drinking Water. It is recommended that the applicant contact Glenn County EHD and the following for additional information:

District 21 - Reese Crenshaw, 364 Knollcrest Dr., Ste 101 Redding CA, 96002 (530) 224-4800

Solid Waste Permit:
The proposed Advanced Thermal Conversion project shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.

Air Pollution Control
The facility will be required to modify the existing District Permit to Operate. The first step in this process is to complete and submit an Authorization to Construct (ATC) application prior to construction. The application is available at www.countyofglenn.net/APCD . All new sources of air pollution and the air pollution control equipment including emissions estimates should be included in the ATC application.

Gas and Electric Transmission and Distribution
The PG&E preliminary review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights. With that stated the PG&E correspondence(s) include numerous items that should be fully reviewed and may require addressing.

Noise:
The Glenn County General Plan Noise Element provides a basis for local policies to control and abate environmental noise, and to protect the citizens of Glenn County from excessive noise exposure by enforcing its Noise Ordinance (County Code Chapter 15.56.100). The application states the site will have compressors and auger motors that will not exceed the existing noise and vibration already on-site. The provided information does not analyze noise levels created due to proposed operations. For example, decibels anticipated at the property lines. The project is required to comply with the Glenn County Noise Code(s).

Public Services:
The project analysis is to include review of impacts associated with public services and facilities in order to maintain acceptable service ratios, response times or other performance objectives including but not limited to police and fire protection. Further

information/analysis is required to in order to determine if the proposal could include or require the installation or maintenance of associated infrastructure such as fuel breaks, emergency water sources, power lines or other utilities; including if the proposal and safety measures reflect the capacity of the local fire protection district to respond to an incident which may entail specific equipment and/or training.

Agricultural Statement of Acknowledgment:
The applicant/landowner is notified of Glenn County Code 15.58 Right to Farm and Section 15.58.030 which requires the Agricultural Statement of Acknowledgment to be recorded. A signed, notarized, and recorded copy of the Agricultural Statement of Acknowledgment is being requested to be included with the Conditional Use Permit application.

Written Notice:
Limited additional progress can be taken on the project analysis regarding the particular items listed until responses from the applicant are received. More specifically, a completed Traffic Impact Study/Analysis conducted by a professional Transportation Consulting firm is submitted, and the items are addressed/responded to. In order to continue the Conditional Use Permit process, please provide all the agencies requested and required information to the Glenn County Planning Division in a timely manner.

If you have any questions, please contact the Glenn County Planning & Community Development Services Agency at (530) 934-6540 to discuss actions towards completing the application requirements.

Sincerely,

Andy Popper,
Principal Planner
apopper@countyofglenn.net

Ec:
Wayne McFarland wmcf@syntechbioenergy.com;
Jim Quan jquan@syntheches.com
Bill Carriere wcarriere@carrierefarms.com

planning@countyofglenn.net ; MSkelton@countyofglenn.net; KBackus@countyofglenn.net; MBiggs@countyofglenn.net; LNiehues@countyofglenn.net; publicworks@countyofglenn.net; gcsoadmin@countyofglenn.net; TRichardson@countyofglenn.net; gcbuilding@countyofglenn.net; acordova@countyofglenn.net; steve.u.chung@navy.mil; PGEPlanReview@pge.com; THPO@paskenta.org; lbill@paskenta.org; greg@glenncountyrcd.org; Jerred.Ferguson@Waterboards.ca.gov; dramirez@mechoopda-nsn.gov; environmental@countyofglenn.net; andrew.dove@waterboards.ca.gov; dlrp@conservation.ca.gov; R2CEQA@wildlife.ca.gov; joe.monson@cdfa.ca.gov; CalfireTGUFireMarshal@fire.ca.gov; D3.local.development@dot.ca.gov; notifydwr@water.ca.gov; Nevin.Yeates@CalRecycle.ca.gov; John.Loane@CalRecycle.ca.gov; cicc@colusa-nsn.gov; Charlene.Wardlow@conservation.ca.gov; jeff.lindberg@arb.ca.gov; Joseph.Hunt@dtsc.ca.gov; matthew.lima@glenncodorafire.com; admin@glenncodorafire.com; randjhansen@pulsarco.com; angelina.healy@dot.ca.gov; Dhatt, Satwinder K@DOT

satwinder.dhatt@dot.ca.gov; gary.arnold@dot.ca.gov; Fong, Alexander Y@DOT <alexander.fong@dot.ca.gov>

Andy Popper

From: Hosea, Robert@Wildlife <Robert.Hosea@Wildlife.ca.gov>
Sent: Monday, December 9, 2024 7:57 AM
To: Andy Popper
Cc: Wildlife R2 CEQA
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

You don't often get email from robert.hosea@wildlife.ca.gov. Learn why this is important

Mr. Popper-
The California Department of Fish and Wildlife has reviewed the proposed project subject to Conditional Use Permit 2024-004 and has no comments at this time. Please keep Mr. Robert Hosea informed if there are changes or expansion plans made to the proposed project. Thank you for the opportunity to review and comment on the proposed project.
-Robert (Bob) Hosea, Environmental Scientist
North Central Region. Habitat Conservation Program
California Department of Fish and Wildlife
(530) 708-1199

Andy Popper

From: CALFIRE TGU Tehama Glenn Fire Marshal <CalfireTGUFireMarshal@fire.ca.gov>
Sent: Monday, December 2, 2024 9:24 AM
To: Andy Popper
Subject: RE: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Hello Andy,

This project is located in the Local Responsibility Area (LRA), there for CAL FIRE does not have any jurisdictional authority for this project.

Thank you,

Brian Wright
Battalion Chief
Tehama Glenn Unit
633 Washington St. RM 22
Red Bluff, CA 96080
(530) 527-7986 Office

From: Andy Popper <APopper@countyofglenn.net>
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Warning: this message is from an external user and should be treated with caution.

To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency

225 North Tehama Street
Willows, CA 95988
530-934-6540

Andy Popper

From: Dhatt, Satwinder K@DOT <satwinder.dhatt@dot.ca.gov> on behalf of D3 Local Development@DOT <D3.local.development@dot.ca.gov>
Sent: Thursday, December 19, 2024 8:57 AM
To: Andy Popper
Cc: Arnold, Gary S@DOT; Fong, Alexander Y@DOT
Subject: Caltrans District 3 LDR Response: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion
Attachments: Caltrans Comments Letter - Conditional Use Permit 2024-004 CarriereSyntech.pdf

Hi Andy,

Thank you for including the California Department of Transportation (Caltrans) in the review process of Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion project. Attached you will find our comments regarding this project.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me, Local Development Review and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Thank you!

Satwinder Dhatt
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3
703 B Street, Marysville, CA 95901
(530) 821-8261

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401
www.dot.ca.gov

December 19, 2024

GTS# 03-GLE-2024-00115
SCH# 2024120076

Mr. Andy Popper, Principal Planner
Glenn County
Planning & Community Development Services Agency
225 North Tehama Street
Willows, CA 95988

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Dear Mr. Popper,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The project is located at 1640 State Highway 45, south of the community of Glenn; located on the east side of State Route (SR) 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California. The project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a Pacific Gas & Electric (PG&E) pipeline. Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. Based on the Early Consultation package provided, Caltrans has the following requests and recommendations:

Highway Operations & Traffic Safety

- Trip Generation: Please provide an estimate of the number of trips generated by the project for all vehicles and trucks including:
    - Trucks transporting compressed RNG to the PG&E pipeline facility.
    - Vehicles or trucks transporting walnut shells from the project.
    - Potential maintenance and supply vehicles.
- Trip Distribution: For the trips generated from the project site, please identify the routes the trucks and vehicles will use and identify any potential impacts to SR 45, County Road 54, and project driveway intersections.
- Project Driveway. Truck trips should be converted into Passenger Car Equivalent (PCE) of 3 PCE per truck. Caltrans may require northbound and/or southbound turn/deceleration lanes for safety concerns.
- Turn Radius and Maneuverability: Please indicate that intersections and access points can safely accommodate truck movements and provide an Auto-Turn truck analysis template to demonstrate maneuverability.
- If any work is done on the driveways from SR 45 to the project site, please inform Caltrans as that may require traffic control plans to be provided.

Encroachment Permit

Any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW) requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901
D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,

Alexander Fong

for GARY ARNOLD, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401 | www.dot.ca.gov

December 20, 2024

GTS # 03-GLE-2024-00113

Andy Popper, Principal Planner
Planning & Community Development Services Agency
Glenn County
225 North Tehama Street
Willows, CA 95988

Carriere Farms / Syntech CF1, LLC., Advanced Thermal Conversion (CUP 2024-004)

Dear Mr. Popper,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The project contains two sites. The first site is located at 1640 State Route (SR) 45, south of the community of Glenn. It abuts the northbound lane of SR 45, south of County Road 52, west of the Sacramento River and north of County Road 54 in the unincorporated area of Glenn County. The second site is just west of site one, abutting the eastbound lane of SR 162, east of County "V" Road and west of County "W" Road.

This project is requesting a Conditional Use Permit (#2024-004) for Carriere Farms / Syntech CF1, LLC. to operate an Advanced Thermal Conversion (ATC) facility. The ATC project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing, onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, called SynTech CF1, will include the following four main operational components: 1. Organic Feedstock to Syngas Conversion 2. Biochar Transfer and Storage Facility 3. Collection of Syngas and upgrade to Pipeline Quality RNG 4. Pipeline RNG Storage and Transfer Facility Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In grid

power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Based on the Early Consultation and document review request, Caltrans has the following requests and recommendations:

Highway Operations / Forecasting & Modeling

- Please provide a Traffic Impact Study (TIS) that includes information regarding anticipated project trip generations, trip distributions, and anticipated queuing.
- Please use the Institute of Transportation Engineering (ITE) Trip Generation Manual for this analysis.
- Please clarify whether the applicant plans to use existing accesses or creating new one(s).
- Please ensure that the design vehicle is appropriate, based off the Truck Networks on California State Highways Map for District 3 (Link: https://dot.ca.gov/programs/traffic-operations/legal-truck-access/truck-network-map).
- Please provide information for review about the design vehicle(s) that will be used at these sites.

Comments for sheet C1 (page 57/60) off SR 45 and for sheet C1 (page 60/60) off SR 162. If the driveway access is from the SHS:

- Please provide information regarding driveway access to and from both sites. This information should be in a site plans.
- Please show proper dimension of all driveways. Ensure that the driveways follow guidance outlined in the California Highway Design Manual (HDM).
- Please provide AutoTurn CAD templates, using the correct design vehicle, showing the design vehicle entering and exiting the site plans.

Right of Way Engineering

All connections to the SHS will require mapping. As the project moves forward, Caltrans will request plans showing the State right of way (ROW) delineated with bearings, distances along with SR boundary determination. Caltrans ROW Record Maps mapping are available by contacting the District 3 ROW Map counter at: d3rwmaprequest@dot.ca.gov.

Encroachment Permit

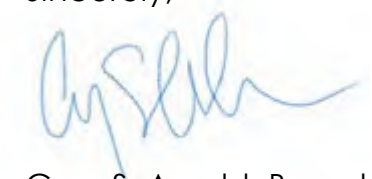
Any project along or within the State's ROW requires an encroachment permit issued by Caltrans.

- The applicant must provide necessary documents and mitigate any environmental, cultural resources, traffic operations, hydraulics, etc. effects on the State's highway ROW.
- Facilities proposed within the State ROW necessitate a Maintenance Agreement with the local entity.

Any work performed within the State's highway ROW must meet all Caltrans design and construction standards and will require a Caltrans' Encroachment Permit. A pre-application meeting with the encroachment permits unit is required (D3encpermit@dot.ca.gov).

If you have any question regarding these comments or require additional information, please contact Angelina Healy, Local Development Review Coordinator, by phone (530) 790-8138 or via email at D3.Local.Development@dot.ca.gov.

Sincerely,



Gary S. Arnold, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
Caltrans District 3

Andy Popper

From: Allyson Smith
Sent: Monday, December 16, 2024 3:06 PM
To: Andy Popper
Subject: Comments on Conditional Use Permit 2024-004
Attachments: CUP2024-004 Syntech.docx

Hi Andy,

Please see comments regarding the Carriere/Syntech CF1, LLC Advanced Thermal Conversion project.

The District has been speaking with companies and consultants over the past few years about biomass projects at Carriere. We are excited to see this finally get to the planning stage.

Sincerely,

Allyson Smith
Environmental Program Manager
Glenn County Air Pollution Control District
720 N. Colusa Street
Willows, CA 95988
asmith@countyofglenn.net
office (530) 934-6500
fax (530) 934-6503

COUNTY OF GLENN
Air Pollution Control District

Marcie Skelton, Air Pollution Control Officer/CUPA Director
720 N. Colusa Street ◆ P.O. Box 351 ◆ Willows, CA 95988
(530) 934-6500 ◆ Fax (530) 934-6503
www.countyofglenn.net

Date: December 13, 2024
Project: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion
Planner: Andy Popper, Principal Planner
Applicant: Wayne McFarland for Carriere Family Farms

Mr. Popper,

The Glenn County Air Pollution Control District (District) has the following comments regarding the application for Conditional Use Permit, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project. The District has been in contact with representatives at Syntech beginning in spring 2024 regarding this project.

- The District is writing to express our full support for the ATC project being developed by Syntech at Carriere Family Farms. As an organization dedicated to sustainable energy solutions and environmental conservation, we recognize the tremendous benefits that biogas technology can provide to communities, industries, and the environment. By converting organic waste into clean energy, this initiative not only helps to address critical issues related to waste management but also contributes to reducing greenhouse gas emissions, improving local air quality, and creating new economic opportunities. We strongly believe that the successful implementation of this project will serve as a model for other regions and businesses seeking to transition to sustainable energy practices.

- The facility will be required to modify their existing District Permit to Operate. The first step in this process is to complete and submit an Authorization to Construct (ATC) application prior to construction. The application is available on our website www.countyofglenn.net/APCD. All new sources of air pollution and the air pollution control equipment including emissions estimates should be included in the ATC application.

Please contact me with any questions or comments that you or anyone else may have.

Regards,

Allyson Smith
Environmental Program Manager

GLENN COUNTY
Planning & Community Development Services Agency
Environmental Health Department

225 N Tehama St.
Willows, CA 95988
Tel: 530.934.6102 Fax: 530.934.6103
www.countyofglenn.net

Mardy Thomas, Director

Date: December 17, 2024

To: Andy Popper, Principal Planner
Glenn County Planning & Community Development Services Agency (PCDSA)
(Via Email)

From: Kevin Backus, REHS
Director, Glenn County PCDSA - Environmental Health Department

Re: CUP 2024-004, Carriere/Syntech CF1 LLC, Advanced Thermal Conversion APN 016-030-011 and 016-090-016

We have reviewed the application information for the project noted above and recommend it be found complete for further processing. We have the following comments/requirements:

1. The proposed Advanced Thermal Conversion project shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.
2. Existing onsite wastewater treatment systems (OWTS) shall be expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the Environmental Health Department (EHD).
3. In addition, facilities shall be provided to accommodate workers during construction of the project. These facilities shall be approved by the EHD.
4. Water wells used to supply potable water shall meet current construction requirements, be permitted and regulated by the EHD or the State Water Resource Control Board (SWRCB), Division of Drinking Water. Contact EHD and SWRCB to determine appropriate level of regulation.
5. All garbage, rubbish and refuse created, produced or accumulated during construction, at the proposed facility and/or on the property shall be removed by a permitted waste hauler or taken to a permitted facility at least once each week. All garbage shall be kept in a container with a close-fitting cover, without leakage or escape of odors.

Please contact Environmental Health at 530-934-6102 with any questions on the above requirements for this project.

PUBLIC WORKS AGENCY

P.O. Box 1070 / 777 N. Colusa Street
Willows, CA 95988

Airports
Engineering
Flood Control
Roads & Bridges
Solid Waste
Surveyor

December 11, 2024

Glenn County Planning and
Community Development Services
777 N. Colusa Street
Willows, CA 95988

Attn: Andy Popper, Principal Planner

Subject: Conditional Use Permit 2024-004 – Carriere / Syntech CF1, LLC

Comments

None

Conditions

None

Michael Biggs

Michael Biggs
Engineering Technician III
Glenn County Public Works

Andy Popper

From: Dennis Ramirez <dramirez@mechoopda-nsn.gov>
Sent: Wednesday, November 27, 2024 8:48 AM
To: Andy Popper
Cc: Planning Email Group
Subject: Re: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Happy Thanksgiving Andy,
I hope you and your family are doing well?!
No concerns from Mechoopda Indian Tribe.
Dennis Ramirez
Tribal Chairman
Mechoopda Indian Tribe
1920 Alcott Ave
Chico, California 95928
(530) 899-8922 ext 215
Cell (530)514-1582
Email: dramirez@mechoopda-nsn.gov
Official website: http://www.mechoopda-nsn.gov/
Facebook: http://www.facebook.com/mechoopda.tribe

Sent from my iPhone

> On Nov 26, 2024, at 4:49 PM, Andy Popper <APopper@countyofglenn.net> wrote:
>
> To Whom it May Concern,
>
> Please accept the following Request for Review/Early Consultation for commenting.
>
> Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review
>
> Comments are being requested by Tuesday, December 17, 2024.
> Thank you for your time and consideration regarding this matter.
>
> Sincerely,
> Andy Popper, Principal Planner
> https://www.countyofglenn.net/
> Glenn County Planning &
> Community Development Services Agency
> 225 North Tehama Street
> Willows, CA 95988
> 530-934-6540

Andy Popper

From: PGE Plan Review <PGEPlanReview@pge.com>
Sent: Monday, December 2, 2024 11:00 AM
To: Andy Popper
Subject: RE: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review
Attachments: Initial_Response_Letter_12-1-2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Classification: Internal

Dear Andy Popper,

Thank you for submitting the CUP 2024-004 plans. The PG&E Plan Review Team is currently reviewing the information provided. Should this project have the potential to interfere with PG&E's facilities, we intend to respond to you with project specific comments. Attached is some general information when working near PG&E facilities that must be adhered to when working near PG&E's facilities and land rights.

This email and attachment does not constitute PG&E's consent to use any portion of PG&E's land rights for any purpose not previously conveyed. If there are subsequent modifications made to your design, we ask that you resubmit the plans to the email address listed below.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Thank you,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: Andy Popper <APopper@countyofglenn.net>
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

CAUTION: EXTERNAL SENDER!

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

You can read about PG&E's data privacy practices at PGE.com/privacy.

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

December 2, 2024

Andy Popper
County of Glenn
225 North Tehama Street
Willows, CA 95988

Ref: Gas and Electric Transmission and Distribution

Dear Andy Popper,

Thank you for submitting the CUP 2024-004 plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E’s ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4’) in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

Andy Popper

From: PGE Plan Review <PGEPlanReview@pge.com>
Sent: Tuesday, December 17, 2024 6:27 AM
To: Andy Popper
Subject: RE: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review
Attachments: No_Impact_Response_12-17-2024.pdf

Classification: Internal

Dear Andy Popper,

Attached is our response to your proposed project.

Thank you,



Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: Andy Popper <APopper@countyofglenn.net>
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

CAUTION: EXTERNAL SENDER!

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To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street

Willows, CA 95988
530-934-6540

You can read about PG&E's data privacy practices at PGE.com/privacy.

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

December 17, 2024

Andy Popper
Glenn County Planning
225 North Tehama Street
Willows, CA 95988

Re: Conditional Use Permit 2024-004
Carriere/Syntech CF1, LLC

Dear Andy Popper,

Thank you for providing PG&E the opportunity to review the proposed plans for Conditional Use Permit 2024-004 dated 11/26/2024. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: https://www.pge.com/cco/.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

Documents Received

After

Request For Review

and

Pre-Consultation

Commenting

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GLENN COUNTY
Planning & Community Development Services Agency

225 N. Tehama Street
Willows, CA 95988
530.934.6540 Fax 530.934.6533
www.countyofglenn.net

Mardy Thomas, Director

Wayne McFarland
1625 Broadway Street
Suite 119
Fresno, CA 93721

wmcf@syntechbioenergy.com
(815) 513-3363

RE: Conditional Use Permit 2024-004,
Carriere/Syntech CF1, LLC Advanced Thermal Conversion
SCH#: 2024120076

December 20, 2024

To Applicant,

This letter is to provide (attached) agency comments received to date as a result of the Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion Request for Review / Early Consultation process. It should be noted that the comments received to date are the preliminary comments and additional comments may be received during further required review processes.

Transportation:
Caltrans has commented that a Traffic Impact Study (TIS) among other times includes information regarding anticipated project trip generations, trip distributions, and anticipated queuing. This project analysis will also require review/environmental analysis regarding vehicle miles traveled, vehicle routes, Green House Gas Emissions, and the existing/proposed route conditions.

Therefore, in order to support the environmental review data of possible impacts from the project traffic on the road system, the applicant shall submit a completed Traffic Impact Study/Analysis conducted by a professional transportation consulting firm. The Traffic Impact Study/Analysis shall also include, but not limited to, all items as noted in the Caltrans comment letter(s) as well as, recommended Conditions of Approval and/or Mitigation Measures to offset plausible traffic and road impacts.

The Project has retained W-Trans, a professional transportation consulting firm to provide stamped traffic impacts for the project.

W-Trans has found the project to significantly reduce overall existing traffic impacts as a result of this new use of the project site. Specifically, by eliminating all truck trips associated with transporting waste walnut shells from the site and replacing them with a significantly lower number of truck trips associated with transporting RNG to the gas

injection site.

The Project has provided a draft copy of W-Trans traffic study and will provide a stamped version next week.

Water Quality/Onsite Septic Capacity:
The total water usage/wastewater volumes are not specifically addressed in the application documents. This is not being required at this time; however, it is yet to be determined if the property can support the proposed number of persons and ancillary wastewater uses. The Glenn County the Environmental Health Department (EHD) has commented that, existing onsite wastewater treatment systems (OWTS) shall be

expanded and/or new OWTS shall be installed to accommodate the increase in employees. All OWTS shall be permitted and approved by the EHD.

The Project will expand the existing OWTS to provide for the increase in the total number of persons and ancillary waste water uses.

Water Supply:

Onsite ground water wells used to supply water to the proposed facility, construction workers, and operation employees shall be permitted and regulated by the Glenn County EHD and/or the State Water Resource Control Board (SWRCB), Division of Drinking Water. Although comments from the State Water Resources Control Board have yet to be received; based on the projected persons at the location, this facility may be classified as a Public Water System, and may be required to obtain a drinking water permit from the State Water Resources Control Board, Division of Drinking Water. It is recommended that the applicant contact Glenn County EHD and the following for additional information:

District 21 - Reese Crenshaw, 364 Knollcrest Dr., Ste 101 Redding CA, 96002 (530) 224-4800

The Project has contacted SWRCB and discussed the project with their staff. SWRCB has a new District Director, Rebecca Tabor, who I have left a message for after discussing the project with SWRCB staff. The Carriere Shelling facility already is permitted as a Public Water System with the SWRCB. Bill Carriere has provided me with both the SWRCB Public Water System Permit and the CCR also issued to Carriere.

The Project has provided both the SWRCB Public Water System permit and the SWRCB CCR to Andy Popper and Glenn County previously for their review. Please let us know if we need to send these documents again.

Solid Waste Permit:

The proposed Advanced Thermal Conversion project shall be approved, regulated and have a solid waste permit thru the Environmental Health Department (EHD) with concurrence/oversight by CalRecycle.

The Project is attaching laboratory analysis that certified the biochar produced from the Syntech BioMax ATC process using waste walnut shells as a USDA Certified Biobased Product. The attached guaranteed laboratory analysis shows that the biochar is an organic, nontoxic substance. At full production, the BioMax ATC process will produce just 15 tons a day that will be shipped to another processing site to upgrade the biochar into graphene every two days.

The process biochar will be directly placed into 500 lb. totes through enclosed conveyance equipment. The totes are lined with a liner that will prevent combustion, dust, moisture and odor. Once the totes are full, they are sealed using a airtight cap enclosure. The project has attached specification sheets for both the tote and liner to be used.

The Project is also including comments from Syntech's Chief Science Officer, Drew Manica, for Glenn County's review and use.

Air Pollution Control

The facility will be required to modify the existing District Permit to Operate. The first step

in this process is to complete and submit an Authorization to Construct (ATC) application prior to construction. The application is available at www.countyofglenn.net/APCD . All new sources of air pollution and the air pollution control equipment including emissions estimates should be included in the ATC application.

The Project has attached a competed draft Glenn County APCD Authorization to Construct to ammend/modify the existing APCD PTO.

Gas and Electric Transmission and Distribution
The PG&E preliminary review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights. With that stated the PG&E correspondence(s) include numerous items that should be fully reviewed and may require addressing.

The Project will continue to work with PG&E to manage any potential impact to their facilities or easement rights.

Noise:
The Glenn County General Plan Noise Element provides a basis for local policies to control and abate environmental noise, and to protect the citizens of Glenn County from excessive noise exposure by enforcing its Noise Ordinance (County Code Chapter 15.56.100). The application states the site will have compressors and auger motors that will not exceed the existing noise and vibration already on-site. The provided information does not analyze noise levels created due to proposed operations. For example, decibels anticipated at the property lines. The project is required to comply with the Glenn County Noise Code(s).

County Code 15.56.100, does provide for an exemption for agricultural processes operated on land already zoned for agricultural uses. It would seem reasonable to find this use satisfactory for such an exemption to the Glenn County Noise Ordinance.

The Project has previously provided sound mapping documents for the County's use. Please let us know if we need to provide these documents again.

Public Services:
The project analysis is to include review of impacts associated with public services and facilities in order to maintain acceptable service ratios, response times or other performance objectives including but not limited to police and fire protection. Further information/analysis is required to in order to determine if the proposal could include or

require the installation or maintenance of associated infrastructure such as fuel breaks, emergency water sources, power lines or other utilities; including if the proposal and safety measures reflect the capacity of the local fire protection district to respond to an incident which may entail specific equipment and/or training.

The Project will work with Glenn County to mitigate any impacts associated with public services and facilities, where deemed reasonable. We will await the County's Public Services analysis relative to this project.

Agricultural Statement of Acknowledgment:
The applicant/landowner is notified of Glenn County Code 15.58 Right to Farm and Section 15.58.030 which requires the Agricultural Statement of Acknowledgment to be recorded. A signed, notarized, and recorded copy of the Agricultural Statement of Acknowledgment is being requested to be included with the Conditional Use Permit application.

The Project will provide signed, notarized and recorded copy of the Agricultural Statement of Acknowledgment as requested.

Written Notice:
Limited additional progress can be taken on the project analysis regarding the particular items listed until responses from the applicant are received. More specifically, a completed Traffic Impact Study/Analysis conducted by a professional Transportation Consulting firm is submitted, and the items are addressed/responded to. In order to continue the Conditional Use Permit process, please provide all the agencies requested and required information to the Glenn County Planning Division in a timely manner.

If you have any questions, please contact the Glenn County Planning & Community Development Services Agency at (530) 934-6540 to discuss actions towards completing the application requirements.

