CITY OF SANTA CRUZ

Notice of Exemption

To: ☑ Clerk of the Board
County of Santa Cruz
Governmental Center
701 Ocean Street
Santa Cruz, CA 95060

☑ Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: City of Santa Cruz Public Work Department, 809 Center Street, Room 201, Santa Cruz, CA 95060

Project Title: City of Santa Cruz Resource Recovery Operational Change

Project Address: 605 Dimeo Lane

Assessor's Parcel No.: APN 59-121-01

Project Location: City of Santa Cruz

County of: City of Santa Cruz

Project Description: The project involves a minor operational change at the City of Santa Cruz Resource Recovery Facility (RRF), located at 605 Dimeo Lane. The RRF is located approximately three miles west of the city limits off Highway 1 and encompasses approximately 100 acres; see Figure 1. The facility serves as the City's primary solid waste management and recycling facility, and currently accepts, processes, and transfers municipal solid waste, recyclables, and organic materials.

The RRF currently operates seven days a week with an opening time of 6:00 AM for trucks and landfill and ancillary operations, and 7:30 AM for the public, pursuant to terms of its operating permit from the California Department of Resources Recycling and Recovery (CalRecycle) (Solid Waste Facility Permit No. 44-AA-0001). The project would change the permitted start time for ancillary operations from 6:00 AM to 5:30 AM to provide sufficient time for site preparation before collection trucks arrive at the facility at 6:00 AM. Ancillary operations would include activities such as removing daily cover, which may consist of either soil or tarp material. This change is intended to optimize daily operations and allow for improved coordination of waste collection and processing activities.

Name of Person or Agency Carrying Out Project: City of Santa Cruz Public Works Department

Name of Public Agency Approving Project: City of Santa Cruz

Exempt Status: (check one)

_____ Ministerial Project (Section 21080(b)(1); 15268).

__✓__ Categorically Exempt (Section 15301).

_____ Declared Emergency (Section 21080(b)(3); 15269(a)).

_____ Emergency Project (Section 21080(b)(4); 15269(b)(c)).

_____ Statutory Exemption (Code/Section _____).

__✓__ The project clearly will not have a significant effect on the environment (15061(b)(3)).

Reasons why project is exempt: CEQA provides "categorical exemptions" which are applicable to categories of projects and activities that the California Natural Resources Agency has determined generally do not pose a risk of significant impacts on the environment. The Class 1 categorical exemption is for existing facilities and includes "minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use."

The project consists solely of a modification to the facility's operational schedule, adjusting the permitted start time for ancillary operations by one-half hour from 6:00 AM to 5:30 AM. This change is intended to provide sufficient time for site preparation activities, such as the removal of daily cover (either soil or tarp), prior to the facility's 6:00 AM opening to collection trucks. The change does not increase the facility's capacity, alter waste processing methods, or introduce new waste streams. No new construction, ground disturbance, or infrastructure changes are required, and all RRF activities will continue to operate as permitted. The proposed operational change does not involve any physical modifications to RRF facilities, facility capacity, or waste stream composition, and thus, would not result in impacts to the environment. No additional infrastructure, equipment, or staffing changes are required beyond adjusting the existing operational schedule. Operations at the facility will continue to follow existing protocols for waste handling and processing. The change is expected to benefit overall operational efficiency without altering the existing services or increasing traffic volumes beyond current levels. Vehicle activity associated with the facility, including collection vehicles, would not change as existing waste streams and processing volumes will remain the same. Thus, the adjusted operating hours represent a negligible alteration to existing operations and are consistent with the criteria outlined for a Class I categorical exemption.

Furthermore, the project meets the "common sense" exemption set for in CEQA Guidelines section 15061(b)(3), which applies to projects where it can be seen with certainty that there is no possibility that the activity may have a significant effect on the environment. As indicated above, the minor change in the start time for ancillary operations by one-half hour, but would not result in new construction, alteration of existing facilities or changes in RRF processes or capacity, and thus would not result in a significant effect on the environment. The City has further considered whether the project is subject to any of the exceptions to the use of a categorical exemption found at CEQA Guidelines Section 15300.2. This section prohibits the use of categorical exemptions under the following circumstances:

(a) for certain classes of projects (not the Class 1 exemption) due to location;

(b) when the cumulative impact of successive projects of the same type in the same place, over time, is significant;

(c) where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances;

(d) where the project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway;

(e) where the project is located on a state designated hazardous waste site; and

(f) where the project may cause a substantial adverse change in the significance of a historical resource.

Exception (a) - Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located; a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This exception is not applicable to the Class 1 categorical exemption.

Exception (b) - Cumulative Impact. All exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. This exception is not applicable because there is no evidence of a potential significant cumulative impacts due to successive projects of the same type in the same place. There are no other known public projects of the same type planned at the RRF or in the project area that could result in significant cumulative impacts. However, there is a planned installation of a permanent enclosed low nitrogen oxide flare to ensure regulatory compliance by providing a backup device for landfill gas collection and destruction. However, there would be no cumulative impacts with the start time operational change as the project would not result in land disturbance or construction that would result in impacts that would contribute to potential impacts of the planned flare project.

Exception (c) - Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. This exception is not applicable because no potential significant impacts have been identified. The proposed operational change of the RRF's opening time by one-half hour for ancillary operations does not involve any new construction or modifications to the RRF, and would not result in impacts to the physical environment.

The project would not change to the facility's accepted waste types or introduce new processing methods that could result in impacts. Ancillary operations such as the removal of daily cover—whether soil or tarp—are already part of routine facility activities and will continue to follow standard protocols. The shift in operational hours by 30 minutes is minor and occurs during early morning hours when onsite staff are preparing the disposal area for the facility's standard 6:00 AM opening for collection trucks. No sensitive receptors are located nearby, and vehicle trips with existing operations will remain unchanged. The project does not involve any construction or expansion of the facility footprint.

Overall, the schedule change represents a negligible modification that would not result in significant environmental impacts. There are no "unusual circumstances" that differentiates the project from other similar routine operational adjustments at the RRF or that differentiates the project from the general class of similarly situated landfill/resource recovery projects permitted throughout the state.

Exception (d) - Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This exception is not applicable because the RRF is not located adjacent to or visible from a

designated scenic highway. Highway 1, located to the west of the RRF, is identified as being eligible for designation, but is not currently an officially designated scenic highway. Furthermore, the project would not result in new construction or alteration of existing RRF facilities.

Exception (e) - Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. This exception is not applicable because the project site is not an identified hazardous waste site compiled pursuant to Government Code section 65962.5.

Exception (f) - Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. This exception is not applicable because the project would not result in construction of new facilities, ground disturbance or alteration of existing facilities, and thus, and would not affect historical resources. There are no structures on the site that will be removed or altered.

Therefore, the City is able to document that the project qualifies for the Categorical Exemption found at CEQA Guidelines section 15301, which allows for minor alteration to existing facilities and equipment, as well as the "common sense" exemption as there is no possibility of the project resulting in a significant impact on the environment. None of the potential exceptions to the use of a categorical exemption apply to this project.

Lead Agency
Contact Person: Hoi Yu

Phone: (831) 420-5160

Department: Public Works

Address: 809 Center Street, Room 201
Santa Cruz, CA 95060

Signature: _____

Date: 6/18/25

Title: Director of Public Works

☑ Signed by Lead Agency
☐ Signed by Applicant

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a notice of exemption been filed by the public agency approving the project? ☑ Yes ☐ No

Date Received for filing at County Clerk: _____

Date Received for filing at OPR: _____

PROJECT LOCATION