Sincerely,
Andy Popper,
Principal Planner
apopper@countyofglenn.net

Ec:
Wayne McFarland wmcf@syntechbioenergy.com;
Jim Quan jquan@syntheches.com
Bill Carriere wcarriere@carrierefarms.com

planning@countyofglenn.net ; MSkelton@countyofglenn.net; KBackus@countyofglenn.net; MBiggs@countyofglenn.net; LNiehues@countyofglenn.net; publicworks@countyofglenn.net; gcsoadmin@countyofglenn.net; TRichardson@countyofglenn.net; gcbuilding@countyofglenn.net; acordova@countyofglenn.net; steve.u.chung@navy.mil; PGEPlanReview@pge.com; THPO@paskenta.org; lbill@paskenta.org; greg@glenncountyrcd.org; Jerred.Ferguson@Waterboards.ca.gov; dramirez@mechoopda-nsn.gov; environmental@countyofglenn.net; andrew.dove@waterboards.ca.gov; dlrp@conservation.ca.gov; R2CEQA@wildlife.ca.gov; joe.monson@cdfa.ca.gov; CalfireTGUFireMarshal@fire.ca.gov; D3.local.development@dot.ca.gov;

notifydwr@water.ca.gov; Nevin.Yeates@CalRecycle.ca.gov; John.Loane@CalRecycle.ca.gov; cicc@colusa-nsn.gov; Charlene.Wardlow@conservation.ca.gov; jeff.lindberg@arb.ca.gov; Joseph.Hunt@dtsc.ca.gov; matthew.lima@glenncodorafire.com; admin@glenncodorafire.com; randjhansen@pulsarco.com; angelina.healy@dot.ca.gov; Dhatt, Satwinder K@DOT satwinder.dhatt@dot.ca.gov; gary.arnold@dot.ca.gov; Fong, Alexander Y@DOT <alexander.fong@dot.ca.gov>

Appendix 1: SynChar™ Biochar – A Zero-Waste Process

The BioMax® ATC process at CF1 produces zero "waste", meaning all biomass feedstock is converted into heat and two material coproducts – RNG and a high-carbon biochar, branded as SynChar™. SynChar™ biochar is produced at a yield of 4% by volume of WWS and is 100% recovered, safely stored, and transported for downstream conversion to other value-added carbon-based products. Due to the commercial value of the products and applications stemming from SynChar™, SynTech's objective is to ensure that all the biochar produced at Carriere Farms is handled safely and sustainably to maximize the efficient use of the feedstock and to avoid any losses to the environment, aged inventory, or damage to the SynChar™ product. The following discussion explains how SynTech accomplishes this objective.

Data Sheet for Biochar

SynTech is in the process of developing a material Safety Data Sheet (SDS) for SynChar™. The key points of an SDS for biochar include product identification as "biochar," warning about potential dust hazards, instructions to wear appropriate personal protective equipment (PPE) like respirators and gloves when handling, and first aid measures in case of contact with eyes or skin. While the SDS for SynChar™ is in development, the key safety data for SynChar™ is expected to be similar to that of other biochar materials. For reference, a representative SDS from Biochar Solutions, DBA Western Biochar (Golden, CO) [1] is provided in Appendix 2: Safety Data Sheet.

Composition of SynChar™

Due to its high-temperature conditions and tightly controlled gas introduction system, the BioMax® ATC process produces virtually no tar. Hence, the only co-product of the ATC process, aside from renewable energy, is a high-carbon biochar, which possesses unique physical and chemical properties, including a high degree of graphitic carbon and a low number of impurities.

SynChar™ produced by the BioMax® gasifier system is organic, non-reactive, and non-toxic. SynChar™ and has met the strict certification requirements of the International Biochar Initiative (IBI). IBI certification ensures that SynChar™ contains negligible levels of dioxins, polycyclic aromatic hydrocarbons (PAH's), polychlorinated benzenes (PCB's), and heavy metals, which verifies that it is safe to use in soil applications for food production. Testing per USDA's BioPreferred certification has confirmed that SynChar™ biochar contains contemporary carbon from biomass (i.e., not fossil carbon from coal). Copies of the official laboratory reports used for certification of SynChar™ are attached in Appendix 3: Certified Laboratory Reports.

Proximate analysis is an important quality control parameter for carbon-based materials, such as biochar, coal, and coke. Proximate analysis measures the readily identifiable components like moisture, volatile matter, fixed carbon, and ash content. One widely used test method for proximate analysis is thermogravimetric analysis (TGA), in which the sample is heated to high temperatures while measuring the weight loss of the sample. At a specified temperature, the gas flow surrounding the sample is switched from inert atmosphere to oxygenated air to differentiate the non-combustible vs. combustible components of the sample. Figure 1Figure 1 below shows a proximate analysis of a representative sample of SynChar™ biochar produced from waste walnut shells at Carriere Farms. The results below indicate a moisture content of 6.87%, 18.83% volatile content, 37.11% fixed carbon, and 37.19% residual ash. While the moisture content may change based on exposure to environmental conditions after

February 26, 2025

Mr. Jim Quan
SynTech Energy Services, LLC
1625 Broadway Street, 119
Fresno, CA 93721

DRAFT Trip Generation Assessment for the SynTech Advanced Thermal Conversion Facility

Dear Mr. Quan;

As requested, W-Trans has prepared trip generation assessment for the proposed SynTech Advanced Thermal Conversion (ATC) Facility to be located on the Carriere Family Farms site in the County of Glenn. The purpose of this letter is to determine the potential change in trip generation associated with the proposed project.

Project Description

The proposed project includes construction of an ATC facility at the Carriere Family Farms walnut processing facility located at 1640 State Route (SR) 45. The ATC facility would operate 24/7 to remediate waste walnut shells (WWS) from the existing shelling facility into Renewable Natural Gas (RNG). The RNG would then be compressed into mobile storage trailers, transported to the Carriere Drying and Hulling facility located approximately 4.5 miles away at 7693 SR 162, and injected into the PG&E pipeline. The biochar biproduct of the ATC process would be stored on-site until the quantity is sufficient for a full truckload shipment, which is anticipated to occur every one to two days. The proposed project would require 13 full-time employees to operate the ATC facility.

Trip Generation

Trip generation estimates are typically developed using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 11th Edition, 2021. While the Manual does include rates for generic industrial land uses, no land use included in the Manual closely matches the existing walnut disposal and proposed ATC operations so the trip generation for the proposed project was estimated using site-specific operational parameters to more accurately estimate the potential changes in trip generation.

Existing Use

The WWS are currently transported by truck to Anderson for disposal. Based on information provided by the applicant team, near-term estimates for 2027 indicate that the walnut processing facility would require an anticipated 6,000 truckloads per year to dispose of about 135,000 tons of WWS using trucks with a carrying capacity of 45,000 pounds. This equates to an average of 16 trucks per day, or 32 trips accounting for one trip when leaving the site and one trip when returning. These truck trips are generally spread out over the course of the day so for the purposes of assessing the peak hour trip generation it was assumed that one truckload (two trips) occurs during each peak hour.

Proposed Use

Truck Trips

With the implementation of the project as proposed, trips required for WWS disposal would be eliminated and replaced with RNG trips to the injection site and trips for biochar removal. When fully operational, the facility would remediate 135,000 tons of WWS annually and generate 2,850 MMBtu of RNG and 15 tons of biochar biproduct per day. The RNG would be stored in a mobile storage trailer and transported three times a day on average to be injected into the PG&E pipeline. While the RNG trailers would remain at the ATC facility, the trucks

minus the trailer, would leave the site between loads; therefore, four truck trips would be made per delivery to the pipeline (one trip when arriving to the ATC site to pick up the trailer, one trip when traveling with a full trailer to the injection site, one trip when traveling with an empty trailer back to the ATC site, and one trip when leaving the ATC site without a trailer).

Biochar would be transported from the site every one to two days when a truckload shipment of the biproduct has been generated. To maintain a conservative estimate, a rate of one truck per day was assumed, including one each inbound and outbound trip. The proposed ATC operations would result in an average of 14 truck trips per day, consisting of 12 trips for ATC injection and two trips for biochar removal. All of these trips are expected to occur outside of peak hours.

Employee Trips

The proposed ATC facilities would result in 13 additional full-time employees at the site. These full-time employees would be expected to generate 39 trips per day using a rate of three daily trips per employee, which accounts for one trip each when arriving and departing plus a second round trip for half of the employees to account for the fact that some employees may leave the site for lunch or for routine errands throughout the work day while others may carpool or be dropped off in the morning and picked up in the evening.

Net Change

Overall, at buildout the proposed ATC facility has the potential to result in 21 more daily trips on average compared to the existing WWS disposal condition, with 11 more trips during the a.m. and p.m. peak hours each. The net increase in trips is attributable to the additional on-site employees as the total truck trips would be expected to decrease by 18 trips per day.

To account for the fact that trucks require more time to enter a roadway and accelerate to the free-flow travel speed, an equivalency factor of 3.0 passenger vehicles per truck was applied, consistent with standard traffic engineering practice. After applying the passenger car equivalency (PCE) factor of 3.0, and including both truck and employee trips, the project would be expected to generate 15 fewer equivalent trips on a daily basis, with seven more trips during each peak hour. The trip generation estimates based on the stated assumptions for the existing and proposed conditions are indicated in Table 1.

DRAFT

Table 1 – Trip Generation Summary

Generator	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing (WWS Disposal)											
WWS Trucks	16	2.00	-32	0.13	-2	-1	-1	0.13	-2	-1	-1
PCE Trips	*3.00*		*-96*		*-6*	*-3*	*-3*		*-6*	*-3*	*-3*
Proposed (ATC Facility)											
Employees	13	3.00	39	1.00	13	9	4	1.00	13	4	9
RNG Trucks	3	4.00	12	0.00	0	0	0	0.00	0	0	0
PCE Trips	*3.00*		*36*		*0*	*0*	*0*		*0*	*0*	*0*
Biochar Trucks	1	2.00	2	0.00	0	0	0	0.00	0	0	0
PCE Trips	*3.00*		*6*		*0*	*0*	*0*		*0*	*0*	*0*
Total Proposed			**53**		**13**	**9**	**4**		**13**	**4**	**9**
Total Proposed PCE			*81*		*13*	*9*	*4*		*13*	*4*	*9*
Net Change			**21**		**11**	**8**	**3**		**11**	**3**	**8**
Net Change PCE			*-15*		*7*	*6*	*1*		*7*	*1*	*6*

Note: PCE = Passenger Car Equivalent

Vehicle Miles Traveled (VMT)

Though VMT is not generally evaluated for truck trips, because the proposed project would eliminate the need to transport WWS from the project site to Anderson, consideration was given to the project's potential to have a positive impact on VMT. The existing condition wherein WWS are transported to Anderson is expected to require 32 daily one-way trips of 80 miles each in 2027, which translates to 2,560 VMT per day. The proposed project would eliminate the trips to Anderson and result in 12 daily one-way trips of 4.5 miles each for RNG injection, which translates to 54 daily VMT, or 2,506 less VMT than the existing condition. While the proposed project would also result in VMT associated with employees and biochar removal, these two aspects combined are expected to produce substantially fewer than 2,506 daily VMT; as a result, it can be concluded that the proposed project would result in decreases in both truck VMT and total VMT.

Conclusions

- The proposed project has the potential to generate 21 new trips on a daily basis compared to the existing condition wherein WWS are transported to Anderson for disposal, with 11 additional trips during each peak hour. The net increase in trips is attributable to the additional on-site employees as the total truck trips would be expected to decrease by 18 trips per day.

- Taking vehicle miles traveled (VMT) into consideration, the proposed project would be expected to result in a substantial reduction of VMT as 16 daily round trips to Anderson (a distance of 80 miles away) would be replaced with fewer and shorter trips to the PG&E pipeline approximately 4.5 miles from the ATC site.

- Using a PCE factor of 3.0, the proposed project would be expected to generate the equivalent of 15 fewer trips on a daily basis, even with an additional 13 employees.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,

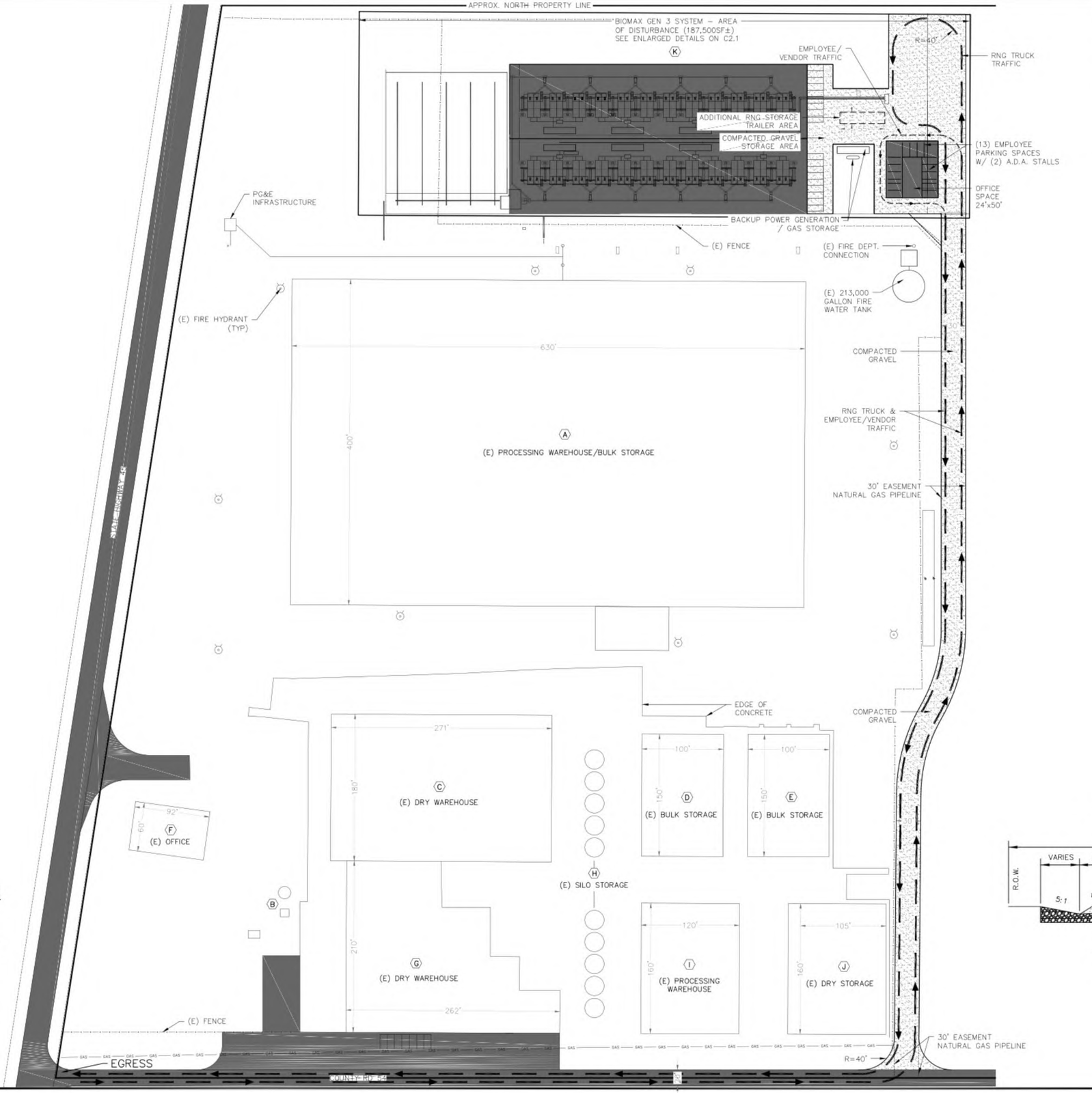
Gabriel Ramos, EIT
Assistant Engineer

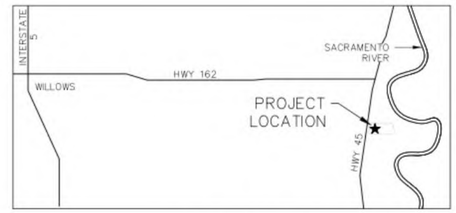
Cameron Nye, PE (Traffic)
Transportation Engineer

Dalene J. Whitlock, PE (Civil, Traffic), PTOE
Senior Principal

DJW/cjn-gr/GLX003.L1

DRAFT





VICINITY MAP
NO SCALE

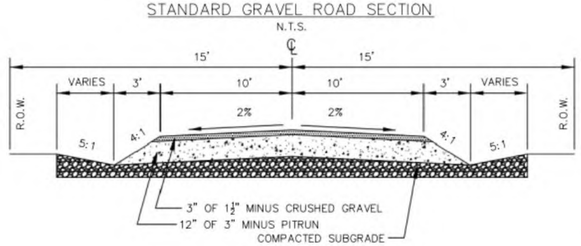
CARRIERE LAND, LLC
1640 STATE HIGHWAY 45
GLENN, CA 95943
APN: 016-030-011

LEGEND:

1530	CONTOUR ELEVATION
	FENCE
	ASPHALT (4,480± SF)
	COMPACTED GRAVEL (63,132± SF)
	(E) POWER POLE
	(E) HYDRANT
	TRAFFIC FLOW (TRUCKS)
	TRAFFIC FLOW (AUTOMOBILES)
APN	ASSESSOR'S PARCEL NUMBER
APPROX.	APPROXIMATELY
DWY	DRIVEWAY
(E)	EXISTING
(P)	PROPOSED
RD	ROAD
SF	SQUARE FEET
R	RADIUS

(A) (E) PROCESSING WAREHOUSE/BULK STORAGE
(B) (E) WELL/TANK
(C) (E) DRY WAREHOUSE
(D) (E) BULK STORAGE
(E) (E) BULK STORAGE
(F) (E) OFFICE
(G) (E) DRY WAREHOUSE
(H) (E) SILO STORAGE
(I) (E) PROCESSING WAREHOUSE
(J) (E) DRY STORAGE
(K) (P) LOCATION FOR BIOMAX GEN 3 SYSTEM – AREA OF DISTURBANCE (187,500SF±) SEE ENLARGED DETAILS ON C2

STANDARD GRAVEL ROAD SECTION
N.T.S.



CIRCULATION PLAN
GRAPHIC SCALE
40 0 20 40
(IN FEET)
1 inch = 40 ft.

Revisions:

REALM ENGINEERING
CIVIL ENGINEERING, SURVEYING & PLANNING
1767 MARKET STREET SUITE c
REDDING, CA. 96001
530-526-7493

PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER JASON B. VITE No. 67800 Exp. 6/30/25 CIVIL STATE OF CALIFORNIA

CIRCULATION PLAN

CARRIERE LAND, LLC.
1640 STATE HIGHWAY 45
GLENN, CA 95943-9649
(559) 217-8335
GLENN COUNTY APN: 016-030-011

PLOTTED BY: --- ---
DATE PLOTTED: 3/05/25
SCALE OF DRAWING: SEE PLAN
JOB NUMBER:
CADD FILE:
SHEET: C2

California Historical Resources Information System

BUTTE
GLENN
LASSEN
MODOC
PLUMAS
SHASTA
SIERRA
SISKIYOU
SUTTER
TEHAMA
TRINITY

Northeast Information Center
1074 East Avenue, Suite F
Chico, California 95926
Phone (530) 898-6256
neinfocntr@csuchico.edu

January 2, 2025

Andy Popper
Glenn County Planning & Community
Development Services Agency
225 N. Tehama Street
Willows, CA 95988

IC File # NE24-614
Project Review

RE: CUP 2024-004
T19N, R1W, Sections 67 & 68 (016-030-011); T19N, R1W, Section 34 (016-090-016) MDBM
USGS Glenn 7.5' (1969) & Willows 15' (1966) quadrangle maps
214.95 acres (Glenn County)

Andy Popper:

In response to your request, a records search for the project cited above was conducted by examining the official maps and records for cultural resources and surveys in Glenn County. Cultural resources in our inventory include archaeological objects, sites, landscapes, districts, and all manner of buildings and structures associated with past human activities. Please note that access to archaeological resource records is restricted to qualified individuals.

Results:

Archaeological Resources:

Resources within or adjacent to the project area:	No resources were located in the project area

In addition, seven resources have been recorded within the one-mile vicinity.

Built Environment Resources: According to our records, no resources of this type have been recorded within or adjacent to the project boundaries. The Built Environment Resources Directory

(BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, does not list any properties within or adjacent to the proposed project area. The BERD is available online at: https://ohp.parks.ca.gov/?page_id=30338

Previous Investigations: According to our records, the project area has been partially surveyed for cultural resources. The reports are listed below.

Laura Leach-Palm, Pat Mikkelsen, Paul Brandy, Jay King, and Lindsay Hartman (Far Western Anthropological Research Group)

2008 *Cultural Resources Inventory of Caltrans District 3 Rural Conventional Highways in Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo and Yuba Counties.*
NEIC-009539

Ben Elliott (URS Corporation)

2010 *Final Cultural Resources Technical Report, Levee Geotechnical Evaluation Program, Sacramento River: Right Bank Levee, Glenn and Colusa Counties, California.*
NEIC-010909

Historical Maps and Literature Search: The official records and maps for archaeological sites and surveys in Glenn County were reviewed. Also reviewed: **National Register of Historic Places - Listed properties and Determined Eligible Properties** (2022); **California Inventory of Historic Resources** (1976); **California Historical Landmarks** (2022); **Built Environment Resource Directory** (2022).

The USGS Glenn 7.5' (1969) & Willows 15' (1966) quadrangle maps depict archaeological sensitive areas within the project's region such as structures, foundations, and waterways. Additional structures, foundations, and waterways are located in the general project vicinity.

The project is located in a region utilized by Konkow populations at the time of Euro-American contact. Indigenous populations used the local region for seasonal and/or permanent settlement, as well as for the gathering of plants, roots, seeds, domestic materials, and hunting seasonal game. Historically, Euro-Americans utilized the region for mining and transportation opportunities.

Sensitivity Assessment and Recommendations:

Based upon the above information and local topography, the project area is considered to have low sensitivity for cultural resources. Portions of the project along existing sites, roads, and trails are sensitive for archaeological resources. Other areas of sensitivity are flats near creeks, springs, seeps, or rock outcrops that may be located in the project area.

Therefore, because the project area has not been previously surveyed for archaeological resources, we recommend that a professional consultant be contacted prior to ground disturbance. The project archaeologist can offer recommendations for avoidance and protection of any existing or newly identified resources. If the proposed project contains buildings or structures that meet the minimum

age requirement (45 years in age or older) it is recommended that the resources be assessed by a qualified specialist familiar with architecture and history of the county. Review of the available historic building/structure data has included only those sources listed above and should not be considered comprehensive. A list of qualified consultants is available online at www.chrisinfo.org.

During any phase of parcel development, if any archaeological resources are encountered, all work should cease in the area of the find pending an examination of the site and materials by the project archaeologist. This request to cease work in the area of a potential archaeological find is intended for accidental discoveries made during construction activities and is not intended as a substitute for the recommended cultural resources survey. It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the California Office of Historic Preservation (OHP): https://ohp.parks.ca.gov/?page_id=28351

If human remains are discovered, California Health and Safety Code Section 7050.5 requires you to protect the discovery and notify the county coroner, who will determine if the find is Native American. If the remains are recognized as Native American, the coroner shall then notify the Native American Heritage Commission (NAHC). California Public Resources Code Section 5097.98 authorizes the NAHC to appoint a Most Likely Descendant (MLD) who will make recommendations for the treatment of the discovery.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Not all known cultural resources have been recorded and submitted to the OHP, so this record search should not be considered an exhaustive list of all cultural resources present in your project area. DPR forms and reports that are used for recording and evaluating sites and individual resources are submitted to the Northeast Information Center by private and public agencies. Please note that the Northeast Information Center is not responsible for misinformation of coordinates presented on the submitted DPR forms. If a discrepancy is found, please contact the lead agency for more information.

Due to processing delays and other factors, not all of the cultural resource reports and resource records that have been submitted to the OHP are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for cultural resource management work in the search area. Finally, Native American tribes have cultural resource information not in the CHRIS Inventory, and the NAHC should be contacted at (916) 373-3710 for information regarding Native American representatives in the vicinity of the project.

Payment for this project review was received on (Check # 1041). Thank you for your dedication preserving Glenn County's and California's irreplaceable cultural heritage, and please feel free to contact us if you have any questions or need any further information or assistance.

Sincerely,

Ashlyn Weaver

Ashlyn Weaver, M.A.
Coordinator & GIS Specialist
Northeast Information Center
(530) 898-6256

COUNTY OF GLENN
Air Pollution Control District

Marcie Skelton, Air Pollution Control Officer/CUPA Director
720 N. Colusa Street ◆ P.O. Box 351 ◆ Willows, CA 95988
(530) 934-6500 ◆ Fax (530) 934-6503
www.countyofglenn.net

AUTHORITY TO CONSTRUCT APPLICATION (GENERAL)

- **A $130.00 FILING FEE IS DUE UPON SUBMITTAL OF THIS APPLICATION**
- ALL REQUESTED INFORMATION MUST BE COMPLETED IF APPLICABLE (INCLUDING ATTACHED ADDITIONAL INFORMATION FORM)
- ALL AVAILABLE EQUIPMENT MANUFACTURERS ENGINEERING SPECIFICATIONS MUST BE INCLUDED OR AVAILABLE UPON REQUEST
- IF ADDITIONAL ENGINEERING, EVALUATION, AND REVIEW IS NEEDED, ACTUAL COST THEROF MAY BE CHARGED TO APPLICANT

Date: _____ Project Name: _____

1. **Application for a Permit to:** (please check one)

Construct _____ Alter/Modify _____Name/Owner Change _____Change Location _____

2. **Is This a New Facility?** Yes No

3. **Are You Changing Equipment on an Existing Facility?** Yes No

4. **Expected Date of Construction/Installation Completion:**_____

5. **Contact Information:**

Business Name: _____ Office Phone: _____

Owner Name: _____ Cell/Other Phone: _____

Fax: _____ E-Mail: _____

Facility Address/Location (plus GPS): _____

Mailing Address: _____ City: _____ State: _____ Zip: _____

6. **Emergency Contacts:** (day or night)

Name _____Title _____Phone _____

Name _____Title _____Phone _____

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Air Pollution Control District

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www.countyofglenn.net

7. General Type/Nature of Business:_____

_____

8. Specific Product Manufactured, Handled, Processed, and/or Distributed: _____

_____

9. Expected Production or Operating Schedule: (fill in applicable fields)

Production Rate (with units):_____ per (circle one) hour day week month year

Equipment Operation Schedule: _____hour(s) per day _____day(s) per week_____ week(s) per year

Type(s) of Raw material used/processed:

_____

_____

10. Quantities of raw materials used: /hour /day /week /year

11. Maximum hourly process rate: _____

12. Any Stationary Fuel Burning Equipment? (Boilers, Engines, Driers) Yes No

13. If Yes, Please Provide Description:_____

Fuel Type (circle): Diesel Natural Gas Gasoline Liquid Propane Other: _____

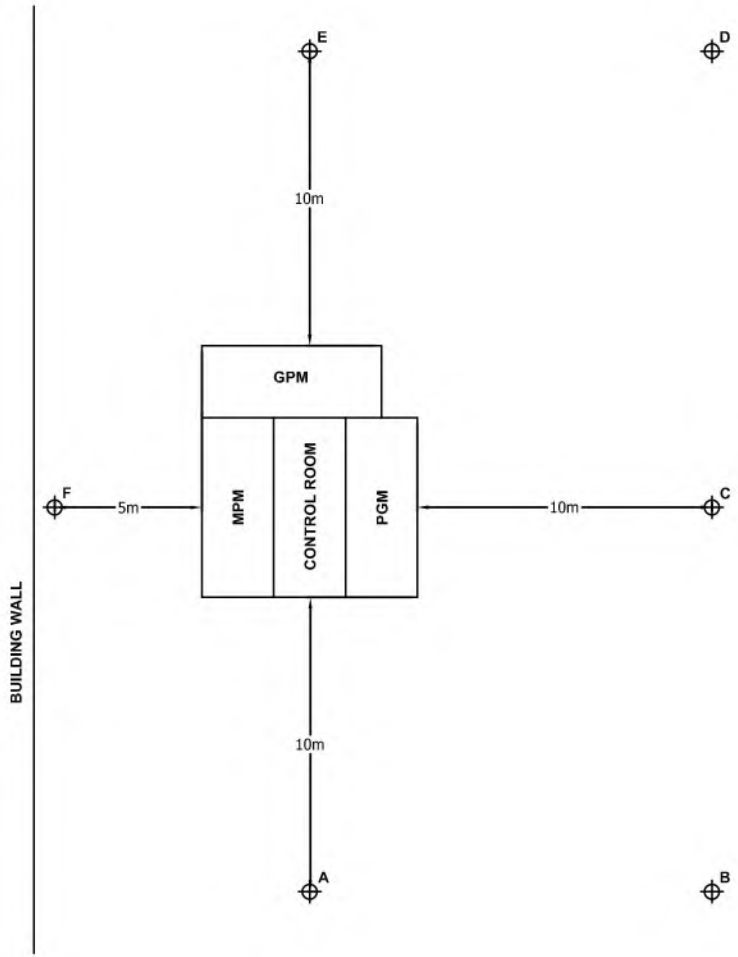
Make: _____ Model: _____ Model Year: _____

Maximum Horsepower: _____ Expected Horsepower: _____ Fuel Consumption: _____

Signature: _____ **Date:** _____

Printed Name: _____

"I certify that all sources having a potential to emit in excess of 25 tons per year in the State of California that is owned, operated, or controlled by this entity are in compliance with all applicable emission limitations and standards."



BioMax 100 Sound Readings Taken On 7/21/12							
All Readings In dBc Scale, 5 Feet Above Ground							
All Values Are +/- 4 dBc							
Conditions	Location	A	B	C	D	E	F
Both Engines @ 65 KW rad @ 60 HZ		76	75	79	75	77	74
Ambient Sound		60	62	62	65	67	
Rise Above Ambient		16	13	17	10	10	

THIS DOCUMENT IS THE PROPERTY OF COMMUNITY POWER CORPORATION AND CONTAINS CONFIDENTIAL INFORMATION. THIS DOCUMENT MAY NOT BE COPIED NOR MAY THE INFORMATION IT CONTAINS BE DISCLOSED UNLESS AUTHORIZATION IN WRITING IS PROVIDED BY COMMUNITY POWER CORPORATION. ACCEPTANCE OF THIS DOCUMENT INDICATES AGREEMENT TO RECEIVE SUCH INFORMATION IN CONFIDENCE.

UNLESS OTHERWISE NOTED OR SPECIFIED
INTERPRET DIMENSIONS AND TOLERANCES PER ANSI Y14.5
DIMENSIONS ARE IN INCHES (mm)
FILLETS AND RADII: .01-.03
BREAK SHARP CORNERS: .01-.03, REMOVE ALL BURRS
DIMENSIONAL TOLERANCES
.X = +/-.1 .XX = +/-.03 .XXX = +/-.01
ANGLE = +/-.5

	SIGNATURE	DATE
DRAWN	SR	8/30/2012
ENGINEERING		
ADMINISTRATION		
FABRICATION		
NEXT ASSEMBLY		

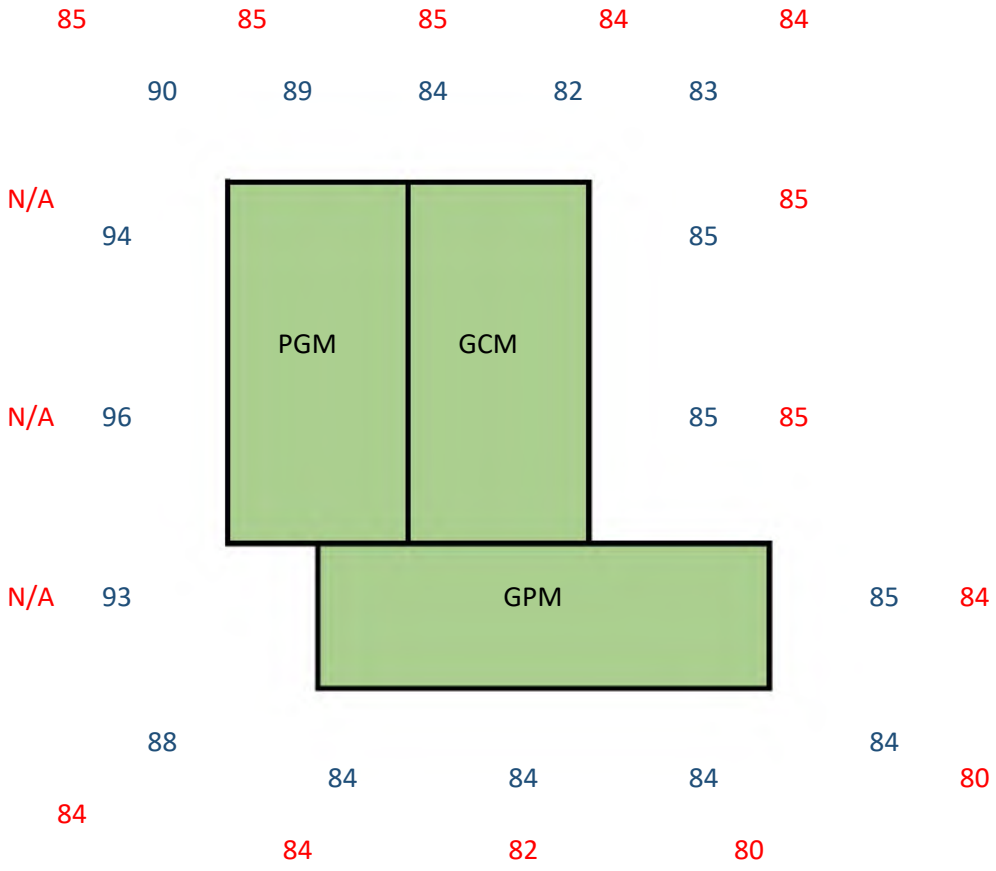
Community Power Corporation
Energy Systems for Sustainable Power
8420 SOUTH CONTINENTAL ROAD
LITTLETON, CO 80127
(303) 933-3135 TEL
(303) 933-1497 FAX
WWW.GOCPC.COM

TITLE: Manitoba Sound Readings - July 2012

SIZE	JOB NO.	DWG NO.	REV.
B		12-1162	-

SCALE | WEIGHT | SHEET 1 OF 1

Map of Noise Measurements around a BioMax Gen 2 - No MPM



All measurements are on the industrial dBa scale. Numbers shown in BLUE are measured at a distance of 5.0 meters from the edge of the containers. Numbers shown in RED are measured at a distance of 10.0 meters from the edge of the containers. Measurements at locations shown as N/A were not possible because another BioMax unit was in that location. The unit used for these measurements was Unit #4 at San Saba Pecan.

Note: The unit used for these measurements was Unit #4 at San Saba Pecan. Unit #3 next to this unit was running at the time of the measurements.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

July 19, 2016

Carriere Family Farms, Inc.
1640 State Highway 45
GLENN, CA 95943

Attention: Ron Bryant, Plant Manager

RE: **Carriere Family Farms, Inc., Public Water System No. 1100101, Permit No. 01-21-16(P)11001**

A permit application, received by the Division of Drinking Water (Division) on January 15, 2016, requested a permit to operate the Carriere Family Farms public water system near Glenn in Glenn County. The permit application was made in accordance with Section 116525, et seq., of the California Health and Safety Code (CH&SC) and is acceptable for filing. The fee receipt is enclosed.

Pursuant to Sections 116535 and 116540 of the CH&SC, THE DIVISION OF DRINKING WATER FINDS that a water supply permit shall be granted to Carriere Family Farms to operate a nontransient noncommunity public water system as described in the enclosed Engineering Report (Report), dated September 2015 and prepared by the Division. The decision to grant the permit is based on findings contained in the Report. The Report finds that the Carriere Family Farms water system can consistently provide safe and wholesome drinking water from the existing well and distribution system. A copy of the permit is enclosed.

As a reminder, initial lead and copper samples must be collected **during July, August, or September 2016.**

If you have questions concerning the enclosed domestic water supply permit or accompanying Report, please call me at (530) 224-4861, or Ray Bruun at (530) 224-3252.

Sincerely,

R. Crenshaw

Reese B. Crenshaw, P.E.
Valley District Engineer
Drinking Water Field Operations Branch

Enclosures

STATE OF CALIFORNIA

DOMESTIC WATER SUPPLY PERMIT ISSUED TO

Carriere Family Farms, Inc., Water System

(Public Water System No. 1100101)

PERMIT NO. 01-21-16(P)11001 DATE OF ISSUE: July 19, 2016

WHEREAS:

1. Carriere Family Farms, Inc., (System) submitted an application to the Division of Drinking Water (Division), dated January 15, 2016, for operating an existing nontransient noncommunity public water system on its property south of the community of Glenn in Glenn County.

2. The purpose of the permit is to authorize operation of the System, including an existing domestic supply well (Well 01) and distribution system.

3. The System has submitted all information needed to evaluate the application.

4. The Division has reviewed the application and supporting information and has determined that the water system complies with applicable state drinking water requirements.

5. The permit application is hereby accepted for filing.

6. Well 01 does not have a sanitary seal.

THEREFORE:

1. A Domestic Water Supply Permit is hereby issued to the Carriere Family Farms water system (System) as follows:

    a) The existing well, Well 01, is designated as an approved source of supply.

    b) The existing distribution system is designated as an approved conveyance.

    c) Any bacteriological issues originating with Well 01 that cannot be resolved with hypochlorination will result in revocation of paragraph 1. a)., above.

2. This permit amendment is subject to the following special conditions:

    a) The well totalizer must be read and recorded at least once each month.

    b) Continuous chlorination of water produced by Well 01 shall not commence unless authorized in a permit amendment.

FOR THE DIVISION OF DRINKING WATER

7/19/16
Date

R. Crenshaw
Reese B. Crenshaw, P.E.
Valley District Engineer
Drinking Water Field Operations Branch

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

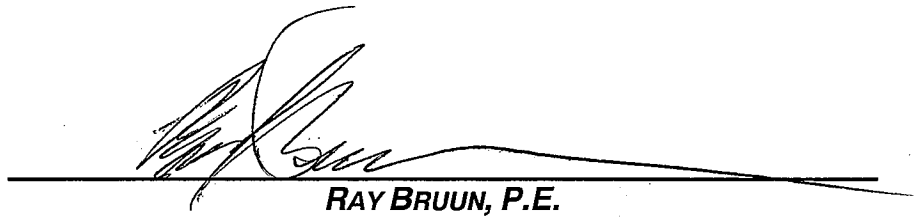
ENGINEERING REPORT IN THE MATTER OF THE PERMIT

FOR

CARRIERE FAMILY FARMS, INC.
GLENN COUNTY

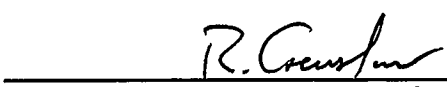
JULY 2016

REPORT PREPARED BY:



RAY BRUUN, P.E.
ASSOCIATE SANITARY ENGINEER

REPORT REVIEWED BY:



REESE B. CRENSHAW, P.E.
SENIOR SANITARY ENGINEER

Purpose of Report

An existing (discovered) water system, owned by Carriere Family Farms, Inc., (Carriere) consists of a well (Well 01), pressure tank, and distribution system. The purpose of this report is to assess the sanitary and chemical reliability of the water system. Recommendations will be made regarding a permit to authorize the operation of the water system.

Water System Summary

Carriere owns a walnut processing facility located approximately 1.3 miles south of the community of Glenn, in Glenn County. The water system supplies potable water for office space, break rooms, kitchen, rest rooms, hose bibs, walnut bleaching, and landscape irrigation. There are two walnut processing plants onsite. One, owned by Carriere Family Farms, produces walnut meat; the other, owned by Borges, packs in-shell walnuts. The water system is classified as a nontransient noncommunity public water system and serves full-time and seasonal employees, as follows (per information provided by Carriere Family Farms):

- *Office – 10 to 15 full-time employees*
- *Shelling operation – 10 full-time employees and 30 employees 9 months out of the year*
- *In-shell operation – 25 employees for 4 months, of which 12 employees will stay on up to 6 months*

On January 15, 2016, Carriere submitted a permit application and filing fee. The application has been accepted for filing.

The plant site comprises the southwest corner of a 96.37-acre parcel (1640 Highway 45, Glenn, CA; APN 016-030-011-0), located on the east side of State Highway 45/162. The facility is within the 100-year flood plain as defined by FIRM Panel 06021C0650D.

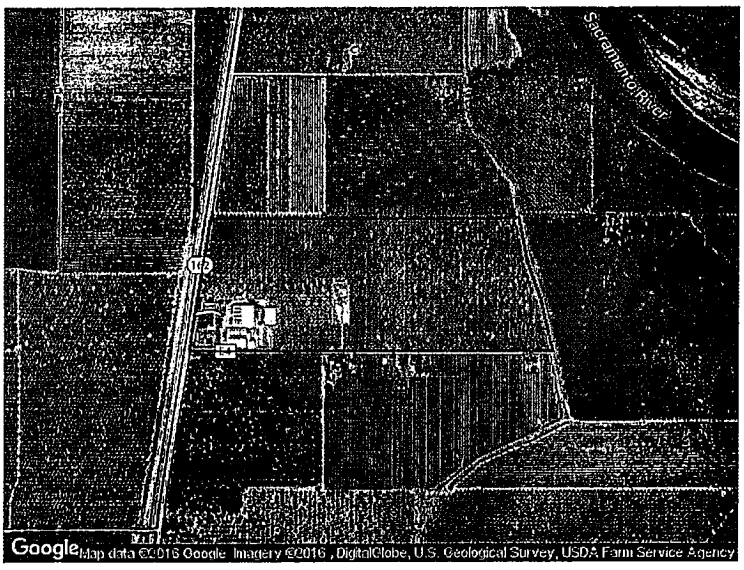
General Information

APN:	016-030-011-0	**Use Type:**	AGRICULTURAL PRESERVE
Situs Address:	1640 HWY 45 GLENN CA 95943-9649	**Tax Rate Area:**	081-014
Mailing Address:	1640 HWY 45 GLENN CA 95943		
Legal Desciption:	1640 HWY 45		

CLICK HERE For More Info on this Property! >

Assessment

Year Assd:	2015
Land:	$756,505
Structure(s):	$176,745
Other:	
Total Land and Improv:	$933,250
HO Exempt?:	N
Exemption Amt:	



**The information provided here is deemed reliable, but is not guaranteed.

Water Sources and Distribution System

Historically, water has been supplied by a domestic well (Well 01) which served a farm house now used as an office. According to a well completion report supplied by the water system, Well 01 was drilled in December 1966 using cable-tool technology. Forty-eight (48) feet of 10-inch diameter, butt-welded, blank steel casing was installed in a 47-foot borehole, making this an open bottom well. There is no sanitary seal. Lithology was reported as follows:

0 to 4 feet ..... Soil
4 to 14 feet ..... Yellow clay
14 to 45 feet ..... Sand & gravel
45 to 47 feet ..... Brown clay
47 feet → ..... Gravel

The make/model of submersible pump and pumping capacity are unknown. The well has a pressure tank (bladder type), for pump control. The water supplier recently (2016) installed a wellhead sample tap and flow meter. The distribution system consists of PVC pipe, ranging from 1 to 2 inches in diameter.

Carriere's contract operator is Culligan of Chico (Culligan) which has a number of employees that have the required minimum operator grade of D1.

Chemical Water Quality

Chemical samples collected from Well 01 from 2014 to 2016 show the well produces water that meets all primary MCLs. Historical chemical test results are provided in the appendices to this engineering report. The well is also bacteriologically clean. Monthly routine coliform samples have been nondetect since the water system began testing in 2014 (the water system does not chlorinate).

Appraisal of Sanitary Hazards and Safeguards

A DWSAPP (Drinking Water Source Assessment and Protection Program) analysis was completed in January 2016. The analysis concludes that the well is most vulnerable to the following:

- Septic systems – low density (<1/acre)
- Agricultural Drainage
- Food processing
- Crops, irrigated
- Fertilizer, Pesticide/ Herbicide Application
- Transportation Corridors- Freeways/state highways
- Surface water - streams/ lakes/rivers
- Wells – Water supply

California Environmental Quality Act (CEQA) Exemption

The action to adopt a permit for a replacement well is categorically exempt from CEQA in accordance with Title 22, Section 60101(a), "Class 1, Existing Facilities." A Notice of Exemption was mailed to the State Clearinghouse in July 2016.

Recommendations

A domestic water supply permit should be issued to Carriere Family Farms, for the use and operation of Well 01 and distribution system.

Attachments

Site Map

Photographs

Well Data Sheet

Well Completion Report

Chemical Data

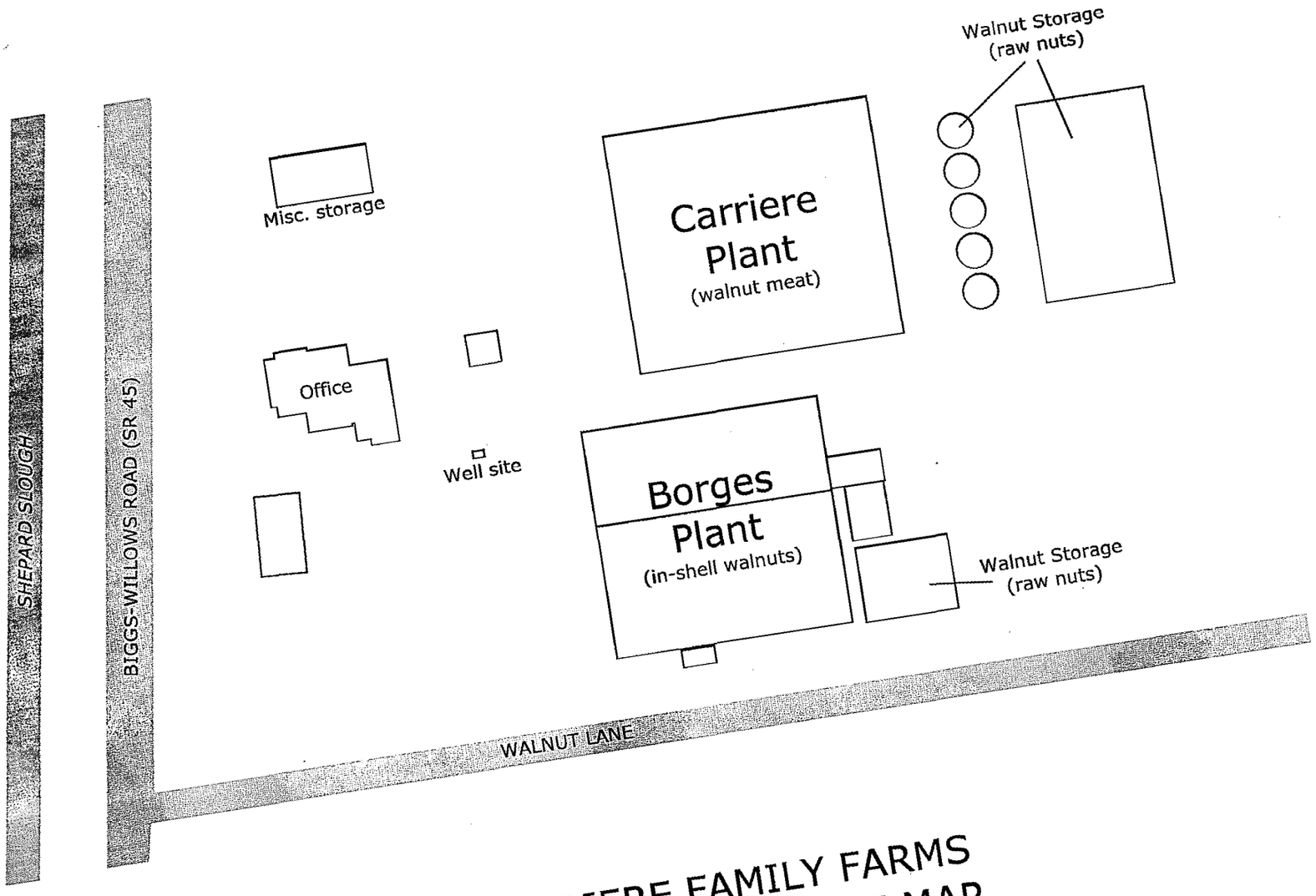
Permit Amendment Application

Drinking Water Source Assessment (DSWAP)

California Environmental Quality Act – Notice of Exemption

TMF Form

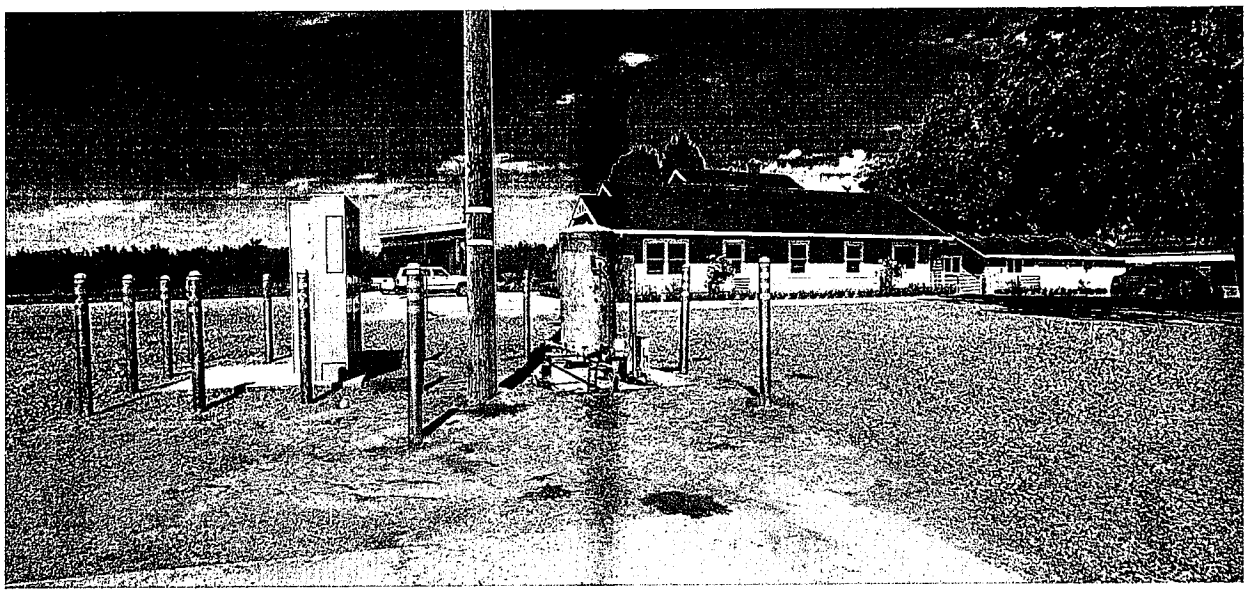
Site Map



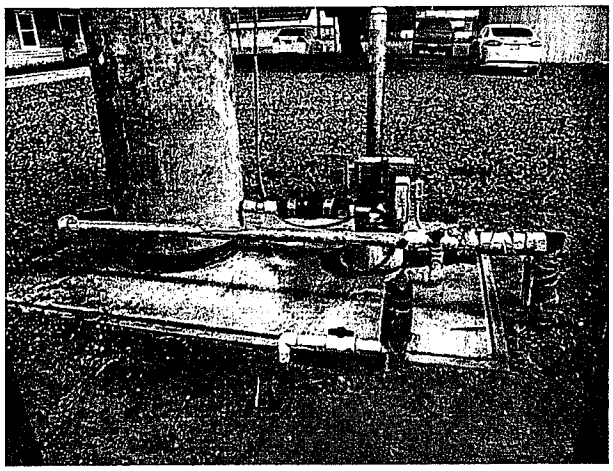
CARRIERE FAMILY FARMS
WS# 1100101 - SITE MAP

(not to scale)

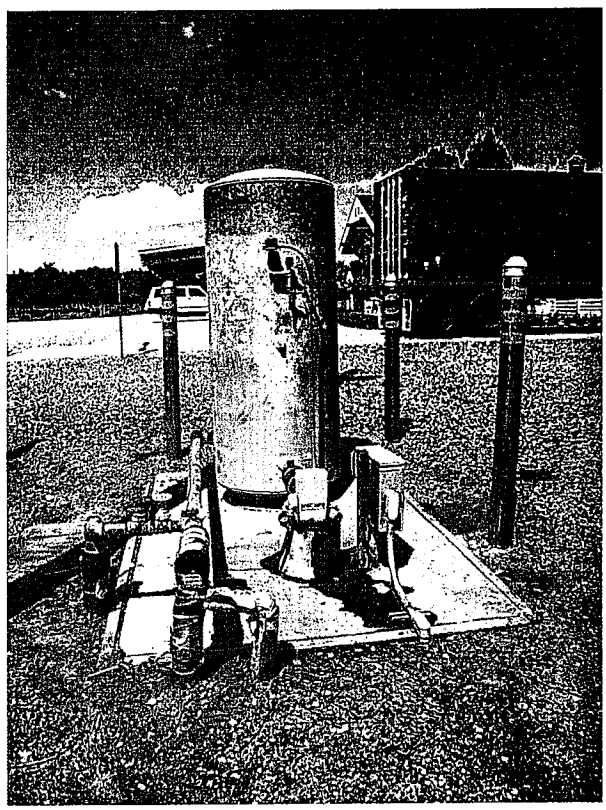
Photographs



Well 01, with office in the background.



Well 01.



Well 01.

Well Data Sheet

Well Data Sheet

Complete as much information as possible. Leave blank if information is not available, use N.A. if not applicable.
** Indicates items required for Source Water Assessment*
*** Indicates additional items required for assessments and Ground Water Rule*

	(separate multiple entries in field with semi-	Actual, Estimated or Default?
DATA SHEET GENERAL INFORMATION		
System Name	Carriere Family Farms	*from DDW database*
System Number	1100101	*from DDW database*
Source of Information (well log, DDW/County files, system, etc)	System	
Organization Collecting Information (DDW, County, System, other)	System	
Date Information Collected/Updated	Oct-12, 2015	
WELL IDENTIFICATION		
* Well Number or Name	Carriere Family Farms	*from DDW database*
* DDW Source Identification Number (FRDS ID No.)		
DWR Well Log on File? ("YES" or "NO")	No	
State Well Number (from DWR)		
Well Status (Active, Standby, Inactive)	Active	*from DDW database*
WELL LOCATION		
Latitude		*from DDW database*
Longitude		*from DDW database*
Ground Surface Elevation (ft above Mean Sea Level)	91.5'	
Street Address	1640 Highway 45	
Nearest Cross Street	Rd. 54	
City	Glenn	
County	Glenn	
* Neighborhood/Surrounding Area *(see Note 1)*	A	
Site plan on file? ("YES" or "NO")	Yes	
DWR Ground Water Basin		*to come from DWR*
DWR Ground Water Sub-basin		*to come from DWR*
SANITARY CONDITIONS		
** Distance to closest Sewer Line, Sewage Disposal, Septic Tank (ft)	165'	Actual
Distance to Active Wells (ft)	>1,000'	Estimated
Distance to Abandoned Wells (ft)		
Distance to Surface Water (ft)		
** Size of controlled area around well (square feet)	250,000	Actual
* Type of access control to well site *(fencing, building, etc)*	Fencing	✓
* Surface Seal? (Concrete slab)("YES", "NO" or "UNKNOWN")	Yes	✓
* Dimensions of concrete slab: Length(ft)/ Width(ft)/ Thick(in)	5'x8'x4"	✓
* Within 100 year flood plain? ("YES", "NO" or "UNKNOWN")	Yes	✓

* Drainage away from well? ("YES" or "NO")	Yes	
ENCLOSURE/HOUSING		
Enclosure Type *(building, vault, none, etc.)*	None	
Floor material		
Located in Pit? ("YES" or "NO")		
Pit depth (feet) (if applicable)		
WELL CONSTRUCTION		
Date drilled	Dec. 27, 1966	
Drilling Method		
Depth of Bore Hole (feet below ground surface)	48'	
Casing Beginning Depth/Ending Depth(ft below surface); 2nd Casing Beginning Depth/Ending Depth; 3rd Casing, etc.	0 to 46'	
Casing Diameter (inches); 2nd Casing Diameter; 3rd Casing, etc.	10"	Actual
Casing Material; 2nd Casing Material; 3rd Casing, etc.	Steel	~
	(separate multiple entries in field with semi-	Actual, Estimated or Default?
WELL CONSTRUCTION (continued)		
Conductor casing used? ("YES", "NO" or "UNKNOWN") *(See Note*	Unknown	
Conductor casing removed? ("YES", "NO" or "UNKNOWN")	Unknown	
* Depth to highest perforations/screens (ft below surface) (or "UNKNOWN")	No perforations	
Screened Interval Beginning Depth/Ending Depth (ft below surface); 2nd Screened Interval Beg. Depth/Ending Depth; 3rd Screened		
* Total length of screened interval (ft) *(default = 10% pump capacity in gpm)* (or "UNKNOWN")		
* Annular Seal?("YES", "NO" or "UNKNOWN") *(See Note 3)*	No	
* Depth of Annular Seal (ft)		
Material of Annular Seal *(cement grout, bentonite, etc.)*		
Gravel pack, Depth to top (ft below ground surface)		
Total length of gravel pack (ft)		
Complete as much information as possible. Leave blank if information is not available, use N.A. if not applicable.		
** Indicates items required for Source Water Assessment*		
*** Indicates additional items required for assessments and Ground Water Rule*		
AQUIFER		
* Aquifer Materials *(list all that apply: sand, silt, clay, gravel, rock, fractured rock)*	Sand; Silt; clay	Actual
* Effective porosity (decimal percent) *(default = 0.2)* (or "UNKNOWN")	Unknown	

* Confining layer (Impervious Strata) above aquifer? ("YES", "NO" or "UNKNOWN")	Unknown	
Thickness of confining layer, if known (ft)		
Depth to confining layer, if known (ft below ground)		
* Static water level (ft below ground surface)		
Static water level measurement: Date/Method		
Pumping water level (ft below ground surface)		
Pumping water level measurement: Date/Method		
WELL PRODUCTION		
Well Yield (gpm)		
Well Yield Based On (i.e., pump test, etc.)		
Date measured		
Is the well metered? ("YES" or "NO")	No	
Production (gallons per year)	154,000	Estimated
Frequency of Use (hours/year)	3,600 hrs. / year	Actual
Typical pumping duration (hours/day)	20 hrs / day	Actual
PUMP		
Make		
Type		
Size (hp)		
* Capacity (gpm)		
Depth to suction intake (ft below ground surface)		
Lubrication Type		
Type of Power: *(i.e., electric, diesel, etc.)*		
Auxiliary power available? ("YES" or "NO")	No	Actual
Operation controlled by: *(i.e., level in tank, pressure, etc.)*	Pressure	~
Pump to Waste capability? ("YES" or "NO")	No	~
Discharges to: *(i.e., distribution system, storage, etc.)*	Distribution System	~

NOTES

1. Neighborhood/Surrounding Area (list all that apply): A= Agricultural, Ru = Rural, Re = Residential, Co = Commercial, I = Industrial, Mu = Municipal, P = Pristine, O = Other
2. Conductor Casing - Oversized casing used to stabilize bore hole during well construction. Should be removed during installation of annular seal.

3. Annular Seal - Seal of grout in the space between the well casing and the wall of the drilled hole. Sometimes called "sanitary seal".

Please Note:
The information on this Well Data Sheet is considered confidential. To allow the information to be included in the permit report, or made available subject to a public information act request, the waiver clause below has to to be signed and dated by the owner (public water system). In lieu of this signature, the WDS has to be retained in a confidential file, or the information shown in the shaded rows has to be "blacked out."

I/We, (Name) Ron Bryant *certify* ***that I/We am/are the present owners of the well described on this well data sheet. I/We have reviewed the information presented on this well data sheet and I/We take no exception to having the information inlcuded in the SWRCB - Divison of Drinking Water's Engineering Report. I/We understand that by including the well data sheet in the Engineering Report, it will be part of a public document that can be reviewed and copied subject to a Public Information Act request.***

Ron Bryant
(Signature)

Jan. 11, 2016
(Date)

Well Data Sheet Supplement
REMARKS AND DEFECTS
(Use or note these items as appropriate)

(** indicates items pertinent to Ground Water Rule)
Distance (ft) to other sanitary concerns:
** Type of Sanitary Concern: _____
** Type of Sanitary Concern: _____
** Type of Sanitary Concern: _____
** Type of Sanitary Concern: _____
** Type of Sanitary Concern: _____
Raw Water Quality concerns? (Yes or No)
** Microbiological (coliform)
Chemicals
Other (list)
** Continuous Chlorination provided? (Yes or No)
Condition of enclosure or housing
Pit Drained? (if applicable)
Pitless Adaptor? Make and Model
Height of pump base (inches)
Casing Vent? (yes or no)
Air/Vacuum Release? (yes or no)
Sampling Taps? (yes or no)
Location of sampling taps
Wellhead Riser? (yes or no); height above well
Other

Well Completion Report

ORIGINAL
File with DWR

JAN 9 - 1987

Do Not Fill In

WATER WELL DRILLERS REPORT

(Sections 7079, 7080, 7081, 7082, Water Code)

No 5062

THE RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES

State Well No. 19N/1W-18
Other Well No.

[redacted]

(1) OWNER:
Name Manuel Dias
Address Rt 4 - Box 392
Chico Calif

(2) LOCATION OF WELL:
County Glenn Owner's number, if any
Township, Range, and Section
Distance from cities, roads, railroads, etc. 1½ Miles South
Glenn Stone on Coal Side Rd 200 feet

(3) TYPE OF WORK (check):
New Well [X] Deepening [ ] Reconditioning [ ] Destroying [ ]
If destruction, describe material and procedure in Item 11.

(4) PROPOSED USE (check):
Domestic [X] Industrial [ ] Municipal [ ]
Irrigation [X] Test Well [ ] Other [ ]

(5) EQUIPMENT:
Rotary [ ]
Cable [X]
Other [ ]

(6) CASING INSTALLED:
STEEL: OTHER:
SINGLE [X] DOUBLE [ ]

From ft.	To ft.	Diam.	Gage or Wall
0	48	10	10

If gravel packed

Diameter of Bore	From ft.	To ft.

Size of shoe or well ring: ½ x 4"
Size of gravel:
Describe joint Butt Weld

(7) PERFORATIONS OR SCREEN:
Type of perforation or name of screen

From ft.	To ft.	Perf. per row	Rows per ft.	Size in. x in.
	None			

(8) CONSTRUCTION:
Was a surface sanitary seal provided? Yes [ ] No [X] To what depth ft.
Were any strata sealed against pollution? Yes [ ] No [ ] If yes, note depth of strata
From 0 ft. to 46 ft. Plain Casing
From ft. to ft.
Method of sealing Plain Casing

(9) WATER LEVELS:
Depth at which water was first found, if known 12 ft.
Standing level before perforating, if known ft.
Standing level after perforating and developing ft.

(10) WELL TESTS: Overflow Pumped
Was pump test made? Yes [X] No [ ] If yes, by whom?
gal./min. with ft. drawdown after hrs.
Temperature of water Was a chemical analysis made? Yes [ ] No [ ]
Was electric log made of well? Yes [ ] No [ ] If yes, attach copy

(11) WELL LOG:
Total depth 47 ft. Depth of completed well 47 ft.
Formation (Describe by color, character, size of material, and structure)

ft. to	ft.	
0	4	Sand
4	14	Yellow clay
14	46	Sand & gravel
46	47	Brown clay
47	—	Gravel

FOR OFFICIAL USE ONLY

Work started Dec 27 19 66 Completed Dec 29 19 66

WELL DRILLER'S STATEMENT:
This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

NAME MW Beckland
(Person, firm, or corporation) (Typed or printed)
Address 6 Ord Ferry Street
Chico Calif

[SIGNED] MW Beckland
(Well Driller)

License No 132008 Dated 7/16, 19 52

SKETCH LOCATION OF WELL ON REVERSE SIDE

DWR 188 (REV. 9-65)

55491-950 10-65 SON TRIP ① △ OSP

Chemical Data

STATE OF CALIFORNIA
DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR ALL CONSTITUENTS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 19800101 THRU 20160628
REPORT OF SYSTEM: 1100101

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

SOURCE NO: 001 NAME: WELL 01 CLASS: NTNC STATUS: Active

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE	RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001		**1100101**	**CARRIERE FAMILY FARMS**	**001**	**WELL 01**					
	DBP	DISINFECTION BYPRODUCTS								
		32101	BROMODICHLOROMETHANE (THM)	2014/09/03	< 0.5	*	--------	1.000	--------	UG/L
		32101	BROMODICHLOROMETHANE (THM)	2015/06/04	< .5000	*	--------	1.000	--------	UG/L
		32104	BROMOFORM (THM)	2014/09/03	< 0.5	*	--------	1.000	--------	UG/L
		32104	BROMOFORM (THM)	2015/06/04	< .5000	*	--------	1.000	--------	UG/L
		32106	CHLOROFORM (THM)	2014/09/03	< 0.5	*	--------	1.000	--------	UG/L
		32106	CHLOROFORM (THM)	2015/06/04	< .5000	*	--------	1.000	--------	UG/L
		32105	DIBROMOCHLOROMETHANE (THM)	2014/09/03	< 0.5	*	--------	1.000	--------	UG/L
		32105	DIBROMOCHLOROMETHANE (THM)	2015/06/04	< .5000	*	--------	1.000	--------	UG/L
		82080	TOTAL TRIHALOMETHANES	2014/09/03	< 0.5		80.000	--------	80.000	UG/L
		82080	TOTAL TRIHALOMETHANES	2015/06/04	< .5000		80.000	--------	80.000	UG/L
	GP	SECONDARY/GP								
		82383	AGGRSSIVE INDEX (CORROSIVITY)	2014/09/03	11.8	*	--------	--------	--------	
		00440	BICARBONATE ALKALINITY	2014/09/03	240	*	--------	--------	--------	MG/L
		00916	CALCIUM	2014/09/03	42	*	--------	--------	--------	MG/L
		00445	CARBONATE ALKALINITY	2014/09/03	< 10	*	--------	--------	--------	MG/L
		00940	CHLORIDE	2014/09/03	49		500.000	--------	250.000	MG/L
		00081	COLOR	2014/09/03	< 5		15.000	--------	15.000	UNITS
		01042	COPPER	2014/09/03	< 10		1000.000	50.000	1000.000	UG/L
		00900	HARDNESS (TOTAL) AS CACO3	2014/09/03	208	*	--------	--------	--------	MG/L
		71830	HYDROXIDE ALKALINITY	2014/09/03	< 10	*	--------	--------	--------	MG/L
		01045	IRON	2014/09/03	50		300.000	100.000	300.000	UG/L
		00927	MAGNESIUM	2014/09/03	25	*	--------	--------	--------	MG/L
		01055	MANGANESE	2014/09/03	< 10		50.000	20.000	50.000	UG/L
		00086	ODOR THRESHOLD @ 60 C	2014/09/03	< 1		3.000	1.000	3.000	TON
		00403	PH, LABORATORY	2014/09/03	7.5	*	--------	--------	--------	
		01077	SILVER	2014/09/03	< 1		100.000	10.000	100.000	UG/L
		00929	SODIUM	2014/09/03	22	*	--------	--------	--------	MG/L
		00095	SPECIFIC CONDUCTANCE	2014/09/03	512		1600.000	--------	900.000	US

STATE OF CALIFORNIA
DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR ALL CONSTITUENTS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 19800101 THRU 20160628
REPORT OF SYSTEM: 1100101

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

SOURCE NO: 001 NAME: WELL 01 CLASS: NTNC STATUS: Active

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE	RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	GP	SECONDARY/GP								
		00945	SULFATE	2014/09/03	5.6		500.000	0.500	250.000	MG/L
		70300	TOTAL DISSOLVED SOLIDS	2014/09/03	290		1000.000	--------	500.000	MG/L
		82079	TURBIDITY, LABORATORY	2014/09/03	0.2		5.000	0.100	5.000	NTU
		01092	ZINC	2014/09/03	< 20		5000.000	50.000	5000.000	UG/L
	IO	INORGANIC								
		01105	ALUMINUM	2014/09/03	< 10		1000.000	50.000	200.000	UG/L
		01097	ANTIMONY	2014/09/03	< 1		6.000	6.000	6.000	UG/L
		01002	ARSENIC	2014/09/03	< 2		10.000	2.000	5.000	UG/L
		01007	BARIUM	2014/09/03	94.7		1000.000	100.000	1000.000	UG/L
		01012	BERYLLIUM	2014/09/03	< 1		4.000	1.000	4.000	UG/L
		01027	CADMIUM	2014/09/03	< 0.2		5.000	1.000	5.000	UG/L
		01034	CHROMIUM (TOTAL)	2014/09/03	6		50.000	10.000	50.000	UG/L
		01032	CHROMIUM, HEXAVALENT	2014/09/03	4.22		10.000	1.000	10.000	UG/L
		01291	CYANIDE	2014/09/03	< 0.004		150.000	100.000	150.000	UG/L
		00951	FLUORIDE (F) (NATURAL-SOURCE)	2014/09/03	< 0.1		2.000	0.100	2.000	MG/L
		01051	LEAD	2014/09/03	< 0.5		--------	5.000	15.000	UG/L
		71900	MERCURY	2014/09/03	0.02		2.000	1.000	2.000	UG/L
		01067	NICKEL	2014/09/03	< 1		100.000	10.000	100.000	UG/L
		A-031	PERCHLORATE	2014/09/03	< 2		6.000	4.000	4.000	UG/L
		A-031	PERCHLORATE	2015/03/09	< 2		6.000	4.000	4.000	UG/L
		01147	SELENIUM	2014/09/03	< 1		50.000	5.000	50.000	UG/L
		01059	THALLIUM	2014/09/03	< 0.2		2.000	1.000	2.000	UG/L
	NI	NITRATE/NITRITE								
		00618	NITRATE (as N)	2015/12/17	2.2		10.000	0.400	5.000	mg/L
		00618	NITRATE (as N)	2016/04/11	1.8		10.000	0.400	5.000	mg/L
		71850	NITRATE (AS NO3)	2014/09/03	< 0.4		45.000	2.000	23.000	MG/L
		A-029	NITRATE + NITRITE (AS N)	2014/09/03	< 0.1		10000.000	400.000	5000.000	UG/L
		00620	NITRITE (AS N)	2014/09/03	< 0.1		1000.000	400.000	500.000	UG/L
	RA	RADIOLOGICAL								
		01501	GROSS ALPHA	2014/09/03	1.04		15.000	3.000	5.000	PCI/L

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

SOURCE NO: 001 NAME: WELL 01 CLASS: NTNC STATUS: Active

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE	RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	RA	RADIOLOGICAL								
		01502	GROSS ALPHA COUNTING ERROR	2014/09/03	1.19	*	--------	--------	--------	PCI/L
		A-072	GROSS ALPHA MDA95	2014/09/03	1.30	*	3.000	--------	--------	PCI/L
		09501	RADIUM 226	2015/03/09	0.038	*	--------	1.000	--------	PCI/L
		09502	RADIUM 226 COUNTING ERROR	2015/03/09	0.197	*	--------	--------	--------	PCI/L
		A-074	RADIUM 226 MDA95	2015/03/09	0.470	*	1.000	--------	--------	PCI/L
		11501	RADIUM 228	2015/03/09	0.000		--------	1.000	--------	
		11502	RADIUM 228 COUNTING ERROR	2015/03/09	0.466	*	--------	--------	--------	PCI/L
		A-075	RADIUM 228 MDA95	2015/03/09	0.253	*	1.000	--------	--------	PCI/L
		28012	URANIUM (PCI/L)	2014/09/03	0.411		20.000	1.000	20.000	PCI/L
		A-028	URANIUM COUNTING ERROR	2014/09/03	0.494	*	--------	--------	--------	PCI/L
		A-073	URANIUM MDA95	2014/09/03	0.300	*	1.000	--------	--------	PCI/L
	S1	REGULATED VOC								
		34506	1,1,1-TRICHLOROETHANE	2014/09/03	< 0.5		200.000	0.500	0.500	UG/L
		34506	1,1,1-TRICHLOROETHANE	2015/06/04	< .5000		200.000	0.500	0.500	UG/L
		34516	1,1,2,2-TETRACHLOROETHANE	2014/09/03	< 0.5		1.000	0.500	0.500	UG/L
		34516	1,1,2,2-TETRACHLOROETHANE	2015/06/04	< .5000		1.000	0.500	0.500	UG/L
		34511	1,1,2-TRICHLOROETHANE	2014/09/03	< 0.5		5.000	0.500	0.500	UG/L
		34511	1,1,2-TRICHLOROETHANE	2015/06/04	< .5000		5.000	0.500	0.500	UG/L
		34496	1,1-DICHLOROETHANE	2014/09/03	< 0.5		5.000	0.500	0.500	UG/L
		34496	1,1-DICHLOROETHANE	2015/06/04	< .5000		5.000	0.500	0.500	UG/L
		34501	1,1-DICHLOROETHYLENE	2014/09/03	< 0.5		6.000	0.500	0.500	UG/L
		34501	1,1-DICHLOROETHYLENE	2015/06/04	< .5000		6.000	0.500	0.500	UG/L
		34551	1,2,4-TRICHLOROBENZENE	2014/09/03	< 0.5		5.000	0.500	0.500	UG/L
		34551	1,2,4-TRICHLOROBENZENE	2015/06/04	< .5000		5.000	0.500	0.500	UG/L
		34536	1,2-DICHLOROBENZENE	2014/09/03	< 0.5		600.000	0.500	0.500	UG/L
		34536	1,2-DICHLOROBENZENE	2015/06/04	< .5000		600.000	0.500	0.500	UG/L
		34531	1,2-DICHLOROETHANE	2014/09/03	< 0.5		0.500	0.500	0.500	UG/L
		34531	1,2-DICHLOROETHANE	2015/06/04	< .5000		0.500	0.500	0.500	UG/L

SYSTEM NO: NAME: COUNTY:

SOURCE NO: NAME: CLASS: STATUS:

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE		RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	S1	REGULATED VOC									
		34541	1,2-DICHLOROPROPANE	2014/09/03	<	0.5		5.000	0.500	0.500	UG/L
		34541	1,2-DICHLOROPROPANE	2015/06/04	<	.5000		5.000	0.500	0.500	UG/L
		34561	1,3-DICHLOROPROPENE (TOTAL)	2014/09/03	<	0.5		0.500	0.500	0.500	UG/L
		34561	1,3-DICHLOROPROPENE (TOTAL)	2015/06/04	<	.5000		0.500	0.500	0.500	UG/L
		34571	1,4-DICHLOROBENZENE	2014/09/03	<	0.5		5.000	0.500	0.500	UG/L
		34571	1,4-DICHLOROBENZENE	2015/06/04	<	.5000		5.000	0.500	0.500	UG/L
		34030	BENZENE	2014/09/03	<	0.5		1.000	0.500	0.500	UG/L
		34030	BENZENE	2015/06/04	<	.5000		1.000	0.500	0.500	UG/L
		32102	CARBON TETRACHLORIDE	2014/09/03	<	0.5		0.500	0.500	0.500	UG/L
		32102	CARBON TETRACHLORIDE	2015/06/04	<	.5000		0.500	0.500	0.500	UG/L
		77093	CIS-1,2-DICHLOROETHYLENE	2014/09/03	<	0.5		6.000	0.500	0.500	UG/L
		77093	CIS-1,2-DICHLOROETHYLENE	2015/06/04	<	.5000		6.000	0.500	0.500	UG/L
		34423	DICHLOROMETHANE	2014/09/03	<	0.5		5.000	0.500	0.500	UG/L
		34423	DICHLOROMETHANE	2015/06/04	<	.5000		5.000	0.500	0.500	UG/L
		34371	ETHYLBENZENE	2014/09/03	<	0.5		300.000	0.500	0.500	UG/L
		34371	ETHYLBENZENE	2015/06/04	<	.5000		300.000	0.500	0.500	UG/L
		46491	METHYL-TERT-BUTYL-ETHER (MTBE)	2014/09/03	<	1		13.000	3.000	3.000	UG/L
		46491	METHYL-TERT-BUTYL-ETHER (MTBE)	2015/06/04	<	1.0000		13.000	3.000	3.000	UG/L
		34301	MONOCHLOROBENZENE	2014/09/03	<	0.5		70.000	0.500	0.500	UG/L
		34301	MONOCHLOROBENZENE	2015/06/04	<	.5000		70.000	0.500	0.500	UG/L
		77128	STYRENE	2014/09/03	<	0.5		100.000	0.500	0.500	UG/L
		77128	STYRENE	2015/06/04	<	.5000		100.000	0.500	0.500	UG/L
		34475	TETRACHLOROETHYLENE	2014/09/03	<	0.5		5.000	0.500	0.500	UG/L
		34475	TETRACHLOROETHYLENE	2015/06/04	<	.5000		5.000	0.500	0.500	UG/L
		34010	TOLUENE	2014/09/03	<	0.5		150.000	0.500	0.500	UG/L
		34010	TOLUENE	2015/06/04	<	.5000		150.000	0.500	0.500	UG/L
		34546	TRANS-1,2-DICHLOROETHYLENE	2014/09/03	<	0.5		10.000	0.500	0.500	UG/L
		34546	TRANS-1,2-DICHLOROETHYLENE	2015/06/04	<	.5000		10.000	0.500	0.500	UG/L

STATE OF CALIFORNIA
DRINKING WATER ANALYSES RESULTS REPORT
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REPORT OF SYSTEM: 1100101

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

SOURCE NO: 001 NAME: WELL 01 CLASS: NTNC STATUS: Active

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE	RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	S1	REGULATED VOC								
		39180	TRICHLOROETHYLENE	2014/09/03	< 0.5		5.000	0.500	0.500	UG/L
		39180	TRICHLOROETHYLENE	2015/06/04	< .5000		5.000	0.500	0.500	UG/L
		34488	TRICHLOROFLUOROMETHANE	2014/09/03	< 0.5		150.000	5.000	5.000	UG/L
		34488	TRICHLOROFLUOROMETHANE	2015/06/04	< .5000		150.000	5.000	5.000	UG/L
		81611	TRICHLOROTRIFLUOROETHANE (FREON 113)	2014/09/03	< 0.5		1200.000	10.000	10.000	UG/L
		81611	TRICHLOROTRIFLUOROETHANE (FREON 113)	2015/06/04	< .5000		1200.000	10.000	10.000	UG/L
		39175	VINYL CHLORIDE	2014/09/03	< 0.5		0.500	0.500	0.500	UG/L
		39175	VINYL CHLORIDE	2015/06/04	< .5000		0.500	0.500	0.500	UG/L
		81551	XYLENES (TOTAL)	2014/09/03	< 0.5		1750.000	0.500	0.500	UG/L
		81551	XYLENES (TOTAL)	2015/06/04	< .5000		1750.000	0.500	0.500	UG/L
	S2	REGULATED SOC								
		34676	2,3,7,8-TCDD (DIOXIN)	2014/09/03	0000000000		30.000	5.000	5.000	PG/L
		39045	2,4,5-TP (SILVEX)	2014/09/03	< 1		50.000	1.000	1.000	UG/L
		39730	2,4-D	2014/09/03	< 2		70.000	10.000	10.000	UG/L
		77825	ALACHLOR	2014/09/03	< 1		2.000	1.000	1.000	UG/L
		39033	ATRAZINE	2014/09/03	< 0.5		1.000	0.500	0.500	UG/L
		38710	BENTAZON	2014/09/03	< 2		18.000	2.000	2.000	UG/L
		34247	BENZO (A) PYRENE	2014/09/03	< 0.10		0.200	0.100	0.100	UG/L
		81405	CARBOFURAN	2014/09/03	< 5		18.000	5.000	5.000	UG/L
		39350	CHLORDANE	2014/09/03	< 0.1		0.100	0.100	0.100	UG/L
		38432	DALAPON	2014/09/03	< 10		200.000	10.000	10.000	UG/L
		A-026	DI(2-ETHYLHEXYL)ADIPATE	2014/09/03	< 5.0		400.000	5.000	5.000	UG/L
		39100	DI(2-ETHYLHEXYL)PHTHALATE	2014/09/03	< 3.0		4.000	3.000	3.000	UG/L
		38761	DIBROMOCHLOROPROPANE (DBCP)	2014/09/03	< 0.01		0.200	0.010	0.010	UG/L
		81287	DINOSEB	2014/09/03	< 1		7.000	2.000	2.000	UG/L
		78885	DIQUAT	2014/09/03	< 2		20.000	4.000	4.000	UG/L
		38926	ENDOTHALL	2014/09/03	< 40		100.000	45.000	45.000	UG/L
		39390	ENDRIN	2014/09/03	< 0.01		2.000	0.100	0.100	UG/L
		77651	ETHYLENE DIBROMIDE (EDB)	2014/09/03	< 0.02		0.050	0.020	0.020	UG/L

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

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PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE		RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	S2	REGULATED SOC									
		79743	GLYPHOSATE	2014/09/03	<	20		700.000	25.000	25.000	UG/L
		39410	HEPTACHLOR	2014/09/03	<	0.01		0.010	0.010	0.010	UG/L
		39420	HEPTACHLOR EPOXIDE	2014/09/03	<	0.01		0.010	0.010	0.010	UG/L
		39700	HEXACHLOROBENZENE	2014/09/03	<	0.01		1.000	0.500	0.500	UG/L
		34386	HEXACHLOROCYCLOPENTADIENE	2014/09/03	<	0.1		50.000	1.000	1.000	UG/L
		39340	LINDANE	2014/09/03	<	0.05		0.200	0.200	0.200	UG/L
		39480	METHOXYCHLOR	2014/09/03	<	0.1		30.000	10.000	10.000	UG/L
		82199	MOLINATE	2014/09/03	<	2		20.000	2.000	2.000	UG/L
		38865	OXAMYL	2014/09/03	<	5		50.000	20.000	20.000	UG/L
		34671	PCB-1016 (AS DECACHLOROBIPHENYL (DCB))	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39488	PCB-1221 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39492	PCB-1232 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39496	PCB-1242 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39500	PCB-1248 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39504	PCB-1254 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39508	PCB-1260 (AS DCB)	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		39032	PENTACHLOROPHENOL	2014/09/03	<	0.2		1.000	0.200	0.200	UG/L
		39720	PICLORAM	2014/09/03	<	1		500.000	1.000	1.000	UG/L
		39055	SIMAZINE	2014/09/03	<	0.5		4.000	1.000	1.000	UG/L
		A-001	THIOBENCARB	2014/09/03	<	1		70.000	1.000	1.000	
		39400	TOXAPHENE	2014/09/03	<	0.5		3.000	1.000	1.000	UG/L
	UA	STATE UCMR									
		77562	1,1,1,2-TETRACHLOROETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77562	1,1,1,2-TETRACHLOROETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		01020	BORON	2014/09/03		100		1000.000	100.000	1000.000	UG/L
		34668	DICHLORODIFLUOROMETHANE (FREON 12)	2014/09/03	<	0.5		1000.000	0.500	1000.000	UG/L
		34668	DICHLORODIFLUOROMETHANE (FREON 12)	2015/06/04	<	.5000		1000.000	0.500	1000.000	UG/L
		A-033	ETHYL-TERT-BUTYL ETHER	2014/09/03	<	3	*	--------	3.000	--------	UG/L
		A-033	ETHYL-TERT-BUTYL ETHER	2015/06/04	<	3.0000	*	--------	3.000	--------	UG/L

STATE OF CALIFORNIA
DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR ALL CONSTITUENTS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 19800101 THRU 20160628
REPORT OF SYSTEM: 1100101

SYSTEM NO: 1100101 NAME: CARRIERE FAMILY FARMS COUNTY: GLENN

SOURCE NO: 001 NAME: WELL 01 CLASS: NTNC STATUS: Active

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE		RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	UA	STATE UCMR									
		A-034	TERT-AMYL-METHYL ETHER	2014/09/03	<	3	*	--------	3.000	--------	UG/L
		A-034	TERT-AMYL-METHYL ETHER	2015/06/04	<	3.0000	*	--------	3.000	--------	UG/L
		01087	VANADIUM	2014/09/03		7		50.000	3.000	50.000	UG/L
	UB	UNREG. TABLE B									
		77222	1,2,4-TRIMETHYLBENZENE	2014/09/03	<	0.5		330.000	0.500	330.000	UG/L
		77222	1,2,4-TRIMETHYLBENZENE	2015/06/04	<	.5000		330.000	0.500	330.000	UG/L
		38458	DIMETHOATE	2014/09/03	<	2	*	--------	--------	--------	UG/L
		A-011	P-ISOPROPYLTOLUENE	2014/09/03	<	0.5	*	--------	--------	--------	UG/L
		A-011	P-ISOPROPYLTOLUENE	2015/06/04	<	.5000	*	--------	--------	--------	UG/L
	UC	UNREG. TABLE C									
		38533	PROPACHLOR	2014/09/03	<	0.5		0.500	0.500	0.500	UG/L
	XX	GENERAL NON CHAP 15									
		77168	1,1-DICHLOROPROPENE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77168	1,1-DICHLOROPROPENE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		77613	1,2,3-TRICHLOROBENZENE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77613	1,2,3-TRICHLOROBENZENE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		77226	1,3,5-TRIMETHYLBENZENE	2014/09/03	<	0.5		330.000	0.500	330.000	UG/L
		77226	1,3,5-TRIMETHYLBENZENE	2015/06/04	<	.5000		330.000	0.500	330.000	UG/L
		34566	1,3-DICHLOROBENZENE	2014/09/03	<	0.5		--------	0.500	600.000	UG/L
		34566	1,3-DICHLOROBENZENE	2015/06/04	<	.5000		--------	0.500	600.000	UG/L
		77173	1,3-DICHLOROPROPANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77173	1,3-DICHLOROPROPANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		77170	2,2-DICHLOROPROPANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77170	2,2-DICHLOROPROPANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		39740	2,4,5-T	2014/09/03	<	1	*	--------	--------	--------	UG/L
		A-008	2-CHLOROTOLUENE	2014/09/03	<	0.5		140.000	0.500	0.500	UG/L
		A-008	2-CHLOROTOLUENE	2015/06/04	<	.5000		140.000	0.500	0.500	UG/L
		A-021	3-HYDROXYCARBOFURAN	2014/09/03	<	3		--------	3.000	3.000	UG/L
		A-009	4-CHLOROTOLUENE	2014/09/03	<	0.5		140.000	0.500	140.000	UG/L
		A-009	4-CHLOROTOLUENE	2015/06/04	<	.5000		140.000	0.500	140.000	UG/L

SYSTEM NO: NAME: COUNTY:

SOURCE NO: NAME: CLASS: STATUS:

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE		RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	XX	GENERAL NON CHAP 15									
		39053	ALDICARB	2014/09/03	<	3		--------	3.000	7.000	UG/L
		A-020	ALDICARB SULFONE	2014/09/03	<	2		--------	4.000	4.000	UG/L
		A-019	ALDICARB SULFOXIDE	2014/09/03	<	3		--------	3.000	3.000	UG/L
		39330	ALDRIN	2014/09/03	<	0.075	*	--------	0.075	0.002	UG/L
		00410	ALKALINITY (TOTAL) AS CACO3	2014/09/03		200	*	--------	--------	--------	MG/L
		82198	BROMACIL	2014/09/03	<	2		--------	10.000	10.000	UG/L
		81555	BROMOBENZENE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		81555	BROMOBENZENE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		A-012	BROMOCHLOROMETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		A-012	BROMOCHLOROMETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		34413	BROMOMETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		34413	BROMOMETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		77860	BUTACHLOR	2014/09/03	<	0.38		--------	0.380	0.380	UG/L
		77700	CARBARYL	2014/09/03	<	5		--------	5.000	700.000	UG/L
		34311	CHLOROETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		34311	CHLOROETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		34418	CHLOROMETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		34418	CHLOROMETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		34704	CIS-1,3-DICHLOROPROPENE	2014/09/03	<	0.5		0.500	0.500	0.500	UG/L
		34704	CIS-1,3-DICHLOROPROPENE	2015/06/04	<	.5000		0.500	0.500	0.500	UG/L
		39570	DIAZINON	2014/09/03	<	2	*	1.200	--------	--------	UG/L
		77596	DIBROMOMETHANE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		77596	DIBROMOMETHANE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		82052	DICAMBA	2014/09/03	<	1	*	--------	1.500	--------	UG/L
		39380	DIELDRIN	2014/09/03	<	0.01	*	--------	0.020	0.002	UG/L
		A-036	DIISOPROPYL ETHER	2014/09/03	<	3	*	--------	3.000	--------	UG/L
		A-036	DIISOPROPYL ETHER	2015/06/04	<	3.0000	*	--------	3.000	--------	UG/L
		34391	HEXACHLOROBUTADIENE	2014/09/03	<	0.5		--------	0.500	0.500	UG/L
		34391	HEXACHLOROBUTADIENE	2015/06/04	<	.5000		--------	0.500	0.500	UG/L
		77223	ISOPROPYLBENZENE	2014/09/03	<	0.5		770.000	0.500	770.000	UG/L

SYSTEM NO: NAME: COUNTY:

SOURCE NO: NAME: CLASS: STATUS:

PSCODE		GROUP/CONSTITUENT IDENTIFICATION		DATE		RESULT	*	MCL	DLR	TRIGGER	UNIT
1100101001	XX	77223	ISOPROPYLBENZENE	2015/06/04	<	.5000		770.000	0.500	770.000	UG/L
		71814	LANGELIER INDEX AT SOURCE TEMP.	2014/09/03		-0.02		--------	--------	--------	
		A-014	M,P-XYLENE	2014/09/03	<	0.5	*	--------	0.500	--------	UG/L
		A-014	M,P-XYLENE	2015/06/04	<	.5000	*	--------	0.500	--------	UG/L
		39051	METHOMYL	2014/09/03	<	2		--------	2.000	2.000	UG/L
		39356	METOLACHLOR	2014/09/03	<	1	*	--------	--------	--------	UG/L
		81408	METRIBUZIN	2014/09/03	<	0.5	*	--------	--------	--------	UG/L
		34696	NAPHTHALENE	2014/09/03	<	0.5		170.000	0.500	170.000	UG/L
		34696	NAPHTHALENE	2015/06/04	<	.5000		170.000	0.500	170.000	UG/L
		A-010	N-BUTYLBENZENE	2014/09/03	<	0.5		260.000	0.500	70.000	UG/L
		A-010	N-BUTYLBENZENE	2015/06/04	<	.5000		260.000	0.500	70.000	UG/L
		77224	N-PROPYLBENZENE	2014/09/03	<	0.5		260.000	0.500	260.000	UG/L
		77224	N-PROPYLBENZENE	2015/06/04	<	.5000		260.000	0.500	260.000	UG/L
		77135	O-XYLENE	2014/09/03	<	0.5	*	--------	0.500	--------	UG/L
		77135	O-XYLENE	2015/06/04	<	.5000	*	--------	0.500	--------	UG/L
		00937	POTASSIUM	2014/09/03		1	*	--------	--------	--------	MG/L
		39057	PROMETRYN	2014/09/03	<	2		--------	2.000	2.000	UG/L
		77350	SEC-BUTYLBENZENE	2014/09/03	<	0.5		260.000	0.500	0.500	UG/L
		77350	SEC-BUTYLBENZENE	2015/06/04	<	.5000		260.000	0.500	0.500	UG/L
		00931	SODIUM ABSORPTION RATIO	2014/09/03		0.7	*	--------	--------	--------	
		77353	TERT-BUTYLBENZENE	2014/09/03	<	0.5		260.000	0.500	0.500	UG/L
		77353	TERT-BUTYLBENZENE	2015/06/04	<	.5000		260.000	0.500	0.500	UG/L
		34699	TRANS-1,3-DICHLOROPROPENE	2014/09/03	<	0.5	*	0.500	0.500	--------	UG/L
		34699	TRANS-1,3-DICHLOROPROPENE	2015/06/04	<	.5000	*	0.500	0.500	--------	UG/L

Permit Amendment Application

STATE OF CALIFORNIA
APPLICATION
FOR
DOMESTIC WATER SUPPLY PERMIT AMENDMENT
FROM

Applicant: Carriere Family Farms
(Enter the name of legal owner, i.e., person(s) or organization)

Address: 1640 State Highway 45 Glenn,CA. 95943

System Name: Carriere Family Farms

System Number: 1100101

TO: State Water Resources Control Board
Division of Drinking Water
Drinking Water Field Operations Branch, District 21
364 Knollcrest Drive, Suite 101
Redding, CA 96002

Pursuant and subject to the requirements of the California Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), Article 7, Section 116525, relating to domestic water supply permits, application is hereby made for a domestic water supply permit to operate a Nontransient-Noncommunity Water System in Glenn,CA.

(Applicant should state the type of system, e.g., community, transient-noncommunity, or nontransient-noncommunity, and the proposed area of services. This application form may also be used for a change in ownership application.)

FOR OFFICIAL USE

RECEIVED
SWRCB REDDING
JAN 19 2016
DIVISION OF DRINKING WATER

Date Received:

I (We) declare under penalty of perjury that the statements on this application and on the accompanying attachments are correct to my (our) knowledge and that I (we) are acting under authority and direction of the responsible legal entity under whose name this application is made.

Signed By:

Title: Plant Manager

Address: 1640 Highway 45

Drinking Water Source Assessment (DSWAP)

Drinking Water Source Assessment

Water System

Carriere Family Farms

Glenn County

Water Source

Well 01

Assessment Date

January 2016

California Division of Drinking Water
Northern Field Operations Branch
Valley District

District No.	**21**
System No.	**1100101**
Source No.	**001**
PS Code	**1100101-001**

Assessment Summary

Description of System and Source

The Carriere Family Farms water system is classified as non-transient and is located in Glenn County. The water system serves two walnut packing plants and an office. There are approximately 55 empoyees.

The drinking water source (Well 01) is of unknown construction (a well log could not be located) and probably does not have a sanitary seal. The well has a 10-inch diameter steel casing, submersible pump, and pressure tank. It draws from the underlying aquifer. The well is likely between 50 and 150 feet in depth.

Land surrounding the facility is used almost exclusively to grow orchard crops. The facility is on the east side of Highway 45/162 about 1.3 miles south of the community of Glenn, in Glenn County. The River Branch Canal is across the two-lane highway from the plant.

Assessment Procedures

This assessment was conducted by staff of the Division of Drinking Water, in January 2016, in accordance with standard DWSAP procedures. Information for the assessment was obtained from online maps, satellite photos, the plant manager (Ron Bryant), etc.

Contents of this Assessment

- *Assessment Summary*
- *Vulnerability Summary*
- *Delineation of Protection Zones*
- *Physical Barrier Effectiveness Checklist*
- *Inventory of Possible Contaminating Activities*
- *Vulnerability Ranking*
- *Assessment Map*

Comments

Well location (coordinates) was established using an online map (mapper.acme.com).

Vulnerability Summary

THE FOLLOWING INFORMATION MUST BE INCLUDED IN THE SYSTEM CONSUMER CONFIDENCE REPORT

A source water assessment was conducted for the *Well 01* of the *Carriere Family Farms* water system in *January 2016*.

The source is considered most vulnerable to the following activities associated with contaminants detected in the water supply:

- *Septic systems – low density (<1/acre)*
- *Agricultural Drainage*
- *Crops, irrigated*

The source is considered most vulnerable to the following activities not associated with any detected contaminants:

- *Septic systems – low density (<1/acre)*
- *Agricultural Drainage*
- *Food processing*
- *Crops, irrigated*
- *Fertilizer, Pesticide/ Herbicide Application*
- *Transportation Corridors- Freeways/state highways*
- *Surface water - streams/ lakes/rivers*
- *Wells – Water supply*

Discussion of Vulnerability

There have been no contaminants detected in the water supply at or near regulatory levels; however, the source is still considered vulnerable to activities located near the drinking water source.

Delineation of Ground Water Protection Zones

Indicate the method used to delineate the zones:

(For more information refer to the Drinking Water Source Assessment and Protection document)

__X__ Calculated Fixed Radius (Default) (Show calculations below)

_____ Modified Calculated Fixed Radius (Show calculations below and attach documentation for direction of ground water flow)

_____ More detailed methods
Type used (i.e., analytical methods, hydrogeologic mapping, modeling):

_____ Arbitrary Fixed Radius (For use only by or with permission of DHS—use minimum distances shown below)

Calculated Fixed Radius Equation

The equation for the calculated fixed radius (R) is $R_t = \sqrt{Q\,t / \pi\,\eta\,H}$

$R_t = R_2$, R_5, or R_{10} corresponding to t (Calculate R for each travel time)
Q = maximum pumping capacity of well
(ft^3/year = gpm * 70,267):_____
t = time of travel (years), 2, 5 and 10 years
π = 3.1416
η = effective porosity (decimal percent) (If unknown, assume 0.2):
_____
H = screened interval of well (feet) (If unknown, assume 10% of Q gpm, 10 ft minimum):
_____

Specific methods follow on next page

Calculated Fixed Radius Delineation Method (Default)

Using the equation presented above, calculate the size of zones for the appropriate aquifer setting of the source.

Default values

Porous Media Aquifer

Zone A (2 year TOT) R_2 = _____ft, minimum = 600 ft —use larger: _____ft
Zone B5 (5 year TOT) R_5 = _____ft, minimum = 1,000 ft—use larger: _____ft
Zone B10 (10 year TOT) R_{10} = _____ft, minimum = 1,500 ft—use larger: _____ft

Fractured Rock Aquifer

(Increase size of zones by 50%)

Zone A (2 year TOT) $1.5R_2$ = _____ft, minimum = 900 ft—use larger: _____ft
Zone B5 (5 year TOT) $1.5R_5$ = _____ft, minimum = 1,500 ft—use larger: _____ft
Zone B10 (10 year TOT) $1.5R_{10}$ = _____ft, minimum = 2,250 ft—use larger: _____ft

Modified Calculated Fixed Radius Delineation Method

In porous media aquifers, if the direction of ground water flow is known (see Section 6.2.3), the default zone circle may be shifted upgradient by $0.5R_t$. The upgradient and downgradient limits of the zone are determined below.

Zone A (2-year TOT)

upgradient distance = $1.5R_2$ = _____ft, minimum = 900 ft, use larger: _____ft
downgradient distance = $0.5R_2$ = _____ft, minimum = 300 ft, use larger: _____ft

Zone B5 (5-year TOT)

upgradient distance = $1.5R_5$ = _____ft, minimum = 1,500 ft, use larger: _____ft
downgradient distance = $0.5R_5$ = _____ft, minimum = 500 ft, use larger: _____ft

Zone B10 (10-year TOT)

upgradient distance = $1.5R_{10}$ = _____ft, minimum = 2,250 ft, use larger: _____ft
downgradient distance = $0.5R_{10}$ = _____ft, minimum = 750 ft, use larger: _____ft

Physical Barrier Effectiveness (PBE) – Ground Water, page 1 of 2
Source Name:_____ Source No.:_____

PARAMETER	*POINTS* Unconfined		Confined	
A. TYPE OF AQUIFER Confinement *(up to **50** points maximum)* choose one				
a. Unconfined, Semi-confined, Fractured Rock, Unknown	0	X		
b. Confined			50	
B. AQUIFER MATERIAL (Unconfined Aquifer) Type of materials within the aquifer *(up to **20** points maximum)* choose one				
1. Porous Media (Interbedded sands, silts, clays, gravels) with continuous clay layer minimum 25' thick above water table within Zone A	20			
2. Porous Media (Interbedded sands, silts, clays, and gravels)	10	X		
3. Fractured rock * (* Low Physical Barrier Effectiveness - no further questions required)	0			
C. PATHWAYS OF CONTAMINATION (All Aquifers) Presence of Abandoned or Improperly Destroyed Wells *(up to **10** points maximum)*				
1. Are they present within Zone A (2-year time of travel (TOT) distance)?				
a. Yes or unknown	0	X	0	
b. No	5		5	
2. Are they present within Zone B5 (2- to 5-year TOT distance)?				
a. Yes or unknown	0	X	0	
b. No	3		3	
3. Are they present within Zone B10 (5- to 10-year TOT distance)?				
a. Yes or unknown	0	X	0	
b. No	2		2	
D. STATIC WATER CONDITIONS (Unconfined Aquifer) Depth to static Water (DTW) = 15 feet *(up to **10** points maximum)* choose one				
1. 0 to 20 feet	0	X		
2. 20 to 50 feet	2			
3. 50 to 100 feet	6			
4. > 100 feet	10			
E. WELL OPERATION (Unconfined Aquifer) Depth to Uppermost Perforations (DUP) DUP = 50 feet; Maximum Pumping Rate of Well (Q) Q = 50 gallons/minute; Length of screened interval (H) H = 1 feet; [(DUP – DTW) / (Q/H)] = <1 *(up to **10** points maximum)* choose one				
1. < 5	0	X		
2. 5 to 10	5			
3. > 10	10			

Physical Barrier Effectiveness – Ground Water, page 2 of 2
Source Name: _____ Source No. _____

PARAMETER	*POINTS*			
	Unconfined		Confined	
F. HYDRAULIC HEAD (Confined Aquifer) What is the relationship in hydraulic head between the confined aquifer and the overlying unconfined aquifer? (i.e. does the well flow under artesian conditions?) *(up to **20** points maximum)* choose one				
1. head in confined aquifer is higher than head in unconfined aquifer under all conditions			20	
2. head in confined aquifer is higher than head in unconfined aquifer under static conditions			10	
3. head in confined aquifer is lower than or same as head in unconfined aquifer			0	
4. unknown			0	
G. WELL CONSTRUCTION (All Aquifers) 1. Sanitary Seal (Annular Seal) Depth = NONE feet *(up to **10** points maximum)* choose one				
a. None or less than 20 feet deep	0	X	0	
b. 20 to 50 ft deep	6		10	
c. 50 ft or greater	10		10	
2. Surface seal (concrete cap) *(up to **4** points maximum)* choose one				
a. Not present or improperly constructed	0	X	0	
b. Watertight, slopes away from well, at least 2' laterally in all directions	4		4	
3. Flooding potential at well site *(up to **1** point maximum)* choose one				
a. Subject to localized flooding (i.e. in low area or unsealed pit or vault) or Within 100 year flood plain	0	X	0	
b. Not subject to flooding	1		1	
4. Security at well site *(up to **5** points maximum)* choose one				
a. Not secure	0	X	0	
b. Secure (i.e. housing, fencing, etc.)	5		5	
Maximum Points Possible	70		100	
POINT TOTAL FOR THIS SOURCE	10			

Physical Barrier Effectiveness SCORE INTERPRETATION

Point Total		Effectiveness	
X 0 to 35	=	**Low**	(includes all sources in Fractured Rock)
36 to 69	=	**Moderate**	
70 to 100	=	**High**	

Possible Contaminating Activities (PCA) Inventory Form - Ground Water

District Name _____ District No. _____ County
System Name _____ System No.
Source Name _____ Source No. _____ PS Code: _____

Completed by _____ Date _____

PCA tables used for this drinking water source:

Commercial/Industrial	X
Residential/Municipal	
Agricultural/Rural	X
Other (required for all)	X

PCA Checklist COMMERCIAL/INDUSTRIAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Automobile- Body shops (H)	N	N	N	
Automobile- Car washes (M)	N	N	N	
Automobile- Gas stations (VH)	N	N	N	
Automobile- Repair shops (H)	N	N	N	
Boat services/repair/ refinishing (H)	N	N	N	
Chemical/petroleum pipelines (H)	N	N	N	
Chemical/petroleum processing/storage (VH)	N	N	N	
Dry cleaners (VH)	N	N	N	
Electrical/electronic manufacturing (H)	N	N	N	
Fleet/truck/bus terminals (H)	N	N	N	
Furniture repair/ manufacturing (H)	N	N	N	
Home manufacturing (H)	N	N	N	
Junk/scrap/salvage yards (H)	N	N	N	
Machine shops (H)	N	N	N	
Metal plating/ finishing/fabricating (VH)	N	N	N	
Photo processing/printing (H)	N	N	N	
Plastics/synthetics producers (VH)	N	N	N	
Research laboratories (H)	N	N	N	
Wood preserving/treating (H)	N	N	N	
Wood/pulp/paper processing and mills (H)	N	N	N	
Lumber processing and manufacturing (H)	N	N	N	
Sewer collection systems (H, if in Zone A, otherwise L)	N	N	N	
Parking lots/malls (>50 spaces) (M)	N	N	N	
Cement/concrete plants (M)	N	N	N	
Food processing (M)	Y	N	N	Facility processes walnuts
Funeral services/graveyards (M)	N	N	N	
Hardware/lumber/parts stores (M)	N	N	N	
Appliance/Electronic Repair (L)	N	N	N	
Office buildings/complexes (L)	N	N	N	
Rental Yards (L)	N	N	N	
RV/mini storage (L)	N	N	N	

PCA Checklist RESIDENTIAL/MUNICIPAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Airports - Maintenance/ fueling areas (VH)				
Landfills/dumps (VH)				
Railroad yards/ maintenance/ fueling areas (H)				
Septic systems - high density (>1/acre) (VH if in Zone A, otherwise M)				
Sewer collection systems (H, if in Zone A, otherwise L)				
Utility stations - maintenance areas (H)				
Wastewater treatment plants (VH in Zone A, otherwise H)				
Drinking water treatment plants (M)				
Golf courses (M)				
Housing - high density (>1 house/0.5 acres) (M)				
Motor pools (M)				
Parks (M)				
Waste transfer/recycling stations (M)				
Apartments and condominiums (L)				
Campgrounds/ Recreational areas (L)				
Fire stations (L)				
RV Parks (L)				
Schools (L)				
Hotels, Motels (L)				

PCA Checklist AGRICULTURAL/RURAL

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Grazing (> 5 large animals or equivalent per acre) (H in Zone A, otherwise M)	N	N	N	
Concentrated Animal Feeding Operations (CAFOs) as defined in federal regulation1 (VH in Zone A, otherwise H)	N	N	N	
Animal Feeding Operations as defined in federal regulation2 (VH in Zone A, otherwise H)	N	N	N	
Other Animal operations (H in Zone A, otherwise M)	N	N	N	
Farm chemical distributor/ application service (H)	N	N	N	
Farm machinery repair (H)	N	N	N	
Septic systems - low density (<1/acre) (H in Zone A, otherwise L)	Y	N	Y	A – Facility's septic B10 – Ranch house
Lagoons / liquid wastes (H)	N	N	N	
Machine shops (H)	N	N	N	
Pesticide/fertilizer/ petroleum storage & transfer areas (H)	N	N	N	
Agricultural Drainage (H in Zone A, otherwise M)	Y	Y	Y	Facility surrounded by orchards
Wells - Agricultural/ Irrigation (H)	N	N	N	
Managed Forests (M)	N	N	N	
Crops, irrigated (Berries, hops, mint, orchards, sod, greenhouses, vineyards, nurseries, vegetable) (M)	Y	Y	Y	Facility surrounded by orchards
Fertilizer, Pesticide/ Herbicide Application (M)	Y	Y	Y	Facility surrounded by orchards
Sewage sludge/biosolids application (M)	N	N	N	
Crops, non-irrigated (e.g., Christmas trees, grains, grass seeds, hay, pasture) (L) (includes drip-irrigated crops)	N	N	N	

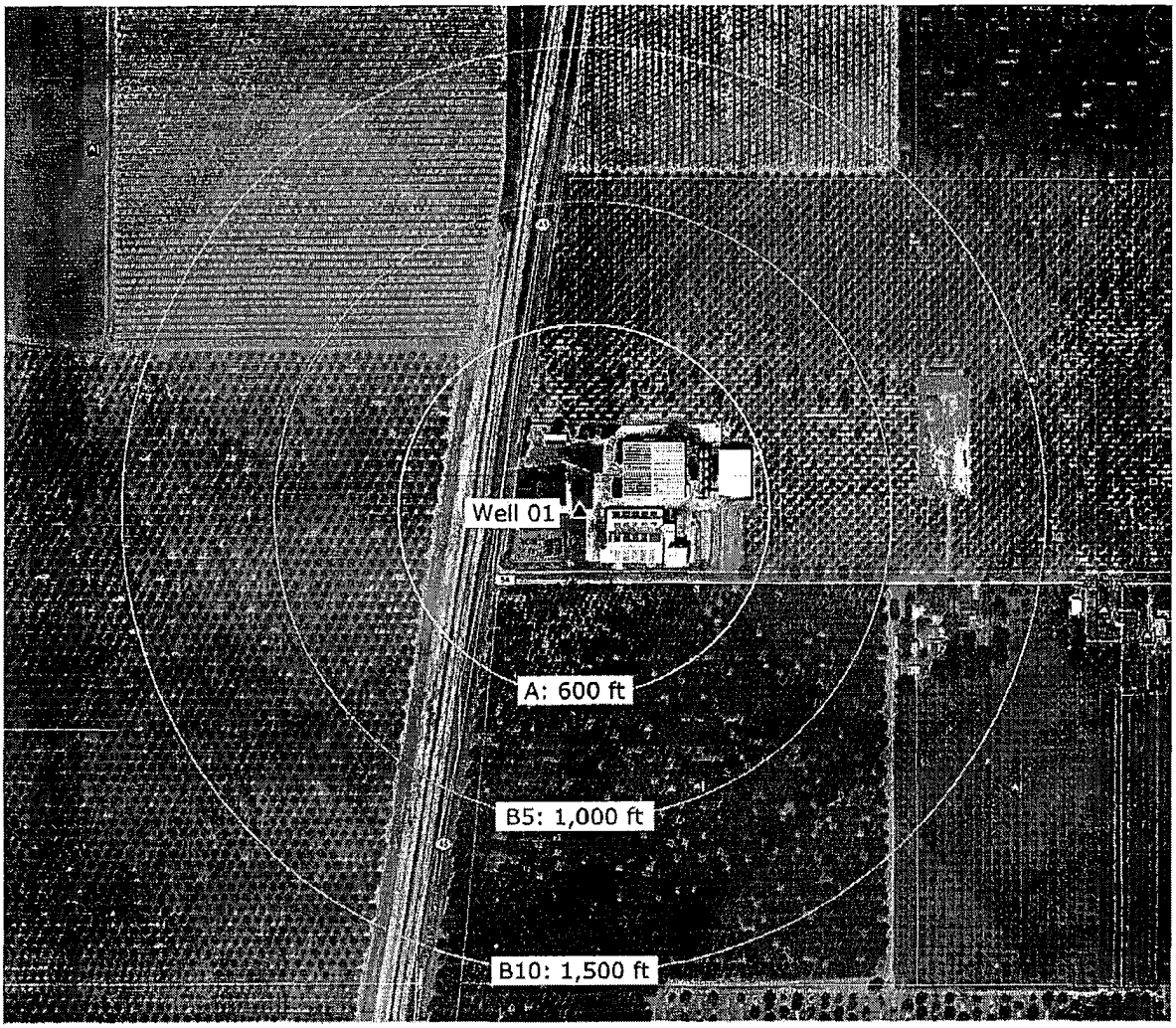
PCA Checklist OTHER ACTIVITIES

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
NPDES/WDR permitted discharges (H)	N	N	N	
Underground Injection of Commercial/Industrial Discharges (VH)	N	N	N	
Historic gas stations (VH)	N	N	N	
Historic waste dumps/ landfills (VH)	N	N	N	
Illegal activities/ unauthorized dumping (H)	N	N	N	
Injection wells/ dry wells/ sumps (VH)	N	N	N	
Known Contaminant Plumes (VH)	N	N	N	
Military installations (VH)	N	N	N	
Mining operations - Historic (VH)	N	N	N	
Mining operations - Active (VH)	N	N	N	
Mining - Sand/Gravel (H)	N	N	N	
Wells - Oil, Gas, Geothermal (H)	N	N	N	
Salt Water Intrusion (H)	N	N	N	
Recreational area - surface water source (H)	N	N	N	
Underground storage tanks - Confirmed leaking tanks (VH)	N	N	N	
Underground storage tanks - Decommissioned - inactive tanks (L)	N	N	N	
Underground storage tanks - Non-regulated tanks (tanks smaller than regulatory limit) (H)	N	N	N	
Underground storage tanks - Not yet upgraded or registered tanks (H)	N	N	N	
Underground storage tanks - Upgraded and/or registered - active tanks (L)	N	N	N	
Above ground storage tanks (M)	N	N	N	
Wells - Water supply (M)	N	N	Y	Domestic & possibly ag
Construction/demolition staging areas (M)	N	N	N	
Contractor or government agency equipment storage yards (M)	N	N	N	
Dredging (M)	N	N	N	
Transportation corridors - Freeways/state highways (M)	Y	Y	Y	State Route 45/162
Transportation corridors - Railroads (M)	N	N	N	
Transportation corridors - Historic railroad right-of-ways (M)	N	N	N	
Transportation corridors - Road Right-of-ways (herbicide use areas) (M)	N	N	N	
Transportation corridors - Roads/ Streets (L)	N	N	N	
Hospitals (M)	N	N	N	
Storm Drain Discharge Points (M)	N	N	N	
Storm Water Detention Facilities (M)	N	N	N	

PCA Checklist OTHER ACTIVITIES (continued)

PCA (Risk Ranking)	PCA in Zone A?	PCA in Zone B5?	PCA in Zone B10?	Comments
Artificial Recharge Projects - Injection wells (potable water) (L)	N	N	N	
Artificial Recharge Projects - Injection wells (non-potable water) (M)	N	N	N	
Artificial Recharge Projects - Spreading Basins (potable water) (L)	N	N	N	
Artificial Recharge Projects - Spreading Basins (non-potable water) (M)	N	N	N	
Medical/dental offices/clinics (L)	N	N	N	
Veterinary offices/clinics (L)	N	N	N	
Surface water - streams/ lakes/rivers (L)	Y	Y	Y	River Branch Canal
Wells - monitoring, test holes (L)	N	N	N	

Groundwater Protection Zones & Assessment Map



CARRIERE FAMILY FARMS
SYSTEM NO. 1100101
DWSAP ZONES
JANUARY 2016

California Environmental Quality Act

Notice of Exemption

NOTICE OF EXEMPTION
(Categorical)

TO: Office of Planning and Research
P.O. Box 3044
Sacramento, CA 958112-3044

FROM: State Water Resources Control Board
Valley District Office
364 Knollcrest Drive, Suite 101
Redding, CA 96002
Contact: Reese Crenshaw
Phone number: 530-224-4861

SCH#: [if applicable] **WATER SYSTEM #:** 1100101

PROJECT TITLE: Operation of a Potable Water Well

PROJECT LOCATION: In the vicinity of Highway 45 and Interstate 5, Glenn County

PROJECT DESCRIPTION: The State Water Resources Control Board (SWRCB), as the responsible agency, will be issuing a water supply permit. The Carriere Family Farms proposed project is the operation of an existing water system with one potable well.

PUBLIC AGENCY APPROVING PROJECT AND CARRYING OUT PROJECT: This is to advise that the SWRCB has issued a water supply permit for the above described project.

Categorical Exemption Status:

- ☒ Class 1 Existing Facilities
  (CCR, Title 14, Sec 15301 and Title 22, Section 60101 (a))
- ☐ Class 2 Replacement or Reconstruction
  (CCR, Title 14, Sec 15302 and Title 22, Section 60101 (b))
- ☐ Class 3 New Construction or Conversion of Small Structures
  (CCR, Title 14, Sec 15303 and Title 22, Section 60101 (c))
- ☐ Class 4 Minor Alterations to Land
  (CCR, Title 14, Sec 15304 and Title 22, Section 60101 (d))
- ☐ Class 6 Information Collection
  (CCR, Title 14, Sec. 15306 and Title 22 Section 60101)

Reason why project is exempt: The public water system is existing and newly discovered by SWRCB district staff.

The State Water Resources Control Board is a responsible agency for this project and is not responsible for the California Department of Fish and Wildlife filing fees.

LEAD AGENCY: Carriere Family Farms
CONTACT PERSON: Ron Bryant
PHONE NUMBER: (530) 934-8200

Signature: R. Crenshaw Date: 7/19/16

Name: Reese Crenshaw Title: Senior Sanitary Engineer

TMF Form

State Water Resources Control Board (SWRCB)

TMF Capacity Assessment "E-Z" Form
For
Transient-Noncommunity Public Water Systems
(Change of Ownership)

Water System Name:	System Number:
Carriere Family Farms	1100101

Person completing this assessment:

Ron Bryant
Name

Plant Manager
Title

Ron Bryant
Signature

Jan. 12, 2016
Date

Background

As a result of the 1996 Federal Safe Drinking Water Act the California legislature passed Senate Bill 1307. This bill added Section 116540 to the California Health and Safety Code (CHSC). Subparagraph a) of this section states, "*No public water system that was not in existence on January 1, 1998, shall be granted a permit unless the system demonstrates to the department that the water supplier possesses adequate financial, managerial, and technical capacity to assure the delivery of pure, wholesome, and potable drinking water. This section shall also apply to any change of ownership of a public water system that occurs after January 1, 1998.*"

The information you provide on this form will be used to assess the technical, managerial, and financial (TMF) capacity of your transient noncommunity public water system.

Instructions

This is a streamlined form that asks for specific documentation. In order to qualify to use this form you must be able to answer yes to ALL of the following statements. If you cannot answer yes to ALL of these statements you must use the standard TMF Assessment form.

2012-3777

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:
ELTON R. GARNER, JR.
Attorney at Law
P.O. Box 908
Willows, California 95988

CIOS ENCLOSED

Recorded at the request of:
ATTORNEY
09/06/2012 02:18 PM
Fee: $22.00 Pgs: 4
OFFICIAL RECORDS
Sheryl Thur, Clerk-Recorder
Glenn County, CA

MAIL TAX STATEMENTS TO:
Carriere Land, LLC
c/o Carriere Brothers
1640 State Hwy 45
Glenn, California 95943

QUITCLAIM DEED

The undersigned grantor(s) declare(s):
Documentary transfer tax is $ -0-
( ) computed on full value of property conveyed, or
( ) computed on full value less value of liens and encumbrances remaining at time of sale.
(x) Unincorporated area: ( ) City of Willows, and

AILEEN R. CARRIERE, as Trustee of the HERBERT A. CARRIERE TRUST and AILEEN R. CARRIERE, as Trustee of the AILEEN R. CARRIERE TRUST, hereby REMISES, RELEASES AND QUITCLAIMS to CARRIERE LAND, LLC, all her interest in that certain real property located in the County of Glenn, State of California, and more particularly described in Exhibit "A" attached hereto and made a part hereof by this reference.

Dated: January 1, 2012.

HERBERT A. CARRIERE TRUST

By: Aileen R. Carriere
AILEEN R. CARRIERE, as Trustee

AILEEN R. CARRIERE TRUST

By: Aileen R. Carriere
AILEEN R. CARRIERE, as Trustee

MAIL TAX STATEMENTS AS DIRECTED ABOVE

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California }

County of Glenn }

On August 15 2012, before me, Yvonne A. Mayberry, Notary Public,
DATE NAME, TITLE OF OFFICER

personally appeared **AILEEN R. CARRIERE**

who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Yvonne A. Mayberry

YVONNE A. MAYBERRY
COMM. NO. 1979054
NOTARY PUBLIC - CALIFORNIA
GLENN COUNTY
MY COMMISSION EXPIRES
JUNE 17, 2016

(Seal)

Capacity Claimed by Signer

- ☐ INDIVIDUAL(S)
- ☐ CORPORATE OFFICER(S)

TITLE(S)

- ☐ PARTNER(S) ☐ LIMITED ☐ GENERAL
- ☐ ATTORNEY-IN-FACT
- ✔ TRUSTEE(S)
- ☐ SUBSCRIBING WITNESS
- ☐ GUARDIAN/CONSERVATOR
- ☐ OTHER: _____

Type of Document: QuitClaim Deed

Signer is Representing:
NAME OF PERSON(S) OR ENTITY(IS)

HERBERT A. CARRIERE TRUST
and
AILEEN R. CARRIERE TRUST

EXHIBIT "A"

Parcel I:

All that certain land situate, lying and being in the County of Glenn, State of California, described as follows:

Portions of the Rancho known as the Larkin's Children's Ranch being more particularly described by the survey and map thereof of the Glenn Ranch made by H.B. Shackelford, a licensed surveyor, in May and June, 1900 (said map being recorded in the office of the Glenn County Recorder, August 23, 1900) as follows:

The North half of the South half of section 67, together with right of way from the Southwest corner thereof, 40 feet wide due West to the Jacinto and Princeton Road, said right of way to be 20 feet in width each side of the line dividing the South half from the North with half of the Southeast quarter of Section 68.

Also all that portion of the North half of the Southeast quarter of Section 68 lying East of the Princeton and Jacinto Road, subject to a right of way along the South side 20 feet wide.

Also a portion of Section 67 described as follows: Beginning at a stake 20 chains South of the quarter Section corner of Sections 67 and 68, said stake marking the Southwest corner of Hanson and Hanson's Tract; running thence East 12.83 chains to a stake in the center of levee to the point of commencement of the 31 acre tract; thence East along the South line of Hanson and Hanson 31.67 chains to a stake on the West bank of the Sacramento River; thence Southerly along said West bank of Sacramento River to a stake which is 10 chains South of Hanson and Hanson's South line; thence West 30.33 chains to a stake in the center of the aforesaid levee; thence Northerly along the center of said levee to the place of beginning.

Together with all of the grantor's right, title and interest, if any, in and to all accreted land that is not located within the metes and bounds description of the hereinabove described real property that lies between the East boundary line of said real property and the presently existing West Bank of the Sacramento River.
APN: 016-030-011-0 and 016-030-029-0

Parcel II:

All that certain land situate, lying and being in the County of Glenn, State of California, described as follows:

Being a portion of the Rancho known as the Larkin's Children's Rancho, said tract being more particularly described by the survey and map of the Glenn Ranch made by H.B. Shackelford, a licensed surveyor in May and June, 1900 (said map or plat being recorded in the office of the Recorder of the County of Glenn, on August 23, 1900) and being more particularly described as follows, to wit:

EXHIBIT "A" (continued)

BEGINNING at a point 660 feet South of quarter section corner on the line between Sections 73 and 74 of said Glenn Ranch Survey; thence West 864.6 feet; thence South 478.5 feet, thence East 864.6 feet to section line; thence directly East in Section 74, 2193 feet to the West bank of the Sacramento River; thence North 29° 16' West 412.0 feet along the West bank of the said River; thence North 2' 16" West 118.5 feet along said West bank of said river to a point due East of the place of beginning, thence West 1985 feet to said place of beginning.

Together with a right of way 40 feet wide from the Northwest corner of said lands due North off of the West end of lands sold P.F. Estes and along the West side of land sold Charles Beck to the main levee of the Sacramento River; thence down said levee to a point where right of way heretofore granted Charles Beck and other, leaves said levee, thence due West 12.50 chains to the Princeton and Jacinto Public Road. A Strip of land 40 feet wide off the West side of said premises herein described is subject to a right of way for roads.

EXCEPTING THEREFROM a portion of Section 73 of the Glenn Ranch Survey described as follows: Beginning at a point 1138.5 feet South and 350.8 feet West of the Northeast corner of the Southeast quarter of Section 73 of the Glenn Ranch Survey, said point being on the South boundary of the land deeded by H.H. Hanson et us to Wm. R. Lane by Deed recorded October 24, 1925 in Book 92 of Deeds, page 398, thence North 194.67 feet to an iron pipe; thence West 144.9 feet to an iron pipe, thence South 194.67 feet to an iron pipe, thence East 144.9 feet, more or less to an iron pipe marking the place of beginning.
APN: 016-040-016-0

RESERVING FROM ALL PROPERTY DESCRIBED IN THIS EXHIBIT "A" ANY AND ALL OIL, GAS, MINERALS, AND OTHER HYDROCARBON SUBSTANCES TOGETHER WITH THE RIGHT TO REMOVE THE SAME.

Five Year Budget Projection

Expenses	2016	2017	2018	2019	2020
Operations + Maintenance					
Utilities	1,800.00	1,854.00	1,928.00	2,025.00	2,146.00
Fees	500.00	550.00	600.00	650.00	700.00
Coliform Monitoring	650.00	675.00	700.00	725.00	750.00
Chemical Monitoring	700.00	725.00	750.00	775.00	800.00
Parts and Supplies	500.00	200.00	100.00	100.00	100.00
Miscellaneous	200.00	200.00	150.00	100.00	100.00
	4,350.00	4,204.00	4,228.00	4,375.00	4,596.00
General + Administrative					
Professional Services	1,000.00	1,050.00	1,100.00	1,150.00	1200.00
Insurance	50.00	55.00	60.00	65.00	70.00
Miscellaneous	600.00	700.00	800.00	900.00	1,000.00
	1,650.00	1,805.00	1,960.00	2,015.00	2,270.00
Total Yearly Expenses	6,000.00	6,009.00	6,188.00	6,390.00	6,866.00

Report prepared by

Ron Bryant

Carriere Family Farms

System Number 1100101

Consumer Confidence Report
Certification Form

(to be submitted with a copy of the CCR)

(to certify electronic delivery of the CCR, use the certification form on the State Water Board's website at http://www.swrcb.ca.gov/drinking_water/certlic/drinkingwater/CCR.shtml)

Water System Name:	**CARRIERE FAMILY FARMS**
Water System Number:	**CA1100101**

The water system named above hereby certifies that its Consumer Confidence Report was distributed on _____(date) to customers (and appropriate notices of availability have been given). Further, the system certifies that the information contained in the report is correct and consistent with the compliance monitoring data previously submitted to the State Water Resources Control Board, Division of Drinking Water.

Certified By:	Name:	Brenda Gonzalez	
	Signature:	Brenda Gonzalez	
	Title:	Quality Assurance Manager	
	Phone Number:	(530) 934-8200	Date: 5/27/2024

To summarize report delivery used and good-faith efforts taken, please complete the form below by checking all items that apply and fill-in where appropriate:

☒ CCR was distributed by mail or other direct delivery methods. Specify other direct delivery methods used:

Posted in break room areas and main office buidlings.

☐ "Good faith" efforts were used to reach non-bill paying customers. Those efforts included the following methods:

- ☐ Posted the CCR on the internet at http:// _____
- ☐ Mailed the CCR to postal patrons within the service area (attach zip codes used)
- ☐ Advertised the availability of the CCR in news media (attach a copy of press release)
- ☐ Publication of the CCR in a local newspaper of general circulation (attach a copy of the published notice, including name of the newspaper and date published)
- ☐ Posted the CCR in public places (attach a list of locations)
- ☐ Delivery of multiple copies of CCR to single bill addresses serving several persons, such as apartments, businesses, and schools
- ☐ Delivery to community organizations (attach a list of organizations)
- ☐ Other (attach a list of other methods used)

☐ *For systems serving at least 100,000 persons:* Posted CCR on a publicly-accessible internet site at the following address: http://_____

☐ *For investor-owned utilities:* Delivered the CCR to the California Public Utilities Commission

(This form is provided as a convenience and may be used to meet the certification requirement of section 64483(c), California Code of Regulations.)

2023 Consumer Confidence Report

Water System Name: CARRIERE FAMILY FARMS Report Date: April 2024

We test the drinking water quality for many constituents as required by state and federal regulations. This report shows the results of our monitoring for the period of January 1 - December 31, 2023.

Este informe contiene información muy importante sobre su agua potable. Tradúzcalo ó hable con alquien que lo entienda bien.

Type of water source(s) in use: According to SWRCB records, this Source is Groundwater. This Assessment was done using the Default Groundwater System Method.

Your water comes from 1 source(s): WELL 01

Opportunities for public participation in decisions that affect drinking water quality: Regularly-scheduled water board or city/county council meetings currently are not held as the water provided is to employees only. There is an open door policy if any employee has an questions.

For more information about this report, or any questions relating to your drinking water, please call (530)343-5105 and ask for Greg Lowe.

TERMS USED IN THIS REPORT

Maximum Contaminant Level (MCL): The highest level of contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically feasible. Secondary MCLs are set to protect the odor, taste, and appearance of drinking water.

Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs are set by the U.S. Environmental Protection Agency (USEPA).

Public Health Goal (PHG): The level of a contaminant in drinking water below which there is no known or expected risk to health. PHGs are set by the California Environmental Protection Agency.

Maximum Residual Disinfectant Level (MRDL): The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

Maximum Residual Disinfectant Level Goal (MRDLG): The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.

Primary Drinking Water Standards (PDWS): MCLs and MRDLs for the contaminants that affect health along with their monitoring and reporting requirements, and water treatment requirements.

Treatment Technique (TT): A required process intended to reduce the level of a contaminant in drinking water.

Regulatory Action Level (AL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that a water system must follow.

Level 1 Assessment: A Level 1 assessment is a study of the water system to identify potential problems and determine (if possible) why total coliform bacteria have been found in our water system.

Level 2 Assessment: A Level 2 assessment is a very detailed study of the water system to identify potential problems and determine (if possible) why an E. coli MCL violation has occurred and/or why total coliform bacteria have been found in our water system on multiple occasions.

mg/L: milligrams per liter or parts per million (ppm)

ug/L: micrograms per liter or parts per billion (ppb)

The sources of drinking water: (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include:

- *Microbial contaminants,* such as viruses and bacteria, that may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
- *Inorganic contaminants,* such as salts and metals, that can be naturally-occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.
- *Pesticides and herbicides,* that may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses.
- *Organic chemical contaminants,* including synthetic and volatile organic chemicals, that are by-products if industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff, agricultural application, and septic systems.
- *Radioactive contaminants,* that can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, the USEPA and the State Water Resource Control Board (State Water Board) prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. State Water Board regulations also establish limits for contaminants in bottled water that provide the same protection for public health.

Tables 1 and 2 list all of the drinking water contaminants that were detected during the most recent sampling for the constituent. The presence of these contaminants in the water does not necessarily indicate that the water poses a health risk. The State Water Board allows us to monitor for certain contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of the data, though representative of the water quality, are more than one year old.

Any violation of MCL, AL or MRDL is highlighted. Additional information regarding the violation is provided later in this report.

Table 1 - SAMPLING RESULTS SHOWING THE DETECTION OF LEAD AND COPPER

Lead and Copper (complete if lead or copper detected in last sample set)	**Sample Date**	**No. of Samples**	**90th percentile level detected**	**No. Sites Exceeding AL**	**AL**	**PHG**	**Typical Sources of Contaminant**
Copper (mg/L)	(2022)	5	0.22	0	1.3	.3	Internal corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives

Table 2 - DETECTION OF CONTAMINANTS WITH A PRIMARY DRINKING WATER STANDARD

Chemical or Constituent (and reporting units)	**Sample Date**	**Average Level Detected**	**Range of Detections**	**MCL [MRDL]**	**PHG (MCLG) [MRDLG]**	**Typical Sources of Contaminant**
Arsenic (ug/L)	(2023)	2	n/a	10	0.004	Erosion of natural deposits; runoff from orchards, glass and electronics production wastes
Barium (mg/L)	(2023)	0.12	n/a	1	2	Discharge from oil drilling wastes and from metal refineries; erosion of natural deposits
Hexavalent Chromium (ug/L)	(2020)	6	n/a		0.02	Discharge from electroplating factories, leather tanneries, wood preservation, chemical synthesis, refractory production, and textile manufacturing facilities; erosion of natural deposits.
Fluoride (mg/L)	(2020)	0.1	n/a	1	2	Erosion of natural deposits; water additive that promotes strong teeth; discharge from fertilizer and aluminum factories.
Nitrate as N (mg/L)	(2023)	1.8	n/a	10	10	Runoff and leaching from fertilizer use; leaching from septic tanks and sewage; erosion of natural deposits

Toluene (ug/L)	(2022)	30.5	n/a	150	150	Discharge from petroleum and chemical factories; underground gas tank leaks

Additional General Information on Drinking Water

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts if some contaminants. The presence of contaminants does not necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the USEPA's Safe Drinking Water Hotline (1-800-426-4791).

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. USEPA/Centers for Disease Control (CDC) guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

Lead Specific Language for Community Water Systems: If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with the service lines and home plumbing. *Carriere Family Farms* is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/lead.

2023 Consumer Confidence Report

Drinking Water Assessment Information

Assessment Information
A source water assessment was conducted for the WELL 01 of the CARRIERE FAMILY FARMS water system in September, 2015.

WELL 01 - - is considered most vulnerable to the following activities not associated with any detected contaminants:
Irrigated Crops
Fertilizer/Pesticide/Herbicide Application
Transportation Corridors (State Highway)
Wells (Agriculture/Irrigation)

Discussion of Vulnerability
There have been no contaminants detected in the water supply, however the source is still considered vulnerable to activities located near the drinking water source.

Acquiring Information
A copy of the complete assessment may be viewed at:
State Water Resources Control Board
Division of Drinking Water
364 Knollcrest Dr., Suite 101
Redding, CA 96002

You may request a summary of the assessment be sent to you by contacting:
Daniel L. Cikuth, P.E.
Associate Sanitary Engineer

Phone: (530) 224-3271
Fax: (530) 224-4844
Email: dan.cikuth@waterboards.ca.gov

Carriere Family Farms

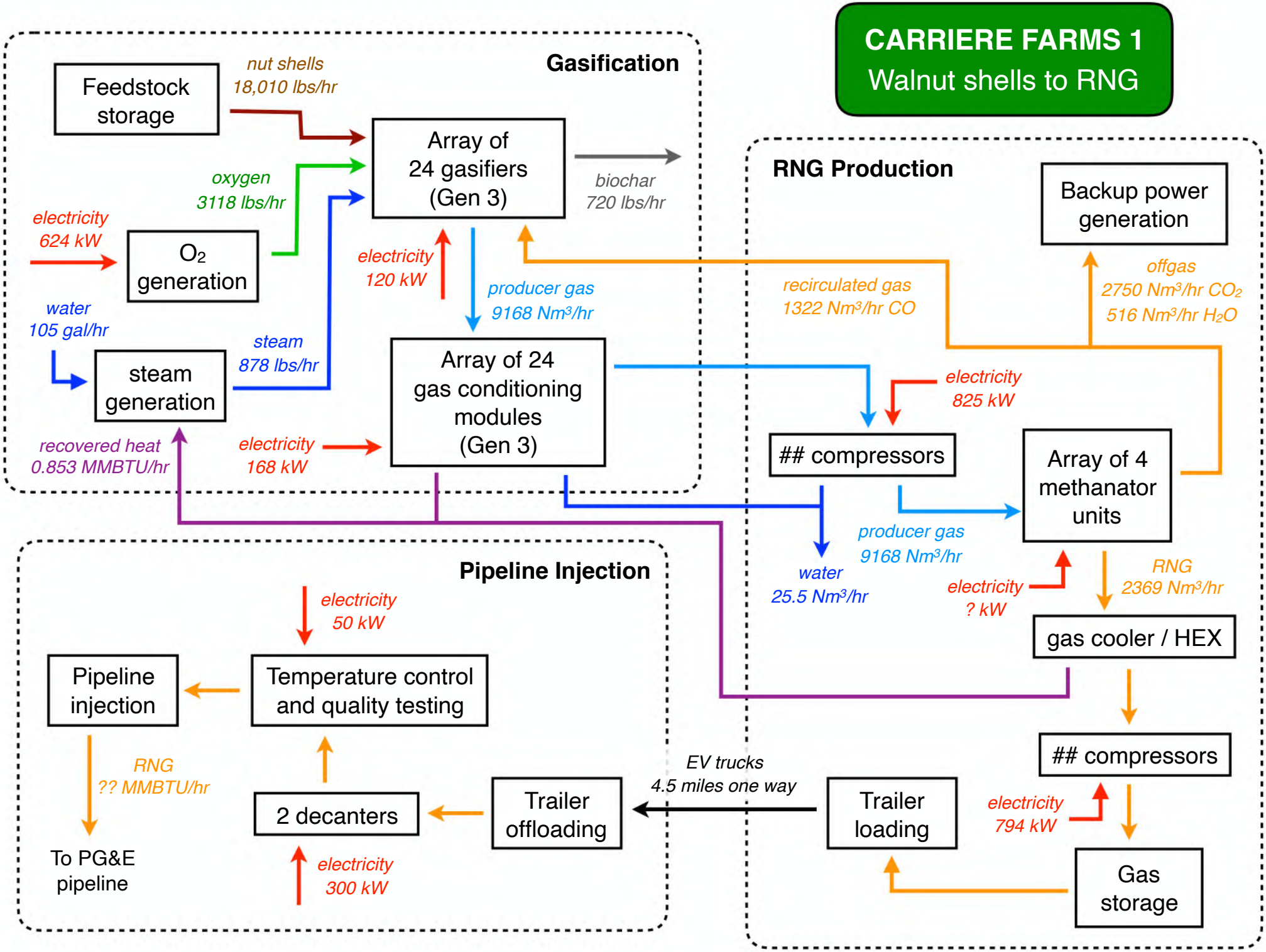
Analytical Results By FGL - 2023

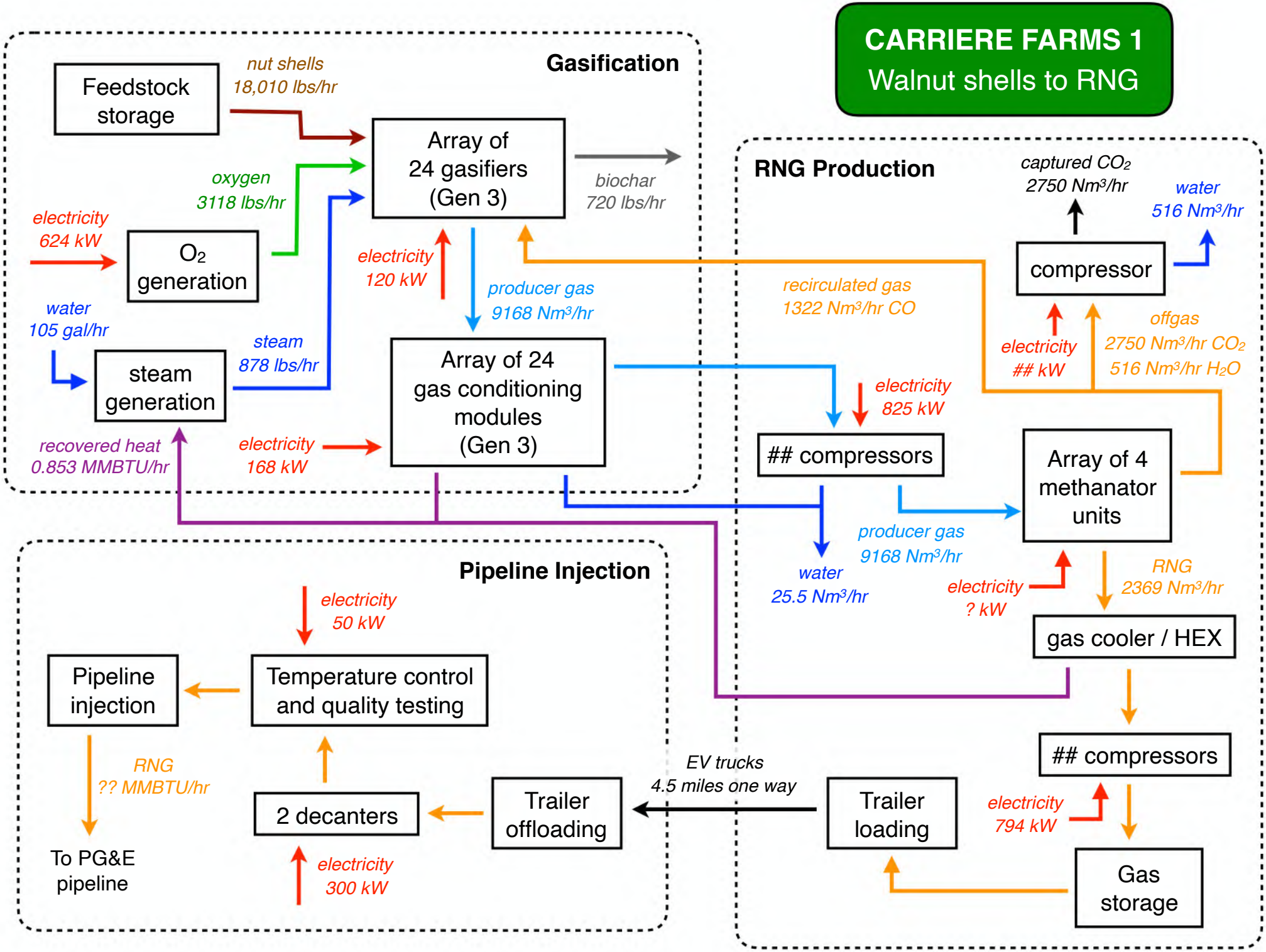
LEAD AND COPPER RULE									
		Units	MCLG	CA-MCL	PHG	Sampled	Result	90th Percentile	# Samples
Copper		mg/L		1.3	.3			0.22	5
Borges Breakroom #1	CH 2278430-3	mg/L				2022-09-30	ND		
Borges Mens Restroom #1	CH 2278430-4	mg/L				2022-09-30	0.05		
Carrier Mens Restroom #6	CH 2278430-2	mg/L				2022-09-30	0.05		
Carrier Womens Restroom #6	CH 2278430-1	mg/L				2022-09-30	0.09		
Office Kitch Office	CH 2278430-5	mg/L				2022-09-30	0.35		

PRIMARY DRINKING WATER STANDARDS (PDWS)									
		Units	MCLG	CA-MCL	PHG	Sampled	Result	Avg. Result(a)	Range (b)
Arsenic		ug/L		10	0.004			2	2 - 2
WELL 01	CH 2372465-1	ug/L				2023-04-18	2		
Barium		mg/L	2	1	2			0.12	0.12 - 0.12
WELL 01	CH 2072173-1	mg/L				2020-04-06	0.12		
Hexavalent Chromium		ug/L			0.02			6.0	6.0 - 6.0
WELL 01	CH 2072173-1	ug/L				2020-04-06	6.0		
Fluoride		mg/L		2	1			0.1	0.1 - 0.1
WELL 01	CH 2072173-1	mg/L				2020-04-06	0.1		
Nitrate as N		mg/L		10	10			1.8	1.8 - 1.8
WELL 01	CH 2372465-1	mg/L				2023-04-18	1.8		
Toluene		ug/L		150	150			30.5	30.5 - 30.5
WELL 01	CH 2273847-1	ug/L				2022-05-31	30.5		

Carriere Family Farms
CCR Login Linkage - 2023

FGL Code	Lab ID	Date_Sampled	Method	Description	Property
CA1100101_DST_L	CH 2278430-3	2022-09-30	Metals, Total	Borges Breakroom #1	Lead & Copper Monitoring
	CH 2278430-4	2022-09-30	Metals, Total	Borges Mens Restroom #1	Lead & Copper Monitoring
Bacti-Rout-ss03	CH 2371401-1	2023-03-02	Coliform	Borges Plant-HB W.Side of Bldg	Routine Bacteriological -3
	CH 2373848-1	2023-06-08	Coliform	Borges Plant-HB W.Side of Bldg	Routine Bacteriological -3
	CH 2377618-1	2023-09-07	Coliform	Borges Plant-HB W.Side of Bldg	Routine Bacteriological -3
	CH 2390335-1	2023-12-07	Coliform	Borges Plant-HB W.Side of Bldg	Routine Bacteriological -3
CA1100101_DST_L	CH 2278430-2	2022-09-30	Metals, Total	Carrier Mens Restroom #6	Lead & Copper Monitoring
	CH 2278430-1	2022-09-30	Metals, Total	Carrier Womens Restroom #6	CARRIERE FAMILY FARMS
Bacti-Rout-ss02	CH 2370925-1	2023-02-14	Coliform	Carriere Office-HBPatio/W.Side	Routine Bacteriological -2
	CH 2373183-1	2023-05-10	Coliform	Carriere Office-HBPatio/W.Side	Routine Bacteriological -2
	CH 2376448-1	2023-08-09	Coliform	Carriere Office-HBPatio/W.Side	Routine Bacteriological -2
	CH 2379662-1	2023-11-09	Coliform	Carriere Office-HBPatio/W.Side	Routine Bacteriological -2
Bacti-Rout-ss01	CH 2370158-1	2023-01-05	Coliform	Carriere Plant-HB SE Corner	Routine Bacteriological -1
	CH 2372464-1	2023-04-18	Coliform	Carriere Plant-HB SE Corner	Routine Bacteriological -1
	CH 2375222-1	2023-07-12	Coliform	Carriere Plant-HB SE Corner	Routine Bacteriological -1
	CH 2378655-1	2023-10-11	Coliform	Carriere Plant-HB SE Corner	Routine Bacteriological -1
CA1100101_DST_L	CH 2278430-5	2022-09-30	Metals, Total	Office Kitch Office	Lead & Copper Monitoring
WELL 01	CH 2072173-1	2020-04-06	Wet Chemistry	WELL 01	Water Quality Monitoring
	CH 2072173-1	2020-04-06	Metals, Total	WELL 01	Water Quality Monitoring
	CH 2273847-1	2022-05-31	EPA 524.2	WELL 01	Water Quality - VOCs
	CH 2372465-1	2023-04-18	Wet Chemistry	WELL 01	Water Quality Monitoring
	CH 2372465-1	2023-04-18	Metals, Total	WELL 01	Water Quality Monitoring


CARRIERE FARMS 1
Walnut shells to RNG
Gasification
Feedstock storage
nut shells
18,010 lbs/hr
Array of 24 gasifiers (Gen 3)
biochar
720 lbs/hr
oxygen
3118 lbs/hr
electricity
624 kW
O2 generation
electricity
120 kW
producer gas
9168 Nm3/hr
water
105 gal/hr
steam generation
steam
878 lbs/hr
Array of 24 gas conditioning modules (Gen 3)
recovered heat
0.853 MMBTU/hr
electricity
168 kW
RNG Production
Backup power generation
recirculated gas
1322 Nm3/hr CO
offgas
2750 Nm3/hr CO2
516 Nm3/hr H2O
electricity
825 kW
compressors
Array of 4 methanator units
producer gas
9168 Nm3/hr
water
25.5 Nm3/hr
electricity
? kW
RNG
2369 Nm3/hr
gas cooler / HEX
compressors
electricity
794 kW
Gas storage
Trailer loading
EV trucks
4.5 miles one way
Trailer offloading
Pipeline Injection
electricity
50 kW
Temperature control and quality testing
Pipeline injection
RNG
?? MMBTU/hr
To PG&E pipeline
2 decanters
electricity
300 kW


CARRIERE FARMS 1
Walnut shells to RNG
Gasification
Feedstock storage
nut shells
18,010 lbs/hr
Array of 24 gasifiers (Gen 3)
biochar
720 lbs/hr
oxygen
3118 lbs/hr
electricity
624 kW
O2 generation
electricity
120 kW
producer gas
9168 Nm3/hr
water
105 gal/hr
steam generation
steam
878 lbs/hr
Array of 24 gas conditioning modules (Gen 3)
recovered heat
0.853 MMBTU/hr
electricity
168 kW
RNG Production
captured CO2
2750 Nm3/hr
water
516 Nm3/hr
compressor
recirculated gas
1322 Nm3/hr CO
electricity
kW
offgas
2750 Nm3/hr CO2
516 Nm3/hr H2O
electricity
825 kW
compressors
Array of 4 methanator units
producer gas
9168 Nm3/hr
water
25.5 Nm3/hr
electricity
? kW
RNG
2369 Nm3/hr
gas cooler / HEX
compressors
electricity
794 kW
Gas storage
Pipeline Injection
electricity
50 kW
Pipeline injection
Temperature control and quality testing
RNG
?? MMBTU/hr
To PG&E pipeline
2 decanters
electricity
300 kW
Trailer offloading
EV trucks
4.5 miles one way
Trailer loading

Original 250' x 580' Dedicated Area

670'

653'

3'

368'

150'

15'

65'

CF2 - 24 New Gen 3 Syngas Gas Output Units, all dedicated to Syngas production for upgrade to RNG. Electric power is grid supplied.

6'

15' Diameter Silos, To Hold Minimum of 3 Day Feedstock Supply for 4 BioMax Gen 3 Units, 15' Tall

Equipment Concrete Pad - (92'x 368') - 5,976 ft2 Compacted Gravel = 27,880 ft2

Compacted Gravel Area - 18' x 332' = 5,976 ft2

Conveyors

Bucket Elevators

Feedstock Gravity Chutes

Gas Production Module

LiquiMax® RNG System Components

RNG Delivery Line to NG Pipeline or Truck Manifold

PG Delivery Lines

PG Manifold

Gas Conditioning Module

Compacted Gravel Area - 18' x 222' = 3,996 ft2

Compacted Gravel Area - 18' x 110' = 1,980 ft2

Conveyor to Storage Silos

Bucket Elevator

Flat Storage Shell Movement Equipment

Shell Flat Storage Area

150'

Truck and Grain Access

Shell Auger from CFF to Flat Storage Area

Shell Auger from CFF

~197'

CF1—24 BioMax® Gen 3 units total, 5 transferred units (4 Gen 1s and 1 Gen 2) reconfigured and remanufactured as Gen 3's, 19 new Gen 3 units, all dedicated to Syngas production for upgrade to RNG. Electric power is grid supplied.

Compacted Gravel Area for Spare Parts Storage Containers - 32' x 96' = 3,072 ft2

Spare Parts Storage 8' x 20' ISO Containers

Compacted Gravel Area for Biochar Storage - 150' x 157' = 15,700 ft2

Original 580' Line from 3.4 Acre Parcel

RNG Truck Loading Manifold

52'

Compacted Gravel Area - 69' x 69' = 4,761 ft2

Concrete Area Between CF1/CF2 Ph 1 and CF2 Ph 2 - 1' x 368' = 368 ft2

Concrete Employee Parking Area, 3-5 Spaces, 20' x 64' = 1,280 ft2

Truck Route

250'

Existing Walnut Orchard

Backup Power Generation

Gas Storage for Backup Power Generation

Concrete Employee Parking Area, 3-5 Spaces, 20' x 50' = 1,000 ft2

Office Space - 24' x 50'

Car Route

Compacted Gravel Area - 96' x 39' = 3,744 ft2

Concrete Visitor Parking Area, 5 Spaces, 20' x 50' = 1,000 ft2

Compacted Gravel Area - 20' x 64' = 1,280 ft2

20'

Entry/Exit Gate

Existing CFF Fence

Water Tank

Compacted Gravel Area - 10' x 100' = 18,000 ft2

Original 250' x 580' Dedicated Area

670'

652'

368'

3'

150'

15'

65'

150'

Truck and Drive Access

Shell Flat Storage Area

Future Location of CF2 Project - 24 Additional Gen 3 Units Dedicated to RNG Production

LiquiMax® RNG System Components

LiquiMax® RNG System Components

LiquiMax® RNG System Components

LiquiMax® RNG System Components

RNG Delivery Line to NG Pipeline or Truck Manifold

Gas Conditioning Module

PG Delivery Lines

PG Manifold

Conveyor to Storage Silos

Bucket Elevators

Conveyors

Feedstock Gravity Chutes

Gas Production Module

Compacted Gravel Area - 18' x 112' = 1,980 ft2

Bucket Elevators

Conveyors

Feedstock Gravity Chutes

Gas Production Module

Compacted Gravel Area - 18' x 222' = 3,996 ft2

Flat Storage Shell Movement Equipment

Bucket Elevator

15' Diameter Silos, To Hold Minimum of 3 Day Feedstock Supply for 4 BioMax Gen 3 Units, 35' Tall

8'

52'

Equipment Concrete Pad - (116' x 240') - 3,936 ft2 Compacted Gravel = 23,844 ft2

Compacted Gravel Area for Spare Parts Storage Containers - 32' x 96' = 3,072 ft2

RNG Truck Loading Manifold

Compacted Gravel Area - 65' x 65' = 4,761 ft2

Backup Power Generation

Gas Storage for Backup Power Generation

Concrete Employee Parking Area, 3-5 Spaces, 20' x 50' = 1,000 ft2

Spare Parts Storage 8' x 20' ISO Containers

Compacted Gravel Area for Spare Parts Storage Containers - 32' x 96' = 3,072 ft2

Compacted Gravel Area - 15' x 96' = 1,440 ft2

Concrete Employee Parking Area, 3-5 Spaces, 20' x 64' = 1,280 ft2

Office Space - 24' x 50'

Compacted Gravel Area - 20' x 64' = 1,280 ft2

20'

Truck Route

Car Route

Compacted Gravel Area - 96' x 39' = 3,744 ft2

Concrete Visitor Parking Area, 5 Spaces, 20' x 50' = 1,000 ft2

Entry/Exit Gate

Original 580' Line from 3.4 Acre Parcel

Compacted Gravel Area for Biochar Storage - 100' x 157' = 15,700 ft2

250'

Existing Walnut Orchard

Shell Auger from CFF to Flat Storage Area

Shell Auger from CFF

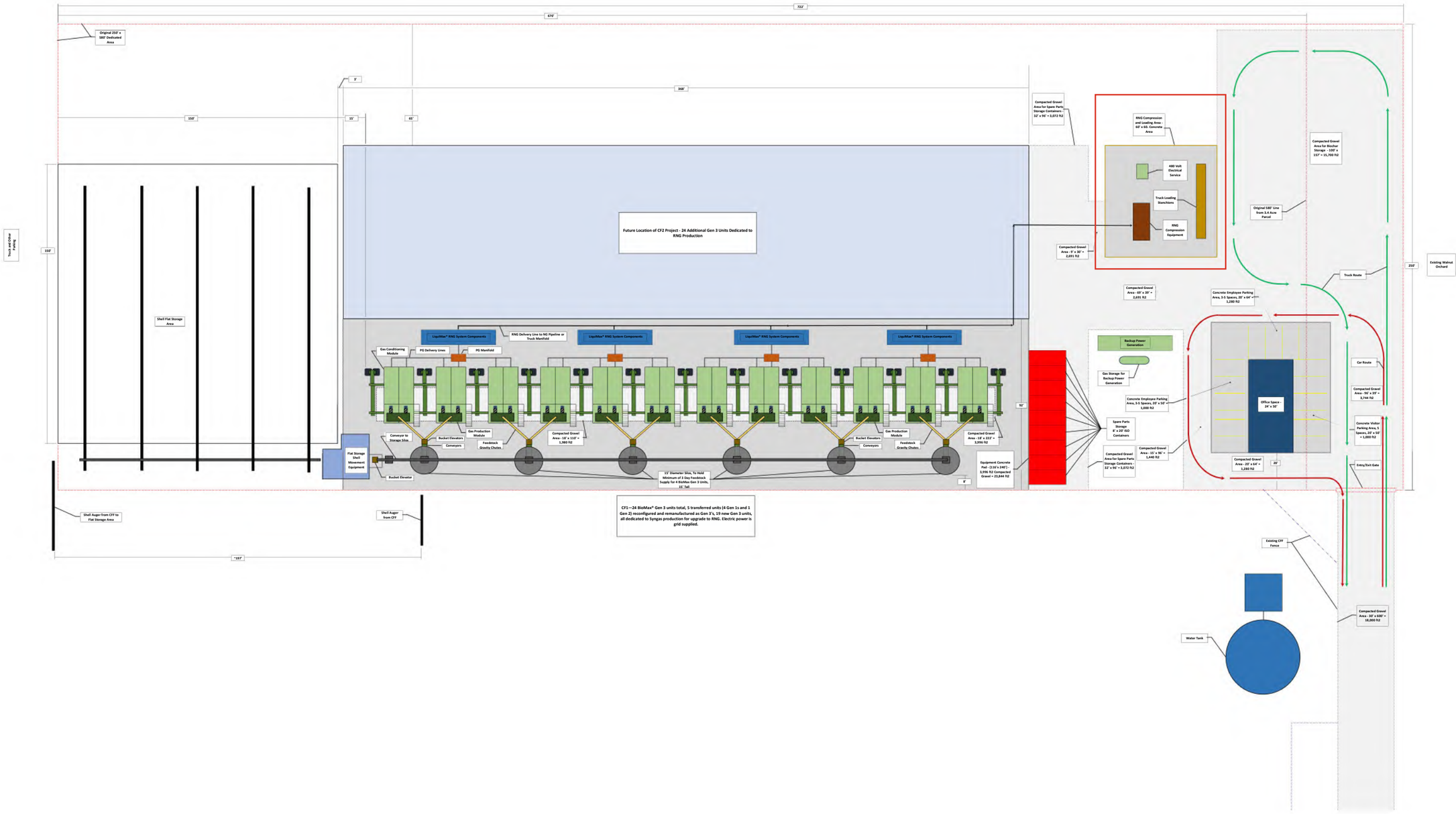
~197

CF1—24 BioMax® Gen 3 units total, 5 transferred units (4 Gen 1s and 1 Gen 2) reconfigured and remanufactured as Gen 3's, 19 new Gen 3 units, all dedicated to Syngas production for upgrade to RNG. Electric power is grid supplied.

Existing CFF Fence

Water Tank

Compacted Gravel Area - 10' x 100' = 18,000 ft2


722'
670'
Original 250' x 580' Dedicated Area
5'
368'
150'
15'
65'
150'
Truck and Grain Access
Shell Flat Storage Area
Future Location of CF2 Project - 24 Additional Gen 3 Units Dedicated to RNG Production
Compacted Gravel Area for Spare Parts Storage Containers - 32' x 96' = 3,072 ft2
RNG Compression and Loading Area - 60' x 60. Concrete Area
480 Volt Electrical Service
Truck Loading Stanchions
RNG Compression Equipment
Compacted Gravel Area for Biochar Storage - 100' x 157' = 15,700 ft2
Original 580' Line from 3.4 Acre Parcel
Compacted Gravel Area - 9' x 30' = 2,691 ft2
Compacted Gravel Area - 69' x 39' = 2,691 ft2
Concrete Employee Parking Area, 3-5 Spaces, 20' x 64' = 1,280 ft2
Truck Route
250'
Existing Walnut Orchard
LiquiMax® RNG System Components
RNG Delivery Line to NG Pipeline or Truck Manifold
Gas Conditioning Module
PG Delivery Lines
PG Manifold
Backup Power Generation
Gas Storage for Backup Power Generation
Concrete Employee Parking Area, 3-5 Spaces, 20' x 50' = 1,000 ft2
Car Route
Compacted Gravel Area - 96' x 39' = 3,744 ft2
Office Space - 24' x 50'
Conveyor to Storage Silos
Bucket Elevators
Conveyors
Gas Production Module
Feedstock Gravity Chutes
Compacted Gravel Area - 18' x 110' = 1,980 ft2
Compacted Gravel Area - 18' x 222' = 3,996 ft2
Spare Parts Storage 8' x 20' ISO Containers
Concrete Visitor Parking Area, 5 Spaces, 20' x 50' = 1,000 ft2
Compacted Gravel Area - 15' x 96' = 1,440 ft2
Compacted Gravel Area for Spare Parts Storage Containers - 32' x 96' = 3,072 ft2
Compacted Gravel Area - 20' x 64' = 1,280 ft2
20'
Entry/Exit Gate
Flat Storage Shell Movement Equipment
Bucket Elevator
15' Diameter Silos, To Hold Minimum of 3 Day Feedstock Supply for 4 BioMax Gen 3 Units, 55' Tall
8'
Equipment Concrete Pad - (116' x 240') - 3,936 ft2 Compacted Gravel = 23,844 ft2
52'
Existing CFF Fence
Water Tank
Compacted Gravel Area - 10' x 100' = 18,000 ft2
Shell Auger from CFF to Flat Storage Area
Shell Auger from CFF
~197'
CF1—24 BioMax® Gen 3 units total, 5 transferred units (4 Gen 1s and 1 Gen 2) reconfigured and remanufactured as Gen 3's, 19 new Gen 3 units, all dedicated to Syngas production for upgrade to RNG. Electric power is grid supplied.

COMMENTS RECEIVED

From

March 13, 2025

to

April 9, 2025

Andy Popper

From: Dennis Ramirez <dramirez@mechoopda-nsn.gov>
Sent: Thursday, March 13, 2025 1:41 PM
To: Andy Popper
Cc: Planning Email Group
Subject: Re: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC, Advanced Thermal Conversion NOTICE OF INTENT

Good afternoon,
No concerns for Mechoopda.
Thank you
Dennis Ramirez
Tribal Chairman
Mechoopda Indian Tribe
1920 Alcott Ave
Chico, California 95928
(530) 899-8922 ext 215
Cell (530)514-1582
Email: dramirez@mechoopda-nsn.gov
Official website: http://www.mechoopda-nsn.gov/
Facebook: http://www.facebook.com/mechoopda.tribe

Sent from my iPhone

On Mar 13, 2025, at 1:20 PM, Andy Popper <APopper@countyofglenn.net> wrote:

LEGAL NOTICE OF INTENT AND PUBLIC HEARING TO ADOPT A MITIGATED NEGATIVE DECLARATION
NOTICE IS HEREBY GIVEN that the Planning Commission of the County of Glenn, State of California, will hold a Public Hearing to consider the project as listed below. The Public Hearing will be held at the Glenn County Board of Supervisors' Chambers, 2nd Floor Willows Memorial Hall, 525 West Sycamore Street, Willows, California, on Wednesday, April 16, 2025, at 9:00 A.M., or as soon thereafter as the business of the Commission will allow.
PROJECT: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC, Advanced Thermal Conversion
APPLICANT/LANDOWNER: Wayne McFarland/Carriere Family Farms
PROJECT DESCRIPTION: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.
LOCATION: The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.
ASSESSOR PARCEL NUMBERS: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)
ZONING: "FS-80" Farmland Security Zone **GENERAL PLAN**: "Intensive Agriculture"
DECISIONS: The Planning Commission may approve, deny, or continue the:
(A) Mitigated Negative Declaration (B) Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC
All environmental information and project documentation is available for review at the Planning & Community Development Services Agency. Contact Andy Popper, Principal Planner at planning@countyofglenn.net, (530) 934-6540, or at the Glenn County Planning & Community Development Services Agency, 225 North Tehama Street, Willows, CA, 95988. All interested parties may submit comments regarding the proposed project by Wednesday, April 16, 2025, at 9:00 A.M., or appear and present oral and/or written testimony at the Public Hearing. If you challenge the nature of the proposed action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in correspondence delivered to the appropriate authority at, or prior to, the public hearing.
Documentation is also available at keywords: *'Glenn County Conditional Use Permits'* or
https://www.countyofglenn.net/resources/reports/conditional-use-permits
CUP2024-004, Carriere Syntech CF1, LLC, NOI, Staff Report, COAs, MM, MND, IS, and Appendix

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Andy Popper
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

<CUP2024-004, Syntech, Legal Notice, For Posting.pdf>

Andy Popper

From: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>
Sent: Thursday, March 27, 2025 9:49 AM
To: Andy Popper
Subject: Caltrans District 3 LDR Response: Carriere/Syntech CF1, LLC Advanced Thermal Conversion - Site Circulations Plan

Hello Andy,

Thank you for including the California Department of Transportation (Caltrans) in the review process of the Site Circulation Plan proposed for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion project. We wanted to reach out and let you know we have no comments at this time.

Please note, that we are still reviewing the NOI for the MND. Once we have completed our review we will provide a response.

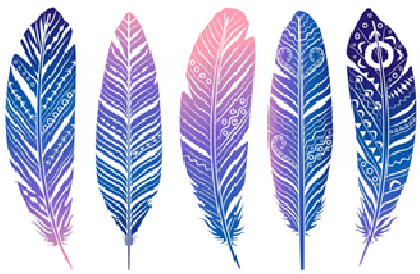
In the meantime, please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me, Local Development Review, Equity and System Planning Coordinator, by phone (530) 790-8138 or via email at D3.local.development@dot.ca.gov.

Thank you,

Angelina Healy
Native American Liaison, Equity & Local Development Review
Associate Transportation Planner
DPLAS | Caltrans – District 3
703 B Street | Marysville, CA 95901

Work Cell: (530) 790-8138
Email: angelina.healy@dot.ca.gov
Schedule: 6am - 3:30pm, M-F (Monday as rotating day off)



From: Andy Popper <APopper@countyofglenn.net>
Sent: Wednesday, March 26, 2025 9:20 AM
To: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>

Cc: Haime Dias <hdias@syntheches.com>; Jim Quan <jquan@syntheches.com>
Subject: RE: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

EXTERNAL EMAIL. Links/attachments may not be safe.

To Angelina Healy
Native American Liaison, Equity & Local Development Review
Associate Transportation Planner

To assist in Caltrans review, the project documentation is located at:
CUP2024-004, Carriere Syntech CF1, LLC, NOI, Staff Report, COAs, MM, MND, IS, and Appendix

A copy is also at SCH:
https://ceqanet.opr.ca.gov/Project/2024120076

In addition, the following Conditions of Approval are part of the project in response to Caltrans comments:

California Department of Transportation (Caltrans):
Condition of Approval (Caltrans):
The applicant/operator shall be responsible to complete all Caltrans requirements and improvements; including a Traffic Impact Study (TIS) that includes information regarding anticipated project trip generations, trip distributions, and anticipated queuing using the Institute of Transportation Engineering (ITE) Trip Generation Manual for the analysis.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans any requested information regarding driveway access to and from both sites. This information shall be in site plans showing proper dimension of all driveways as outlined in the California Highway Design Manual (HDM) with Auto Turn CAD templates, using the correct design vehicle, showing the design vehicle entering and exiting the site plans.

Condition of Approval (Caltrans):
The applicant/operator shall provide Caltrans mapping for all connections to the State Highway System (SHS) showing the State right of way (ROW) delineated with bearings, distances along with State Route (SR) boundary determination.

Condition of Approval (Caltrans):
The applicant/operator shall ensure with Caltrans that the design vehicle is appropriate, based off the Truck Networks on California State Highways Map for District 3 including information about the design vehicle(s) used at the sites.

Condition of Approval (Caltrans):
The applicant/operator shall be responsible for an encroachment permit issued by Caltrans for any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW).

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>
Sent: Friday, March 21, 2025 7:06 AM
To: Haime Dias <hdias@syntheches.com>

Cc: Andy Popper <APopper@countyofglenn.net>
Subject: RE: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Hello Mr. Dias,

We currently have the Traffic Circulation Plan under review with the Caltrans Functional Review teams. We are aiming to complete our review and respond by the end of next week.

I do apologize, as our timeline for reviews typically take three weeks. Two weeks for our functional reviewing team to review amongst their normal workload and an additional week for management review and approval.

We thank you for your continued patience.

Angelina Healy
Native American Liaison, Equity & Local Development Review
Associate Transportation Planner
DPLAS | Caltrans – District 3
703 B Street | Marysville, CA 95901

Work Cell: (530) 790-8138
Email: angelina.healy@dot.ca.gov
Schedule: 6am - 3:30pm, M-F (Monday as rotating day off)



From: Haime Dias <hdias@synteches.com>
Sent: Thursday, March 20, 2025 1:50 PM
To: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>
Subject: Fw: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Angelina,

I left you a voicemail regarding the outcome of this CUP application, would you be able to share the CALTRANS review with me?

Thanks,
Haime

Haime Dias

SynTech Energy Services

hdias@syntheches.com

M. 402/618-1495

From: Jim Quan <jquan@syntheches.com>
Sent: Monday, March 10, 2025 3:45 PM
To: Andy Popper <APopper@countyofglenn.net>; Haime Dias <hdias@syntheches.com>
Subject: Re: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Andy,

Thanks for reaching out to Caltrans and your follow up.

Jim

Jim Quan

SynTech Energy Services, LLC

Project Development/Management

1625 Broadway Street, 119

Fresno, CA 93721

jquan@syntheches.com

CONFIDENTIALITY NOTICE: This email transmission, any and all documents or information accompanying, preceding or flowing from it contain confidential and proprietary information. The information transmitted is intended only for the use of the individual(s) named above and shall only be used for the purpose(s) intended and may not be published, disseminated or used otherwise without the express written authorization of the sender. If you are not the intended recipient of the transmitted information, you are hereby notified that disclosing, copying, distributing, or taking action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please notify the sender and delete the information. Thank you. SynTech PCo, LLC.

From: Andy Popper <APopper@countyofglenn.net>
Sent: Monday, March 10, 2025 11:17 AM

To: Haime Dias <hdias@syntheches.com>
Cc: Jim Quan <jquan@syntheches.com>
Subject: FW: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Hdias@syntheches.com

Forwarding for your reference, etc.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov> **On Behalf Of** D3 Local Development@DOT
Sent: Friday, March 7, 2025 6:26 AM
To: Andy Popper <APopper@countyofglenn.net>
Subject: RE: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Hello Andy,

I received your voice message from yesterday about the developer wanting to move forward and submit to the State Clearing House.

Caltrans is currently reviewing the latest submittal of the Traffic Analysis that was provided.

Our review process takes approximately three weeks. Two weeks for Caltrans functional reviewers to review amongst their normal workload, and an additional week for vetting comments and achieving approvals by management.

With that said, we received the Traffic Analysis the afternoon of February 26th, placing Caltrans with a response date of roughly March 20th. I hope this is reasonable. I do understand the developer's eagerness to move forward. I do apologize.

Thank you,

Angelina Healy
Native American Liaison, Equity & Local Development Review
Associate Transportation Planner
DPLAS | Caltrans – District 3
703 B Street | Marysville, CA 95901

Work Cell: (530) 790-8138
Email: angelina.healy@dot.ca.gov
Schedule: 6am - 3:30pm, M-F (Monday as rotating day off)



From: Andy Popper <APopper@countyofglenn.net>
Sent: Wednesday, February 26, 2025 2:25 PM
To: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>; Dhatt, Satwinder K@DOT <satwinder.dhatt@dot.ca.gov>
Cc: Jim Quan <jquan@synteches.com>
Subject: FW: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

EXTERNAL EMAIL. Links/attachments may not be safe.

To:
angelina.healy@dot.ca.gov;
and
satwinder.dhatt@dot.ca.gov

To Caltrans,

Please see the above responding Traffic Analysis, to the above Caltrans comment letters (for reference);

regarding the CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion proposal.

The applicant's consultant is copied for questions directed to project specifics, etc.

Thank you.

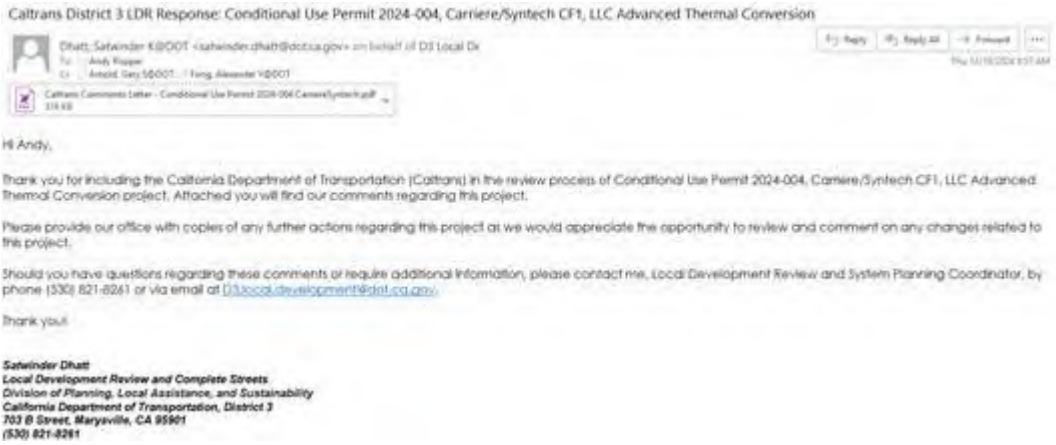
Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Andy Popper
Sent: Friday, December 20, 2024 11:11 AM
To: angelina.healy@dot.ca.gov; Dhatt, Satwinder K@DOT <satwinder.dhatt@dot.ca.gov>
Cc: gary.arnold@dot.ca.gov; Fong, Alexander Y@DOT <alexander.fong@dot.ca.gov>
Subject: FW: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

To Caltrans,
Thank you for commenting regarding the CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion proposal.

This email is simply to inform Caltrans that the Planning Division received two comment letters for the proposal (-00113: 12-19 and -00115: 12-20).
This is likely the result of Glenn County both direct emailing the 'Request for Review', as well as, requesting comments via the State Clearinghouse 'Early-Consultation' process.

Both letters are requesting/commenting on similar items that can all be addressed via a Traffic Impact Study (TIS).


Caltrans District 3 LDR Response: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

Dhatt, Satwinder K@DOT <satwinder.dhatt@dot.ca.gov> on behalf of D3 Local Dv

To: Andy Popper
Cc: Arnold, Gary S@DOT; Tung, Alexander Y@DOT

Caltrans Comments Letter - Conditional Use Permit 2024-004 Carriere/Syntech.pdf
319 KB

Hi Andy,

Thank you for including the California Department of Transportation (Caltrans) in the review process of Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion project. Attached you will find our comments regarding this project.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me, Local Development Review and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Thank you!

Satwinder Dhatt
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3
703 B Street, Marysville, CA 95901
(530) 821-8261

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Healy, Angelina R@DOT <angelina.healy@dot.ca.gov>
Sent: Friday, December 20, 2024 10:27 AM
To: Andy Popper <APopper@countyofglenn.net>
Cc: Arnold, Gary S@DOT <gary.arnold@dot.ca.gov>
Subject: Caltrans District 3 LDR Response: CUP 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion

> You don't often get email from angelina.healy@dot.ca.gov. Learn why this is important

Hello Andy,

Thank you for including the California Department of Transportation (Caltrans) in the review process of the CUP for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion. Caltrans has reviewed and provided comments in the attachment.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me, Local Development Review, Equity and System Planning Coordinator, by phone (530) 790-8138 or via email at D3.local.development@dot.ca.gov.

Thank you,

Angelina Healy
Native American Liaison, Equity & Local Development Review
Associate Transportation Planner
DPLAS | Caltrans – District 3
703 B Street | Marysville, CA 95901

Work Cell: (530) 790-8138
Email: angelina.healy@dot.ca.gov
Schedule: 6am - 3:30pm, M-F (Monday as rotating day off)



From: Andy Popper <APopper@countyofglenn.net>
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

EXTERNAL EMAIL. Links/attachments may not be safe.

To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

Andy Popper

From: PGE Plan Review <PGEPlanReview@pge.com>
Sent: Sunday, April 6, 2025 2:11 PM
To: Andy Popper
Subject: RE: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC, Advanced Thermal Conversion NOTICE OF INTENT
Attachments: PG&E_Initial_Response_Letter_04.06.2025.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Classification: Public

Dear Andy,

Thank you for submitting the CUP 2024-004 plans. The PG&E Plan Review Team is currently reviewing the information provided. Should this project have the potential to interfere with PG&E's facilities, we intend to respond to you with project specific comments on or prior to the provided deadline. Attached is some general information when working near PG&E facilities that must be adhered to when working near PG&E's facilities and land rights.

This email and attachment does not constitute PG&E's consent to use any portion of PG&E's land rights for any purpose not previously conveyed. If there are subsequent modifications made to your design, we ask that you resubmit the plans to the email address listed below.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Thank you,

Pacific Gas and Electric Company
Plan Review Team
Email: pgeplanreview@pge.com

From: Andy Popper <APopper@countyofglenn.net>
Sent: Thursday, March 13, 2025 1:20 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC, Advanced Thermal Conversion NOTICE OF INTENT

CAUTION: EXTERNAL SENDER!

This email was sent from an EXTERNAL source. Do you know this person? Are you expecting this email? Are you expecting any links or attachments? If suspicious, do not click links, open attachments, or provide credentials. Don't delete it. **Report it by using the "Report Phish" button.**

LEGAL NOTICE OF INTENT AND PUBLIC HEARING TO ADOPT A MITIGATED NEGATIVE DECLARATION

NOTICE IS HEREBY GIVEN that the Planning Commission of the County of Glenn, State of California, will hold a Public Hearing to consider the project as listed below. The Public Hearing will be held at the Glenn County Board of Supervisors' Chambers, 2nd Floor Willows Memorial Hall, 525 West Sycamore Street, Willows, California, on Wednesday, April 16, 2025, at 9:00 A.M., or as soon thereafter as the business of the Commission will allow.

PROJECT: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC, Advanced Thermal Conversion

APPLICANT/LANDOWNER: Wayne McFarland/Carriere Family Farms

PROJECT DESCRIPTION: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion (ATC) project will operate on a 24/7 basis to remediate up to 135,000 tons a year of waste walnut shells (WWS) from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas (RNG), which will then be compressed into a mobile storage trailer and then transported an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The RNG project, referred to as SynTech CF1 will consist of the following four main operational components:

1. Organic Feedstock to Syngas Conversion
2. Biochar Transfer and Storage Facility
3. Collection of Syngas and Upgrade to Pipeline Quality RNG
4. Pipeline RNG Storage and Transfer Facility

Walnut shells will be moved to the ATC site via an enclosed conveyor system to a secondary waste walnut shell storage building used specifically for the ATC process. The project will draw power from the local utility grid during normal operation. In the case of grid power interruption, a natural gas and/or syngas fueled emergency generator will power essential safety and operational systems until grid power is restored. The biochar byproduct of the ATC process will be approximately 4% by volume of the WWS volume converted or remediated in the process and will be collected in 500 lb. storage containers for storage and shipment. Additional project information is included in the application and documents.

LOCATION: The project is located at 1640 State Route 45, south of the community of Glenn; located on the east side of State Route 45, south of the County Road 52, west of the Sacramento River, and north of County Road 54, in the unincorporated area of Glenn County, California.

ASSESSOR PARCEL NUMBERS: 016-030-011 (96.37± acres), 016-090-016 (145.75± acres)

ZONING: "FS-80" Farmland Security Zone **GENERAL PLAN**: "Intensive Agriculture"

DECISIONS: The Planning Commission may approve, deny, or continue the:

(A) Mitigated Negative Declaration (B) Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC

All environmental information and project documentation is available for review at the Planning & Community Development Services Agency. Contact Andy Popper, Principal Planner at planning@countyofglenn.net, (530) 934-6540, or at the Glenn County Planning & Community Development Services Agency, 225 North Tehama Street, Willows, CA, 95988. All interested parties may submit comments regarding the proposed project by Wednesday, April 16, 2025, at 9:00 A.M., or appear and present oral and/or written testimony at the Public Hearing. If you challenge the nature of the proposed action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in correspondence delivered to the appropriate authority at, or prior to, the public hearing.

Documentation is also available at keywords: *'Glenn County Conditional Use Permits'* or
https://www.countyofglenn.net/resources/reports/conditional-use-permits
CUP2024-004, Carriere Syntech CF1, LLC, NOI, Staff Report, COAs, MM, MND, IS, and Appendix

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

From: Andy Popper
Sent: Tuesday, November 26, 2024 4:49 PM
Cc: Planning Email Group <Planning@countyofglenn.net>
Subject: Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

To Whom it May Concern,

Please accept the following Request for Review/Early Consultation for commenting.

Conditional Use Permit 2024-004, Carriere/Syntech CF1, LLC Advanced Thermal Conversion, Request for Review

Comments are being requested by Tuesday, December 17, 2024.
Thank you for your time and consideration regarding this matter.

Sincerely,
Andy Popper, Principal Planner
https://www.countyofglenn.net/
Glenn County Planning &
Community Development Services Agency
225 North Tehama Street
Willows, CA 95988
530-934-6540

You can read about PG&E's data privacy practices at PGE.com/privacy.

Pacific Gas and Electric Company

Plan Review Team
Land Management

PGEPlanReview@pge.com

April 6, 2025

Andy Popper
Glenn County
Planning & Community Development Services Agency

Ref: Gas and Electric Transmission and Distribution

Dear Andy,

Thank you for submitting the plans for CUP 2024-004 for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E’s ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4’) in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037
TEL: (650) 589-1660
FAX: (650) 589-5062
levans@adamsbroadwell.com

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AIDAN P. MARSHALL
ALAURA R. McGUIRE
ISABEL TAHIR

Of Counsel
MARC D. JOSEPH

March 26, 2025

Via U.S. Mail and Email

Mardy Thomas, Director
Glenn County
Planning & Community Development Services
225 N. Tehama Street
Willows, CA 95988
Email: planning@countyofglenn.net

County Clerk-Recorder
Glenn County
516 West Sycamore Street
Willows, CA 95988
Email: clerkrecorder@countofglenn.net

Via Email Only:

Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Request for Mailed Notice of Actions and Hearings Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas, Mr. Popper, and County Clerk-Recorder:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"), as well as a copy of the environmental review document when it is made available for public review.

The Project includes an application for a Conditional Use Permit ("CUP") to construct and operate an Advanced Thermal Conversion facility 24 hours a day. The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000

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MMBtu/year of Renewable Natural Gas ("RNG"), which will then be compressed into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The project will draw power from the local utility grid during normal operation. The project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California. The property is identified by Parcel numbers 016-030-011 and 016-090-016.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152 and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please use the following contact information for all correspondence:

U.S. Mail
Lauren Evans
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
levans@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at levans@adamsbroadwell.com. Thank you for your assistance.

Sincerely,

Lauren Evans

Lauren Q. Evans
Legal Assistant

LQE:ljl

7836-001j

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Via Email Only:
Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Request for Immediate Access to Documents Referenced in the Mitigated Negative Declaration – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas, Mr. Popper, and County Clerk-Recorder:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Mitigated Negative Declaration prepared for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). *This request excludes a copy of the MND. This request also excludes any documents that are currently available on the Glenn County website as of today's date*.[1]

[1] Accessed https://www.pittsburgca.gov/services/community-development/planning/public-reviews on February 4, 2025.

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Our request for ***immediate access*** to all documents referenced in the MND is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.[2]

The Project includes an application for a Conditional Use Permit ("CUP") to construct and operate an Advanced Thermal Conversion facility 24 hours a day. The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas ("RNG"), which will then be compressed into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The :Project will draw power from the local utility grid during normal operation. The Project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California. The property is identified by Parcel numbers 016-030-011 and 016-090-016.

We request access to the above records in their original form, as maintained by the agency.[3] Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed as attachments.

We will pay for any direct costs of duplication associated with filling this request up to $200. [4] However, please contact me with a cost estimate before copying/scanning the materials.

---

[2] *See* Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report" shall be made "available for review"); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public"); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("[W]hatever is required to be considered in an EIR must be in that formal report. . ."), internal citations omitted.

[3] Gov. Code § 7922.570; *Sierra Club v. Super. Ct*. (2013) 57 Cal. 4th 157, 161-62.

[4] Gov. Code §§ 7922.530, 7922.575; *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144; *County of Los Angeles v. Super. Ct*. (2000) 82 Cal.App.4th 819, 826.

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If you have any questions, please call me at (650) 589-1660 or email me at levans@adamsbroadwell.com. Thank you for your assistance.

Sincerely,

Lauren Evans

Lauren Q. Evans
Legal Assistant

LQE:ljl

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March 26, 2025

Via U.S. Mail and Email

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Via Email Only:

Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Public Records Act Request – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas, Mr. Popper, and County Clerk-Recorder:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request a copy of any and all public records referring or related to the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project.

The Project includes an application for a Conditional Use Permit ("CUP") to construct and operate an Advanced Thermal conversion facility 24 hours a day. The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas ("RNG"), which will then be compressed

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into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The project will draw power from the local utility grid during normal operation. The project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California. The property is identified by Parcel numbers 016-030-011 and 016-090-016.

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq*.). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request access to the above records in their original form, as maintained by the agency.[1] Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, Next Request or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to $200.[2] However, please contact me with a cost estimate before copying/scanning the materials.

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[1] Gov. Code § 7922.570; *Sierra Club v. Super. Ct*. (2013) 57 Cal. 4th 157, 161-62.
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If you have any questions, please call me at (650) 589-1660 or email me at levans@adamsbroadwell.com. Thank you for your assistance.

Sincerely,

Lauren Evans

Lauren Q. Evans
Legal Assistant

LQE:ljl

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April 4, 2025

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Email: planning@countyofglenn.net

Via Email Only
Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Request to Extend the Public Review and Comment Period for the Mitigated Negative Declaration – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP 2024-004; SCH No. 2024120076)

Dear Mr. Thomas and Mr. Popper:

On behalf of California Unions for Reliable Energy ("CURE"), we respectfully request that Glenn County ("County") extend the public review and comment period for the Mitigated Negative Declaration ("MND")[1] for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). The public comment period currently ends April 16, 2025, the same date as the Planning Commission's proposed hearing on the Project.[2] The comment period should be

[1] Glenn County, Mitigated Negative Declaration for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project ("MND") (March 12, 2025), available at: https://www.countyofglenn.net/sites/default/files/resources/CUP2024-004%2C%20Carriere%20Syntech%20CF1%2C%20LLC%2C%20NOI%2C%20Staff%20Report%2C%20COAs%2C%20MM%2C%20MND%2C%20IS%2C%20and%20Appendix.pdf.

[2] Glenn County, Legal Notice of Intent and Public Hearing to Adopt a Mitigated Negative Declaration ("Notice"), available at: https://www.countyofglenn.net/sites/default/files/resources/CUP2024-

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extended by at least 30 days due to the County's failure to provide timely access to documents referenced and relied upon in the MND. The Planning Commission hearing should also be continued to a later date after the close of the public comment period so that the Planning Commission can meaningfully considers all public comments submitted on the MND, as required by CEQA.[3]

On March 26, 2025, our office submitted a request, pursuant to the California Environmental Quality Act ("CEQA"),[4] for access to any and all documents referenced or relied upon in the MND.[5] [6] CEQA section 21092(b)(1) and CEQA Guidelines section 15072(g)(4) require that "all documents referenced" and "all documents incorporated by reference" in a negative declaration shall be "readily accessible to the public during the lead agency's normal working hours" during the entire public comment period.[7] On April 2, 2025, our office followed up with the County via email regarding the request.[8] To date, the County has not provided CURE with access to any responsive records. The County has also failed to advise CURE when (or whether) the County would provide access to the MND reference documents.

We ask the County to fully and immediately comply with our March 26, 2025, request by providing access to all documents referenced and incorporated by reference in the MND, including, but not limited to the following:

1. Supporting Documents for the MND and appendices:

004%2C%20Carriere%20Syntech%20CF1%2C%20LLC%2C%20NOI%2C%20Staff%20Report%2C%20COAs%2C%20MM%2C%20MND%2C%20IS%2C%20and%20Appendix.pdf.

[3] 14 Cal Code Regs. ("C.C.R.") § 15074(b) (prior to approving project, decision-making body of lead agency must consider the proposed mitigated negative declaration together with any comments received during the public review process, and cannot adopt a mitigated negative declaration unless "the whole record before it (including the initial study and any comments received)" demonstrates no significant effects).

[4] Pub. Resources Code §§ 21000 *et seq*.

[5] **Exhibit A**– Letter to Mardy Thomas, Andy Popper, and County Clerk-Recorder, Glenn County from Lauren Q. Evans, Adams Broadwell Joseph & Cardozo ("ABJC") re: Request for Immediate Access to Documents Referenced in the Mitigated Negative Declaration – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 202-004, SCH No. 2024120076) (March 26, 2025).

[6] The same day, our office submitted a separate public records request pursuant to the Public Records Act ("PRA") for access to other *public records* related to the Project. **Exhibit B** – Letter to Mardy Thomas, Andy Popper, and County Clerk-Recorder, Glenn County from Lauren Q. Evans, ABJC re: Public Records Act Request – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 202-004, SCH No. 2024120076) (March 26, 2025).

[7] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15072(g)(4).

[8] Email to Glenn County from Lauren Q Evans, ABJC (April 2, 2025).

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a. Emissions modeling and health risk assessment supporting MND Section III (Air Quality) (including but not limited to CalEEMod and other emissions modeling input and output files)
b. Sound mapping[9] and noise impact assessment of existing and expected noise levels to support MND Section XIII (Noise)
c. Site assessment for biological resources supporting MND Section IV (Biological Resources).
d. Hydrology and water quality assessment supporting MND Section X (Hydrology and Water Quality)
e. Hazardous materials assessment supporting MND Section IX (Hazards and Hazardous Materials)

2. Missing Weblinks for Documents Referenced in the MND's Biological Resources Impact Analysis:
   a. Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Department of the Army, Waterways Experiment Station, Vicksburg, Mississippi 39180-0631.
   b. California Department of Fish and Game. 1994. A Field Guide to Lake and Streambed Alteration Agreements, Sections 1600-1607, California Fish and Game Code. Environmental Services Division, Sacramento, CA.
   c. Glenn County Environmental Impact Report
3. Corrected Weblinks for Documents Referenced in MND's Mineral Resources Impact Analysis:
   a. California Department of Conservation. 1997. Mined Land Classification Map for Central Glenn County.https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc
4. Accessible Weblinks for Documents Referenced in MND's Resources Section:
   a. California Department of Fish and Wildlife. 2014. California Central Valley Wetlands and Riparian GIS Data Sets: http://www.dfg.ca.gov/biogeodata/wetlands/.

These missing reference documents form the basis of much of the MND's environmental and health impact analyses and its proposed mitigation measures. Without access to these fundamental reference documents during the public comment period, CURE and other members of the public are prevented from meaningfully commenting on the Project's potentially significant environmental impacts. This directly violates the procedural mandates of CEQA.

[9] Referenced in Syntech replies to Cover Letter and Agency comments, p. 3 ("The Project has previously provided sound mapping documents for the County's use.").

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CEQA compels a lead agency to make all documents referenced in a negative declaration "available for review" during the entire public comment period.[10] The courts have held that the failure to provide even a few pages of a CEQA document for a portion of the public review period invalidates the entire CEQA process, and that such a failure must be remedied by permitting additional public comment.[11] It is also well settled that a CEQA document may not rely on hidden studies or documents that are not provided to the public.[12]

Accordingly, we request the County:

1) Extend the public review and comment period **for at least 30 days from the date on which the County releases *all* MND reference documents** for public review.
2) Immediately provide access to all documents referenced and incorporated by reference in the MND.
3) Continue the Planning Commission hearing, currently scheduled for April 16, 2025, to a later date after the close of the public comment period so that Planning Commission meaningfully considers all public comments submitted on the MND, as required by CEQA.

Given the short time before the current comment deadline ends, please contact me as soon as possible with your response to this request, but no later than close of business on **Wednesday April 9, 2025**.

Thank you for your prompt attention and response to this matter.

Sincerely,

Alaura McGuire

Alaura McGuire

Attachments
ARM:acp

[10] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15072(g)(4).
[11] *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.
[12] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").

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EXHIBIT A

ADAMS BROADWELL JOSEPH & CARDOZO
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March 26, 2025

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Via Email Only:
Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Request for Immediate Access to Documents Referenced in the Mitigated Negative Declaration – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas, Mr. Popper, and County Clerk-Recorder:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Mitigated Negative Declaration prepared for the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). *This request excludes a copy of the MND. This request also excludes any documents that are currently available on the Glenn County website as of today's date*.[1]

[1] Accessed https://www.pittsburgca.gov/services/community-development/planning/public-reviews on February 4, 2025.

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Our request for ***immediate access*** to all documents referenced in the MND is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.[2]

The Project includes an application for a Conditional Use Permit ("CUP") to construct and operate an Advanced Thermal Conversion facility 24 hours a day. The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas ("RNG"), which will then be compressed into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The :Project will draw power from the local utility grid during normal operation. The Project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California. The property is identified by Parcel numbers 016-030-011 and 016-090-016.

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[2] *See* Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report" shall be made "available for review"); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public"); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("[W]hatever is required to be considered in an EIR must be in that formal report. . ."), internal citations omitted.

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If you have any questions, please call me at (650) 589-1660 or email me at levans@adamsbroadwell.com. Thank you for your assistance.

Sincerely,

Lauren Evans

Lauren Q. Evans
Legal Assistant

LQE:ljl

EXHIBIT B

ADAMS BROADWELL JOSEPH & CARDOZO
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ISABEL TAHIR

Of Counsel
MARC D. JOSEPH

March 26, 2025

Via U.S. Mail and Email
Mardy Thomas, Director
Glenn County
Planning & Community Development Services
225 N. Tehama Street
Willows, CA 95988
Email: planning@countyofglenn.net

County Clerk-Recorder
Glenn County
516 West Sycamore Street
Willows, CA 95988
Email: clerkrecorder@countofglenn.net

Via Email Only:
Andy Popper, Principal Planner
Email: planning@countyofglenn.net

Re: Public Records Act Request – Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076)

Dear Mr. Thomas, Mr. Popper, and County Clerk-Recorder:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request a copy of any and all public records referring or related to the Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) ("Project") proposed by Wayne McFarland ("Applicant"). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project.

The Project includes an application for a Conditional Use Permit ("CUP") to construct and operate an Advanced Thermal conversion facility 24 hours a day. The facility will convert up to 135,000 tons a year of waste walnut shells ("WWS") from an existing onsite walnut shelling facility into approximately 1,041,000 MMBtu/year of Renewable Natural Gas ("RNG"), which will then be compressed

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into a mobile storage trailer and then transported to an existing walnut huller/dryer facility to be injected into a PG&E pipeline. The project will draw power from the local utility grid during normal operation. The project is located at 1640 State Route 45, south of the community of Glenn, in the unincorporated area of Glenn County, California. The property is identified by Parcel numbers 016-030-011 and 016-090-016.

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq*.). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request access to the above records in their original form, as maintained by the agency.[1] Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, Next Request or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to $200.[2] However, please contact me with a cost estimate before copying/scanning the materials.

Please use the following contact information for all correspondence:

U.S. Mail
Lauren Evans
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
levans@adamsbroadwell.com

[1] Gov. Code § 7922.570; *Sierra Club v. Super. Ct*. (2013) 57 Cal. 4th 157, 161-62.
[2] Gov. Code §§ 7922.530, 7922.575; *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144; *County of Los Angeles v. Super. Ct*. (2000) 82 Cal.App.4th 819, 826.

If you have any questions, please call me at (650) 589-1660 or email me at levans@adamsbroadwell.com. Thank you for your assistance.

Sincerely,

Lauren Evans

Lauren Q. Evans
Legal Assistant

LQE:ljl

7836-003j

OFFICE OF THE COUNTY COUNSEL

County of Glenn

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COUNTY COUNSEL

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CHRISTOPHER D. ROSKE
DEPUTY COUNTY COUNSEL

LILIANA CHAVEZ-CARDONA
ADMINISTRATIVE SERVICES OFFICER

April 4, 2025

Lauren Q. Evans
Adams Broadwell Joseph & Cardozo
levans@adamsbroadwell.com
Sent via email

RE: **Public Records Request Received March 26, 2025**

Dear Ms. Evans:

This letter partially responds to your March 26, 2025, Public Records Act Request received by the Air Pollution Control District. We have forwarded this request to the County Clerk-Recorder's Office and the Office of Planning & Community Services. The Clerk-Record's Office indicated it has no responsive records. The Office of Planning & Community needs additional time to gather any potential records. If there are any additional records, we anticipate the records will be available for review on or before April 14, 2025.

As we understand the request, you are seeking the following records:

Request:

All records referring or relating to Carriere/Syntech CF1, LLC Advanced Thermal Conversion Project (CUP No. 2024-004, SCH No. 2024120076) proposed by Wayne McFarland.

Response to Request:

At this time, responsive records can be retrieved via SharePoint at the link provided below:

Lauren Evans

Should you have any questions regarding any of the foregoing or wish to discuss the matter further, please do not hesitate to contact me.

Thank you.

Christopher Roske
Christopher D. Roske
Deputy County Counsel